

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

IAN LUSUNG,

Plaintiffs,

v.

GUANGZHOUZHAOWENSHANGMAOYOUXIANGONGSI,  
*et al.*,

Defendants.

Civil Action No. 25-cv-989

**(Judge Hardy)**

**DECLARATION OF STANLEY D. FERENCE  
IN SUPPORT OF REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS**

I caused the complaint and a summons in this action to be served on the Defendants on the dates as set forth in ECF No. 15; at the time within which such Defendants may answer or otherwise move as to the complaint has expired; that such Defendants have not answered or otherwise moved and that the time for such Defendants to answer or otherwise move has not been extended.

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

Executed in Pittsburgh, Pennsylvania on August 19, 2025.

/s/ Stanley D. Ference III  
Stanley D. Ference III  
Pa. ID No. 59899  
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