

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

TANE HANNAH MEETS,

Plaintiff,

v.

FULONG002, et al.,

Defendants.

Case No. 25-cv-1404

FILED UNDER SEAL

DECLARATION OF TANE HANNAH MEETS

I, TANE HANNAH MEETS, 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 Tane Meets 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 designer who produces work under the names “Tane Meets” and “Tangerine Tane.” My signature style is recognized for its bright colors, animals, and nature. I work with gouache and watercolor paints, as well as, digital mediums. I am a self-taught designer, with no formal training. My mother inspired me and provided early mentorship. My art style is a blend of whimsical charm and refined aesthetic designs that appeal to both children and adults. I have achieved notable accomplishments in my career, such as having my designs feature in movie productions, securing top positions in Spoonflower Design Challenges, and being featured in various collections across different platforms.

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

Tangerine-Tane

ABOUT SHOP DESIGNS

Designs (39)

FILTER

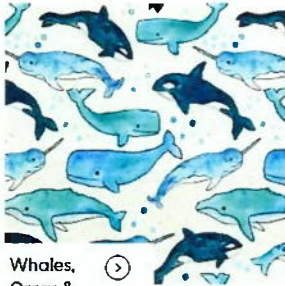
SORT - RELEVANCE



society6



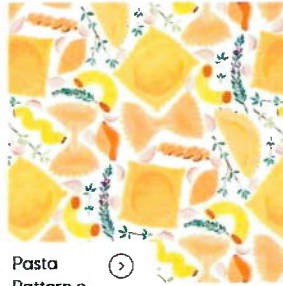
New Arrivals Wall Decor Home & Living Clothing & Accessories Shop By Artist Inspiration Flash Sale



Whales, Orcas &...



Butter Yellow...



Pasta Pattern o...



Blooms and Books

<https://society6.com/a/artists/tangerinetane/designs>





5. I am the owner of the United States Copyright Registration Nos. VA 2-414-474; VA 2-414-471; VA 2-414-899; VA 2-414-902; VA 2-414-472; VA 2-414-475; VA 2-414-477; and VA 2-414-900. (the “Tane Meets Works”). True and correct copies of the copyright registrations for the Tane Meets Works are attached to the Complaint as **Exhibit 1**.


6. I control the quality of all materials and content that feature the distinctive Tane Meets Works.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-414-471	Gilded Jade & Mint Turtles		 Def #1-23; 50-115
VA 2-414-471	Cute Cacti in Pots		 Def #24-36; 116-121
VA 2-414-899	Whales, Orcas & Narwhals on Deep Teal		 Def #37-41; 47-48
VA 2-414-902	Blooms of Ink		 Def #42-43

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-414-472	Daisy Blues - Daisy Pattern on Cornflower Blue		 Def #44-45; 49
VA 2-414-475	Paper Planes in Blue		 Def #46; 122-123
VA 2-414-477	Paper Planes in Pastel		 Def #124-131
VA 2-414-900	Pastel Floral Medallion on Faded Silver Wood		 Def #132

10. Monetary damages alone cannot adequately compensate me for the ongoing infringement because monetary damages fail to address the loss of control 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 Tane Meets Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Tane Meets copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Tane Meets Works and derivative works.

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

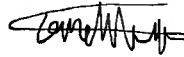
13. The marketing and distribution of the Tane Meets Works and derivative works are aimed at growing and sustaining sales. When infringers use the Tane Meets Works without authorization, the exclusivity associated with the Tane Meets Works, as well as my reputation, is damaged and eroded, resulting in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

14. Uncontrolled profiteering and pirating of the Tane Meets Works create the impression that the copyright rights associated with the Tane Meets Works may be infringed with impunity. The Tane Meets 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 Tane Meets Works cannot be compensated for financially since it erodes my ability to monetize the Tane Meets 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 11, 2025



Tane Hannah Meets