

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Bartley Forbes v. Jingjingwang, et al.

Forbes · No. 2:25-cv-01494 · Decided December 19, 2025

SUMMARY

This preliminary injunction order grants continuing injunctive relief in a copyright infringement action brought by Bartley Forbes against Jingjing Wang and other defendants. The order restrains the defendants from using the plaintiff's copyrighted works, preserves and freezes specified assets and online marketplace accounts, authorizes discovery, and imposes related obligations on third-party service providers and financial institutions. The court found that the plaintiff was likely to prevail, would suffer irreparable harm absent relief, and had posted a \$5,000 bond.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Cathy Bissoon
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	December 19, 2025
DOCKET	2:25-cv-01494
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought an ex parte temporary restraining order, asset and merchant-storefront restraints, an order to show cause concerning a preliminary injunction, expedited discovery, and alternative service. After prior temporary restraining and alternative-service orders, the court held a show-cause hearing and entered this preliminary injunction order.
STANDARD OF REVIEW	Preliminary-injunction factors: likelihood of success on the merits, likelihood of immediate and irreparable harm, balance of harms, and the public interest.
PRECEDENTIAL VALUE	unpublished district-court interlocutory order; nonprecedential
PARTIES	Bartley Forbes v. Jingjingwang, et al.

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QUESTIONS PRESENTED

1. Whether plaintiff satisfied the requirements for a preliminary injunction against defendants' alleged copyright infringement.
2. Whether the court had authority under Pennsylvania law, Federal Rule of Civil Procedure 64, and the Copyright Act to restrain defendants' assets before judgment.
3. What injunctive, asset-restraint, expedited-discovery, and preservation measures were warranted to prevent continuing infringement and preserve potential monetary and equitable relief.

HOLDINGS

1. A preliminary injunction was warranted because plaintiff demonstrated a likelihood of success on the copyright claims, likely immediate and irreparable harm, that the balance of harms favored plaintiff, and that the public interest favored protecting consumers and plaintiff's intellectual-property interests.
2. The court had authority to impose a prejudgment asset restraint because plaintiff sought monetary relief under the Copyright Act and equitable relief, and the restraint was necessary to preserve potential recovery and partial satisfaction of a judgment.
3. Defendants and persons acting in concert with them who had notice of the order were prohibited from using, distributing, selling, transferring, concealing, or otherwise dealing with plaintiff's copyrighted works and specified related assets, accounts, storefronts, and records during the pendency of the litigation or until further order.

KEY QUOTATIONS

“Courts have repeatedly held that an infringing party acts at its own peril and issuing a preliminary injunction is simply requiring the infringing party to cease doing what it had no right to do initially.” (Finding 8)

“the injunctive relief previously granted on November 12 and November 19, 2025, shall remain in place through the pendency of this litigation” (Order I.A)

“the \$5,000.00 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this PI Order is terminated.” (Order III)

FACTUAL BACKGROUND

Plaintiff owns copyrighted artwork and alleged that defendants used unauthorized copies and constituent elements of the artwork to advertise, offer, and sell virtually indistinguishable knock-off products through online marketplaces including Amazon, Temu, and Walmart. The court found that the alleged infringement threatened

plaintiff's sales, profits, goodwill, control over creative content, and ability to license the copyrights. Defendants did not contest the requested preliminary injunction.

PROCEDURAL HISTORY

Plaintiff filed an action asserting copyright-related claims against defendants allegedly selling infringing products through online marketplaces. The court entered temporary restraining, asset-restraint, expedited-discovery, and alternative-service orders on November 12 and November 19, 2025. Defendants were served but filed no responses and did not appear at the December 10, 2025 show-cause hearing; the court then continued the restraints and entered a preliminary injunction.

DISPOSITION

other

CASES CITED

- Phillip Morris USA Inc. v. Bros. Grocery Corp., 2014 U.S. Dist. LEXIS 112274, at *13 (E.D.N.Y. 2014)
- New York City Triathlon, LLC v. NYC Triathlon Club, Inc., 704 F. Supp. 2d 305, 344 (S.D.N.Y. 2010)
- Warner Bros. Entm't, Inc. v. WTV Sys., 824 F. Supp. 2d 1003, 1014-15 (C.D. Cal. 2011)
- Concrete Mach. Co. v. Classic Lawn Ornaments, Inc., 843 F.2d 600, 612 (1st Cir. 1988)
- Helene Curtis Industries v. Church & Dwight Co., Inc., 560 F.2d 1325, 1333 (7th Cir. 1977)