

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN DOE,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A",

Defendants.

No. 1:21-cv-1702

Hon. Joan B. Gottschall

Mag. Susan E. Cox

SEALED TEMPORARY RESTRAINING ORDER

THIS CAUSE being before the court on Plaintiff's Renewed *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery (the "*Ex Parte* Motion") against the defendants identified on Schedule A to the Amended Complaint and attached hereto (collectively, the "Defendants") and the online marketplace accounts identified in Schedule A (the "Online Marketplace Accounts"), and this court having considered the evidence before it hereby GRANTS Plaintiff's *Ex Parte* Motion in its entirety.

This court further finds that it has personal jurisdiction over the Defendants since the Defendants directly target or knowingly assist in targeting Illinois consumers through their knowing participation in the advertising, offers to sell, and offering shipments of products bearing the GLIDER CAPO mark to Illinois consumers, including in in this Judicial District. Specifically, Defendants are reaching out to do business with Illinois residents by operating or knowingly participating in the operation of one or more commercial, interactive Internet Stores through which

Illinois residents can purchase products bearing Plaintiff's registered trademark, but which products are not made or authorized by Plaintiff.

This court further finds there is good cause for issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure because Plaintiff has presented specific facts through evidence and exhibits that clearly establish immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants will likely modify Online Store data and content, change hosts, redirect traffic to other stores and websites in their control, move any assets from accounts in U.S.-based financial institutions to offshore accounts, and otherwise evade this court and attempt to escape all legal accountability. As other courts have recognized, proceedings against those who deliberately traffic in counterfeit merchandise are often useless if notice is given to the adverse party. Accordingly, this court orders that:

1. Within five (5) business days of receipt of this Order, Defendants and all those in active concert or participation with Defendants shall take the following actions:

- a. all listings and advertisements used by or associated with Defendants listed in Schedule A in connection with the sale of goods using Plaintiff's GLIDER CAPO trademark shall be disabled;
- b. Defendants' Online Marketplace Account(s) shall be restrained and enjoined from transferring, liquidating, converting, encumbering, pledging, loaning, selling, concealing, dissipating, disbursing, assigning, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any money or other assets owned or controlled by Defendants until further ordered by this court; and

- c. all funds and assets controlled by Defendants shall be restrained and enjoined and not transferred or surrendered for any purpose without the express authorization of the court.

2. Within five (5) business days after receipt of actual notice of this Order, Defendants and all those in active concert or participation with Defendants shall provide to Plaintiff expedited discovery, including copies of documents and records, relating to:

- a. a full accounting of the monthly sales revenue for Defendants' Online Marketplace Account(s), as well as a full accounting, on a month-by-month basis, of the amount of funds transferred in and out of the Online Marketplace Account(s);
- b. an accounting of the total funds restrained in each financial/payment processing account controlled by or associated with Defendants;
- c. the full list of names, addresses, email addresses, and IP addresses, of each person who registered, are listed in, logged into, used, or who otherwise handled or is associated with the stores and associated financial/payment processing accounts of the Defendants; and
- d. the full list of stores and associated financial/payment processing accounts opened, operated by, or at any time used by the Defendants.

3. Plaintiff may provide Notice of this Order to Defendants and all those in active concert or participation with Defendants through electronic mail, U.S. First Class Mail, or by private process server.

4. Plaintiff may provide notice of the anticipated preliminary injunction motion and associated hearing by electronically publishing a link to this Order, and other relevant documents,

**JOHN DOE v. THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A"**

Schedule A

Doe #	Marketplace	Seller Name	Seller ID (199)	Product ID
1	Alibaba	Alwaysfaith International Trade Co., Ltd. (Huizhou)	alwaysfaith	62311586569
2	Alibaba	Shenzhen Wanweisi Technology Co., Ltd.	cn1537969831rbao	1600179580861
3	Alibaba	Shenzhen Grand Exploits Technology Co., Ltd.	cnget	60422070562
4	Alibaba	Huizhou Zhuoyun Technology Co., Ltd.	hzzhuoyun	62225630481
4	Alibaba	Huizhou Zhuoyun Technology Co., Ltd.	hzzhuoyun	62225652039
4	Alibaba	Huizhou Zhuoyun Technology Co., Ltd.	hzzhuoyun	62227560325
5	Alibaba	Shenzhen Jouyar Technology Co., Ltd.	jouyar	62236625531
6	Alibaba	Shenzhen Musicalcase Technology Co., Ltd.	musicalcase	1600089435396
7	Alibaba	Shenzhen Swiff Technology Co., Ltd.	szruifu	1600111280522
8	Aliexpress	Magical Rhyme Store	225170	1005001639880050
9	Aliexpress	Outdoor on the road Dropshipping store	427106	4001085818363
10	Aliexpress	LiteTech	633860	33036798973
11	Aliexpress	powerest seller	710505	32995428627
11	Aliexpress	Powerest seller	710505	32994721433
12	Aliexpress	Seventh chord Musical instrument accessories store	728625	32809646730
13	Aliexpress	happyeasybuy01	732974	1005002111378570
14	Aliexpress	MUSIC ONE STORE	1081435	32453553263
15	Aliexpress	Buying store	1171640	33024755117
16	Aliexpress	Sportsdiary	1189855	4000848775514
17	Aliexpress	Bob Music Store	1243586	32679293161
18	Aliexpress	Bluenight Outdoors Store	1329146	4000959999172
19	Aliexpress	Fashion boom	1484150	33038473714
20	Aliexpress	BoBo Chou Store	1713033	32886467256

21	Aliexpress	WY Outdoor Sporting Store	1742026	32832409115
22	Aliexpress	HLF Store	1862356	32948012626
23	Aliexpress	miracle store	1873556	1005002218040730
24	Aliexpress	Archaeus Store	1895620	4001156993357
25	Aliexpress	Sports Club+	1984375	33034620195
26	Aliexpress	Buy4fun	1996340	33038469737
27	Aliexpress	ammoon officail store	2010021	33029900906
28	Aliexpress	Fun Sunday Shop	2163014	32965443357
29	Aliexpress	Outdoors	2341017	4000294823368
29	Aliexpress	Outdoors	2341017	4001103478586
30	Aliexpress	Music HuHu Store	2802200	33038836598
31	Aliexpress	Fun Outdoor Store	2931036	4001251830787
32	Aliexpress	Workout Funny Store	2964112	32963961079
33	Aliexpress	Sound Of Music Store	3000081	33034261506
34	Aliexpress	Trendy Music Store	3097022	33020477169
35	Aliexpress	Funny Musicly Store	3115003	33024751261
35	Aliexpress	Funny Musicly Store	3115003	33029920024
36	Aliexpress	Sikiwind Outdoor Store Store	3518006	4000849702455
37	Aliexpress	Ali-Outdoor Discount Store	3578007	4001041921258
38	Aliexpress	Outdoor Product Hyid Store	3864095	1005001976495170
39	Aliexpress	FunnyRock Store	3892020	32971899165
40	Aliexpress	Ourdoor Fun Store	4083001	1005001894312000
41	Aliexpress	ASD2018 Store	4396020	33033028944
42	Aliexpress	SyMusic Store	4430006	32890841648
43	Aliexpress	Sportin Outdoors Store	4523014	4000780618963
44	Aliexpress	Loving Traveling Store	4582020	32969950633
45	Aliexpress	Outdoor Companion Store	4651171	4001275252472
46	Aliexpress	Outdoor Drop-Shipping Store	4757017	1005001368048280
47	Aliexpress	YANG Outdoor Store	4766022	4000300086528
48	Aliexpress	Sportswear Dropshipping Store	4795017	1005001744305580
49	Aliexpress	Tsurumi Outdoor Store	4821028	4000224914841
50	Aliexpress	YTKYQ Music Store	4855015	4000989896230
51	Aliexpress	FunBuy Music Store	4882022	4001331426056
52	Aliexpress	Outdoor Workout Funny Store	4915084	1005002198461220

53	Aliexpress	Outdoor Workout Tools Store	4919099	1005002198428320
54	Aliexpress	Hypaethral store	4927056	1005002050806270
55	Aliexpress	Muslady Official Store	4935025	32999483403
55	Aliexpress	Muslady Official Store	4935025	33042831110
56	Aliexpress	LemonBest MuMu Outdoor Store	4988249	4000970811069
57	Aliexpress	CoCoo Outdoor&Sporting Store	4988501	4000853247673
58	Aliexpress	BestOutdoor Store	4993350	1005001495938880
59	Aliexpress	GETMUSIC STORE	5003381	33044491271
60	Aliexpress	Guitar Life Store	5007197	33036822032
61	Aliexpress	NUNU Outdoor Store	5009374	4000971439960
62	Aliexpress	Cindy Music instrument Store	5021118	4000042139638
63	Aliexpress	Green J Store	5041116	4000907182717
64	Aliexpress	Ahri Outdoor Store Store	5043028	4000971501359
65	Aliexpress	Deigo Outdoor Store Store	5043030	4000907215254
66	Aliexpress	Sprting Box Store	5060125	4000971468790
67	Aliexpress	Outdoor & Motion Store	5067223	33064143515
68	Aliexpress	Parkii Store	5070170	4000036654348
69	Aliexpress	Music sorcerer Store	5073199	4000064644321
70	Aliexpress	Quality music Store	5077167	4000056062207
70	Aliexpress	Quality music Store	5077167	4000056383811
71	Aliexpress	Keep-Running Store	5098098	4000688633743
72	Aliexpress	KUWORUN Store	5106071	4000300173148
73	Aliexpress	Co Co On Outdoor Store	5142081	4000853217985
74	Aliexpress	Leia Outdoor Store	5142088	4000970712955
75	Aliexpress	Ailsa Outdoor Store	5147050	4000970708918
76	Aliexpress	Playing Music Store	5220023	4000114635050
77	Aliexpress	SH Cycling Store	5220040	1005002232217430
78	Aliexpress	Shop5244320 Store	5244320	4000907218136
79	Aliexpress	Music Zone Store	5247143	4000144796586
79	Aliexpress	Music Zone Store	5247143	4000144816326
80	Aliexpress	ALLMUSIC Store	5249093	4000133863773
81	Aliexpress	Soundly Music Store	5254126	4000154070558
82	Aliexpress	Shop5278007 Store	5278007	1005002058224290
83	Aliexpress	Deportes healthy Store	5361042	4000217076598
84	Aliexpress	Topleader Sport-s Store	5420255	1005002096438480
85	Aliexpress	ProOutdoor Store	5424246	1005002129778690

86	Aliexpress	diposlong Happiness Ear Music Store	5487019	10000181729439
87	Aliexpress	Doudi Life Store	5596592	4001162672711
88	Aliexpress	YN07 Store	5614252	4001160618838
89	Aliexpress	Inherited Store	5623186	4000970763318
90	Aliexpress	Outreach Fitness Store	5785689	4001305068900
91	Aliexpress	Optimism&positivity Store	5787621	4001150285547
92	Aliexpress	Huge HG Store	5873308	1005001929151080
93	Aliexpress	Miaoyin Music Store	5877965	4001240024501
94	Aliexpress	Shop5881356 Store	5881356	1005002033490590
95	Aliexpress	Life is Movement Go Go Go Store	5883742	4001189648226
96	Aliexpress	Camping & Fishing Store	5889808	1005002117228640
97	Aliexpress	Nansandian Store	5972409	1005002126008850
98	Aliexpress	Music Fan Club Store	910318048	1005002140353440
99	Aliexpress	Shop910320038 Store	910320038	1005002233936180
100	Aliexpress	Hey Jude Music Store	910325117	1005001661901210
101	Aliexpress	Sporting Good Store	910334294	1005001308415180
102	Aliexpress	MISSI Store	910338322	1005002212604060
103	Aliexpress	Leafsheep Fitness & Outdoor Store	910426021	1005001840744470
104	Aliexpress	Shop910443284 Store	910443284	1005001858595370
105	Aliexpress	Ninepcent Sport-s Store	910448042	1005002241604810
106	Aliexpress	Go Fun Outdoor Store	910561237	1005001643269240
107	Aliexpress	Soul-muse Store	910891005	1005001632072580
108	Aliexpress	Always-On The Way Store	910915007	1005001638269140
109	Aliexpress	Exercise Life Store	911057083	1005001867691680
110	Aliexpress	Here Outdoor Store	911062055	1005001741211480
111	Aliexpress	Shop911229026 Store	911229026	1005001867324910
112	Aliexpress	Out Funny Store	911229188	1005001936571730
113	Aliexpress	Cycling TC Store	911417587	1005002198095700
114	Aliexpress	Shop911607534 Store	911607534	1005002233271530
115	Amazon	QbtYZhXn	A1626LN12GDDJ	B08RS9MYRN
116	Amazon	kinghee	A1ADDR70FPYK7E	B07VPG9TX5
117	Amazon	MiBeiDianZiKeJi	A1FDX9VZLV7QJ8	B07RGHQGZF
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B08RBV9347
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B08SBP3RY4

118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B0829WV3L1
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B0824Z1GSL
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B0824Z1GSL
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B0829WV3L1
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B08RBV9347
118	Amazon	dahaiguoji	A1XQSHL9O5HLA K	B08SBP3RY4
119	Amazon	lianheshengshi	A27VIGOFFNBM1O	B08R9XX2V3
120	Amazon	YZLSM	A3I0SY5UYW2BX M	B08RBNBKS7
120	Amazon	YZLSM	A3I0SY5UYW2BX M	B08RBNBKS7
121	Amazon	XURI7652	A3JNYHZG00IDB B	B07ZM7XJ65
122	Amazon	qweqweqdcsadqwd	A3KMU8LN0USKG F	B08TQZD24V
122	Amazon	qweqweqdcsadqwd	A3KMU8LN0USKG F	B08TQZD24V
123	Amazon	Buildinp	ACB5TK597JTI0	B08QHCHLK3
124	Amazon	HAOHAOUS STORE	ACG04E05ZXW3C	B08BG2BFSM
125	Amazon	QiJuQuan	AO12O06BAR384	B08QHC4D9D
126	DHgate	Egetmart	19853086	534116483
127	eBay	1st.4u	1st.4u	333892393265
128	eBay	1st.vzu	1st.vzu	113940907670
128	eBay	1st.vzu	1st.vzu	113940907670
128	eBay	1st.vzu	1st.vzu	113940907670
129	eBay	3dayandnight	3dayandnight	164324174315
129	eBay	3dayandnight	3dayandnight	133484815361
129	eBay	3dayandnight	3dayandnight	164324174315
129	eBay	3dayandnight	3dayandnight	133484815361
130	eBay	abala.coco	abala.coco	333883933601
131	eBay	acwholesaler	acwholesaler	174366714845
132	eBay	ainiss_84	ainiss_84	363168402309
132	eBay	ainiss_84	ainiss_84	363168402309
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132	eBay	ainiss_84	ainiss_84	363168402309

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133	eBay	animallov	animallov	392857611741
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
134	eBay	anmas15	anmas15	254185923012
135	eBay	balamer	balamer	353365481500
135	eBay	balamer	balamer	353366499689
136	eBay	base-life	base-life	203254417303
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
137	eBay	beige-moon	beige-moon	224307189333
138	eBay	best-wishing	best-wishing	393112233721
139	eBay	cleanto	cleanto	392208254515
140	eBay	dand_3778	dand_3778	383942319821
140	eBay	dand_3778	dand_3778	383942319821
140	eBay	dand_3778	dand_3778	383942319821
141	eBay	dgchongyan	dgchongyan	274551453518
141	eBay	dgchongyan	dgchongyan	284106781759
141	eBay	dgchongyan	dgchongyan	274551456275
141	eBay	dgchongyan	dgchongyan	274604400587
141	eBay	dgchongyan	dgchongyan	274605252767
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141	eBay	dgchongyan	dgchongyan	284059750546
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141	eBay	dgchongyan	dgchongyan	284006670822
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141	eBay	dgchongyan	dgchongyan	284059752181
141	eBay	dgchongyan	dgchongyan	284059748688
142	eBay	elektroniklieben66	elektroniklieben66	393011461877
142	eBay	elektroniklieben66	elektroniklieben66	393011461877

143	eBay	flowersgrass	flowersgrass	333709550504
144	eBay	gelivable.2u	gelivable.2u	293483328783
144	eBay	gelivable.2u	gelivable.2u	293483328783
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145	eBay	good_item7	good_item7	323362626921
146	eBay	gracefulvara	gracefulvara	254803759531
147	eBay	haisea007	haisea007	402661385044
148	eBay	hea1985	hea1985	114671816072
149	eBay	hk_5009	hk_5009	333887644439
149	eBay	hk_5009	hk_5009	333887644439
149	eBay	hk_5009	hk_5009	333887644439
150	eBay	iklq_55	iklq_55	124560729297
150	eBay	iklq_55	iklq_55	124560729297
151	eBay	kvvhome09	kvvhome09	202913162771
152	eBay	lalang-love-diy	lalang-love-diy	203035441640
153	eBay	laptopallfor87	laptopallfor87	323941815559
154	eBay	liansmile	liansmile	265039733120
155	eBay	linjoy11	linjoy11	383581867742
156	eBay	manshop3	manshop3	324126027738
157	eBay	me-1652	me-1652	313333007304
158	eBay	motherlan9148	motherlan9148	353363849864
159	eBay	musicinstrument-us	musicinstrument-us	202921071782
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159	eBay	musicinstrument-us	musicinstrument-us	202921071782
159	eBay	musicinstrument-us	musicinstrument-us	202921071782
159	eBay	musicinstrument-us	musicinstrument-us	202921071782
160	eBay	newcj2016-7	newcj2016-7	174621541486
160	eBay	newcj2016-7	newcj2016-7	174621541486
160	eBay	newcj2016-7	newcj2016-7	174621541486
160	eBay	newcj2016-7	newcj2016-7	174621541486
161	eBay	newgaga	newgaga	133650666349
162	eBay	outdoormall19	outdoormall19	402137837650
162	eBay	outdoormall19	outdoormall19	402137837650
162	eBay	outdoormall19	outdoormall19	402137837650
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163	eBay	quickkway	quickkway	372681690253

163	eBay	quicckway	quicckway	373132221069
164	eBay	rearrange518	rearrange518	233847932209
164	eBay	rearrange518	rearrange518	233847932209
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165	eBay	relaxtree	relaxtree	324456535831
166	eBay	seaboltd2013	seaboltd2013	351774906844
166	eBay	seaboltd2013	seaboltd2013	351774906844
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167	eBay	shan901	shan901	153347082422
168	eBay	shanghai123456	shanghai123456	124557303661
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169	eBay	shibaynu	shibaynu	264766515520
170	eBay	silentmusic16	silentmusic16	232609865290
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170	eBay	silentmusic16	silentmusic16	232609865290
171	eBay	silver-stars	silver-stars	353375535545
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171	eBay	silver-stars	silver-stars	353375535545
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172	eBay	smitter01	smitter01	143838510908
172	eBay	smitter01	smitter01	274448963668
173	eBay	stevenmoore99	stevenmoore99	392261373392
174	eBay	sunstarfford	sunstarfford	184010543962
174	eBay	sunstarfford	sunstarfford	184010543962
175	eBay	supermarket8882016	supermarket8882016	313396665357

176	eBay	tdcq888	tdcq888	284155600650
177	eBay	time.ing	time.ing	254427798281
178	eBay	topkoo	topkoo	203248178892
178	eBay	topkoo	topkoo	203248178892
179	eBay	twozyyd	twozyyd	284172990337
179	eBay	twozyyd	twozyyd	284172990337
180	eBay	urukzone	urukzone	402429376171
181	eBay	xovo1894	xovo1894	264981774317
182	eBay	xuanxi_4437	xuanxi_4437	402681042808
182	eBay	xuanxi_4437	xuanxi_4437	402681042808
182	eBay	xuanxi_4437	xuanxi_4437	402681042808
183	Etsy	GGITEMSShop	GGITEMSShop	939588068
184	Joom	James	15061569201296545 40-143-3-709- 2790169109	5dd913bc28fc71010 1a9294e
185	Joom	okdealsne32	15078607122649734 84-159-3-26193- 3655226888	5dca92736ecda8010 1a3dfcc
186	Joom	Crazy sports	5bff7cd6ecda80301 9f3bea	5ccd306228fc71010 1f6c058
187	Joom	Grocery Products	5cd37ee38b2c370301 2d65ed	5cded7308b4513010 10e4a49
188	Shopify	Hymax Company Ltd	givewatch.com	glider-guitar-capo--- buy-2-free-shipping- worldwide
189	Shopify	Marul Company Ltd	mailoutroom.com	glider-guitar-capo- slide-electric- classic-acoustic- guitar-bass-ukulele
190	Shopify	Maisyjasmine	maisyjasmine.com	glide-n-strum- rolling-guitar-capo
191	Wish	Electryjorge	5e44e0e9ddbcbe3b70 b3e99c	5fb5e084f90ec537b 77da3a8
192	Wish	KOZEYSDOTCOM	5f40ec733d6cd0e002 6dd5c7	5f4e420fe499f30c91 f49ae4
193	Wish	Anavillgu	5f63d0ab8f31d9575a d399ff	5fb5e08b6755c91e0 01c0787
194	Wish	davidShopTaco	5f8aea967d0a10a8d3 966d97	5fb5e091d6fa5d005 28d0b09
195	Wish	Brexidux	5fa140fcb03263e2e9 937fec	600ef7b8cdb579004 2afc28c
195	Wish	Brexidux	5fa140fcb03263e2e9 937fec	600eb9567f11df005 0e897a1

196	Wish	SB1B1295	5fab14fddf43003dd9f084f3	5fb3ff8ff86c5938b3f6406a
196	Wish	SB1B1295	5fab14fddf43003dd9f084f3	5fb53a08390968e3c57ee680
197	Wish	Wikiti	5fc359aa10cec61eee6733cf	600eb87786f59f0f11a49b71
198	Wish	Spherecords	5fe4d3d705f7720f908f23ca	600ef5bb06f8e50048436424
198	Wish	Spherecords	5fe4d3d705f7720f908f23ca	600eb63315b671004336fed5
199	Wish	Uogurity	5fe4d4ebcd47690f1212783b	600ef7fd9498017e4ccd5198
199	Wish	Uogurity	5fe4d4ebcd47690f1212783b	600eb6775faacfc229066872