

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

XYZ CORPORATION,

PLAINTIFF,

v.

THE PARTNERSHIPS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE No.: 1:26-cv-00011

JUDGE MARY M. ROWLAND

MAGISTRATE JUDGE YOUNG B. KIM

**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, XYZ Corporation ("Plaintiff"), seeks to extend the Temporary Restraining Order granted and entered by the Court on January 26, 2026 ("TRO") for a period of fourteen (14) days until February 23, 2026.

On January 26, 2026, this Court entered the TRO against the Defendants identified on Schedule A to the Complaint ("Defendants"). [18]. 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 Decl.") at ¶¶ 2-3. As of February 4, 2026, the third parties have not completed effectuating the TRO, but are working diligently to comply. *Id.* Plaintiff anticipates freezing financial accounts identified by these third parties that are related to Defendants' sales of infringing products. *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 as the third parties have requested additional time to comply with the TRO and Plaintiff has a right to an accounting of the financial accounts associated with the Defendants to determine the extent of the infringement. If the TRO is allowed to expire, the injunctive relief will not be implemented by these third parties and Plaintiff may be left without recourse. 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 off-shore bank accounts, destroy any potential evidence that supports Plaintiff's allegations (such as by deactivating their Internet stores and deleting or disposing of sales data and business records), and continue to infringe upon Plaintiff's federally registered trademarks. As discussed in Plaintiff's Memorandum in Support of its Motion for Temporary Restraining Order [13], 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 February 23, 2026.

Dated: February 4, 2026

Respectfully submitted,

/s/ Alison K. Carter

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