IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CHRISTIAN DIOR COUTURE, S.A.,

Plaintiff,

Case No. 19-cv-05007

Judge Charles P. Kocoras

v.

VIPBAGSCLUB.COM, et al.,

Defendants.

Magistrate Judge Gabriel A. Fuentes

PLAINTIFF'S EX PARTE MOTION FOR ENTRY OF A TEMPORARY RESTRAINING ORDER, INCLUDING A TEMPORARY INJUNCTION, TEMPORARY TRANSFER OF THE DEFENDANT DOMAIN NAMES, TEMPORARY ASSET RESTRAINT, <u>AND EXPEDITED DISCOVERY</u>

Plaintiff Christian Dior Couture, S.A. ("Plaintiff" or "Dior") seeks entry of an *ex parte* temporary restraining order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of unauthorized products, a temporary transfer of the Defendant Domain Names, a temporary asset restraint, and expedited discovery in an action arising out of 15 U.S.C. § 1114; Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, *et seq.*; and the U.S. Copyright Act, 17 U.S.C. § 101, *et seq.* A Memorandum of Law in Support is filed concurrently with this Motion.

Dated this 29th day of June 2019.

Respectfully submitted,

/s/ Justin R. Gaudio Amy C. Ziegler Justin R. Gaudio Allyson M. Martin Greer, Burns & Crain, Ltd. 300 South Wacker Drive, Suite 2500 Chicago, Illinois 60606 312.360.0080 312.360.9315 (facsimile) aziegler@gbc.law jgaudio@gbc.law amartin@gbc.law

Counsel for Plaintiff Christian Dior Couture, S.A.