

**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 THE PRODUCTION OF
DOCUMENTS AND THINGS TO DEFENDANTS**

Plaintiff Lishui Mpin Toys Co., Ltd. ("Plaintiff"), pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, hereby requests that each Defendant produce each of the documents identified and described below in electronic form.

Request No. 1.

Documents, electronically stored information, and things supporting Your answer to Interrogatory No. 1, including registration documents and e-mails for Defendant's E-commerce Store, Your Social Media Accounts, Your Financial Accounts, any e-mail addresses associated with Defendant's E-commerce Store, and any e-mail addresses associated with Your Financial Accounts.

Request No. 2.

Documents, electronically stored information, and things supporting your response to Interrogatory No. 2, including each Infringing Product listing page and all Infringing Product listing images.

Request No. 3.

Listing images for each Infringing Product.

Request No. 4.

Exemplars of each Infringing Product.

Request No. 5.

Product packaging for each Infringing Product.

Request No. 6.

All documents and things relating to the sale of Infringing Products to any person or entity located in the State of Illinois, including but not limited to purchase orders, invoices, and shipping records.

Request No. 7.

All documents and things relating to the sale of Infringing Products to any person or entity located in the United States, including but not limited to purchase orders, invoices, and shipping records.

Request No. 8.

All documents and things relating to the manufacture, importation, and/or distribution of the Infringing Products, including all communications with manufacturers such as Defendant Shenzhen Yongsheng Technology Co., Ltd.

Request No. 9.

All documents and things relating to the quantity of Infringing Products sold and the gross and net revenue derived therefrom.

Request No. 10.

All documents and things relating to the "Fraudulent Copyright Registrations" identified in the Complaint, including applications, deposits, correspondence with the U.S. Copyright Office, and any evidence of the date of creation of the works.

Request No. 11.

All documents and things relating to DMCA reports or takedown notices filed by You against Plaintiff's authorized resellers.

Request No. 12.

All documents and things relating to Your knowledge of Plaintiff's Copyrighted Works prior to the filing of this Lawsuit, including communications with Ningbo East Future Imp & Exp Co., Ltd.

Request No. 13.

All documents and things relating to the ownership, management, and control of Defendant Shenzhen Yongsheng Technology Co., Ltd. by Defendant Qin Lu.

Request No. 14.

A complete copy of the Terms of Service or Seller Agreements for any online marketplace or E-commerce Store used to sell the Infringing Products, including TikTok Shop.

Request No. 15.

All communications between You and any online marketplace regarding the Infringing Products or the suspension/reinstatement of Your E-commerce Store.

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 Requests for Production set forth above.
2. 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.
3. If you object to any subpart or portion of a Request or object to providing the documents, electronically stored information, or things requested, set forth fully the grounds upon which your objection is based and answer the unobjectionable subpart(s) of the Request and/or supply the documents, electronically stored information, or things to which no objection is made.
4. Documents, electronically stored information, and things under your control must be produced even though they are in the possession of an employee or agent of yours, such as an accountant, attorney, or other person from whom you have a right to retrieve the documents, electronically stored information, or things.
5. If any document, electronically stored information, or thing requested by Plaintiff cannot be produced in full after exercising due diligence to secure the document, electronically stored information, or thing, produce whatever portion of the document, electronically stored information, or thing remains and state whatever information, knowledge or belief you have concerning the unproduced portion. If your response is qualified in any particular respect, set forth the details of such qualification.
6. For any document, electronically stored information, or thing responsive to any request set forth below that Defendant seeks to withhold under a claim of privilege, Defendant shall redact the information being withheld for privilege and indicate the location of the redacted information on or in the produced document, electronically stored information, or thing. For each document, electronically stored information, thing, or part thereof withheld under a claim of privilege or

for any other reason, Defendant shall state:

- a. that such material is being withheld;
 - b. the name and title of all person(s) who possessed or controlled the document, electronically stored information, or thing;
 - c. a brief description of the nature and subject matter of the document, electronically stored information, or thing, including the title and type of document (i.e., whether it is a letter, memorandum, drawing, etc.), electronically stored information, or thing;
 - d. the document's date or the electronically stored information's or thing's date of creation;
 - e. the name and title of the author(s) or creator(s);
 - f. the name and title of the sender(s) of the document or electronically stored information if different from the author(s) or creator(s);
 - g. the name and title of the person(s) to whom the document or electronically stored information is addressed or to whom the thing has been provided, including all person(s) who received copies, photographs, or other representations of the document or electronically stored information or thing;
 - h. the past and current location of all copies of the document or electronically stored information or thing;
 - i. the request or subpart to which the document or electronically stored information, withheld information, or thing is otherwise responsive; and
 - j. the type of privilege claimed (attorney-client communications, attorney work product) and the factual and legal basis supporting the claim of privilege.
7. These Requests shall be deemed continuing so as to require further and supplemental production in accordance with Fed. R. Civ. P. 26.
 8. As used herein, "Plaintiff" shall mean Lishui Mpin Toys Co., Ltd., its officers, directors, employees, agents and representatives, and all persons acting on Plaintiff's behalf.
 9. If any document or electronically stored information or thing is not produced on the ground that such document or electronically stored information or thing is no longer in Defendant's

possession, custody, or control, identify each such document or electronically stored information or thing and specify:

- a. the document's date or the electronically stored information's or thing's date of creation;
- b. a brief description of the nature and subject matter of the document or electronically stored information or thing, including the title and type of document (i.e., whether it is a letter, memorandum, drawing, etc.) or electronically stored information or thing;
- c. the name and title of the author(s) or creator(s), the sender(s), the addressee(s) and the recipient(s) of the document or electronically stored information or thing;
- d. the name and title of all person(s) who possessed or controlled the document, electronically stored information, or thing;
- e. the name and title of the person(s) most knowledgeable about the document or electronically stored information or thing;
- f. the past and current location of all copies of the document or electronically stored information or thing; and
- g. the name and title of the person(s) responsible for its destruction, loss, transfer, or other act or omission by which the document or electronically stored information or thing left Defendant's possession, custody or control, and the date of such act.

10. Any copy of a document or electronically stored information or thing other than the exact duplicate of that document or electronically stored information is a separate document or electronically stored information or thing.

11. Whenever such construction will serve to bring within the scope of these requests some documents, electronically stored information, or things that would otherwise not be brought within its scope, "any" or "each" should be understood to include and encompass "all;" "or" should be understood to include and encompass "and;" "and" should be understood to include and encompass "or;" "including" should be understood to mean including but not limited to; the singular of a word should be understood to include and encompass the plural of the word, and vice versa; and the past tense of a verb shall be understood to include the present tense, and vice versa.

12. Where an objection is made to a request, state all grounds upon which the objection is based, along with a citation of any legal authority relied upon.
13. Ordering and numbering of documents, electronically stored information and things shall be performed in such a manner as to ensure that the source of each document, electronically stored information and thing may be determined.
14. "Communication" shall include all exchanges of information, written or oral, including without limitation, memoranda, telephone conversations, electronic mail, computer discs, documents, and telegrams.
15. "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.
16. "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.

17. 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.

18. “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.

19. “Date” shall mean the exact date, month and year or, if not ascertainable, the best approximation thereof.

20. 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.
21. 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.
22. 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.
23. 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.
24. 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
25. "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.
26. "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.

27. "Lawsuit" or "Litigation" shall mean the above-captioned lawsuit filed in the U.S. District Court for the Northern District of Illinois.
28. "Complaint" shall mean the Complaint filed by Plaintiff in the Lawsuit.
29. The words "and" and "or" shall be construed conjunctively or disjunctively, whichever makes the request most inclusive.
30. 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 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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