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18 CV 10440

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MATTEL, INC.,

*Plaintiff*

v.

276470, 2011TOYELITE, 800K, 99BOWEN,  
ARCADEWORLD15, BABYTOYGIFT, BEST-  
ANIME-TOYS, BEST-DEAL-365,  
BIYUNLIN2016, BUYMARKET,  
BUYMARKET\_DE, CHUNNN\_85,  
CONNIE\_MONICA, COOCARHOT,  
COSPLAY-MALL, DREAMWORLD-0624,  
FLYINGTECHV, FREDERICKWONG2000,  
FUNFUNTOYCLUB, GARDENMALL,  
GOKSO9, GOOD\_DEAL1688, GUANGJI203,  
HAVENSO, HELLOSWORD,  
HOMEPAGE2009, HUGEPOWER,  
JASONSTOYSS, JUDYPHIL0408,  
KITTY\_CHEN132, KONGFAN12, K-  
STORE2015, LA56168616, LEMON-BEST2012,  
MYHONEYPET007, NICEFUTURE21068,  
NIHONGINT,  
OBD KEEP YOUR MOTOR RUNNING,

Civil Case No.:

~~PROPOSED~~ kpl

1) TEMPORARY RESTRAINING  
ORDER; 2) ORDER  
RESTRAINING ASSETS AND  
MERCHANT STOREFRONTS; 3)  
ORDER TO SHOW CAUSE WHY  
A PRELIMINARY INJUNCTION  
SHOULD NOT ISSUE; 4) ORDER  
AUTHORIZING BIFURCATED  
AND ALTERNATIVE SERVICE;  
AND 5) ORDER AUTHORIZING  
EXPEDITED DISCOVERY

FILED UNDER SEAL

|                 |                  |            |
|-----------------|------------------|------------|
| OK_BUY_SMILE,   | REPLYSTORES2015, |            |
| SHENGQUZHAN_0,  | SHINEWORKS606,   |            |
| SLEBOTY,        | SUNNZHO_5,       | SUPER.CZP, |
| SUPERPATCH,     | TINGTING2016,    |            |
| VICTORY.V.V,    | WAP198702,       | WARMSUN07, |
| WENDINGOK,      | WHRNIUNIU.520,   | XHENG513,  |
| XIANNOW,        | XINTEGROUP-US,   | YI0133,    |
| YIYIMYLOVE,     | ZHHF369,         |            |
| ZHOUXIAOLIN2010 | and ZYCQH0419-8, |            |

*Defendants*

On this day, the Court considered Mattel, Inc.'s ("Mattel" or "Plaintiff") *ex parte* application for the following: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery against Defendants 276470, 2011toyclite, 8ook, 99bowen, arcadeworld15, babytoygift, best-anime-toys, best-deal-365, biyunlin2016, buymarket, buymarket\_de, chunnn\_85, connie\_monica, coocarhot, cosplay-mall, dreamworld-0624, flyingtechv, frederickwong2000, funfuntoyclub, gardenmall, gokso9, Good\_Deal1688, guangji203, havenso, hellosword, homepage2009, hugepower, jasonstoyss, judyphil0408, kitty\_chen132, kongfan12, k-store2015, la56168616, lemon-best2012, myhoneypet007, nicefuture21068, nihongint, obd\_keep\_your\_motor\_running, ok\_buy\_smile, replystores2015, shengquzhan\_0, shineworks606, slebotoy, sunnzhoh\_5, super.czp, superpatch, tingting2016, victory.v.v, wap198702, warmsun07, wendingok, whrniuniu.520, xheng513, xiannow, xintegroup-us, yi0133, yiyimylove, zhhf369, zhouxiaolin2010 and zycqh0419-8 (hereinafter collectively referred to as "Defendants" or individually as "Defendant"), eBay (as defined *infra*) and Financial Institutions (as defined *infra*) in light of Defendants' intentional and willful offerings

for sale and/or sales of Counterfeit Products (as defined *infra*) (“Application”).<sup>1</sup> A complete list of Defendants is attached hereto as **Schedule A**, which also includes links to Defendants’ Merchant Storefronts. Having reviewed the Application, the Declarations of Jessica Arnaiz, Lisa Delnaty and Brienne Scully, along with exhibits attached thereto and other evidence submitted in support thereof, the Court makes the following findings of fact and conclusions of law:

### **FACTUAL FINDINGS & CONCLUSIONS OF LAW**

1. Mattel, through its family of companies, is a leading designer, developer, marketer, manufacturer and distributor of well-known children’s toys and games (“Mattel Products”) under its iconic brands, including, but not limited to: Barbie, Thomas & Friends, Hot Wheels, American Girl and Fisher-Price (“Mattel Brands”);

2. One of Mattel’s most popular and successful brands is Thomas and Friends, which features the main character Thomas the Tank Engine as a blue, cheery, anthropomorphic steam engine (“Thomas the Tank Engine”).

3. Thomas the Tank Engine was originally part of a children’s book series and lives on the fictional island of Sodor and aspires to be a “Really Useful Engine,” which is the highest praise possible for trains that are part of the Sodor Railway. Thomas the Tank Engine encourages his fellow trains to be the best they can be, and imparts lessons about friendship, altruism and perseverance;

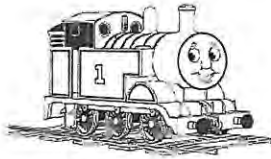
4. Thomas the Tank Engine and the other train characters soon became an award-winning hit around the world, launching a television spin-off series, *Thomas & Friends*, and a vast range of commercial products, including trains and tracks, games, puzzles and books (“Thomas & Friends Products”);

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<sup>1</sup> Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Complaint or Application.

5. While Mattel has gained significant common law trademark and other rights in its Thomas & Friends Products, through use, advertising, and promotion, Mattel and its predecessors in interest have also protected these valuable rights by obtaining federal trademark registrations;

6. For example, Mattel, through its wholly-owned subsidiary Gullane (Thomas) Limited, is the owner and/or licensee of U.S. Trademark Reg. No. 3,799,968 for



for a variety of goods in Classes 9, 16, 24, 25 and 28, U.S. Reg. No. 3,085,762 for “THOMAS & FRIENDS” for a variety of goods in Classes 9, 16, 25, 28 and 41, U.S. Trademark Reg. No. 3,500,987 for “THOMAS & FRIENDS” for a variety of goods in Classes 3, 11, 14 and 24 and U.S. Trademark Reg. No. 3,531,151 for “THOMAS & FRIENDS” for a variety of goods in Classes 18, 20, 21 and 29 (collectively, the “Thomas & Friends Marks”). The Thomas & Friends Marks are currently in use in commerce in connection with the Thomas & Friends Products. The Thomas & Friends Marks were first used in commerce on or before the dates of first use as reflected in the registration certificates;

7. U.S. Trademark Registration Nos. 3,799,968, 3,085,762, 3,500,987 and 3,531,151 are valid, subsisting and incontestable;

8. In addition, Mattel is also the owner and/or licensee of both registered and unregistered copyrights in and related to the Thomas & Friends Products;

9. For example, Mattel, through its wholly-owned subsidiary Gullane (Thomas) Limited, is the owner and/or licensee of U.S. Copyright Reg. PA 1-930-773, covering Thomas & Friends: The Thomas Way, U.S. Copyright Reg. TX 7-953-676, covering Thomas & Friends: Story Time Collection, U.S. Copyright Reg. TX 7-973-191, covering Thomas & Friends: Special Delivery (Lift-a-Flap Sound Book), U.S. Copyright Reg. TX 7-973-196, covering Thomas &



Friends: Railway Race Day (Lift-a-Flap Sound Book), U.S. Copyright Reg. TX 7-973-208, covering Thomas & Friends: I'm Ready to Read with Thomas (Play-a-Sound book), U.S. Copyright Reg. TX 7-985-398, covering Thomas & Friends: I Can Help Thomas (Play-a-Sound book), U.S. Copyright Reg. TX 7-992-119, covering Thomas & Friends: Nine Favorite Tales (Little Golden Book Collection), U.S. Copyright Reg. TX 8-149-304, covering Thomas & Friends: Books & Blocks and U.S. Copyright Reg. TX 4-442-061, covering Thomas the tank engine / by W. Awdry (collectively, the "Thomas & Friends Works");

10. Defendants are manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling products bearing or used in connection with the Thomas & Friends Marks and/or Thomas & Friends Works, and/or products in packaging and/or containing labels and/or hang tags bearing the Thomas & Friends Marks and/or Thomas & Friends Works, and/or bearing or used in connection with marks and/or artwork that are confusingly or substantially similar to the Thomas & Friends Marks and/or Thomas & Friends Works, and/or products that are identical or confusingly or substantially similar to Thomas & Friends Products (collectively referred to as, "Infringing Product(s)" or "Counterfeit Product(s)") through accounts with online marketplace platforms such as eBay.com, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them ("User Accounts") (see **Schedule A** for links to Defendants' Merchant Storefronts and listings for Counterfeit Products);

11. eBay.com is an online marketplace and e-commerce platform that allows manufacturers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale and/or sell in what it characterizes as either auction-style or fixed-price formats and ship their

retail products originating from China, among other locations, directly to consumers worldwide and specifically to consumers residing in the U.S., including New York (hereinafter, “eBay”);

12. Defendants are not, nor have they ever been, authorized distributors or licensees of the Thomas & Friends Products. Neither Mattel, nor any of Mattel’s authorized agents, have consented to Defendants’ use of the Thomas & Friends Marks and/or Thomas & Friends Works, nor has Mattel consented to Defendants’ use of any identical or confusingly similar marks or artwork;

13. Mattel is likely to prevail on its Lanham Act claims, copyright claims and related state law claims at trial;

14. As a result of Defendants’ infringements, Mattel as well as consumers are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Mattel’s Application for *ex parte* relief is granted:

- a. Defendants have offered for sale and sold substandard Counterfeit Products that infringe the Thomas & Friends Marks and Thomas & Friends Works;
- b. Mattel has well-founded fears that more Counterfeit Products will appear in the marketplace; that consumers may be misled, confused and disappointed by the quality of these Counterfeit Products, resulting in injury to Mattel’s reputation and goodwill; and that Mattel may suffer loss of sales for its Thomas & Friends Products; and
- c. Mattel has well-founded fears that if it proceeds on notice to Defendants on this Application, Defendants will: (i) secret, conceal, destroy, alter, sell-off, transfer or otherwise dispose of or deal with Counterfeit Products or other goods that infringe the Thomas & Friends Marks and Thomas & Friends Works, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in

their possession or under their control, (ii) inform their suppliers and others of Mattel's claims with the result being that those suppliers and others may also secret, conceal, sell-off or otherwise dispose of Counterfeit Products or other goods infringing the Thomas & Friends Marks and Thomas & Friends Works, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (iii) secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from its sales of Counterfeit Products or other goods infringing the Thomas & Friends Marks and Thomas & Friends Works and records relating thereto that are in their possession or under their control and/or (iv) open new User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in products, including Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them ("Merchant Storefront(s)") under new or different names and continue to offer for sale and sell Counterfeit Products with little to no consequence;

15. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is far outweighed by the potential harm to Mattel, its business, the goodwill and reputation built up in and associated with the Thomas & Friends Marks and Thomas & Friends Works and to its reputation if a temporary restraining order is not issued;

16. Public interest favors issuance of the temporary restraining order in order to protect Mattel's interests in and to its Thomas & Friends Marks and Thomas & Friends Works, and to protect the public from being deceived and defrauded by Defendants' passing off of their substandard Counterfeit Products as Thomas & Friends Products;

17. Mattel has not publicized its request for a temporary restraining order in any way;

18. Service on Defendants via electronic means is reasonably calculated to result in proper notice to Defendants.

19. If Defendants are given notice of the Application, they are likely to secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from their sales of Counterfeit Products or other goods infringing the Thomas & Friends Marks and Thomas & Friends Works. Therefore, good cause exists for granting Mattel's request for an asset restraining order. It typically takes noticed Financial Institutions a minimum of five (5) days after service of the Order (as defined *infra*) to locate, attach and freeze Defendants' Assets (as defined *infra*) and/or Defendants' Financial Accounts (as defined *infra*) and it is anticipated that it will take eBay a minimum of five (5) days to freeze Defendants' Merchant Storefronts. As such, the Court allows enough time for Mattel to serve the Financial Institutions and eBay with this Order, and for the Financial Institutions and eBay to comply with the Paragraphs I(B)(1) through I(B)(2) and I(C)(1) of this Order, respectively, before requiring service on Defendants.

20. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Mattel the records and documents relating to Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Counterfeit Products. Therefore, Mattel has good cause to be granted expedited discovery.



## **ORDER**

Based on the foregoing findings of fact and conclusions of law, Mattel's Application is hereby **GRANTED** as follows (the "Order"):

### **I. Temporary Restraining Order**

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants are hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Mattel's Application for a preliminary injunction as referenced in **Paragraph (II)(A)** below:

- 1) manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in Counterfeit Products, or any other products bearing the Thomas & Friends Marks and/or marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Thomas & Friends Marks and/or incorporating the Thomas & Friends Works and/or artwork that is substantially similar to, identical to and constitute an infringement of the Thomas & Friends Works;
- 2) communicating, directly or indirectly, with any person or persons: (i) from whom they purchased or obtained any Counterfeit Products; (ii) to whom they sold or offered to sell such Counterfeit Products or (iii) of whom they know, or reasonably believe, to possess, control or have access to any such Counterfeit Products;
- 3) secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products and/or (ii) any computer files, data, business records, documents or any other records or evidence relating to their User Accounts, Merchant Storefronts or any money, securities or other property or assets of Defendants (whether said assets are located in the U.S. or abroad) (hereinafter

collectively referred to as “Defendants’ Assets”) and the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products;

- 4) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order; and
- 5) knowingly instructing, aiding or abetting any other person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(4) above and I(B)(1) through I(B)(2) and I(C)(1) below.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that eBay, Inc., PayPal Inc. (“PayPal”), Payoneer Inc. (“Payoneer”) and PingPong Global Solutions, Inc. (“PingPong”) (eBay, PayPal, Payoneer and PingPong are collectively referred to as the “Financial Institutions”) are hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Mattel’s Application for a preliminary injunction as referenced in **Paragraph (II)(A)** below, or until further order of the Court:

- 1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants’ Assets from or to financial accounts associated with or utilized by any Defendant or any Defendant’s User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad) (“Defendants’ Financial Accounts”) until further ordered by this Court;

- 2) secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to Defendants' Assets and Defendants' Financial Accounts; and
- 3) knowingly instructing, aiding or abetting any person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(4) and I(B)(1) through I(B)(2) above and I(C)(1) below.

C. IT IS HEREBY ORDERED, as sufficient cause has been shown, that eBay is hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Mattel's Application for a preliminary injunction as referenced in **Paragraph (II)(A)** below, or until further order of the Court:

- 1) within five (5) days after receipt of service of this Order, providing services to Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts; and
- 2) knowingly instructing, aiding, or abetting any other person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(4), I(B)(1) through I(B)(2) and I(C)(1) above.

**II. Order to Show Cause Why A Preliminary Injunction  
Should Not Issue And Order Of Notice**

✓ A. Defendants are hereby ORDERED to show cause before this Court in Courtroom 618 of the United States District Court for the Southern District of New York at ~~500 Pearl Street~~/40 Foley Square, New York, New York on November 26, 2018 at 10:00 a.m.



or at such other time that this Court deems appropriate, why a preliminary injunction, pursuant to FRCP 65(a), should not issue.

B. IT IS FURTHER ORDERED that opposing papers, if any, shall be filed electronically with the Court and served on Mattel's counsel by delivering copies thereof to the office of Epstein Drangel LLP at 60 East 42<sup>nd</sup> Street, Suite 2520, New York, NY 10165, Attn: Jason M. Drangel ✓ on or before November 20, 2018. Mattel shall file any Reply papers on or before ✓ November 23 2018.

C. IT IS FURTHER ORDERED that Defendants are hereby given notice that failure to appear at the show cause hearing scheduled in **Paragraph II(A)** above may result in the imposition of a preliminary injunction against them pursuant to FRCP 65, which may take effect immediately upon the expiration of this Order, and may extend throughout the length of the litigation under the same terms and conditions set forth in this Order.

### **III. Asset Restraining Order**

A. IT IS FURTHER ORDERED pursuant to FRCP 64 and 65 and CPLR 6201 and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Financial Institutions shall locate and attach Defendants' Financial Accounts and shall provide written confirmation of such attachment to Mattel's counsel.

### **IV. Order Authorizing Alternative Service by Electronic Means**

A. IT IS FURTHER ORDERED pursuant to FRCP 4(f)(3), as sufficient cause has been shown, that service may be made on, and shall be deemed effective as to Defendants if it is completed by the following means:

- 1) delivery of: (i) PDF copies of this Order together with the Summons and Complaint, or  
(ii) a link to a secure website (including Dropbox.com, NutStore.com, a large mail link



created through RPost.com and via website publication through a specific page dedicated to this Lawsuit accessible through [ipcounselorslawsuit.com](http://ipcounselorslawsuit.com)) where each Defendant will be able to download PDF copies of this Order together with the Summons and Complaint, and all papers filed in support of Mattel's Application seeking this Order to Defendants' e-mail addresses to be determined after having been identified by eBay pursuant to **Paragraph V(C)**.

- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be made within five (5) days of the Financial Institutions and eBay's compliance with **Paragraphs III(A)** and **V(C)** of this Order.
- C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that the Clerk of the Court shall issue a single original summons in the name of "276470 and all other Defendants identified in the Complaint" that will apply to all Defendants.
- D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that service may be made and shall be deemed effective as to the following if it is completed by the below means:
- 1) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PayPal will be able to download a PDF copy of this Order via electronic mail to EE Omaha Legal Specialist at [EEOMALegalSpecialist@paypal.com](mailto:EEOMALegalSpecialist@paypal.com);
  - 2) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where eBay, via eBay's Registered Agent, will be able to download a PDF copy of this Order via electronic mail at [copyright@ebay.com](mailto:copyright@ebay.com), to Bryce Baker at [brybaker@ebay.com](mailto:brybaker@ebay.com) and to Joanna Lahtinen at [jlahtinen@ebay.com](mailto:jlahtinen@ebay.com);

- 3) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Payoneer will be able to download a PDF copy of this Order via electronic mail to Payoneer's Customer Service Management at customerservicemanager@payoneer.com and Edward Tulin, counsel for Payoneer, at Edward.Tulin@skadden.com; and
- 4) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PingPong will be able to download a PDF copy of this Order via electronic mail to PingPong's Legal Department at xieqt@pingpongx.com and legal@pingpongx.com and Mathew Ball, counsel for PingPong, at Matthew.Ball@klgates.com.

#### **V. Order Authorizing Expedited Discovery**

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 5) Within fourteen (14) days after receiving service of this Order, each Defendant shall serve upon Mattel's counsel a written report under oath providing:
  - a. their true name and physical address;
  - b. the name and location and URL of any and all websites that Defendants own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on eBay.com and/or any and all other online marketplace platforms that Defendants own and/or operate;
  - c. the complete sales records for any and all sales of Counterfeit Products, including but not limited to number of units sold, the price per unit, total gross revenues received (in U.S. dollars) and the dates thereof;
  - d. the account details for any and all of Defendants' Financial Accounts, including, but not limited to, the account numbers and current account balances; and
  - e. the steps taken by each Defendant, or other person served to comply with **Section I**, above.

- 1) Mattel may serve interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure as well as Local Civil Rule 33.3 of the Local Rules for the Southern and Eastern Districts of New York and Defendants who are served with this Order shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Mattel's counsel.
- 2) Mattel may serve requests for the production of documents pursuant to FRCP 26 and 34, and Defendants who are served with this Order and the requests for the production of documents shall produce all documents responsive to such requests within fourteen (14) days of service to Mattel's counsel.

B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Financial Institutions shall identify any and all of Defendants' Financial Accounts, and provide Mattel's counsel with a summary report containing account details for any and all such accounts, which shall include, at a minimum, identifying information for Defendants, including contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses), account numbers and account balances for any and all of Defendants' Financial Accounts and confirmation of said compliance with this Order.

C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, eBay shall identify any and all of Defendants' User Accounts and Merchant Storefronts, and provide Mattel's counsel with a summary report containing account details for any and all User Accounts and Merchant Storefronts, which shall include, at a minimum, identifying information for Defendants and Defendants' User Accounts and Defendants' Merchant Storefronts, contact information for Defendants (including, but not

limited to, mailing addresses and e-mail addresses) and confirmation of said compliance with this Order.

D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receiving actual notice of this Order, all Financial Institutions who are served with this Order shall provide Mattel's counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to any and all of Defendants' Financial Accounts, including, but not limited to, documents and records relating to:
  - a. account numbers;
  - b. current account balances;
  - c. any and all identifying information for Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, names, addresses and contact information;
  - d. any and all account opening documents and records, including, but not limited to, account applications, signature cards, identification documents and if a business entity, any and all business documents provided for the opening of each and every of Defendants' Financial Accounts;
  - e. any and all deposits and withdrawals during the previous year from each and every one of Defendants' Financial Accounts and any and all supporting documentation, including, but not limited to, deposit slips, withdrawal slips, cancelled checks and account statements; and
  - f. any and all wire transfers into each and every one of Defendants' Financial Accounts during the previous year, including, but not limited to, documents



sufficient to show the identity of the destination of the transferred funds, the identity of the beneficiary's bank and the beneficiary's account number.

E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receipt of service of this Order, eBay shall provide to Mattel's counsel all documents and records in its possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:
  - a. any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with eBay that were not previously provided pursuant to Paragraph V(C);
  - b. the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided pursuant to Paragraph V(C);
  - c. the nature of Defendants' businesses and operations, methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts with any and all Financial Institutions associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and

- d. Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Counterfeit Products, or any other products bearing the Thomas & Friends Marks and/or marks that are confusingly similar to, identical to, and constitute an infringement of the Thomas & Friends Marks and/or incorporating the Thomas & Friends Works and/or artwork that is substantially similar to, identical to and constitutes infringement of the Thomas & Friends Works.

**VI. Security Bond**

- ✓ A. IT IS FURTHER ORDERED that Mattel shall place security in the amount of five thousand Dollars (\$5,000.00) with the Court which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

**VII. Sealing Order**

- A. IT IS FURTHER ORDERED that Mattel's Complaint and exhibits attached thereto, and Mattel's *ex parte* Application and the Declarations of Jessica Arnaiz, Lisa Delanty and Brienne in support thereof and exhibits attached thereto and this Order shall remain sealed until the Financial Institutions and eBay comply with **Paragraphs I(C), III(A) and V(C)** of this Order.

**SO ORDERED.**

✓ SIGNED this 9<sup>th</sup> day of November, 2018, at 5:20 p.m.

Kathleen Polk Fallis  
UNITED STATES DISTRICT JUDGE

| No | Defendant         | Merchant Storefront   | User Account  |
|----|-------------------|---|---|
| 1  | 276470            | <a href="https://www.ebay.com/itm/Mattel-Thomas-Friends-Gordon-Wooden-Toy-Train-New-Loose/323150321390">https://www.ebay.com/itm/Mattel-Thomas-Friends-Gordon-Wooden-Toy-Train-New-Loose/323150321390</a>   | <a href="https://www.ebay.com/usr/276470">https://www.ebay.com/usr/276470</a>                       |
| 2  | 2011toyelite      | <a href="https://www.ebay.com/itm/Thomas-Friends-Metal-Magnetic-Vehicle-Kevin-Toy-Train-New-Loose/140971030053">https://www.ebay.com/itm/Thomas-Friends-Metal-Magnetic-Vehicle-Kevin-Toy-Train-New-Loose/140971030053</a>                                   | <a href="https://www.ebay.com/usr/2011toyelite">https://www.ebay.com/usr/2011toyelite</a>           |
| 3  | 80ok              | <a href="https://www.ebay.com/itm/Thomas-Its-Friends-Magnetic-Metal-Toy-Train-LADY-Loose-New-in-Stock/181854945632">https://www.ebay.com/itm/Thomas-Its-Friends-Magnetic-Metal-Toy-Train-LADY-Loose-New-in-Stock/181854945632</a>                           | <a href="https://www.ebay.com/usr/80ok">https://www.ebay.com/usr/80ok</a>                           |
| 4  | 99bowen           | <a href="https://www.ebay.com/itm/Learning-Curve-Thomas-Friends-Metal-Diecast-Oliver-Toy-Train-Loose-New/111637054649">https://www.ebay.com/itm/Learning-Curve-Thomas-Friends-Metal-Diecast-Oliver-Toy-Train-Loose-New/111637054649</a>                     | <a href="https://www.ebay.com/usr/99bowen">https://www.ebay.com/usr/99bowen</a>                     |
| 5  | arcadeworld15     | <a href="https://www.ebay.com/itm/New-Thomas-and-Friends-Orbital-Electric-Train-Set-For-Kids-Toys-Christmas-Gift/282759269244">https://www.ebay.com/itm/New-Thomas-and-Friends-Orbital-Electric-Train-Set-For-Kids-Toys-Christmas-Gift/282759269244</a>     | <a href="https://www.ebay.com/usr/arcadeworld15">https://www.ebay.com/usr/arcadeworld15</a>         |
| 6  | babytoygift       | <a href="https://www.ebay.com/itm/Thomas-Friend-Wooden-Magnetic-Tank-Engine-Railway-Baby-Children-Mini-Train-/112946609003">https://www.ebay.com/itm/Thomas-Friend-Wooden-Magnetic-Tank-Engine-Railway-Baby-Children-Mini-Train-/112946609003</a>           | <a href="https://www.ebay.com/usr/babytoygift">https://www.ebay.com/usr/babytoygift</a>             |
| 7  | best-anime-toys   | <a href="https://www.ebay.com/itm/Thomas-and-Friends-Engine-train-45MM-LOTS-PIN-BACK-BADGES-BUTTONS-CLOTH-PARTY/272376857250">https://www.ebay.com/itm/Thomas-and-Friends-Engine-train-45MM-LOTS-PIN-BACK-BADGES-BUTTONS-CLOTH-PARTY/272376857250</a>       | <a href="https://www.ebay.com/usr/best-anime-toys">https://www.ebay.com/usr/best-anime-toys</a>     |
| 8  | best-deal-365     | <a href="https://www.ebay.com/itm/Set-Thomas-Friends-Gordon-and-Tender-Magnetic-Wooden-Toy-Railway-Train/232768282612">https://www.ebay.com/itm/Set-Thomas-Friends-Gordon-and-Tender-Magnetic-Wooden-Toy-Railway-Train/232768282612</a>                     | <a href="https://www.ebay.com/usr/best-deal-365">https://www.ebay.com/usr/best-deal-365</a>         |
| 9  | biyunlin2016      | <a href="https://www.ebay.com/itm/Thomas-Friend-trackmaster-battery-train-railway-engine-train-DOUGLAS-Boxed/283016884934">https://www.ebay.com/itm/Thomas-Friend-trackmaster-battery-train-railway-engine-train-DOUGLAS-Boxed/283016884934</a>             | <a href="http://www.ebay.com/usr/biyunlin2016">http://www.ebay.com/usr/biyunlin2016</a>             |
| 10 | buymarket         | <a href="https://www.ebay.com/itm/Tomica-Takara-Tomy-Thomas-Friends-Chocolate-PERCY-06-TRAIN-MINI-Diecast-Car/331279604988">https://www.ebay.com/itm/Tomica-Takara-Tomy-Thomas-Friends-Chocolate-PERCY-06-TRAIN-MINI-Diecast-Car/331279604988</a>           | <a href="https://www.ebay.com/usr/buymarket">https://www.ebay.com/usr/buymarket</a>                 |
| 11 | buymarket_de      | <a href="https://www.ebay.com/itm/Tomica-Takara-Tomy-Thomas-Friends-Chocolate-PERCY-06-TRAIN-Diecast-Car/222424922180">https://www.ebay.com/itm/Tomica-Takara-Tomy-Thomas-Friends-Chocolate-PERCY-06-TRAIN-Diecast-Car/222424922180</a>                     | <a href="https://www.ebay.com/usr/buymarket_de">https://www.ebay.com/usr/buymarket_de</a>           |
| 12 | chunnn_85         | <a href="https://www.ebay.com/itm/Thomas-Friends-D199-Engine-Metal-Toy-Train-Diecast-Model-Loose-New-In-Stock/263792960630">https://www.ebay.com/itm/Thomas-Friends-D199-Engine-Metal-Toy-Train-Diecast-Model-Loose-New-In-Stock/263792960630</a>           | <a href="https://www.ebay.com/usr/chunnn_85">https://www.ebay.com/usr/chunnn_85</a>                 |
| 13 | connie monica     | <a href="https://www.ebay.com/itm/Thomas-and-Friends-School-Bag-Cartoon-Cute-Kids-Backpack-Boy-Girl-Back-Pack-Gift/122435179571">https://www.ebay.com/itm/Thomas-and-Friends-School-Bag-Cartoon-Cute-Kids-Backpack-Boy-Girl-Back-Pack-Gift/122435179571</a> | <a href="https://www.ebay.com/usr/connie_monica">https://www.ebay.com/usr/connie_monica</a>         |
| 14 | coocarhot         | <a href="https://www.ebay.com/itm/Thomas-and-Friends-Trains-Toys-Cast-Iron-Loose/253318318643">https://www.ebay.com/itm/Thomas-and-Friends-Trains-Toys-Cast-Iron-Loose/253318318643</a>   | <a href="https://www.ebay.com/usr/coocarhot">https://www.ebay.com/usr/coocarhot</a>                 |
| 15 | cosplay-mall      | <a href="https://www.ebay.com/itm/12pcs-Thomas-And-Friends-Mini-Trains-Cars-Take-n-Play-Diecast-Figures-Toys-Doll/25356507802">https://www.ebay.com/itm/12pcs-Thomas-And-Friends-Mini-Trains-Cars-Take-n-Play-Diecast-Figures-Toys-Doll/25356507802</a>     | <a href="https://www.ebay.com/usr/cosplay-mall">https://www.ebay.com/usr/cosplay-mall</a>           |
| 16 | dreamworld-0624   | <a href="https://www.ebay.com/itm/Boys-Girls-Thomas-Kids-Cartoon-Short-Sleeve-T-shirt-Tops-Summer-Casual-Costumes/222994705001">https://www.ebay.com/itm/Boys-Girls-Thomas-Kids-Cartoon-Short-Sleeve-T-shirt-Tops-Summer-Casual-Costumes/222994705001</a>   | <a href="https://www.ebay.com/usr/dreamworld-0624">https://www.ebay.com/usr/dreamworld-0624</a>     |
| 17 | flyingtechv       | <a href="https://www.ebay.com/itm/Thomas-and-His-Friends-Wooden-Railway-Train-Toy-Thomas-The-Tank-Engine-Douglas/323027930641">https://www.ebay.com/itm/Thomas-and-His-Friends-Wooden-Railway-Train-Toy-Thomas-The-Tank-Engine-Douglas/323027930641</a>     | <a href="https://www.ebay.com/usr/flyingtechv">https://www.ebay.com/usr/flyingtechv</a>             |
| 18 | frederickwong2000 | <a href="https://www.ebay.com/itm/Fisher-Price-Trackmaster-Thomas-Friends-Motorized-Hank-Rare-Free-Ship/181869242734">https://www.ebay.com/itm/Fisher-Price-Trackmaster-Thomas-Friends-Motorized-Hank-Rare-Free-Ship/181869242734</a>                       | <a href="https://www.ebay.com/usr/frederickwong2000">https://www.ebay.com/usr/frederickwong2000</a> |
| 19 | funfuntimeclub    | <a href="https://www.ebay.com/itm/FISHER-PRICE-TRACKMASTER-Thomas-Friends-Hank-with-Packing/291593982301">https://www.ebay.com/itm/FISHER-PRICE-TRACKMASTER-Thomas-Friends-Hank-with-Packing/291593982301</a>   | <a href="https://www.ebay.com/usr/funfuntimeclub">https://www.ebay.com/usr/funfuntimeclub</a>       |
| 20 | gardenmall        | <a href="https://www.ebay.com/itm/Emily-The-Tank-Engine-Wooden-Magnet-Connet-Railway-Train-Toy-Car-AR/401553796619">https://www.ebay.com/itm/Emily-The-Tank-Engine-Wooden-Magnet-Connet-Railway-Train-Toy-Car-AR/401553796619</a>                           | <a href="https://www.ebay.com/usr/gardenmall">https://www.ebay.com/usr/gardenmall</a>               |
| 21 | gokso9            | <a href="https://www.ebay.com/itm/Kids-Boy-Girl-Thomas-and-Friends-Long-Sleeve-T-shirt-Tops-Round-Neck-Children/322772843712">https://www.ebay.com/itm/Kids-Boy-Girl-Thomas-and-Friends-Long-Sleeve-T-shirt-Tops-Round-Neck-Children/322772843712</a>       | <a href="https://www.ebay.com/usr/gokso9">https://www.ebay.com/usr/gokso9</a>                       |
| 22 | Good_Deal1688     | <a href="https://www.ebay.com/itm/The-Tank-Engine-Tender-Wooden-Magnetic-Railway-Train-Toys-Truck-Car-Kids-Gifts/323419971286">https://www.ebay.com/itm/The-Tank-Engine-Tender-Wooden-Magnetic-Railway-Train-Toys-Truck-Car-Kids-Gifts/323419971286</a>     | <a href="https://www.ebay.com/usr/good_deal1688">https://www.ebay.com/usr/good_deal1688</a>         |
| 23 | guangji203        | <a href="https://www.ebay.com/itm/NEW-Thomas-and-Friends-Plush-Soft-Silky-Flannel-Blanket-Throw-Bedding-Cartoon/132095061391">https://www.ebay.com/itm/NEW-Thomas-and-Friends-Plush-Soft-Silky-Flannel-Blanket-Throw-Bedding-Cartoon/132095061391</a>       | <a href="https://www.ebay.com/usr/guangji203">https://www.ebay.com/usr/guangji203</a>               |
| 24 | havenso           | <a href="https://www.ebay.com/itm/NEW-THOMAS-FRIENDS-TRACKMASTER-BATTERY-MOTORIZED-TOY-TRAIN-PAXTON-HEAD/192191736027">HEAD/192191736027</a>  | <a href="https://www.ebay.com/usr/havenso">https://www.ebay.com/usr/havenso</a>                     |
| 25 | hellowsword       | <a href="https://www.ebay.com/itm/Thomas-Friends-Emily-Magnetic-Wooden-Toy-Train-Model-Loose-New-In-Stock-Gift/183258010959">https://www.ebay.com/itm/Thomas-Friends-Emily-Magnetic-Wooden-Toy-Train-Model-Loose-New-In-Stock-Gift/183258010959</a>         | <a href="https://www.ebay.com/usr/hellosword">https://www.ebay.com/usr/hellosword</a>               |
| 26 | homepage2009      | <a href="https://www.ebay.com/itm/Thomas-and-Friends-THOMAS-BLUE-Pillow-pee-wee-10-Stuffed-doll-NO-TAGS-SALE/272033114708">https://www.ebay.com/itm/Thomas-and-Friends-THOMAS-BLUE-Pillow-pee-wee-10-Stuffed-doll-NO-TAGS-SALE/272033114708</a>             | <a href="https://www.ebay.com/usr/homepage2009">https://www.ebay.com/usr/homepage2009</a>           |
| 27 | hugepower         | <a href="https://www.ebay.com/itm/Wooden-Thomas-Friends-Lady-Magnetic-Toy-Model-Train-Loose-New-In-Stock-Gift/13209958342">https://www.ebay.com/itm/Wooden-Thomas-Friends-Lady-Magnetic-Toy-Model-Train-Loose-New-In-Stock-Gift/13209958342</a>             | <a href="https://www.ebay.com/usr/hugepower">https://www.ebay.com/usr/hugepower</a>                 |
| 28 | jasonstoyss       | <a href="https://www.ebay.com/itm/Thomas-Friends-Sir-Handel-Magnetic-Wooden-Toy-Train-Loose-New-In-Stock/281680798760">https://www.ebay.com/itm/Thomas-Friends-Sir-Handel-Magnetic-Wooden-Toy-Train-Loose-New-In-Stock/281680798760</a>                     | <a href="https://www.ebay.com/usr/jasonstoyss">https://www.ebay.com/usr/jasonstoyss</a>             |
| 29 | judyphil0408      | <a href="https://www.ebay.com/itm/T0182-Thomas-the-tank-engine-and-friends-Motorized-train-DIESEL/142551499923">https://www.ebay.com/itm/T0182-Thomas-the-tank-engine-and-friends-Motorized-train-DIESEL/142551499923</a>                                   | <a href="https://www.ebay.com/usr/judyphil0408">https://www.ebay.com/usr/judyphil0408</a>           |
| 30 | kitty_chen132     | <a href="https://www.ebay.com/itm/Thomas-Friends-Take-N-Play-Metal-Diecast-Elizabeth-Toy-Train-New-Loose/121673598495">https://www.ebay.com/itm/Thomas-Friends-Take-N-Play-Metal-Diecast-Elizabeth-Toy-Train-New-Loose/121673598495</a>                     | <a href="https://www.ebay.com/usr/kitty_chen132">https://www.ebay.com/usr/kitty_chen132</a>         |
| 31 | kongfan12         | <a href="https://www.ebay.com/itm/Thomas-Friends-Wooden-Magnetic-Train-Engine-Railway-Toy-New-Kids-Xmas-Gift/273400839350">https://www.ebay.com/itm/Thomas-Friends-Wooden-Magnetic-Train-Engine-Railway-Toy-New-Kids-Xmas-Gift/273400839350</a>             | <a href="https://www.ebay.com/usr/kongfan12">https://www.ebay.com/usr/kongfan12</a>                 |
| 32 | k-store2015       | <a href="https://www.ebay.com/itm/LOZ-Thomas-and-his-friends-Train-Emily-Mini-Blocks-Diamond-Nano-Building-Toy-2pc/222340768820">https://www.ebay.com/itm/LOZ-Thomas-and-his-friends-Train-Emily-Mini-Blocks-Diamond-Nano-Building-Toy-2pc/222340768820</a> | <a href="https://www.ebay.com/usr/k-store2015">https://www.ebay.com/usr/k-store2015</a>             |
| 33 | la56168616        | <a href="https://www.ebay.com/itm/wooden-toys-thomas-train-Magnetic-thomas-and-friends-Wooden-Model-Train-for-baby/113218816835">https://www.ebay.com/itm/wooden-toys-thomas-train-Magnetic-thomas-and-friends-Wooden-Model-Train-for-baby/113218816835</a> | <a href="https://www.ebay.com/usr/la56168616">https://www.ebay.com/usr/la56168616</a>               |
| 34 | lemon-best2012    | <a href="https://www.ebay.com/itm/Thomas-Friends-Railway-Engine-Tender-Magnetic-Wooden-Toy-Train-Kids-Gift/153021356045">https://www.ebay.com/itm/Thomas-Friends-Railway-Engine-Tender-Magnetic-Wooden-Toy-Train-Kids-Gift/153021356045</a>                 | <a href="https://www.ebay.com/usr/lemon-best2012">https://www.ebay.com/usr/lemon-best2012</a>       |



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| 35 | myhoneypet007               | <a href="https://www.ebay.com/itm/1x-Magnetic-Linked-Toys-3-Thomas-and-Friends-Train-Wooden-Model-Car-Vehicles/391588011432">https://www.ebay.com/itm/1x-Magnetic-Linked-Toys-3-Thomas-and-Friends-Train-Wooden-Model-Car-Vehicles/391588011432</a>         | <a href="https://www.ebay.com/usr/myhoneypet007">https://www.ebay.com/usr/myhoneypet007</a>                             |
| 36 | nicefuture21068             | <a href="https://www.ebay.com/itm/Thomas-And-Friends-Take-n-Play-Diecast-Train-Car-Toys-Action-Figures-Dolls-12pcs/292068134218">https://www.ebay.com/itm/Thomas-And-Friends-Take-n-Play-Diecast-Train-Car-Toys-Action-Figures-Dolls-12pcs/292068134218</a> | <a href="https://www.ebay.com/usr/nicefuture21068">https://www.ebay.com/usr/nicefuture21068</a>                         |
| 37 | nihongint                   | <a href="https://www.ebay.com/itm/Thomas-Friends-Railway-Engine-Tender-Magnetic-Wooden-Toy-Train-Loose-Gift/153129842514">https://www.ebay.com/itm/Thomas-Friends-Railway-Engine-Tender-Magnetic-Wooden-Toy-Train-Loose-Gift/153129842514</a>               | <a href="https://www.ebay.com/usr/nihongint">https://www.ebay.com/usr/nihongint</a>                                     |
| 38 | obd_keep_your_motor_running | <a href="https://www.ebay.com/itm/3pc-Thomas-Friends-Wood-Train-Toy-Magnetic-Wooden-Model-Train-Kids-train-cabin/113128265793">https://www.ebay.com/itm/3pc-Thomas-Friends-Wood-Train-Toy-Magnetic-Wooden-Model-Train-Kids-train-cabin/113128265793</a>     | <a href="https://www.ebay.com/usr/obd_keep_your_motor_running">https://www.ebay.com/usr/obd_keep_your_motor_running</a> |
| 39 | ok_buy_smile                | <a href="https://www.ebay.com/itm/Donald-Magnetic-Thomas-and-Friends-TAKE-N-PLAY-Railway-Die-Cast-Trains-Engines/223134065255">https://www.ebay.com/itm/Donald-Magnetic-Thomas-and-Friends-TAKE-N-PLAY-Railway-Die-Cast-Trains-Engines/223134065255</a>     | <a href="https://www.ebay.com/usr/ok_buy_smile">https://www.ebay.com/usr/ok_buy_smile</a>                               |
| 40 | replystores2015             | <a href="https://www.ebay.com/itm/Thomas-Friends-No-5-James-Magnetic-Wooden-Toy-Train-Model-Loose-New-In-Stock/152959425116">https://www.ebay.com/itm/Thomas-Friends-No-5-James-Magnetic-Wooden-Toy-Train-Model-Loose-New-In-Stock/152959425116</a>         | <a href="https://www.ebay.com/usr/replystores2015">https://www.ebay.com/usr/replystores2015</a>                         |
| 41 | shengquzhan_0               | <a href="https://www.ebay.com/itm/10pcs-Thomas-and-friends-trains-railway-magnetic-diecast-toys-loose-mini-models-/182558683086">https://www.ebay.com/itm/10pcs-Thomas-and-friends-trains-railway-magnetic-diecast-toys-loose-mini-models-/182558683086</a> | <a href="https://www.ebay.com/usr/shengquzhan_0">https://www.ebay.com/usr/shengquzhan_0</a>                             |
| 42 | shineworks606               | <a href="https://www.ebay.com/itm/New-Womens-Men-Beat-Master-Thomas-The-Train-Funny-3D-Print-Casual-T-Shirt-SGC599/282447644916">https://www.ebay.com/itm/New-Womens-Men-Beat-Master-Thomas-The-Train-Funny-3D-Print-Casual-T-Shirt-SGC599/282447644916</a> | <a href="https://www.ebay.com/usr/shineworks606">https://www.ebay.com/usr/shineworks606</a>                             |
| 43 | slebotoy                    | <a href="https://www.ebay.com/itm/LOZ-Thomas-and-his-friends-Train-Thomas-DJY-Nano-Block-Diamond-Mini-Building-Toy/262963456076">https://www.ebay.com/itm/LOZ-Thomas-and-his-friends-Train-Thomas-DJY-Nano-Block-Diamond-Mini-Building-Toy/262963456076</a> | <a href="https://www.ebay.com/usr/slebotoy">https://www.ebay.com/usr/slebotoy</a>                                       |
| 44 | sunnzho_5                   | <a href="https://www.ebay.com/itm/Kids-Boy-Thomas-and-Friends-Cotton-Short-Sleeve-T-shirt-Children-Clothing-4-10T/292034272173">https://www.ebay.com/itm/Kids-Boy-Thomas-and-Friends-Cotton-Short-Sleeve-T-shirt-Children-Clothing-4-10T/292034272173</a>   | <a href="https://www.ebay.com/usr/sunnzho_5">https://www.ebay.com/usr/sunnzho_5</a>                                     |
| 45 | super.ezp                   | <a href="https://www.ebay.com/itm/NEW-The-Tank-Engine-Tender-Wooden-Magnetic-Railway-Train-Toys-Truck-Car-Gifts/192647709721">https://www.ebay.com/itm/NEW-The-Tank-Engine-Tender-Wooden-Magnetic-Railway-Train-Toys-Truck-Car-Gifts/192647709721</a>       | <a href="http://www.ebay.com/usr/super.ezp">http://www.ebay.com/usr/super.ezp</a>                                       |
| 46 | superpatch                  | <a href="https://www.ebay.com/itm/6PC-Thomas-Friends-Patch-Thomas-the-Tank-Engine-Embroidered-Iron-On-Sew-On-New/142810921129">https://www.ebay.com/itm/6PC-Thomas-Friends-Patch-Thomas-the-Tank-Engine-Embroidered-Iron-On-Sew-On-New/142810921129</a>     | <a href="https://www.ebay.com/usr/superpatch">https://www.ebay.com/usr/superpatch</a>                                   |
| 47 | tingting2016                | <a href="https://www.ebay.com/itm/2pcs-Thomas-Friends-Gordon-and-Tender-Set-Magnetic-Wooden-Railway-Train-Toy/253300773381">https://www.ebay.com/itm/2pcs-Thomas-Friends-Gordon-and-Tender-Set-Magnetic-Wooden-Railway-Train-Toy/253300773381</a>           | <a href="https://www.ebay.com/usr/tingting2016">https://www.ebay.com/usr/tingting2016</a>                               |
| 48 | victory.v.v                 | <a href="https://www.ebay.com/itm/Thomas-Friends-Edward-and-Tender-Set-Magnetic-Wooden-Toy-Railway-Train-New/132412710927">https://www.ebay.com/itm/Thomas-Friends-Edward-and-Tender-Set-Magnetic-Wooden-Toy-Railway-Train-New/132412710927</a>             | <a href="https://www.ebay.com/usr/victory.v.v">https://www.ebay.com/usr/victory.v.v</a>                                 |
| 49 | wap198702                   | <a href="https://www.ebay.com/itm/6pcs-set-Thomas-Friends-Train-PVC-Figures-Figurines-Toy-Cake-Topper/322554154128">https://www.ebay.com/itm/6pcs-set-Thomas-Friends-Train-PVC-Figures-Figurines-Toy-Cake-Topper/322554154128</a>                           | <a href="https://www.ebay.com/usr/wap198702">https://www.ebay.com/usr/wap198702</a>                                     |
| 50 | warmsun07                   | <a href="https://www.ebay.com/itm/Colourful-Thomas-Train-Wall-Stickers-Window-Decals-Baby-Kids-Room-Nursery-Decor/253775056586">https://www.ebay.com/itm/Colourful-Thomas-Train-Wall-Stickers-Window-Decals-Baby-Kids-Room-Nursery-Decor/253775056586</a>   | <a href="https://www.ebay.com/usr/warmsun07">https://www.ebay.com/usr/warmsun07</a>                                     |
| 51 | wendingok                   | <a href="https://www.ebay.com/itm/Thomas-Friends-Gordon-Magnetic-Wooden-Train-Toy-Kids-Gift-Loose-New-In-Stock/263231788282">https://www.ebay.com/itm/Thomas-Friends-Gordon-Magnetic-Wooden-Train-Toy-Kids-Gift-Loose-New-In-Stock/263231788282</a>         | <a href="https://www.ebay.com/usr/wendingok">https://www.ebay.com/usr/wendingok</a>                                     |
| 52 | whrmniu.520                 | <a href="https://www.ebay.com/itm/Thomas-The-Tank-Engine-Train-Classic-Stuffed-Soft-Plush-Toy-Doll-Kids-Toy-Gift/381989370599">https://www.ebay.com/itm/Thomas-The-Tank-Engine-Train-Classic-Stuffed-Soft-Plush-Toy-Doll-Kids-Toy-Gift/381989370599</a>     | <a href="https://www.ebay.com/usr/whrmniu.520">https://www.ebay.com/usr/whrmniu.520</a>                                 |
| 53 | xheng513                    | <a href="https://www.ebay.com/itm/Cute-Thomas-and-Friends-Soft-Warm-Silky-Flannel-Blanket-Throw-Bedding-79-x59/301694814132">https://www.ebay.com/itm/Cute-Thomas-and-Friends-Soft-Warm-Silky-Flannel-Blanket-Throw-Bedding-79-x59/301694814132</a>         | <a href="https://www.ebay.com/usr/xheng513">https://www.ebay.com/usr/xheng513</a>                                       |
| 54 | xiannow                     | <a href="https://www.ebay.com/itm/2pcs-Thomas-Friends-Molly-and-Tender-Set-Magnetic-Wooden-Toy-Railway-Train-KF/152935670330">https://www.ebay.com/itm/2pcs-Thomas-Friends-Molly-and-Tender-Set-Magnetic-Wooden-Toy-Railway-Train-KF/152935670330</a>       | <a href="https://www.ebay.com/usr/xiannow">https://www.ebay.com/usr/xiannow</a>   |
| 55 | xintegroup-us               | <a href="https://www.ebay.com/itm/Train-Tomas-Set-Handcrafted-Electric-Toys-Christmas-for-Kids/282754512764">https://www.ebay.com/itm/Train-Tomas-Set-Handcrafted-Electric-Toys-Christmas-for-Kids/282754512764</a>   | <a href="http://www.ebay.com/usr/xintegroup-us">http://www.ebay.com/usr/xintegroup-us</a>                               |
| 56 | yi0133                      | <a href="https://www.ebay.com/itm/Thomas-Friends-Molly-Magnetic-Wooden-Toy-Model-Train-Loose-New-Baby-Gift/253642252634">https://www.ebay.com/itm/Thomas-Friends-Molly-Magnetic-Wooden-Toy-Model-Train-Loose-New-Baby-Gift/253642252634</a>                 | <a href="https://www.ebay.com/usr/yi0133">https://www.ebay.com/usr/yi0133</a>   |
| 57 | yiymylove                   | <a href="https://www.ebay.com/itm/NEW-Thomas-friend-train-trackmaster-Battery-Douglas-and-Donald-/371815029540">https://www.ebay.com/itm/NEW-Thomas-friend-train-trackmaster-Battery-Douglas-and-Donald-/371815029540</a>                                   | <a href="https://www.ebay.com/usr/yiymylove">https://www.ebay.com/usr/yiymylove</a>                                     |
| 58 | zhht369                     | <a href="https://www.ebay.com/itm/6pcs-Lot-Thomas-and-His-Friends-Wooden-Toy-Cartoon-Magnetic-Trains-Model-Great-K/202421149395">https://www.ebay.com/itm/6pcs-Lot-Thomas-and-His-Friends-Wooden-Toy-Cartoon-Magnetic-Trains-Model-Great-K/202421149395</a> | <a href="https://www.ebay.com/usr/zhht369">https://www.ebay.com/usr/zhht369</a>   |
| 59 | zhouxiaolin2010             | <a href="https://www.ebay.com/itm/Thomas-Friends-Variety-Of-Wooden-Magnetic-Tank-Engine-Railway-Train-Toy-Car/361515871826">https://www.ebay.com/itm/Thomas-Friends-Variety-Of-Wooden-Magnetic-Tank-Engine-Railway-Train-Toy-Car/361515871826</a>           | <a href="https://www.ebay.com/usr/zhouxiaolin2010">https://www.ebay.com/usr/zhouxiaolin2010</a>                         |
| 60 | zyeqh0419-8                 | <a href="https://www.ebay.com/itm/New-Boxed-Thomas-friend-trackmaster-battery-train-railway-engine-train-DUNCAN-/252400738077">https://www.ebay.com/itm/New-Boxed-Thomas-friend-trackmaster-battery-train-railway-engine-train-DUNCAN-/252400738077</a>     | <a href="https://www.ebay.com/usr/zyeqh0419-8">https://www.ebay.com/usr/zyeqh0419-8</a>                                 |
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