

**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. 24-cv-09199

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Celine SA (“Celine”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which lists the aliases used by Defendants to operate their e-commerce stores (the “Seller Aliases”); and (2) Exhibit 2 to the Declaration of Nicolas Lambert, an attachment to Celine’s forthcoming motion for an *ex parte* temporary restraining order, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases.

In this action, Celine is requesting an *ex parte* temporary restraining order and other relief based on an action for trademark infringement, counterfeiting, and false designation of origin. Sealing these documents is necessary to prevent the Defendants from learning of these proceedings prior to the Court issuing a temporary restraining order and Celine taking steps to effectuate that order by working with online service providers to prevent Defendants from continuing to sell counterfeit Celine products and to freeze Defendants’ online payment accounts. If Defendants learned of these proceedings prematurely, they would likely destroy relevant evidence and hide or transfer their assets, which would frustrate the purpose of this lawsuit and interfere with this

Court's power to grant relief. Once Celine has effectuated enforcement of the temporary restraining order with the online service providers, Celine will move to unseal these documents.

Dated September 30, 2024.

Respectfully submitted,

/s/ John Haarlow, Jr.

Counsel for Plaintiff Celine SA
John Haarlow, Jr. (ARDC #6283018)
MERCER OAK LLC
29 North Ada Street
Chicago, IL 60607
(872) 248-0601
john@merceroaklaw.com