

**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 REQUESTS FOR ADMISSIONS TO DEFENDANTS

Plaintiff Lishui Mpin Toys Co., Ltd. ("Plaintiff"), pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, hereby requests that each Defendant answer the following Requests for Admissions, separately and fully in writing under oath.

Request for Admission 1.

Admit that You offered for sale Infringing Products to Illinois.

Request for Admission 2.

Admit that You sold Infringing Products to a buyer with an Illinois shipping address.

Request for Admission 3.

Admit that You accepted money for Infringing Products from a buyer with an Illinois

shipping address.

Request for Admission 4.

Admit that You shipped Infringing Products to an Illinois address.

Request for Admission 5.

Admit that You offered for sale Infringing Products to the United States.

Request for Admission 6.

Admit that You sold Infringing Products to buyers in the United States.

Request for Admission 7.

Admit that You accepted money for Infringing Products from a buyer in the United States.

Request for Admission 8.

Admit that You shipped Infringing Products to the United States.

Request for Admission 9.

Admit that You chose to offer to sell and sell products to the United States when setting up Defendant's E-commerce Store.

Request for Admission 10.

Admit that You chose to offer to sell and sell products to Illinois when setting up Defendant's E-commerce Store.

Request for Admission 11.

Admit that You entered into a contract with an online marketplace, including accepting the terms that the online marketplace imposes on sellers.

Request for Admission 12.

Admit that Defendant's E-commerce Store affirmatively displayed Illinois as a state to which You would ship products.

Request for Admission 13.

Admit that Defendant's E-commerce Store did not exclude shipping to Illinois.

Request for Admission 14.

Admit that Defendant's E-commerce Store did not exclude shipping to the United States.

Request for Admission 15.

Admit that You received an e-mail from Plaintiff that contained a link to a website with the Complaint and TRO.

Request for Admission 16.

Admit that the linked website with the Complaint and TRO shows the response deadline for the Lawsuit.

Request for Admission 17.

Admit that You received an e-mail from Plaintiff that specified the deadline to respond to or answer the Complaint.

Request for Admission 18.

Admit that You reviewed all images called for in response to Request for Production No. 3 to determine whether each product was an Infringing Product.

Request for Admission 19.

Admit that You did not perform a search to determine whether You advertised, offered for sale and/or sold Infringing Products beyond the specific products identified by Plaintiff.

Request for Admission 20.

Admit that You shipped building block toys featuring the "Moli" bear design to an Illinois address.

Request for Admission 21.

Admit that You offered for sale Infringing Products to consumers in the United States via TikTok Shop.

Request for Admission 22.

Admit that Defendant Shenzhen Yongsheng Technology Co., Ltd. manufactured and provided the Infringing Products.

Request for Admission 23.

Admit that You had access to Plaintiff's genuine Mpin Products through Ningbo East Future Imp & Exp Co., Ltd. prior to the filing of this Lawsuit.

Request for Admission 24.

Admit that the works identified in the Fraudulent Copyright Registrations are based on Plaintiff's pre-existing Copyrighted Works.

Request for Admission 25.

Admit that You filed DMCA reports against Plaintiff's authorized resellers using copyright registrations obtained after Plaintiff's works were already in publication.

Request for Admission 26.

Admit that Defendant Qin Lu is the executive director and major shareholder of Defendant Shenzhen Yongsheng Technology Co., Ltd.

Request for Admission 27.

Admit that You received notice of infringement via the TikTok Shop customer service chat function in or around July 2025.

Request for Admission 28.

Admit that You are not licensed or authorized by Plaintiff to reproduce, distribute, or publicly display the Copyrighted Works.

DEFINITIONS AND INSTRUCTIONS

In addition to the definitions and instructions set forth in Fed. R. Civ. P. 36, the following definitions and instructions apply to the Requests for Admissions set forth above and should be considered as part of each such request.

These requests 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.

As used herein, "Plaintiff" shall mean, unless otherwise indicated, the Plaintiff identified in the above caption, any of Plaintiff's officers, directors, employees, agents and representatives, and all persons acting on Plaintiff's behalf.

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, and (a) its present or former directors, officers, employees, agents, representatives, accountants, investigators, consultants, contractors, 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.

As used herein, "Defendant's E-commerce Stores" shall be deemed to include at least Your e-commerce store.

These requests for admission are continuing and require further answer and supplementation, as provided by Fed. R. Civ. P. 26(e).

"Lawsuit" or "Litigation" shall mean the above captioned lawsuit filed in the U.S. District Court for the Northern District of Illinois.

"Complaint" shall mean the Complaint filed by Plaintiff in the Lawsuit, as well as any subsequently filed complaints by Plaintiff.

As used herein, "Copyrighted Works" shall collectively refer to Plaintiff's registered copyrighted works and non-United States origin artworks protected under the Berne Convention, as well as the listing of registrations in the Lawsuit Complaint.

As used herein, "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, imitating, relating to, featuring, referencing, or bearing any of Plaintiff's Copyrighted Works, reproductions of Plaintiff's Copyrighted Works, colorable imitations of Plaintiff's Copyrighted Works, or works substantially indistinguishable from Plaintiff's Copyrighted Works as Copyrighted Works is defined in the Lawsuit Complaint.

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

D. Vincent Yu
NY Bar No. 4895058
Admitted to N.D. Ill.
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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 by email to Defendants' known email addresses. This document will also be posted on the website accessible to Defendants.

Respectfully submitted,

/s/ D. Vincent Yu

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