

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

ALISON FRIEND,

Plaintiff,

v.

VA STOREDAN, *et al.*,

Defendants.

Case No. 25-cv-1219

FILED UNDER SEAL

DECLARATION OF ALISON FRIEND

I, ALISON FRIEND, declare and state as follows:

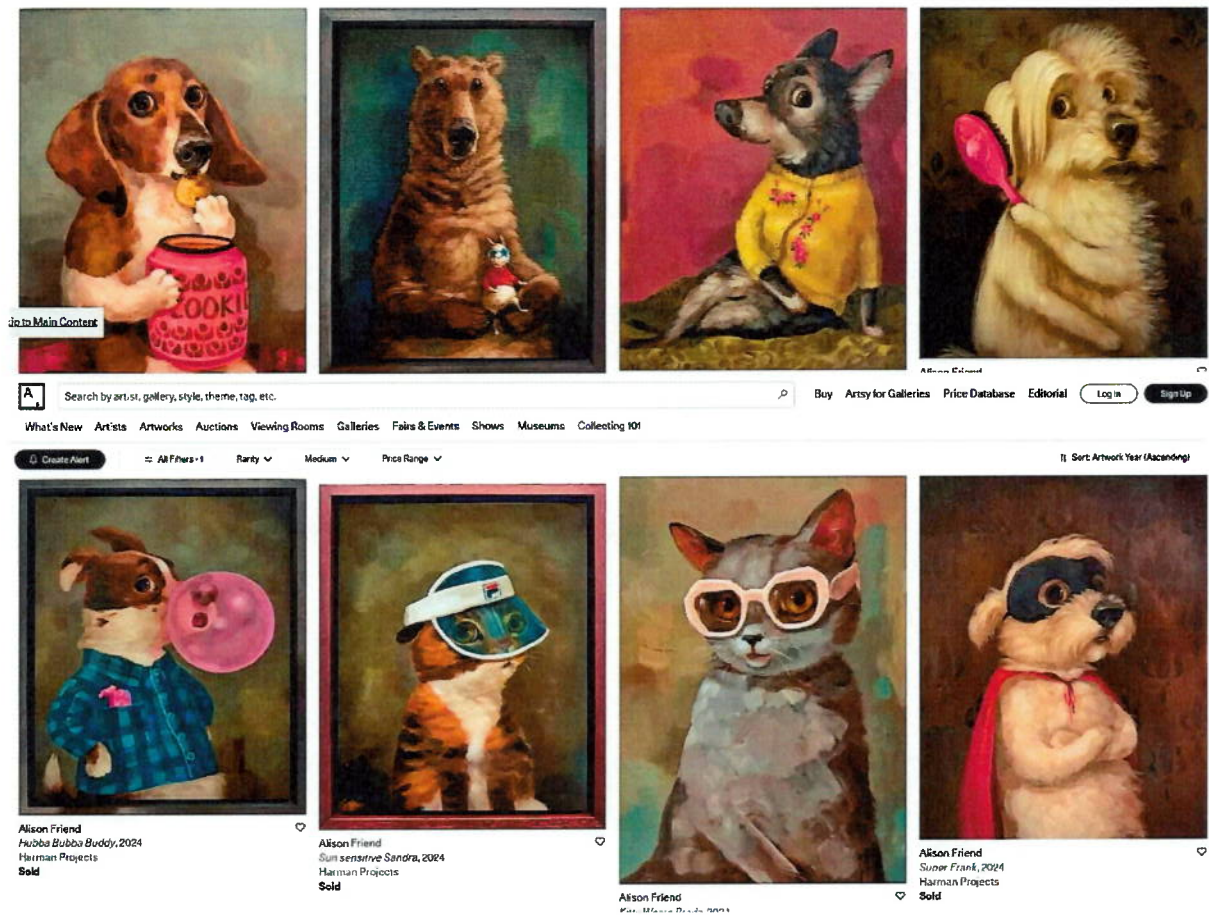
1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I am the artist that creates all the Alison Friend 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 who produces work under the names “Alison Friend” and “McFriendly.” I paint humorous portraits of animals, blending traditional oil techniques with contemporary whimsy to capture the human-like antics of cats, dogs, and other animals. My artistic process begins with an idea for a character, which takes on a life of its own as I paint. I focus on those glances pets give us and the human emotions we think of them having, as that is how we connect with the animals in our lives. I hope to bring just enough to the work for the viewer to participate in the creative process and bring their own story for the subject. I graduated with a degree in fine art and printmaking. I initially pursued a career in illustrating children’s books and have published over twenty books to date with Harper Collins, Nosy Crow, Hodder Children’s, Templar, Usbourne, Little Tiger Press, and Alfred Knopf. I later transitioned to oil painting, and

my unique anthropomorphic portrayals of animals brought me widespread acclaim. My original paintings have been sold to collectors worldwide, and I have participated in numerous solo and group exhibitions in England, Italy, Scotland, Australia, and the United States.

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



<https://www.artsy.net/artist/alison-friend?keyword=harman&page=2&sort=year>



MEET ALISON



Photo credit: ian kane

"I like to paint animals for a character. I have little in my head. It's like a waiting room until it's their time to come out! As long as an idea for a character is, they do take on a life of their own. That's what I love. I get to know them as the painting progresses."

We think of them as having human emotions and I try to capture that. It's how we connect with the animals in our lives. Hopefully I bring just enough to the work for the viewer to create their own story for the subject. I want the viewer to be part of the creative process."

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EXHIBITIONS

2023

- White Space Art Fair, Singapore
- Outside Art Fair, Herman Projects, New York City, New York
- Royal Academy of Arts Summer Exhibition, London
- Solo Show, Herman Projects, New York City, New York
- Content Art Fair, Herman Projects, Miami, Florida

2024

- London Art Fair, Adrian Hill Fine Art, London, England
- Solo Show, Herman Projects, Los Angeles, California
- Solo Show, The Gallery Hub, Exeter, England
- Dance Gallery, Melbourne, Australia
- British Art Fair, Adrian Hill Fine Art, Saatchi Gallery, London, England
- Solo Show, Royal Watercolour Society, Adrian Hill Fine Art, London, England

2022

- Content Art Fair, Herman Projects, Miami, Florida
- Art & Sweet, British Art Fair, Adrian Hill Fine Art, Saatchi Gallery, London, England
- Forty Bungalow Benefit, Corey Hillford Gallery, Los Angeles, California
- Group Show, Chatterbox, The Gallery Hub, Exeter, England
- Group Show, Phoenix Little, Mura Ma, Stockport, England

2021

- Group Show, Aired Support Agency, The Hive Art Gallery, Wakefield, England

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5. I am the owner of the copyright registrations for the Alison Friend copyrighted works, which include United States Copyright Registration Nos. VA 2-413-112; VA 2-413-118; VA 2-382-725; VA 2-382-902; VA 2-412-957; VA 2-413-342; VA 2-388-383; VA 2-413-117; VA 2-388-382; VA 2-413-351; VA 2-388-070; VA 2-382-783; VA 2-413-121; VA 2-413-115; VA 2-382-904; VA 2-382-907; VA 2-382-911; VA 2-382-786; VA 2-382-748; VA 2-412-944; and VA 2-382-905 (the “Alison Friend Works”). True and correct copies of the copyright registrations for the Alison Friend Works are attached to the Complaint as **Exhibit 1**.







6. I control the quality of all materials and content that feature the distinctive Alison Friend Works.





7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Alison Friend 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 Alison Friend 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 Alison Friend 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 Alison Friend Works. The investigations show that Defendants are using the Defendant Internet Stores to sell infringing Alison Friend 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 Alison Friend 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 Alison Friend Works and examples of Defendants' products reviewed that embody the copyrighted Alison Friend Works:

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-413-112	Taco Lover		 Def #1-8, 37-47
VA 2-413-118	Me Time		 Def #9-14
VA 2-382-725	Pizza Lover		 Def #15-19, 48-69

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-382-902	One For Now A Couple For Later		 Def #20-23, 70-80
VA 2-412-957	I love my duckie too		 Def #24-25
VA 2-413-342	Pawtagonia		 Def #26-27
VA 2-388-383	Roy & Rita		 Def #28-29, 81-90
VA 2-413-117	Catsuma		 Def #30

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-388-382	Dog With Gilet		 Def #31
VA 2-413-351	Douglas Made A Portrait Of His Best Friend Paul		 Def #32
VA 2-388-070	The First Bite Is The Sweetest		 Def #33, 91-96
VA 2-382-783	I Love This Stick!		 Def #34, 97-99
VA 2-413-121	Whiskey and Ginger		 Def #35

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-413-115	Betsy Had Been On Hold For Over An Hour		 <p>Def #100-108</p>
VA 2-382-904	Bunny Was Very Pleased With Her New Socks		 <p>Def #36</p>
VA 2-382-907	Cupcake Piglet		 <p>Def #109-112</p>
VA 2-382-911	A Few Of Her Favourite Things		 <p>Def #113-114</p>
VA 2-382-786	A Good Day		 <p>Def #115-120</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-382-748	Grandma's Cat		 Def #121
VA 2-412-944	Ivy		 Def #122-126
VA 2-382-905	Smoking Raccoon		 Def #127-128

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 Alison Friend Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use

of the Alison Friend copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Alison Friend Works and derivative works.

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

13. The marketing and distribution of the Alison Friend Works and derivative works are aimed at growing and sustaining sales. When infringers use the Alison Friend Works without authorization, the exclusivity associated with the Alison Friend 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 Alison Friend Works create the impression that the copyright rights associated with the Alison Friend Works may be infringed with impunity. The Alison Friend 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 Alison Friend Works cannot be compensated for financially since it erodes my ability to monetize the Alison Friend 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 July 23, 2025.



Alison Friend