

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

Lishui Mpin Toys Co., Ltd.

Plaintiff,

vs.

Sentk LLC,
J & Y Stucco LLC,
Heyblack International Trade Inc.,
Shenzhen Yongsheng Technology Co., Ltd., and
Qin Lu.

Defendants.

Case No. 1:26-cv-945

District Judge:

Honorable Matthew F. Kennelly

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT

Plaintiff Lishui Mpin Toys Co., Ltd. ("Plaintiff"), pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, hereby requests that each Defendant respond to the following interrogatories, fully, in writing and under oath, in accordance with the following definitions and instructions.

Interrogatory 1: Identify Yourself, including, but not limited to, identifying the owner(s), officer(s), and/or operator(s) of:

- a) Defendant's E-commerce Store(s) (including TikTok Shop);
- b) Defendant's Social Media Accounts;
- c) Defendant's Financial Accounts.

Interrogatory 2: Identify each and every domain name, TikTok Shop handle, or E-commerce Store used by You, or anyone identified in Your response to Interrogatory No. 1, that advertised, offered for sale, and/or sold Infringing Products to United States residents.

Interrogatory 3: Identify all Infringing Products (specifically building block toys embodying the "Moli" bear design or other Copyrighted Works) advertised, offered for sale, and/or sold by You to the United States since the date of first publication, and for each Infringing Product provide the:

- a) E-commerce store product identification number;
- b) The date the Infringing Product was first offered for sale;
- c) The date the Infringing Product was last offered for sale;
- d) The total number of units sold to date.

Interrogatory 4: For each Infringing Product identified in response to Interrogatory No. 3, state the total gross revenue and net profit realized from sales to:

- a) Residents of the State of Illinois;
- b) Residents of the United States.

Interrogatory 5: Identify the source of the Infringing Products, including the name, address, e-mail address, and website of the manufacturer (e.g., Shenzhen Yongsheng Technology Co., Ltd. or other manufacturers if Shenzhen Yongsheng is a intermediary party) and any intermediary suppliers or distributors.

Interrogatory 6: Identify all financial accounts Used by You in the operation of Defendant's E-commerce Stores, including but not limited to bank accounts, PayPal accounts, and TikTok Shop payment accounts, and for each account provide the account number and the name of the financial institution.

Interrogatory 7: Describe the circumstances under which You obtained the copyright registrations identified in the Complaint as "Fraudulent Copyright Registrations," including

identifying the person or attorney who filed the applications and the date You first became aware of Plaintiff's Copyrighted Works.

Interrogatory 8: Identify all DMCA reports or takedown notices filed by You or your affiliates against Plaintiff or Plaintiff's authorized resellers, including the date of the report, the platform (e.g., TikTok), and the specific copyright registration number relied upon.

Interrogatory 9: Identify all persons with knowledge of the facts alleged in the Complaint or Your defenses thereto, and for each person, state the subject matter of the knowledge they possess.

DEFINITIONS AND INSTRUCTIONS

1. In addition to the definitions and instructions set forth in Fed. R. Civ. P. 34, the following definitions and instructions apply to the Interrogatories set forth above.
2. These interrogatories are addressed to Defendant and (a) its present or former directors, officers, employees, agents, representatives, accountants, investigators, consultants, attorneys, and predecessors or successors in interest and any parent, subsidiary, or affiliated entities; (b) any other person acting on Defendant's behalf or on whose behalf Defendant acted; and (c) any other person otherwise controlled by Defendant, or which controls Defendant, or which is under common control with Defendant.
3. If you find the meaning of any term in these interrogatories to be unclear, you should assume a reasonable meaning, state what that meaning is and respond to the interrogatory on the basis of that assumed meaning.
4. If you object to any subpart or portion of an interrogatory or object to identifying the documents, electronically stored information, or things requested, set forth fully the grounds upon which your objection is based and answer the unobjectionable subparts) of the interrogatory and/or supply the documents, electronically stored information, or things in lieu of identifying the same.
5. Where an objection is made to an interrogatory, state with specificity all grounds upon which the objection is based, along with a citation of any legal authority relied upon.
6. These interrogatories shall be deemed continuing so as to require further and supplemental responses in accordance with Fed. R. Civ. P. 26. Additionally, if at any time Defendant learn that an answer given to any interrogatory was incorrect when given or is no longer correct, Defendant shall promptly provide a written statement, under penalty of perjury, consisting of the correct answer to any such interrogatory.
7. "Communication" shall include all exchanges of information, written or oral, including without limitation, memoranda, telephone conversations, electronic mail, computer discs, documents, and telegrams.
8. "Document" is defined broadly to be given the full scope of that term contemplated in Fed. R.

Civ. P. 34, and includes all tangible things, all originals (or, if originals are not available, identical copies thereof), all non-identical copies of a document, all drafts of final documents, all other written, printed, or recorded matter of any kind, and all other data compilations from which information can be obtained and translated if necessary, that are or have been in your actual or constructive possession or control, regardless of the medium on which they are produced, reproduced, or stored (including without limitation computer programs and files containing requested information), and any recording or writing, as these terms are defined in Rule 1001, Federal Rules of Evidence. Any document bearing marks, including without limitation, initials, stamped initials, comments, or notations not a part of the original text or photographic reproduction thereof, is a separate document.

9. "Document" shall also include, without limitation, the following items, whether printed or reproduced by any process, or written or produced by hand or stored electronically in computer memory, magnetic or hard disk, or other storage medium, and whether or not claimed to be privileged, confidential, or otherwise excludable from discovery: any record of all or any portions of any discussion, communication, agreement, conversation, interview, meeting, conference, conclusion, fact, impression, occurrence, opinion, report, or other similar matter, and shall include, without limitation, letters, correspondence, communications, e-mails, telegrams, papers, cablegrams, mailgrams, notes, memoranda, summaries, abstracts, worksheets, books, manuals, publications, engineering reports and notebooks, schematics, engineering drawings, software source code listings, charts, plans, databases, diagrams, sketches or drawings, photographs, reports and/or summaries of investigations and/or surveys, opinions and reports of committee meetings, desk calendars, appointment books, diaries, diary entries, voice-mails, newspapers, magazine or periodical articles, and any other record of any kind.

10. The term "identify," when used in reference to:

- a. an individual shall mean to state his or her full name, present or last known residence address, present or last known business address, and position or business affiliation;
- b. a business entity shall mean to state its form, full name, address of its present or last principal place of business, and its principal line of business;
- c. a document shall mean to provide information sufficient to locate that document,

including, but not limited to, the following: the production number range (Bates range), the date appearing on such document or, if no date appears thereon, the approximate date the document was prepared; the identifying code number, file number, title or label of such document; a general description of such document (e.g., letter, memorandum, drawing); the title or heading; the number of pages of which such document consists; the name of each person who signed, authored, or authorized the document; the name of each addressee; the name of each person having possession, custody, or control of such document; if the document existed at one time for does not presently exist, the reason(s) why it no longer exists and the identity of the last person having custody of it; and if the document is in a foreign language, whether an English translation of the document exists, whether partial or complete; and

d. a communication shall mean to state its date, the communicator, the communicatee, the type of communication (i.e. conversation, telephone call, letter, note, etc.) and a brief description of its subject matter.

11. "Person" shall mean individuals or entities of any type, including without limitation, individuals, governments (or any agencies thereof), quasi-public entities, corporations, partnerships, limited liability companies, groups, trusts, mutual or joint ventures, and other forms of organizations or associations.
12. "Date" shall mean the exact date, month and year or, if not ascertainable, the best approximation thereof.
13. The phrase "relating to", "related to", or "relate(s) to" means and includes concerning, reflecting, alluding to, mentioning, regarding, discussing, bearing upon, commenting on, constituting, pertaining to, demonstrating, describing, depicting, referring to, summarizing, containing, embodying, showing, comprising, evidencing, refuting, contradicting, and/or supporting.
14. As used herein, "Defendant" or "You" or "Your" or "Yourself" shall be deemed to include the named owner(s) and/or operator(s) of Your e-commerce store, including Sentk LLC, J & Y Stucco LLC, Heyblack International Trade Inc., Shenzhen Yongsheng Technology Co., Ltd., and Qin Lu.

15. As used herein, "Defendant's E-commerce Stores" shall be deemed to include any online store or platform (e.g., TikTok Shop) through which You offered or sold products.
16. As used herein, "Financial Accounts" shall be deemed to include any accounts relating to any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Inc. (PayPal), eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd., and Alibaba.com Singapore E-Commerce Private Limited (collectively "Alibaba"), Amazon.com, Inc. ("Amazon"), Wish US Holdings LLC ("Wish.com"), Etsy, Inc. ("Etsy"), DHgate.com ("DHgate"), WhaleCo Inc. ("Temu"), ByteDance Ltd., TikTok Ltd., TikTok Inc., and TikTok LLC (collectively "TikTok") and Walmart, Inc. ("Walmart") or other merchant account providers, payment providers, third party payment processors, and credit card associations (e.g., MasterCard and Visa Inc.) which receive payments or hold assets for Defendant.
17. As used herein, "Social Media Accounts" shall be deemed to include any accounts relating to any social media platforms, companies, or sites, including, without limitation, Facebook, Instagram, TikTok, and Twitter
18. "Copyrighted Works" shall refer to Plaintiff's registered copyrighted works and non-United States origin artworks protected under the Berne Convention, as described in the Complaint.
19. "Infringing Products" (or "Accused Products") shall mean any product advertised, marketed, promoted, manufactured, imported, distributed, offered for sale or sold by Defendant using, reproducing, copying, or imitating Plaintiff's Copyrighted Works.
20. "Lawsuit" or "Litigation" shall mean the above-captioned lawsuit filed in the U.S. District Court for the Northern District of Illinois.
21. "Complaint" shall mean the Complaint filed by Plaintiff in the Lawsuit.
22. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever makes the request most inclusive.
23. The singular form of a word should be interpreted in the plural as well. Any pronoun shall be construed to refer to the masculine, feminine, or neuter gender as in each case is most appropriate. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever makes the request most inclusive.

Dated: February 27, 2026.

Respectfully submitted,

/s/ D. Vincent Yu

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CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2026, simultaneous with the filing of this submission, a copy of this submission was served by email to Defendants' known email addresses. This submission will also be posted on the website accessible to Defendants.

Respectfully submitted,

/s/ D. Vincent Yu

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