

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

CARRIE HENDRIX,

Plaintiff,

v.

CODIAK, *et al.*,

Defendants.

Case No.

**FILED UNDER SEAL**

**DECLARATION OF CARRIE HENDRIX**

I, CARRIE HENDRIX, declare and state as follows:

1. 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 artist that creates all the Carrie Hendrix Works and the Plaintiff in this lawsuit. I make this declaration from matters within my knowledge save where otherwise stated.

3. I am an artist and graphic designer who produces work under the name “MyCrayons Design”. I cherish authenticity as it is a deeply important part of my design philosophy. I have been a stationery designer for more than 10 years creating elegant fine line botanicals, swoon-worthy watercolor florals, and digital prints. I create unique and easy-to-use templates for wedding invitations, signage, seating charts, and more. I find inspiration for my work in life’s special moments. My favorite mediums are ink and watercolor pencils.

4. I am the official source of products associated with the Carrie Hendrix Works (the “Carrie Hendrix Products”):

About MyCrayonsDesign

Sales  
**24,877**

On Etsy since  
**2012**



## Welcome to MyCrayons Design

My name is Carrie and I'm the artist behind MyCrayons Design. I've combined my love of stationery, illustration, and background in graphic design to create unique and easy-to-use templates for wedding invitations, signage, seating charts and more. So you can enjoy professionally designed stationery that won't break the bank.

A few fun facts about me:

- ♥ My favorite mediums are ink and watercolor pencils
- ♥ I'm a green tea and real food enthusiast

<https://www.etsy.com/shop/MyCrayonsDesign#about>

5. I am the owner of the copyright registrations for the Carrie Hendrix copyrighted works, which include United States Copyright Registration Nos. VA 2-429-519; and VA 2-429-868 (the "Carrie Hendrix Works"). True and correct copies of the copyright registrations for the Carrie Hendrix Works are attached to the Complaint as **Exhibit 1**.



6. I control the quality of all materials and content that feature the distinctive Carrie Hendrix Works.

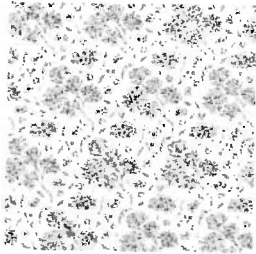

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Carrie Hendrix Works. As a result, the images are widely recognized and exclusively associated by consumers, the public, and the trade with my professional identity as an artist.

8. The success and acclaim of the Carrie Hendrix Works has resulted in significant infringement of my copyright. Consequently, an anti-pirating program has been implemented to

investigate suspicious websites and online marketplace listings identified in proactive internet sweeps. Various marketplace listings have been identified on multiple platforms, including the internet stores identified in Schedule A attached to the Complaint (“Defendant Internet Stores”), which were offering for sale, selling, and/or importing unauthorized copies of the Carrie Hendrix Products to consumers in this judicial district and throughout the United States.

9. I am aware of investigations related to internet-based infringement of the Carrie Hendrix Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Carrie Hendrix Products from foreign countries such as China to consumers in the United States. I, or someone working under my direction, analyzed the Defendant Internet Stores and determined that infringing Carrie Hendrix Products were being offered for sale to the United States, including Pennsylvania. The Defendants and their websites do not conduct business with me and do not have the right or authority to use the copyrights for any reason. Below is a side-by-side comparison of the Carrie Hendrix Works and examples of Defendants’ products reviewed that embody the copyrighted Carrie Hendrix Works:

<b>Reg. Number</b>	<b>Title of Work</b>	<b>Copyrighted Work</b>	<b>Defendants’ Image</b>
VA 2-429-519	Red Poppies		 <p data-bbox="1073 1608 1304 1642">Def #1-48, 55-109</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-429-868	Cherry Blossom		 Def #49-54

10. Monetary damages alone cannot adequately compensate me for the ongoing infringement because monetary damages fail to address the loss of control of and damage to my reputation, goodwill, and control over the nature of the derivative works made using my copyrighted material. Furthermore, monetary damages are difficult, if not impossible, to completely ascertain due to the inability to fully quantify the monetary damage caused to my reputation and goodwill by acts of infringement.

11. My goodwill and reputation are irreparably damaged when the Carrie Hendrix Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Carrie Hendrix copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Carrie Hendrix Works and derivative works.

12. I am further irreparably damaged due to a loss of exclusivity. The copyright rights in the Carrie Hendrix Works are meant to be exclusive rights.

13. The marketing and distribution of the Carrie Hendrix Works and derivative works are aimed at growing and sustaining sales. When infringers use the Carrie Hendrix Works without authorization, the exclusivity associated with the Carrie Hendrix Works, as well as my reputation, is damaged and eroded, resulting in a loss of unquantifiable future sales.

14. Uncontrolled profiteering and pirating of the Carrie Hendrix Works create the impression that the copyright rights associated with the Carrie Hendrix Works may be infringed with impunity. The Carrie Hendrix Works are distinctive and signify to consumers that products are authorized by me and are manufactured to my high-quality standards. The devaluing of the intellectual property associated with the Carrie Hendrix Works cannot be compensated for financially since it erodes my ability to monetize the Carrie Hendrix Works.

15. I will suffer immediate and irreparable injury, loss, or damage if an *ex parte* Temporary Restraining Order is not issued in accordance with Federal Rule of Civil Procedure 65(b)(1).

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

Executed on Jun 12, 2025

*Carrie Hendrix*

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Carrie Hendrix