

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

SHELLEY STEER,

Plaintiff,

v.

YJMYDDZ, et al.,

Defendants.

Case No. 25-cv-1221

FILED UNDER SEAL

DECLARATION OF SHELLEY STEER

I, SHELLEY STEER, 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 April Print 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 name "Shelley Steer." My signature style is recognized for its botanical illustrations that are often rich in color and meticulous detail. I specialize in watercolor, but also use graphite, oil pastels, and digital mediums. My work encompasses a diverse range of projects, such as interiors, fashion, packaging, and identity design. I received my Bachelor of Arts in Textile Design from RMIT in Melbourne. I developed and refined my skills in the fashion industry before moving to London where I was inspired by the Kew Gardens. My countless visits to the Kew Gardens over the changing seasons instilled an appreciation of plants and gardens. This influence is reflected throughout my portfolio. My clients have included Anthropologie, Petite Friture, The Plant Society, and Vogue Living. Additionally, I

have co-founded a design studio, Field Day, which specializes in luxury wallpaper and reflects my continued love of pattern, interiors, and the relationship between decoration and daily life.

4. I am the official source of products associated with the April Print Work (the “April Print Products”):



<https://shelleysteer.com/projects>



5. I am the owner of the United States Copyright Registration No. VA 2-432-868 (the “April Print Work”). A true and correct copy of the copyright registration for the April Print Work is attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive April Print Work.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-432-868	April Print		 <p data-bbox="1159 680 1286 709">Def #1-41</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 April Print Work are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the April Print copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the April Print Work and derivative works.

12. I am further irreparably damaged due to a loss of exclusivity. The copyright rights in the April Print Work are meant to be exclusive rights.

13. The marketing and distribution of the April Print Work and derivative works are aimed at growing and sustaining sales. When infringers use the April Print Work without authorization, the exclusivity associated with the April Print 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 April Print Work create the impression that the copyright rights associated with the April Print Work may be infringed with impunity. The April Print Work 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 April Print Work cannot be compensated for financially since it erodes my ability to monetize the April Print 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 16, 2025



Shelley Steer