

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SKYBROOK E-COMMERCE, LLC,
a North Carolina Limited Liability Company,

Plaintiff,

Case No.: 1:25-cv-10649

v.

THE PARTNERSHIPS and UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE
“A”,

Defendants.

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Skybrook E-Commerce, LLC (“Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A which will identify Defendants’ currently known aliases and Online Marketplaces and (2) Exhibit 2 to the Declaration file in connection with Plaintiff’s Memorandum of in Support of Plaintiff’s Ex Parte Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery (to be filed) which will contain documentary evidence of Defendants’ rampant infringement.

Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement/counterfeiting. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order, negating the purpose of the *ex parte* proceeding. Once the temporary restraining order has been served on the relevant parties and the third-party service providers have complied, Plaintiff will move to unseal these documents.

Respectfully submitted,

Date: September 4, 2025

/s/ Eric Misterovich
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on the date below the foregoing was served on counsel of record via the Court's ECF system.

Date: September 4, 2025

/s/ Eric Misterovich
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