

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

KIEL JAMES PATRICK LLC,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No.: 1:16-cv-08062

**PLAINTIFF'S *EX PARTE* MOTION FOR ENTRY OF A TEMPORARY RESTRAINING  
ORDER, INCLUDING A TEMPORARY INJUNCTION, A TEMPORARY TRANSFER  
OF THE DEFENDANT DOMAIN NAMES, A TEMPORARY ASSET RESTRAINT,  
EXPEDITED DISCOVERY, AND SERVICE OF PROCESS BY EMAIL AND/OR  
ELECTRONIC PUBLICATION**

Plaintiff Kiel James Patrick LLC, ("KJP" or "Plaintiff"), seeks entry of an *ex parte* temporary restraining order, including a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of Counterfeit ANCHOR DESIGN Products, a temporary transfer of the Defendant Domain Names, a temporary asset restraint, expedited discovery, and service of process by email and/or electronic publication in an action arising out of 15 U.S.C. § 1114; Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a); and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510. A Memorandum of Law in Support is filed concurrently with this Motion.

DATED: August 12, 2016

Respectfully submitted,

/s/ Keith A. Vogt

Keith A. Vogt, Esq. (Bar No. 6207971)

1033 South Blvd., Suite 200

Oak Park, Illinois 60302

Telephone: 708-203-4787

E-mail: keith@vogtip.com

Perry J. Hoffman, Esq. (Bar No. 6211115)

Perry Hoffman & Associates P.C.

2100 Sanders Road, Suite 200

Northbrook, Illinois 60062

Telephone: 847-809-4285

E-mail: perry@WeDoIP.com

***ATTORNEYS FOR PLAINTIFF***

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system on August 12, 2016.

/s/ Keith A. Vogt

Keith A. Vogt