

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

DANIEL SMITH,  
Plaintiff,  
v.  
SANGAN TRADING, et al.,  
Defendants.

Civil Action No.

**FILED UNDER SEAL**

**DECLARATION OF DEE ODELL  
IN SUPPORT OF PLAINTIFF’S *EX PARTE* APPLICATION FOR ENTRY OF  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

I, Dee Odell, 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. In making this declaration, I represent the collective effort of a team of researchers for Ference & Associates, including myself, who conducted an investigation to determine if the identified Defendants were and/or are currently offering for sale and/or selling Infringing Products<sup>1</sup> and whether each of the identified Defendants will ship and/or has actually shipped Infringing Products to the United States, including customers specifically located in Pennsylvania.

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<sup>1</sup> As set forth in the Complaint, Defendants are using Plaintiff’s copyrighted works while promoting, selling, offering for sale, and distributing products that incorporate Plaintiff’s copyrighted works (the “Infringing Products”).

3. Prior to filing this Declaration, we accessed through at least one of the online ecommerce platforms Temu.com (“the Merchant Storefronts”) operating under the seller identities as identified on **Schedule “A”** of the Complaint (the “Seller IDs”). Upon accessing each of the Merchant Storefronts, we were able to view Defendants’ Infringing Products, add Infringing Products to the online shopping cart, designate Pennsylvania as the point of purchase and delivery, proceed to the point of checkout, and otherwise actively exchange data with each Merchant Storefront.

4. The checkout pages or order forms for the Infringing Products confirm that each Defendant was and/or is still currently offering for sale and/or selling Infringing Products through their respective Merchant Storefronts and User Accounts and that each Defendant provides shipping and/or has actually shipped Infringing Products to Pennsylvania and other locations throughout the United States.

5. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 22<sup>nd</sup> day of April, 2025, at Pittsburgh, Pennsylvania.

/s/ Dee Odell  
Dee Odell