

EXHIBIT 2

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

PROMIER PRODUCTS INC.,

Plaintiff,

v.

GEAROSZ, *et al.*,

Defendants.

Case No. 25-cv-497

(Judge Colville)

FILED UNDER SEAL

SECOND DECLARATION OF CODY D. GRANDADAM

I, Cody D. Grandadam, hereby declare and state as follows:

1. I am over eighteen (18) years of age. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to testify to the matters stated herein. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am the founder and owner of Promier Products, Inc. (“Promier”), the Plaintiff in this lawsuit, and the owner of the LITEZALL[®], KODIAK[®], ILLUMIBRITE[®], and HANDZFREE[®] lighting brands. I personally operate and manage the company’s independent website, LitezAll.com, and Amazon.com online marketplace storefront. I make this declaration from matters within my knowledge save where otherwise stated.

3. I make this second declaration in support of Plaintiff’s *Ex Parte* Application for Entry of a Temporary Restraining Order and Preliminary Injunction against Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on **Schedule “A”** to the Complaint.

4. Premier's products are sold in the Walmart Stores in the Western District of Pennsylvania. *See, e.g.,* <https://www.walmart.com/ip/Kodiak-1-mile-Beam-Rechargeable-Tactical-Flashlight-COB-LED-1000-Lumens/1849769047> (available at the Moon Township Supercenter, Baden Supercenter, Pittsburgh Supercenter, Cranberry Township Supercenter, Monaca Supercenter, Gibsonia Store, Carnegie Store, and Bethel Park Store) (last visited May 1, 2025).

5. Premier's flashlights are sold to Pennsylvania customers every month. Premier's products are maintained in warehouses in Pennsylvania so that they may quickly be delivered to customers in Pennsylvania. Wikipedia states that Pennsylvania is the fifth most populous state in the United States. <https://en.wikipedia.org/wiki/Pennsylvania> (last visited May 1, 2025).

6. When a seller signs up for an Amazon account, they must elect to sell their products throughout the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 2, 2025

/s/ Cody D. Grandadam
Cody D. Grandadam