

FILED

MAY 02 2019

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

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

AIRIGAN SOLUTIONS, LLC,

Plaintiff,

Civil Action No. 19-503

v.

ABAGAIL, *et al.*,

Defendants.

FILED UNDER SEAL

**DECLARATION OF AMY CLINE
IN SUPPORT OF PLAINTIFF'S *EX PARTE* APPLICATION FOR ENTRY OF
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Amy Cline, 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* Application for Entry of Temporary Restraining Order and Preliminary Injunction ("Application"). 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 **Schedule "A"** hereto (the "Seller IDs"). Upon accessing each of the Merchant Storefronts¹, 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

¹ As defined in the Application, 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.

