

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 16-cv-61752-Dimitrouleas/Snow

VENUS FASHION, INC.,

Plaintiff,

vs.

CHANGCHUN CHENGJI TECHNOLOGY  
CO., LTD.  
AUKEY INTERNATIONAL LIMITED, and  
AUKEY E-BUSINESS CO., LTD.,

Defendants.

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**Plaintiff's Motion to Unseal**

Plaintiff, Venus Fashion, Inc. ("Venus"), by and through its undersigned counsel, hereby moves this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket. As grounds therefore, Plaintiff states as follows:

1. On July 22, 2016, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction and Order Restraining Transfer of Assets (the "Application for Temporary Restraining Order") [DE 5]. Plaintiff's Application for Temporary Restraining Order and supporting documents were filed under seal to prevent Defendants from receiving notice of Plaintiff's investigation into the operation of their illegal businesses.

2. On July 26, 2016, this Court entered a sealed Order [DE 7] granting Plaintiff's Application for Temporary Restraining Order.

3. On August 12, 2016, this Court entered a sealed Amended Order [DE 14] granting Plaintiff's Application for Temporary Restraining Order and scheduling a hearing in Case 0:16-cv-61752-WPD in connection with Plaintiff's Motion for Preliminary Injunction.

Upon receipt of the Temporary Restraining Order, Plaintiff served the Temporary Restraining Order on Paypal to restrain Defendants' financial accounts at issue as authorized by the Court's Order.

4. On August 22, 2016, Plaintiff served Defendants with the Temporary Restraining Order together with all other documents filed in this case.

5. As a seal on this matter is no longer required, Plaintiff respectfully requests this matter be unsealed and the portions of the docket relating to Plaintiff's Application for Temporary Restraining Order, together with all other documents that have been restricted/sealed from the Court docket, be returned to the public portion of the Court file.

WHEREFORE, Plaintiff, Venus Fashion, Inc., respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted/sealed from the Court docket, and direct the Clerk to return those portions of the Court file to the public records.

Dated: September 14, 2016

Respectfully submitted,

By: /s/ Peter A. Chiabotti  
David Otero  
Florida Bar No. 651370  
AKERMAN LLP  
50 N. Laura Street, Suite 3100  
Jacksonville, FL 32202  
Telephone: (904) 798-3700  
Facsimile: (904) 798-3730  
Email: david.otero@akerman.com

Peter A. Chiabotti  
Florida Bar No. 0602671  
peter.chiabotti@akerman.com  
777 South Flagler Drive  
Suite 1100, West Tower  
West Palm Beach, FL 33401  
Telephone: (561) 653-5000  
Facsimile: (561) 659-6313

Trial Counsel

Allan Gabriel  
*Admitted Pro Hac Vice*  
Dykema Gossett PLLC  
333 South Grand Avenue  
Suite 2100  
Los Angeles, CA 90071  
Telephone: 213-457-1800  
Facsimile: 213-457-1850  
agabriel@dykema.com

Aaron D. Charfoos  
*Admitted Pro Hac Vice*  
Dykema Gossett PLLC  
10 S. Wacker Drive  
Suite 2300  
Chicago, IL 60606  
Telephone: (312) 876-1700  
Facsimile: (312) 876-1155  
acharfoos@dykema.com

*Attorneys for Plaintiff Venus Fashion, Inc.*

**Certificate Of Service**

I hereby certify that on September 14, 2016, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system and that a true and correct copy of the foregoing was served this September 14, 2016 by transmission of Notices of Electronic Filing generated by CM/ECF or via e-mail to all parties on the attached Service List. I also certify that a true copy of the foregoing was served on September 14, 2016 upon Defendants via electronic mail at the e-mail addresses [service@vessos.com](mailto:service@vessos.com), [digital.store072010@gmail.com](mailto:digital.store072010@gmail.com), [tongwenping@aukeys.com](mailto:tongwenping@aukeys.com), and [domain@aukeys.com](mailto:domain@aukeys.com), and by posting copies of the same at [www.venuscopyrightenforcement.com/vessos/](http://www.venuscopyrightenforcement.com/vessos/). I also certify also certify that a true copy of the foregoing was served on September 14, 2016 upon Sophie Jiang of Ziliak Law, LLC, who indicated Ziliak Law, LLC represents Defendants although no attorney has made an appearance on behalf of Defendants, via electronic mail at [sjiang@ziliak.com](mailto:sjiang@ziliak.com).

/s/Peter A. Chiabotti \_\_\_\_\_  
Peter A. Chiabotti

**Service List**

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| <p><b>Attorneys For Plaintiff</b><br/>Allan Gabriel<br/>Dykema Gossett PLLC<br/>333 South Grand Avenue, Suite 2100<br/>Los Angeles, CA 90071<br/>Telephone: 213-457-1800<br/>Facsimile: 213-457-1850<br/><a href="mailto:agabriel@dykema.com">agabriel@dykema.com</a></p> <p>Aaron D. Charfoos<br/>Dykema Gossett PLLC<br/>10 S. Wacker Drive, Suite 2300<br/>Chicago, IL 60606<br/>Telephone: (312) 876-1700<br/>Facsimile: (312) 876-1155<br/><a href="mailto:acharfoos@dykema.com">acharfoos@dykema.com</a></p> | <p><b>Attorneys For Plaintiff</b><br/>David Otero<br/>Florida Bar No. 651370<br/>Akerman LLP<br/>50 N. Laura Street, Suite 3100<br/>Jacksonville, FL 32202<br/>Telephone: (904) 798-3700<br/>Facsimile: (904) 798-3730<br/><a href="mailto:david.otero@akerman.com">david.otero@akerman.com</a></p> <p>Peter A. Chiabotti<br/>Florida Bar No. 0602671<br/>Akerman LLP<br/>777 South Flagler Drive<br/>Suite 1100, West Tower<br/>West Palm Beach, FL 33401<br/>Telephone: (561) 653-5000<br/>Facsimile: (561) 659-6313<br/><a href="mailto:peter.chiabotti@akerman.com">peter.chiabotti@akerman.com</a></p> |
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