

**FILED**

OCT 16 2018

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AIRIGAN SOLUTIONS, LLC,

Plaintiff,

v.

BUFUJUGAN, *et al.*,

Defendants.

Civil Action No. 18-1330

(Judge Fischer)

**FILED UNDER SEAL**

**DECLARATION OF JENNIFER LINEBERRY  
IN SUPPORT OF PLAINTIFF'S *EX PARTE* MOTION TO  
AMEND TEMPORARY RESTRAINING ORDER**

I, Jennifer Lineberry, declare and state as follows:

1. I am over 18 years of age, and I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiff's *Ex Parte* Motion to Amend Temporary Restraining Order ("Motion"). If called upon to do so, I could and would competently testify to the following facts set forth below.

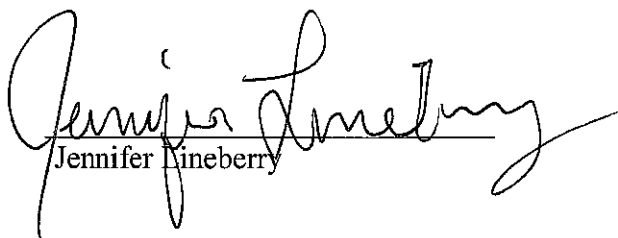
2. Prior to filing this Declaration, I accessed through Amazon.com, the Merchant Storefronts operating under the seller identities as identified on **Amended Schedule "A"** hereto (the "Seller IDs") and which were not identified on **Schedule "A"** attached to my previous Declaration ("the newly added Defendants"). Upon accessing each of the Merchant Storefronts<sup>1</sup>,

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<sup>1</sup> As defined in Plaintiff's *Ex Parte* Application filed October 5, 2018, a "Merchant Storefront" is any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in products, including Counterfeit Products, which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them.

I was able to view products using Airigan Solutions LLC's trademarks or infringing on their patent claims, add products to the online shopping cart, proceed to a point of checkout, and otherwise actively exchange data with each Merchant Storefront. I specified a shipping address located in Pennsylvania ("the Pennsylvania Address") and verified that each Defendant provides shipping to the Pennsylvania Address. For certain of the newly added Defendants, I then placed an order via each Merchant Storefront operating under the Seller IDs for the purchase of various products – all using counterfeits and infringements of at least one of Airigan Solution's trademarks at issue in this action, and requested each product to be shipped to my firm's address in Sewickley, Pennsylvania. Each of my orders was processed entirely online and following the submission of my orders, I finalized payment for each of the various products. At the conclusion of the process, I captured and downloaded the detailed web page screen shots reflecting each product I ordered, together with photographs of the received items, or verification of shipping to the Pennsylvania Address. These were sent to Margaret Tyler, President and CEO of Airigan Solutions LLC. True and correct copies of the web pages I captured and downloaded showing the various products I purchased or verified via newly added Defendants' Seller IDs, together with redacted copies of the order summary web pages, order and shipping confirmation, and photographs of each shipping envelope and product received, are attached hereto as **Composite Exhibit 2**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed the 15th day of October, 2018, at Sewickley, Pennsylvania.

  
Jennifer Dineberry