

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MERCH TRAFFIC, LLC,

PLAINTIFF,

V.

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE NO.: 24-CV-01269

JUDGE JOHN F. KNESS

MAGISTRATE JUDGE JEFFREY COLE

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S *EX PARTE*
MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court's inherent power to effectuate its own orders, Merch Traffic, LLC ("Plaintiff"), seeks to extend the Temporary Restraining Order granted and entered by the Court on June 11, 2024 (the "TRO") [23] for a period of fourteen (14) days until July 9, 2024.

On June 11, 2024, this Court entered the TRO against the Defendants identified on Schedule A to the Complaint. [23]. Since receiving the TRO, Plaintiff has been working to ensure compliance with its terms by third parties. *See* the Declaration of Alison K. Carter (the "Carter Declaration") at ¶¶ 2-3. As of June 20, 2024, the third parties have not completed effectuating the TRO, but are working diligently to comply. *Id.* Plaintiff plans to freeze financial accounts identified by these third parties. *Id.*

Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended, provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2). Plaintiff respectfully submits that there is good cause to extend

the TRO, since there is a high probability that the Defendants will continue to harm Plaintiff without the TRO in place. Specifically, Defendants will likely attempt to move any assets from their financial accounts to offshore bank accounts. As discussed in Plaintiff's Memorandum in Support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order [15] and as found by the Court in granting the TRO, this possibility of harm is significant. Accordingly, in the interest of justice, Plaintiff submits that extension of the TRO is necessary.

In light of the above, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days until July 9, 2024.

Dated: June 20, 2024

Respectfully submitted,

/s/ Alison Carter

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