

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

DOGGIE DENTAL INC, *et al.*,

Plaintiffs,

v.

ANYWILL, *et al.*,

Defendants.

Civil Action No.

19-682

(Judge Hornak)

**DECLARATION OF BRIAN SAMUEL MALKIN
IN SUPPORT OF MOTION FOR ENTRY OF
DEFAULT JUDGMENT AND PERMANENT INJUNCTION**

I, Brian Samuel Malkin, hereby affirm as follows:

1. I am over eighteen (18) years of age and not a party to this action. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to attest to the matters stated herein. I have personal knowledge of every statement made in this Certificate of Service and such statements are true and correct.

2. I am an attorney with the law firm of Ference & Associates LLC, which is located at 409 Broad Street, Pittsburgh, Pennsylvania 15143.

3. I am an attorney for the Plaintiffs Peter Dertsakyan and Doggie Dental, Inc. in the above-captioned case.

4. I make and submit this Supplemental Declaration in support of Plaintiffs' Motion for Default Judgment and Permanent Injunction (hereinafter "Motion for Default Judgment") against those Defendants for whom the Clerk has entered Default (the "Defendants").

6. **Supplemental Exhibit 1** is a chart of evidence I prepared for calculating damages against the identified defendants based upon their infringing use of Plaintiff's copyrighted images. The chart includes citations to the evidence of record by ECF No. and page numbers. In some rows, there are more pages numbers than copyrighted photos identified. This is because the online platform item display page uses a rolling view of photos and for purposes of collecting evidence, each of the photos was rolled over to get a larger version from the rolling display. For further clarification, behind the Chart are copies of color photographs that were captured when all the evidence for this case was gathered. Each color photograph is at least one example of an infringing use of the Plaintiff's copyrighted photographs. There is a coversheet in front of each set of color photographs that indicates which Defendant's online storefront the photographs were being used.

7. **Supplemental Exhibit 2** is a chart indicating the total amount of funds in each Defendant's account at the time the restraints were placed in accordance with the Court's temporary restraining order. This information was provided to Plaintiff by the Third Party Service Provider or the Financial Institution served with the Court's temporary restraining order.

8. The Defendants were served with Requests for Admissions which they failed to answer and are now deemed admitted. These admissions included that they each sold more than 150,000 units of the infringing product.

9. Based upon my personal experiences with these online counterfeiting cases, China based sellers, such as Defaulting Defendants, sell into the United States across multiple e-commerce platforms and do not limit their sales to one e-commerce platform.

10. Examples of such other e-commerce platforms include Alibaba.com, AliExpress.com, DHgate.com, and Wish.com.

I declare under the penalty of perjury laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed this 15th day of June, 2020, at Pittsburgh, Pennsylvania.

/s/ Brian Samuel Malkin
Brian Samuel Malkin

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2020, the foregoing document is being filed via the Case Management/Electronic Case Filing (CM/ECF) system; I also certify that on the same day, a true copy of the foregoing is being served in accordance with the Order Authorizing Alternate Service.

/s/ Brian Samuel Malkin
Brian Samuel Malkin

**SUPPLEMENTAL
EXHIBIT 1**

Defendant No.	Store Name	Total Copyrighted Works Used	ECF No. 15, Page Numbers:	x\$ 150,000.00=
1	Anywill	2	5,8,9	\$300,000.00
2	AHuShi	2	14, 17	\$300,000.00
4	Ale's Store	1	29	\$150,000.00
5	AMZself	1	35	\$150,000.00
9	Aya-Chic	1	65	\$150,000.00
13	Big Elephant	1	92	\$150,000.00
14	BYBELLA	1	99	\$150,000.00
16	De Lon	1	114	\$150,000.00
18	E.L. Solutions	1	125	\$150,000.00
19	Ecolines	1	132	\$150,000.00
20	Elegant kiss	1	140	\$150,000.00
21	Extechnico	2	147, 149	\$300,000.00
22	FairyMe	1	155	\$150,000.00
25	Fangchal	1	175	\$150,000.00
28	horseshoe1	3	196	\$450,000.00
31	J & T Jordan	2	217, 219	\$300,000.00
32	JackPack Labs	2	224	\$300,000.00
33	JESSEPOUNDS	1	231	\$150,000.00
37	Lagita	1	252	\$150,000.00
38	LAROSA MEDICAL	1	265	\$150,000.00
40	LONESON	1	278	\$150,000.00
43	MayMeyz	1	298	\$150,000.00
44	NF Merchandise	1	304	\$150,000.00
46	NO. 1 Online	1	317	\$150,000.00
47	NOTTODAY	2	324	\$300,000.00
53	Quorum Value	1	366	\$150,000.00
56	Ruitx Store	1	388, 390	\$150,000.00
57	Samatoo	1	395, 398	\$150,000.00
59	Shuofeng	3	411, 413, 415	\$450,000.00
61	Smvison	1	426, 429	\$150,000.00
63	Taylor(USA)	1	443	\$150,000.00
64	TOBABYFAT	1	449, 451	\$150,000.00
65	UPBASICN	1	456, 458	\$150,000.00
66	Vanuoda	2	463, 465, 466	\$300,000.00
68	VST Group	2	478, 481, 482	\$300,000.00
69	WINNUO	1	487, 490	\$150,000.00
72	Yu Xingchen	1	517, 519	\$150,000.00

73	Yuntech	1	509	\$150,000.00
76	zUOKIJU	1	538, 540	\$150,000.00
81	CANIKLINE MALL	1	570	\$150,000.00

Color Copies of Infringing Photos

Seller Display Name
Anywill

Seller ID
A1KGXS6694KK0F



2 Infringing Works

Seller Display Name
AHuShi

Seller ID
AWX8XMIYVF7QQ



2 Infringing Works

Seller Display Name
Ale's Store

Seller ID
A28FLU0ZJO0Q51

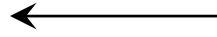
Molars Firm Tooth,
Remove the Odor of the Mouth



1 Infringing Work

Seller Display Name
AMZself

Seller ID
A2LTKBZ1LUKGD2



1 Infringing Work

Seller Display Name
Aya-Chic

Seller ID
AV58HO4Y4YG5

1 Infringing Work

Seller Display Name
Big Elephant

Seller ID
A3AZJ9TNMIEGD

1 Infringing Work

Seller Display Name
BYBELLA

Seller ID
A3N4X0QAELZ7CQ



1 Infringing Work

Seller Display Name
De Lon

Seller ID
A2H9OA2IB881NB



1 Infringing Work

Seller Display Name
E.L. Solutions

Seller ID
A3CNAJSCZDB917

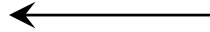
HOW TOOTHBRUSH WORKS?



Stabilizing Paw Pads
To allow easy holding for your dogs

Meat Flavored Throughout
To promote chewing & increase palatability

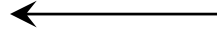
2 Sided Bristle Line Grooves
Clean dogs's teeth down to the gum line



1 Infringing Work

Seller Display Name
Ecolines

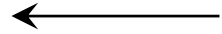
Seller ID
A2VOPXI5HC2XXG



1 Infringing Work

Seller Display Name
Elegant Kiss

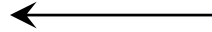
Seller ID
AX9B8JO3UEO1U



1 Infringing Work

Seller Display Name
Elegant Kiss

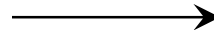
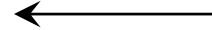
Seller ID
AX9B8JO3UEO1U



Seller Display Name
Extechnico

Seller ID
A20NZHTNL4PTXD

How do we care dog



2 Infringing Works

Seller Display Name
FairyMe

Seller ID
A3T80QRV3HCEL5



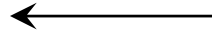
Seller Display Name
Fangchal

Seller ID
A396YX0HT6M56V



Easy to grasp

Long ball brush can let the dog in the play while cleaning in the mouth of food particles can reach the effect of the brush.



Seller Display Name
Horseshoe1

Seller ID
A327N0M7NMJD7R



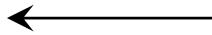
The two photos in the left column are infringing

3 Infringing Works



Seller Display Name
J & T Jordan

Seller ID
A33AHOWEC4JYNC



2 Infringing Works

Seller Display Name
JackPack Labs

Seller ID
A69BPJ5B9WCCL



The two photos in the
left column are
infringing

2 Infringing Works

Seller Display Name
JESSEPOUNDS

Seller ID
AEMFZDZF1ZXNE

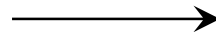
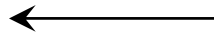
CHARACTERISTICS	DENTAL TREATS & STICKS	DOG TOOTHBRUSHES	CHEW TOYS	PROFESSIONAL VET CLEANING
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ionsee

Small
0-25 lbs

ORAL DISEASE
Also known as Gingivitis



2 Infringing Works

Seller Display Name
Lagita

Seller ID
A2MQTDAKKSEDXZ



1 Infringing Work

Seller Display Name
Larosa Medical

Seller ID
A2PB7QKWA4H0S8



1 Infringing Work

Seller Display Name
LONESON

Seller ID
A1M8E9D3R6YQVS

Fit 0-50 LBs, Small and Medium Dogs



1 Infringing Work

19-682

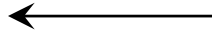
45

Seller Display Name
MayMez

Seller ID
A2A5FZ04CXTTC6



Molars Firm Tooth,
Remove the Odor of the Mouth



1 Infringing Work

Seller Display Name
NF Merchandise

Seller ID
A3JSCT3L9HWKV8



1 Infringing Work

Seller Display Name
NO. 1 Online

Seller ID
A2G5XJ2AQC9U9S

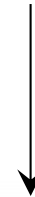
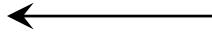
1 Infringing Work

19-682

51

Seller Display Name
NOTTODAY

Seller ID
A3S88F4ORA904G



Big Dog's Favorite



Big Dog
20-80+lbs



German Shepherd



Labrador Retriever



Golden Retriever



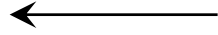
Bulldog



2 Infringing Works

Seller Display Name
Quorum Value

Seller ID
ANS8B7J9GNA2W



1 Infringing Work

Seller Display Name
Ruitx Store

Seller ID
A2RLONNTW8MLTW



USAGE METHOD

1. Squeeze dog toothpaste on the groove of toothbrush.

2. Give it to your baby dog to chew under your supervision, 3-5 minutes each time.

3. If your dog has no interest in this dog tooth brush at first, you can squeeze some peanut butter, coconut oil or other dogs like to eat into the stick hole.



Seller Display Name
Samatoo

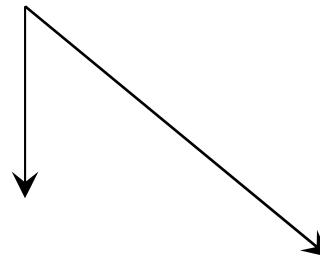
Seller ID
A3VD0VF1UXFDQ4



1 Infringing Work

Seller Display Name
Shuofeng

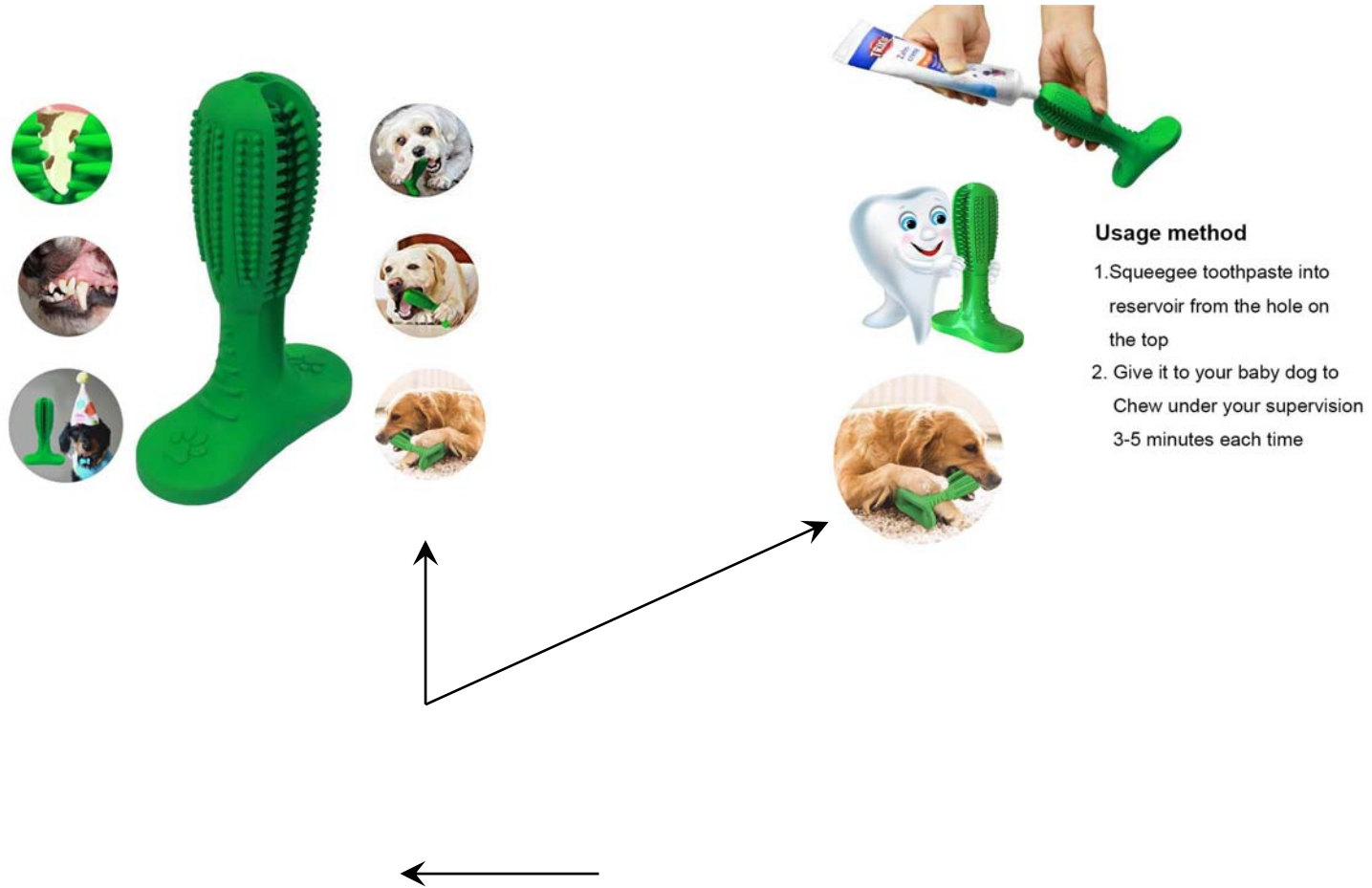
Seller ID
A252ISGGD173I1



3 Infringing Works

Seller Display Name
Smvison

Seller ID
A1I0A6TETBVBZI



3 Infringing Works

Seller Display Name
Taylor(USA)

Seller ID
A36XVP1BD7NYRM



1 Infringing Works

19-682

65

Seller Display Name
TOBABYFAT

Seller ID
A15BGP0GJL0F9Q

1 Infringing Work

Seller Display Name
UPBASICN

Seller ID
A2FZ54PRNJQVG



1 Infringing Work

Seller Display Name
Vanuoda

Seller ID
A3S1XK8QBM0LEQ



2 Infringing Works

Seller Display Name
VST Group

Seller ID
A2V4ZV9PXST2EL

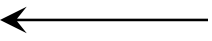
**DOG CHEWS
FOR GOOD
DENTAL
HEALTH**

Ultimate Dog Dental Chew Toys

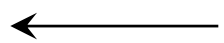
Before



After



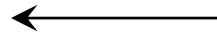
**Larger Size
40LB-90LB**



2 Infringing Works

Seller Display Name
Winnuo

Seller ID
A3VFLP6P9D5Z1Y



1 Infringing Work

Seller Display Name
Yu Xingchen

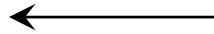
Seller ID
A12GJ7ZZH2R7SR



1 Infringing Work

Seller Display Name
Yuntech

Seller ID
A260EP94GRU9NF



1 Infringing Work

Seller Display Name
zUOKIJU

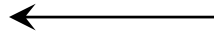
Seller ID
A11URB4R2AC6HW



1 Infringing Work

Seller Display Name
CANIKLINE MALL

Seller ID
A1KZVKZAM21NJW



1 Infringing Work

SUPPLEMENTAL
EXHIBIT 2

Def. No.	Defendant/Amazon Store Name	Amazon Seller ID	Amazon ASIN	Account Balance
20	Elegant kiss	AX9B8JO3UEO1U	B07KZNSYZW	\$15,860.67
79	Big Desert	A2CQ3M4XU1WT8J	B07PHSB3GR	\$13,037.08
33	JESSEPOUNDS	AEMFZDZF1ZXNE	B07JYL5QL9	\$7,589.54
102	UPBASICN	A2FZ54PRNJQVG	B07LG8N4SP	\$4,558.98
25	Fangchal	A396YX0HT6M56V	B07JJF8MZX	\$4,092.99
40	LONESON	A1M8E9D3R6YQVS	B07LG8N4SP	\$3,847.83
98	Waroom	A1SKB4Y8LK6O12	B07Q4P5NYG	\$3,320.83
64	TOBABYFAT	A15BGP0GJL0F9Q	B07HHYWWNV	\$2,971.83
80	Big Wing Style	A3SHZFKHJCMJCN	B07NJ5HPR1	\$2,792.12
5	AMZself	A2LTKBZ1LUKKD2	B07PBKMCJV	\$2,657.03
76	zUOKIJU	A11URB4R2AC6HW	B07MGPWVNK	\$2,493.05
37	Lagita	A2MQTDAKKSEDXZ	B07JDY9843	\$2,244.48
68	VST Group	A2V4ZV9PXST2EL	B07Q19TFYB	\$2,140.93
86	Hunt Sr. Products	A336QI6AJFJY9S	B07QMC1D5Z	\$2,073.81
73	Yuntech	A260EP94GRU9NF	B07L3K526N	\$2,031.22
57	Samatoo	A3VD0VF1UXFDQ4	B07HK8J9DF	\$1,625.40
93	PLUS MI LIFE	A25LSUD2OUVS3T	B07MBMCS6Z	\$1,536.24
22	FairyMe	A3T80QRV3HCEL5	B07PBT5FP9	\$1,509.31
9	Aya-Chic	AV58HO4Y4YG5	B07LCJQ6W2	\$1,423.13
95	sweetypplain	AHDQEKHLS948P	B07QK63NFZ	\$1,330.60
19	Ecolines	A2VOPXI5HC2XXG	B07KVF9CTZ	\$1,328.66
2	AHuShi	AWX8XMIYVF7QQ	B07L68R2YK	\$1,100.09

92	our tomorrow	A2EKHUHZ25L3BC	B07MR29Z4L	\$920.43
94	Realler	ASL612W0VED	B07LD4JB58	\$828.24
1	Anywill	A1KGXS6694KK0F	B07M6PNDMZ	\$704.31
66	Vanuoda	A3S1XK8QBM0LEQ	B07N2K727T	\$674.60
16	De Lon	A2H9OA2IB881NB	B07M8D6FVK	\$613.83
59	Shuofeng	A252ISGGD173I1	B07P4Y14CR	\$579.30
61	Smvison	A1I0A6TETBVBZI	B07P7FY1V4	\$524.45
63	Taylor(USA)	A36XVP1BD7NYRM	B07HH2626J	\$495.43
28	horseshoe1	A327N0M7NMJD7R	B07PKC1CXC	\$494.39
31	J & T Jordan	A33AHOWEC4JYNC	B07KDSPTRH	\$366.53
47	NOTTODAY	A3S88F4ORA904G	B07PRSJZ5H	\$334.48
69	WINNUO	A3VFLP6P9D5Z1Y	B07MFNPBG3	\$280.25
4	Ale's Store	A28FLU0ZJO0Q51	B07ML3RQ4Q	\$266.46
72	Yu Xingchen	A12GJ7ZZH2R7SR	B07PKPTVW5	\$203.01
46	NO.1 Online	A2G5XJ2AQC9U9S	B07MJVHS7Q	\$163.26
81	CANIKLINE MALL	A1KZVKZAM21NJW	B07N14SH8G	\$129.62
96	Tosui	A1214SCEMDA211	B07P2SM38H	\$81.09
38	LAROSA MEDICAL	A2PB7QKWA4H0S8	B07PNT4XJ7	\$48.15
56	Ruitx Store	A2RLONNTW8MLTW	B07MLKR43D	\$28.48
18	E.L. Solutions	A3CNAJSCZDB917	B07LH6YK1K	\$23.69
90	niuworld	A3DOF2HOZYWW1W	B07QYGRRG2	\$14.17
21	Extechnico	A20NZHTNL4PTXD	B07PRPHT7S	\$12.78

43	MayMeyz	A2A5FZ04CXTTC6	B07ML3RQ4Q	\$8.74
44	NF Merchandise	A3JSCT3L9HWKV8	B07M6C3H88	\$6.51
13	Big Elephant	A3AZJ9TNMIEGD	B07MBP1CND	\$0.00
14	BYBELLA	A3N4X0QAELZ7CQ	B07PNDMLZ8	\$0.00
32	JackPack Labs	A69BPJ5B9WCCL	B07N1271C7	\$0.00
53	Quorum Value	ANS8B7J9GNA2W	B07NC54PVD	\$0.00
84	Diligent bee	A3DD0YE17W1LA3	B07M5DJDJX	\$0.00