

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

ABRAHAM SANDOR SZOMOR,

Plaintiff,

v.

WANGDEPENGBM2, et al.,

Defendants.

Case No. 25-cv-1406

FILED UNDER SEAL

DECLARATION OF ABRAHAM SANDOR SZOMOR

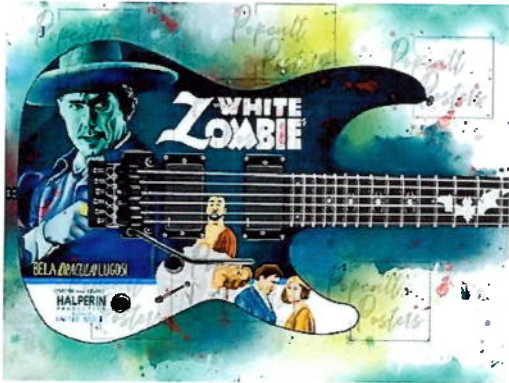
I, ABRAHAM SANDOR SZOMOR, declare and state as follows:

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 Rock N Roll 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 “Abraham Sandor Szomor” and “PopCult Posters.” I am a graphic artist who has been drawing and painting since I was three years old. My passion for music and fascination with the history of electric guitars serve as primary inspiration for my work. I hold an agricultural engineering degree, but ventured into a one-month Adobe training program at Raunder in 2017. I am self-taught and experiment with various mediums, such as graphite, charcoal, aquarelle, and digital painting. My notable achievements include: commission for American Agency, illustrations for Revolver Magazine, caricature paintings exhibited in Hungarian Rock Museum and Hungarian music magazines, and participating in the Parallax Art Fair in London in 2016.

4. I am the official source of products associated with the Rock N Roll Work (the “Rock N Roll Products”):



Guitar Paintings



Car Paintings



Portraits and Caricatures



Retro Designs

<https://popcultposters.com/#work>



5. I am the owner of the United States Copyright Registration No. VA 2-403-937 (the “Rock N Roll Work”). A true and correct copy of the copyright registration for the Rock N Roll Work is attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Rock N Roll Work.

7. Substantial time, money, and other resources have been expended in developing, advertising, licensing, and otherwise promoting the Rock N Roll 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 Rock N Roll 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 Rock N Roll Products to consumers in this judicial district and throughout the United States.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-403-937	Rock N Roll		 Def #1-200

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 Rock N Roll Work are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Rock N Roll Work copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Rock N Roll Work and derivative works.

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

13. The marketing and distribution of the Rock N Roll Work and derivative works are aimed at growing and sustaining sales. When infringers use the Rock N Roll Work without

authorization, the exclusivity associated with the Rock N Roll 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 Rock N Roll Work create the impression that the copyright rights associated with the Rock N Roll Work may be infringed with impunity. The Rock N Roll 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 Rock N Roll Work cannot be compensated for financially since it erodes my ability to monetize the Rock N Roll 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 11, 2025

Abraham Sandor Szomor

Abraham Sandor Szomor