

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

TINGTING CHEN,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, and
UNINCORPORATED ASSOCIATES
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No: 25-cv-11949

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Tingting Chen (“Plaintiff”), by and through her undersigned counsel, brings this action against the Partnerships and Unincorporated Associations identified in Appendix A hereto (collectively, “Defendants”), and alleges as follows:

INTRODUCTION

1. Plaintiff is the owner of U.S. Copyright Registration No. VAu001534208 (the “Chen Works”), which protect her original mahjong pattern illustrations. Plaintiff created these patterns as expressions of her unique creativity, and they have become associated with her online business, giving consumers a distinctive commercial impression. A true and correct copy of the copyright registration is attached hereto as Exhibit A.

2. Plaintiff brings this action to combat online copyright infringers who trade upon her reputation, goodwill, and valuable copyrights by selling products derived from and incorporating unauthorized copies of the Chen Works.

3. Defendants operate unauthorized online stores that market and sell infringing products. In an effort to profit from the Chen Works, Defendants have established numerous Internet Stores designed to appear as legitimate sellers of Plaintiff's products.

4. The Defendants Internet Stores share common identifiers, including design elements and similarities in their infringing product offerings, establishing a logical relationship between them and suggesting that their illegal operations arise out of the same series of transactions or occurrences. Defendants actively conceal their identities and the full scope of their operations to evade accountability.

5. Plaintiff has been and continues to be irreparably harmed by Defendants' infringement through loss of control over her creative works, damage to reputation and goodwill, diminished quality control, and loss of licensing opportunities. Plaintiff seeks both injunctive and monetary relief to prevent further harm.

6. Plaintiff initially pursued non-judicial remedies by filing copyright complaints with Amazon, resulting in removal of infringing listings. Defendants responded by submitting counter-notices, which required Plaintiff to file suit to prevent reinstatement. True and correct copies of the complaints and counter-notices are attached as Exhibits B and C (filed under seal).

7. Plaintiff therefore brings this lawsuit to prevent reinstatement and to stop Defendants' ongoing infringement.

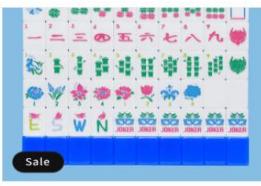
The Plaintiff

8. Plaintiff is a citizen of China and operates an online business selling mahjong products incorporating her original mahjong pattern illustrations. Examples of Plaintiff's products are shown below.

HOME SHOP MAHJONG TILES SET MAHJONG BAG



American Mah Jongg Tiles – with 3 dice, 100 money chips, 1 wind indicator, a carry bag
\$350.00 USD \$219.79 USD



American Mahjong Tile Set(Blue) with Carrying Bag and Accessories, 160 Acrylic Engraved Mahjong Tiles
\$190.00 USD \$169.79 USD



American Mahjong Tiles – with 3 dice, 100 money chips, 1 wind indicator, a carry bag
\$350.00 USD \$217.79 USD



American Mahjongg Tiles – with 3 dice, 100 money chips, 1 wind indicator, a carry bag
\$279.79 USD \$199.79 USD



American Mahjongg Tiles – with 3 dice, 100 money chips, 1 wind indicator, a carry bag
\$350.00 USD \$217.79 USD



Blank Mah Jongg Tiles Set, 32 Pieces, Replace Lost Standard Sized American Mahjongg Tiles & Can Be Used Together with Mahjongg Stickers (Stickers Not Included)
\$49.99 USD \$31.99 USD



Mahjong Tile Patterns
\$179.79 USD \$160.79 USD



Set of American Mahjongg Tiles, 166 Quality Acrylic Mahjongg Tiles with Blue Prints(1.2",Tiles Only Set)
\$129.79 USD \$96.79 USD

9. Plaintiff is the owner of United States Copyright Registration No. VAu001534208,

which covers the Chen Works. The registration is valid, subsisting, and in full force and effect. See Ex A.

10. In an effort to unlawfully profit from the Chen Works, Defendants have created numerous Defendant Internet Stores and designed them to appear as legitimate sellers of Plaintiff's products. It appears Defendants design their storefronts to mislead consumers into believing they are purchasing genuine products from authorized retailers, outlets, or wholesalers.

11. Plaintiff has invested substantial time, money, and creative effort in building consumer awareness, goodwill, and recognition in the Chen Works. The commercial success of Plaintiff's mahjong products is due in large part to her marketing, promotional, and distribution efforts.

12. Plaintiff has taken active steps to protect her rights, including monitoring online infringement, filing takedown complaints (see Ex. B), and responding to counter-notices (see Ex.

C). No one other than Plaintiff and her authorized licensees is permitted to manufacture, import, export, advertise, create derivative works, offer for sale, or sell goods utilizing the Chen Works without Plaintiff's express written permission.

Defendants and Their Unlawful Conduct

14. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within Illinois and this Judicial District, through the operation of fully interactive commercial websites and online marketplaces operating under the Defendant Internet Stores. Each Defendant targets the United States, including Illinois, and has offered to sell, and on information and belief has sold, products bearing unauthorized copies of the Chen Works to consumers within the United States, including Illinois and this Judicial District. Plaintiff confirmed an offer and sale of an infringing product for shipment into Illinois.

15. The Chen Works are original works of authorship and constitute copyrightable subject matter under 17 U.S.C. § 101 et seq.

16. At all relevant times, Plaintiff has held the exclusive rights in the Chen Works, including the rights of reproduction, distribution, and the preparation of derivative works. The Chen Works are the subject of a valid Copyright Registration Certificate issued by the Register of Copyrights (see Ex. A).

17. Without Plaintiff's authorization or consent, each Defendant has manufactured, marketed, distributed, and sold unauthorized products incorporating pirated copies or derivative versions of the Chen Works. Defendants' conduct infringes Plaintiff's exclusive rights under the Copyright Act, 17 U.S.C. § 101 et seq.

18. As a direct result of Defendants' infringement, Plaintiff is entitled to statutory damages under 17 U.S.C. § 504, as well as attorneys' fees and costs under 17 U.S.C. § 505.

19. The unlawful conduct of Defendants is causing, and unless enjoined will continue to cause, Plaintiff irreparable harm that cannot be fully remedied or measured in monetary damages alone. Plaintiff therefore has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiff is entitled to injunctive relief prohibiting further infringement of the Chen Works and ordering Defendants to deliver up for destruction all unauthorized copies and derivative works.

JURISDICTION AND VENUE

20. This Court has original subject matter jurisdiction over the claims in this action pursuant to the Federal Copyright Act, 17 U.S.C. § 101 et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

21. Venue is proper in this District under 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants. Each Defendant directly targets consumers in the United States, including Illinois, through at least one fully interactive commercial online store operating under the Defendant Internet Stores identified in Appendix A (filed under seal).

22. Defendants reach into Illinois to conduct business by operating commercial, interactive Internet Stores through which Illinois residents can purchase products bearing unauthorized copies of Plaintiff's copyrighted works. Plaintiff has confirmed this by successfully purchasing an infringing product from a Defendant Internet Store, demonstrating Defendants capability to ship infringing goods into Illinois.

23. Each Defendant targets Illinois residents by offering products for shipment to the United States, including Illinois, accepting payment in U.S. dollars, and, on information and belief,

completing transactions with Illinois consumers. Defendants are committing tortious acts in Illinois, engaging in interstate commerce, and causing substantial injury to Plaintiff in this District.

24. Additionally, Federal Rule of Civil Procedure 4(k)(2) provides a basis for personal jurisdiction because Plaintiff's claims arise under federal law, Defendants are not subject to jurisdiction in the courts of general jurisdiction of any one state, and exercising jurisdiction is consistent with the Constitution and laws of the United States.

COUNT I
COPYRIGHT INFRINGEMENT
(17 U.S.C. § 101 et seq.)

25. Plaintiff realleges and incorporates by reference Paragraphs 1 through 24 as if fully set forth herein.

26. Plaintiff avers that the Chen Works are original works of authorship and constitute copyrightable subject matter under the laws of the United States, 17 U.S.C. § 101 et seq.

27. Plaintiff further avers that she is the owner of U.S. Copyright Registration No. VAu001534208 covering the Chen Works, which is valid, subsisting, and in full force and effect (see Ex. A).

28. Plaintiff avers that Defendants, without authorization or consent, have intentionally copied, reproduced, distributed, displayed, and offered for sale products incorporating unauthorized copies or derivative versions of the Chen Works through the Defendant Internet Stores.

29. Plaintiff avers that Defendants' conduct infringes her exclusive rights under 17 U.S.C. § 106, including the rights of reproduction, distribution, and the preparation of derivative works.

30. Plaintiff avers that Defendants have deliberately and willfully engaged in infringing acts as part of a calculated scheme to copy and exploit the Chen Works, misappropriate Plaintiff's goodwill, and profit by distributing unauthorized products in direct competition with Plaintiff's business.

31. Plaintiff avers that, as a result of Defendants' infringement, she has suffered and will continue to suffer irreparable harm, including loss of control over her creative works, damage to reputation and goodwill, diversion of sales, diminished licensing opportunities, and market confusion, and that she has no adequate remedy at law.

32. As a result, pursuant to 17 U.S.C. § 502, Plaintiff is entitled to a permanent injunction enjoining Defendants, their officers, agents, servants, employees, and all persons acting in concert with them, from further infringing her rights in the Chen Works.

33. As a result, pursuant to 17 U.S.C. § 503, Plaintiff is entitled to an order requiring Defendants to deliver up for destruction all infringing products, packaging, advertisements, and any other materials in their possession or control that reproduce, display, or otherwise infringe the Chen Works.

34. As a result, pursuant to 17 U.S.C. § 504, Plaintiff is entitled to recover statutory damages of up to \$150,000 per infringed work, or actual damages and Defendants' profits, whichever is greater.

35. As a result, pursuant to 17 U.S.C. § 505, Plaintiff is entitled to recover her reasonable attorneys' fees and costs incurred in connection with this action.

COUNT II
FALSE DESIGNATION OF ORIGIN / UNFAIR COMPETITION
(15 U.S.C. § 1125(a))

36. Plaintiff realleges and incorporates by reference Paragraphs 1 through 35 as if fully set forth herein.

37. Plaintiff avers that she is the creator of original mahjong pattern illustrations embodied in the Chen Works and the owner of U.S. Copyright Registration No. VAu001534208 (see Ex. A). Plaintiff further avers that, through her online business, these designs have become distinctive and are associated by consumers with Plaintiff as their source.

38. Plaintiff avers that Defendants, without authorization, have used reproductions and imitations of Plaintiff's mahjong designs in connection with the advertising, promotion, distribution, and sale of their products through the Defendant Internet Stores, including listings on Amazon.

39. Plaintiff avers that Defendants' use of Plaintiff's designs in product listings is likely to cause consumer confusion, mistake, or deception as to the affiliation, connection, or association of Defendants with Plaintiff, or as to the origin, sponsorship, or approval of Defendants' products by Plaintiff.

40. Plaintiff avers that Defendants have deliberately and willfully adopted and used Plaintiff's designs in their product listings and advertising as part of a calculated scheme to misappropriate Plaintiff's goodwill, confuse consumers as to the source and sponsorship of Defendants' products, and divert sales from Plaintiff to themselves by unfairly competing in the marketplace.

41. Plaintiff avers that Defendants' conduct constitutes false designation of origin and unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

42. Plaintiff avers that she has suffered and will continue to suffer irreparable harm as a result of Defendants' conduct, including loss of control over her reputation and designs, damage to goodwill, diversion of sales, and consumer confusion, and that she has no adequate remedy at law.

43. As a result, pursuant, Plaintiff is entitled to injunctive relief under 15 U.S.C. § 1116, damages under 15 U.S.C. § 1117, and such other relief as the Court deems just and proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment against Defendants as follows:

1. That Defendants, their affiliates, officers, agents, employees, attorneys, and all persons acting in concert with them be temporarily, preliminarily, and permanently enjoined from:
 - a. Using the Chen Works, or any reproduction, copy, or colorable imitation thereof, in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not an authorized Chen product;
 - b. Passing off, inducing, or enabling others to pass off products not produced under Plaintiff's authorization, control, or supervision as genuine Chen products;
 - c. Further infringing the Chen Works or otherwise damaging Plaintiff's goodwill;
 - d. Shipping, delivering, holding for sale, transferring, storing, distributing, returning, or otherwise disposing of products or inventory that are not authorized by Plaintiff and that reproduce or are derived from the Chen Works; and

- e. Using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Internet Stores, or any other online marketplace account, that is used to sell unauthorized products derived from the Chen Works.
2. That judgment be entered in favor of Plaintiff and against Defendants declaring that:
 - a. Defendants have willfully infringed Plaintiff's rights in the Chen Works under 17 U.S.C. § 501; and
 - b. Defendants' acts and conduct, as set forth in this Complaint, have injured Plaintiff's business reputation and goodwill.
3. That Plaintiff be awarded either:
 - a. Actual damages and Defendants' profits; or
 - b. Statutory damages pursuant to 17 U.S.C. § 504, in an amount to be determined at trial.
4. That Plaintiff be awarded her reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505.
5. That the Court award such other and further relief as it deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all issues so triable.

Dated: September 29, 2025

Respectfully submitted,

/s/Alexander Warden
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New York NY, 10018
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Attorney for Plaintiff,
Tingting Chen

VERIFICATION

I, Tingting Chen, declare as follows:

I am the Plaintiff in the above-captioned action. I have read the foregoing Complaint and know the contents thereof. The facts alleged therein are true and correct to the best of my knowledge, information, and belief, formed after a reasonable inquiry. I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 29 day of September, 2025, at Jiaxing, Zhejiang Province, People's Republic of China.

Tingting Chen
Tingting Chen

Plaintiff