

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

CELINE SA,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 1:24-cv-06208

District Judge Robert W. Gettleman

Magistrate Judge Jeffrey Cole

**PLAINTIFF’S *EX PARTE*
MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court’s inherent power to effectuate its own orders, Plaintiff moves to extend the Sealed Temporary Restraining Order entered by the Court on September 10, 2024 (the “TRO”) (Dkt. 24) for a period of fourteen (14) days until September 24, 2024.

1. On September 10, 2024, this Court entered the TRO against the Defendants identified on Schedule A to the Complaint. (*Id.*) As of September 17, 2024, the third parties described in the TRO have received the TRO but have not completed effectuating the TRO by identifying and freezing all of the Defendants’ payment accounts. (Declaration of John Haarlow, Jr. at ¶ 2, filed herewith.)

2. Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2).

3. There is good cause to extend the TRO because there is a high probability that the Defendants will continue to harm Plaintiff without the TRO in place by moving assets contained in the payment accounts of third parties to offshore bank accounts unreachable by the Court and Plaintiff. As discussed in Plaintiff's Memorandum in Support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order, and as found by the Court in granting the TRO, this possibility of harm is significant.

4. Accordingly, the good cause standard of Rule 65(b)(2) is satisfied and the Court should extend the TRO.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order extending the TRO for a period of fourteen (14) days until October 8, 2024 and granting Plaintiff such other and further relief as is just in the circumstances.

Dated September 17, 2024.

Respectfully submitted,

/s/ John Haarlow, Jr.

Counsel for Plaintiff Celine, SA

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