

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

KIEL PATRICK JAMES LLC,

Plaintiff,

v.

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

Defendants.

Case No.: 1:17-cv-00650

Judge Sharon Johnson Coleman

Magistrate Judge Michael T. Mason

PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff KIEL PATRICK JAMES LLC ("KJP") hereby moves this Honorable Court for entry of a Preliminary Injunction. The scope of the Preliminary Injunction is substantially identical to the Temporary Restraining Order entered on February 1, 2017. In support of its Motion, KJP files herewith a Memorandum of Law and a further Declaration of Keith A. Vogt.

DATED: February 10, 2017

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 hereby certify that on February 10, 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website to which the Defendant Domain Names that have been transferred to KJP's control now redirect, and I will send an e-mail to the e-mail addresses identified in Exhibit 2 to the Declaration of Jeremy Savage and any e-mail addresses provided for Defendants by third parties that includes a link to said website.

/s/ Keith A. Vogt

Keith A. Vogt, Esq.
(Bar No. 6207971)
1033 South Blvd, Suite 200
Oak Park, IL 60302
Telephone: 708.203.4787
E-mail: keith@vogtip.com