

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

NONA IONELA PUICĂ,

Plaintiff,

v.

SHANXISHASIJINKEJIYOUXIANGONGSI, *et al.*,

Defendants.

Case No. 25-cv-1094

FILED UNDER SEAL

DECLARATION OF NONA IONELA PUICĂ

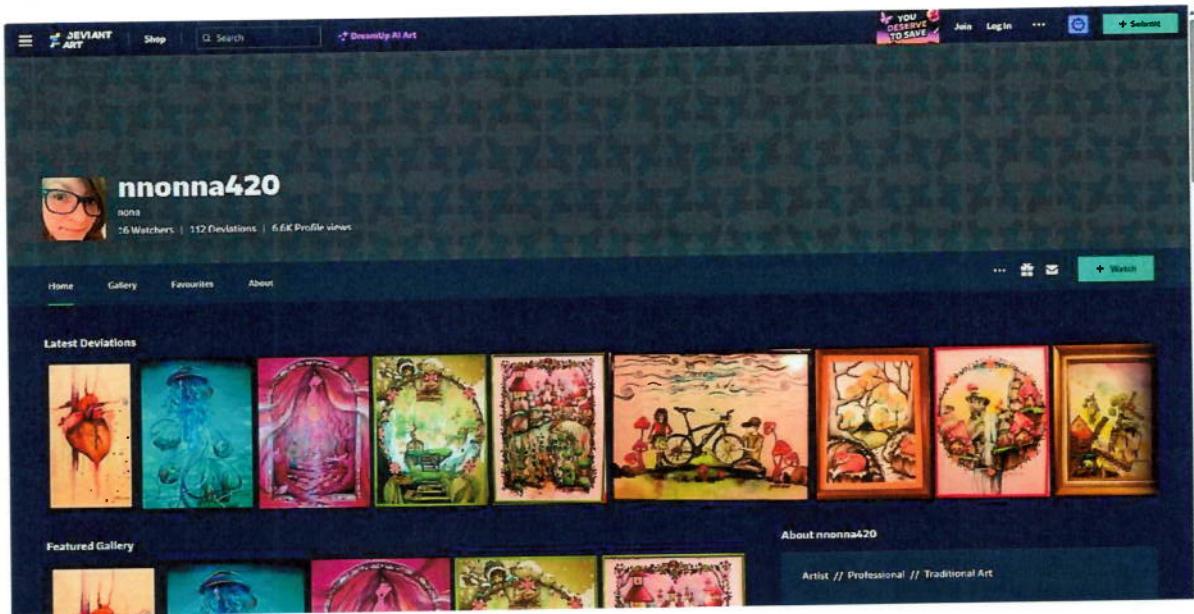
I, NONA IONELA PUICĂ, declare and state as follows:

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 created the Love trees, love nature Work 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 designer who produces work under the names “Nona Puică,” “Nones,” “Nona Nones,” and “nnonna420.” My formal training spans from Arts School and High School in Deva from 1997-2005 to my time at the Faculty of Arts and Design in Timișoara, Romania from 2005 to 2008. My style is a blend of surreal and childlike elements, marked by vibrant colors and an energetic feel. I draw inspiration from themes of nature, animals, and people. Specifically, I base my work on my experiences in nature, interactions with others, and a desire to capture emotions with a surreal touch. Between 1997 and 2008, I participated in group exhibitions, national and international contests, and earned several awards. I have also attended numerous art fairs, where I presented and sold my work, and continue to work on commission. Recently, I have been building an online presence to expand my art sales.

4. I am the official source of products associated with the Love trees, love nature Work (the “Love trees, love nature Products”):



<https://www.deviantart.com/nnonna420>

5. I am the owner of a copyright registration that is identified by United States Copyright Registration No. VA 2-429-482 (the “Love trees, love nature Work”). A true and correct copy of the copyright registration for the Love trees, love nature Work is attached to the Complaint as **Exhibit 1**.



6. I control the quality of all materials and content that feature the distinctive Love trees, love nature Work.

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Love trees, love nature Work. As a result, the image is 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 Love trees, love nature Work 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 Love trees, love nature Work to consumers in this judicial district and throughout the United States.

9. I am aware of investigations related to internet-based infringement of the Love trees, love nature Work. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Love trees, love nature 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 Love trees, love nature 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 Love trees, love nature Work and examples of Defendants’ products reviewed that embody the copyrighted Love trees, love nature Work:

Reg. Number	Title of Work	Copyrighted Work	Defendants’ Image
VA 2-429-482	Love trees, love nature		 <p data-bbox="1117 1644 1268 1675">Def #1-187</p>

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 Love trees, love nature Work is used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Love trees, love nature copyrighted material because infringers take away my ability to control the nature and quality of products bearing the Love trees, love nature Work and derivative works.

12. I am further irreparably damaged due to a loss of exclusivity. The copyright rights in the Love trees, love nature Work are meant to be exclusive rights.

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

14. Uncontrolled profiteering and pirating of the Love trees, love nature Work creates the impression that the copyright rights associated with the Love trees, love nature Work may be infringed with impunity. The Love trees, love nature Work is distinctive and signifies 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 Love trees, love nature Work cannot be compensated for financially since it erodes my ability to monetize the Love trees, love nature Work.

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 10, 2025

Nona Puică

Nona Puică