

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

Yoeu Inc

Plaintiff,

Case No.: 1:26-cv-00007

v.

Honorable Mary M. Rowland

The Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants.

DECLARATION OF ZHANG HUA

I, Zhang Hua, declare as follows:

1. I am the Intellectual Property Department Manager of Yoeu Inc (“ Plaintiff ”). My responsibilities include brand protection, maintaining trademark records, overseeing product listings and marketing, and monitoring online marketplaces for infringement. I am authorized to submit this Declaration on behalf of Plaintiff.
2. This declaration is based upon my personal knowledge and on my review of Plaintiff’s business records, which were made at or near the time of the events described and kept in the ordinary course of Plaintiff’s business. If called as a witness, I could and would testify competently to the matters stated herein.
3. Plaintiff is the owner of all right, title, and interest in its federally registered trademark UEUEKOKO (U.S. Reg. No. 7,467,712) for goods in International Class 3 (the “Mark”). A true and correct copy of the registration certificate is attached as **Exhibit 1**.
4. Plaintiff has used the Mark in U.S. commerce in connection with cosmetic hair oil since at least 2024, and Plaintiff has not abandoned the Mark. Plaintiff is the owner and licensor of

products sold under the Mark and maintains exclusive control over use of the Mark. Plaintiff's products bearing the Mark are offered for sale online through Plaintiff's own store.

5. Plaintiff uses the Mark on, among other things, product packaging, product pages, marketing materials, storefronts.
6. Plaintiff has not authorized Defendants to use the Mark in any manner. Defendants are not Plaintiff's licensees, distributors, or authorized resellers. Plaintiff does not believe Defendants are authorized retailers of genuine Plaintiff products.
7. Through continuous use, marketing, and sales, Plaintiff has developed substantial goodwill in the Mark. Consumers recognize products bearing the Mark as originating from Plaintiff.
8. I perform, supervise, and/or direct investigations related to Internet-based infringement of the Mark. Based on my review of Plaintiff's brand-protection records maintained in the ordinary course of business, Plaintiff's investigation shows that Defendants are using the Seller Aliases to sell unauthorized products bearing the Mark from China to consumers in the U.S. and elsewhere. I, or someone working under my direction, analyzed each of the e-commerce stores operating under the Seller Aliases and determined that such products were being offered for sale to residents of the United States, including Illinois residents. This conclusion was reached through visual inspection of the listed products, the price at which the products were offered for sale, other features commonly associated with e-commerce stores selling counterfeit products, and the fact that Plaintiff has not authorized Defendants to use the Mark. In addition, each e-commerce store offered shipping to the United States, including Illinois. True and correct copies of screenshots showing the active e-commerce stores operating under the Seller Aliases reviewed are attached as **Exhibit 2**.
9. Defendants have targeted sales to Illinois residents by setting up and operating e-commerce

stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars and/or funds from U.S. bank accounts, and, on information and belief, have sold unauthorized products to residents of Illinois.

10. As shown in Exhibit 2, the Mark appears in product titles, product descriptions and/or product images on Defendants' listings. Defendants' unauthorized use of the Mark is likely to cause confusion among consumers as to the source, sponsorship, affiliation, or approval of Defendants' products.
11. Defendants' unauthorized use of the Mark harms Plaintiff by diverting sales, misleading consumers, and depriving Plaintiff of control over the reputation and quality associated with the Mark. This harm is difficult to quantify, and monetary damages alone are inadequate to remedy it.
12. If Defendants are permitted to continue selling products using the Mark, Plaintiff will suffer ongoing harm to its goodwill and brand reputation. Absent immediate temporary injunctive relief, Plaintiff will continue to suffer immediate and irreparable harm from ongoing unauthorized sales and consumer confusion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 13, 2026, in Shenzhen

Declarant: Zhang Hua
Print Name: Zhang Hua