

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

)	
)	
GRAND ISLE GAMES, LLC,)	Case No.: 3:25-cv-00390
)	
Plaintiff,)	
)	Judge: Aleta A. Trauger
v.)	
)	Magistrate Judge:
THE ENTITIES, PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
LISTED ON SCHEDULE A,)	JURY DEMAND
)	
Defendants.		

**PLAINTIFF’S SUPPLEMENTAL MOTION FOR PRELIMINARY INJUNCTION
AGAINST DEFENDANTS 1, 5–9, 11–13, AND 15–16**

Plaintiff Grand Isle Games, LLC (“Plaintiff”), pursuant to Federal Rule of Civil Procedure 65, respectfully files this Supplemental Motion for a Preliminary Injunction against Defendants Nos. 1, 5, 6, 7, 8, 9, 11, 12, 13, 15, and 16 as identified in Schedule A to the Complaint (collectively, the “Supplemental PI Defendants”).

This motion supplements Plaintiff’s Motion for Preliminary Injunction filed on May 27, 2025 (D.E. 34) (the “Pending PI Motion”).

I. BACKGROUND

On April 22, 2025, this Court entered an Ex Parte Temporary Restraining Order (D.E. 17) (the “TRO”), which was subsequently extended by Orders of this Court.

On May 27, 2025, Plaintiff filed its Pending PI Motion (D.E. 34) seeking to convert the TRO into a preliminary injunction against a majority of the Defendants named in Schedule A. In that motion, Plaintiff expressly reserved the right to seek further relief, including a preliminary

injunction, against other Defendants listed on Schedule A as they were identified and served, and as a sufficient basis for such relief was established. (D.E. 34 at 1).

II. BASIS FOR SUPPLEMENTAL MOTION

Plaintiff now seeks a preliminary injunction against the Supplemental PI Defendants on the same terms as sought against those Defendants identified in the Pending PI Motion.

Plaintiff has diligently pursued service upon all Defendants, including those operating through online marketplace platforms such as Temu, via the Court-authorized alternative service methods. Yesterday, on May 28, 2025, Plaintiff received discovery responses from the third-party online marketplace platform Temu. These responses have provided confirmation regarding the identities and infringing activities of the Supplemental PI Defendants, further supporting the need for preliminary injunctive relief against them. These responses also have included contact email addresses that Plaintiff has been able to use to effect service of the Supplemental PI Defendants through the Court-authorized alternative service methods, as shown below:

From: Max Pinson
Sent: 5/28/2025 11:28:12 AM
To: Ed Powell
Bcc: Autumn in October; Bertoco; Chosen Son LXH; Globallif; Good Fun Studio; Hanxin Carfts Factory; Happy shopping Up; Happy tee; Jytue; KKETSY; Light Life Shopping; MARS NEW; Mellow Marvels; New Life toy; REDSTAR; RedstarBazaar; YCCCL
Subject: URGENT LEGAL NOTICE – Court Order and Lawsuit Filed Against You – Grand Isle Games, LLC v. The Entities, Partnerships, and Unincorporated Associations Listed on Schedule A, Case No. 3:25-cv-00390 (U.S. District Court, M.D. Tenn.)
Categories: Smokeball

Dear Temu Seller:

This email serves as **FORMAL LEGAL NOTICE** and **SERVICE OF PROCESS** as authorized by Order of the United States District Court for the Middle District of Tennessee.

Our law firm, Waddey Acheson LLC, represents the Plaintiff, **Grand Isle Games, LLC** ("Plaintiff"), in a lawsuit filed against you and others, captioned *Grand Isle Games, LLC v. The Entities, Partnerships, and Unincorporated Associations Listed on Schedule A, Case No. 3:25-cv-00390*, pending in the United States District Court for the Middle District of Tennessee (the "Action").

You have been identified as a Defendant in this Action. Your specific listing as a Defendant can be found in **Schedule A** to the Complaint, which is available at <https://waddeyacheson.com/notice>.

A Temporary Restraining Order has been issued against you by the Court. In the secure website link previously mentioned (<https://waddeyacheson.com/notice>), please find the following legal documents for your immediate attention:

G GIG5
 Contact list • 17 email addresses
 Send email

- | | |
|---|--|
| AO Autumn in October
a1342062575@sina.com | B Bertoco
sooxia@163.com |
| CL Chosen Son LXH
630052295@qq.com | G Globallif
19925873387@163.com |
| GS Good Fun Studio
goodfan22@163.com | HF Hanxin Carfts Factory
1205193686@qq.com |
| HU Happy shopping Up
809871191@QQ.com | HT Happy tee
373099059@qq.com |
| J Jytue
mtntjn@126.com | K KKETSY
1129994969@qq.com |
| LS Light Life Shopping
963444344@qq.com | MN MARS NEW
31925617@qq.com |
| MM Mellow Marvels
baiwqi@qq.com | NT New Life toy
643081449@qq.com |
| R REDSTAR
redstarincusa@gmail.com | R RedstarBazaar
JXAXINDA2024@outlook.com |
| Y YCCCL
A1756847081@outlook.com | |

The Preliminary Injunction sought against the Supplemental PI Defendants would extend and convert the prohibitions and relief previously granted in the TRO, consistent with the relief sought against the Defendants in the Pending PI Motion.

III. ARGUMENT

The grounds for the issuance of a preliminary injunction against the Supplemental PI Defendants are set forth in Plaintiff's Memorandum of Law in Support of Motion for Preliminary Injunction (D.E. 35), the Declaration of G. Edward Powell III (D.E. 36), the Declaration of Michael Lee (D.E. 37), the entire record in this action, and the Proposed Supplemental Preliminary Injunction Order submitted herewith.

IV. CONCLUSION

WHEREFORE, Plaintiff Grand Isle Games, LLC respectfully requests that this Court grant its Supplemental Motion and enter the Proposed Preliminary Injunction Order against Defendants Nos. 1, 5, 6, 7, 8, 9, 11, 12, 13, 15, and 16, in addition to the Defendants identified in the Proposed Preliminary Injunction Order.

Dated: May 29, 2025

Respectfully submitted,

/s/ Chanelle Acheson

Chanelle Acheson (TN BPR #30008)
W. David Bridgers (TN BPR #16603)
Waddey Acheson LLC
1030 16th Ave S, Suite 300
Nashville, TN 37212
615-839-1100
chanelle@waddeyacheson.com
Counsel for Plaintiff Grand Isle Games, LLC

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2025, a true and correct copy of the foregoing PLAINTIFF'S SUPPLEMENTAL MOTION FOR PRELIMINARY INJUNCTION AGAINST CERTAIN DEFENDANTS will be served upon any Defendants against whom this relief is sought and all counsel of record via ECF and the alternative service methods previously authorized by this Court.

/s/ Chanelle Acheson

Chanelle Acheson (TN BPR #30008)
W. David Bridgers (TN BPR #16603)
Waddey Acheson LLC
1030 16th Ave S, Suite 300
Nashville, TN 37212
615-839-1100
chanelle@waddeyacheson.com
david@waddeyacheson.com
Counsel for Plaintiff Grand Isle Games, LLC