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May 30, 2025

VIA EMAIL

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Hyper Ice, Inc. and Hyperice IP Subco, LLC v. E Hung Tat International Group Co., Limited d/b/a Jqx-US and Jinyun Lige Technology Co., Ltd. d/b/a Jinyunligekeji*, Case No. 25-cv-3643 (VSB)
Letter Request to Modify and Extend TRO

Dear Judge Broderick,

We represent Plaintiffs Hyper Ice, Inc. and Hyperice IP Subco, LLC (“Plaintiffs”) in the above-referenced action (the “Action”).¹ On May 1, 2025, Plaintiffs filed this Action and their Application under seal. On May 22, 2025, the Court entered an Order granting Plaintiffs’ Application (“TRO”). Plaintiffs respectfully submit the instant letter to request modification of Section II of the TRO, specifically the briefing schedule, including the date of the Show Cause Hearing, since to date, Third Party Service Provider Amazon has failed to comply with the expedited discovery ordered in the TRO, as well as an extension of the TRO.

After receiving the TRO, Plaintiffs immediately served it on the Third Party Service Provider and Financial Institutions, via the methods of alternative service authorized by the TRO. To date, Amazon, has yet to provide Plaintiff with any of the expedited discovery ordered in the TRO, including Defendant’s email address, which is necessary to effectuate the alternative service granted in the TRO. Plaintiffs’ counsel contacted Amazon to request an approximate date for when they can expect to receive the expedited discovery. However, Amazon has yet to respond or provide the expedited discovery ordered in the TRO and/or a date by which Plaintiffs can expect to receive the same. Therefore, Plaintiffs respectfully request that the Court modify the briefing schedule, including the date of the Show Cause Hearing in the TRO, to allow Amazon additional time to review and comply with the directives of the TRO, including producing the expedited discovery, for Plaintiffs to serve Defendant in this Action and

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

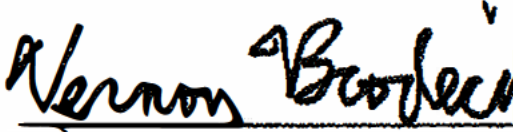
for Defendant to file opposition to Plaintiffs' Application should it wish to do so. This is Plaintiffs' first request for an extension and modification of the briefing schedule and Plaintiffs have not requested the consent of Defendant as it has not been served in the Action yet and the Action remains under seal. Plaintiffs respectfully propose modifying the dates in the TRO as follows:

1. Extending Defendant's deadline to file opposing papers, if any, from May 29, 2025 to June 12, 2025;
2. Extending Plaintiff's deadline to file reply papers, if any, from June 3, 2025 to June 17, 2025; and
3. Rescheduling the Show Cause Hearing from June 5, 2025 at 11:00 a.m. EST to June 18, 2025, June 19, 2025 or at a date and time that is convenient for the Court. As detailed above, since Defendant has not yet been served with the Action, Plaintiffs were unable to seek its consent.

Further, as it currently stands, the TRO is set to expire on Thursday, June 5, 2025, the same day as the Show Cause Hearing. *See* Fed. R. Civ. P. 65(b)(2). Should the Court modify Section II of the TRO, Plaintiff respectfully requests the Court extend the TRO to the new date of the Show Cause Hearing on Plaintiffs' Application.

We thank the Court for its time and consideration.

SO ORDERED:



HON. VERNON S. BRODERICK
UNITED STATES DISTRICT JUDGE

Date: May 30, 2025

Plaintiff's request that I extend the Temporary Restraining Order issued on May 22, 2025 (the "TRO") is granted. *See Loewe, S.A. v. Beijing Onward Fashion Co., Ltd.*, Case No. 24-CV-8871(GHW), Doc. 21 at 2 (S.D.N.Y. Nov. 25, 2024) (extending TRO issued on November 22, 2024 through January 8, 2025). The TRO will remain in effect until June 30, 2025 pending the hearing and determination of Plaintiffs' Application for a preliminary injunction.

The hearing date and related briefing schedule are modified as follows: The hearing established in Section II.A of the Order is adjourned to June 30, 2025 at 3 p.m. The deadline for the submission of oppositions set forth in Section II.B of the Order is extended to June 20, 2025. The deadline for the submission of any reply papers set forth in Section II.B of the Order is extended to June 26, 2025. All other provisions of the TRO remain in full force and effect. Plaintiff's request to extend the sealing of this case is granted. Plaintiff's Complaint and exhibits attached thereto, and Plaintiff's ex parte Application and all declarations in support thereof and exhibits attached thereto, and this Order shall remain sealed until June 30, 2025. Any application to extend the period during which those documents remain under seal must be submitted to the Court in writing no later than June 26, 2025. Plaintiffs are hereby ordered to serve this order on Defendants.