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August 15, 2025

VIA E-MAIL

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

Defendants' time to file opposition papers is extended to September 2, 2025. Time for reply is extended to September 5, 2025. The Show Cause Hearing is adjourned to September 8, 2025 at 11:00 a.m., to take place in Courtroom 14D. The TRO is extended until September 8, 2025.

SO ORDERED.

8.15.25 /s/ Alvin K. Hellerstein

**Re: *POP MART Americas Inc., et al. v. Angel Toy Store Store, et al.*,
Case No. 25-cv-6629
Request to Modify and Extend TRO**

Dear Judge Hellerstein,

We represent Plaintiffs POP MART Americas Inc. (“POP MART Americas”), POP MART (Singapore) Holding Pte. Ltd. (“POP MART Singapore”) and Beijing POP MART Cultural & Creative Co., Ltd. (“POP MART Beijing”) (“Plaintiffs”) in the above-referenced matter (the “Action”).¹ On August 12, 2025, Plaintiffs filed this Action and their Application under seal. On the same day, August 12, 2025, the Court granted Plaintiffs’ Application and entered the Temporary Restraining Order (“TRO”). For the reasons set forth herein, Plaintiffs respectfully request modification of Section II of the TRO, specifically the briefing schedule, including the date of the Show Cause Hearing, since to date, Alibaba and AliExpress have failed to comply with the expedited discovery ordered in the TRO.

After receiving the TRO, Plaintiffs immediately served it on the Third Party Service Providers and Financial Institutions, including Alibaba and AliExpress, via the methods of alternative service authorized by the TRO. Alibaba and AliExpress, however, have yet to provide Plaintiffs with the expedited discovery ordered in the TRO, including Defendants’ email addresses, which are necessary to effectuate the alternative service granted in the TRO. As the TRO currently stands, the Defendants’ deadline to file opposition to Plaintiffs’ Application is August 18, 2025, therefore, Plaintiffs would need to serve Defendants by today, August 15, 2025, for them to have had sufficient time to oppose the TRO should they wish to do so. However, given our recent experience with Alibaba and AliExpress, as discussed in the Turitto Dec., it has taken the Alibaba and AliExpress platforms a minimum of three (3) weeks to provide Epstein Drangel with the expedited discovery ordered in the TRO. Further, Plaintiffs contacted both Alibaba and AliExpress to request an approximate date for when they can expect to receive the expedited discovery, and as of the date of this letter, have only received a response from Alibaba who said more time was needed to comply with the TRO. Therefore, Plaintiffs respectfully

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

request that the Court modify the briefing schedule, including the date of the Show Cause Hearing in the TRO to allow Alibaba and AliExpress additional time to review and comply with the directives of the TRO, including producing the expedited discovery, for Plaintiffs to serve Defendants in this Action and for Defendants to file opposition to Plaintiffs' Application should they wish to do so.

Plaintiffs respectfully propose amending the briefing schedule in the TRO as follows:

1. Extending Defendants' deadline to file opposing papers, if any, from August 18, 2025 to September 2, 2025;
2. Extending Plaintiffs' deadline to file reply papers, if any, from August 21, 2025 to September 5, 2025; and
3. Rescheduling the Show Cause Hearing from August 22, 2025 to September 5, 2025, September 8, 2025 or September 9, 2025, or a date and time that is convenient for the Court.

Further, as it currently stands, the TRO is set to expire on August 26, 2025. *See* Fed. R. Civ. P. 65(b)(2). Should the Court modify Section II of the TRO, Plaintiffs respectfully request 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 attention to this matter.

Respectfully submitted,

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