

**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-11115

District Judge            Edmond E. Chang  
Magistrate Judge        Gabriel A. Fuentes

**PLAINTIFF’S SUPPLEMENTAL MEMORANDUM REGARDING JOINDER  
OF DEFENDANTS ON AMENDED SCHEDULE A**

Plaintiff Celine, SA, pursuant to the Court’s January 30, 2025 Minute Entry [Dkt. 24], submits the following supplemental memorandum establishing that joinder of the eleven (11) Defendants located on Amended Schedule A is proper.

As set forth in *Bose Corp. v. P’ships & Unincorporated Ass’ns Identified on Schedule “A”*, 334 F.R.D. 511 (N.D. Ill. 2020), joinder is appropriate when a plaintiff “has made strong allegations that defendants are...violating a trademark with impunity.” It is further irrelevant at the pleading stage whether a swarm of counterfeiters “is intentionally coordinated or simply a product of market forces enabled by the internet.” *Id.* at 517.

The WeChat account referred to in Paragraph 5 of the Declaration of Dilpreet Aujila [Dkt. 20]<sup>1</sup> was used to collect evidence that links all the remaining defendants, not just the one mentioned in Paragraph 8. The WeChat account actively disseminated these links through its feed. As of the filing of this Supplemental Memorandum, Plaintiff is not able to access the applicable

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<sup>1</sup> Celine filed the Aujla Declaration and associated evidence files under seal.

WeChat link but will provide the Court with additional information upon receipt from Nomadic, the software company responsible for gathering evidence of counterfeiting, if available.

While the WeChat link is currently not accessible to Plaintiff, screenshots of all the online listings of the remaining Defendants listed in Amended Schedule A and attached as Exhibit 1 to the Declaration of Dilpreet Aujila [Dkt. 20] demonstrate that Defendants 002, 008, 009 and 030 all use the same photographic background and white box and/or same color wood floor to advertise the same pair of counterfeit Celine sandals in various colors. Defendants 033 and 034 both include the same photograph of their “factories, logistics and office” on their DHgate storefronts.

The images of Defendant’s storefronts combined with the evidence set forth in the Declaration of Dilpreet Aujila verify a relationship amongst the counterfeiting Defendants on Amended Schedule A (002, 005, 008, 009, 023, 028, 030, 031, 033, 044, 065). Further, as none of these Defendants have appeared, none of them would be prejudiced by permitting joinder in this case. *See Bose Corp.*, 334 F.R.D. at 517 (holding that defendants who do not appear will not be prejudiced by permitting joinder as a court may always sever an objecting defendant that appears and raises defenses). Thus, joinder of the Amended Schedule A Defendants is appropriate in this matter.

Dated February 13, 2025.

Respectfully submitted,

/s/ Lindsay E. Dansdill

Counsel for Plaintiff Celine SA

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