

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

YONGXIANG CHAN,

Plaintiff,

v.

LIGUOJUN2025, *et al.*,

Defendants.

Case No. 25-cv-1435

**FILED UNDER SEAL**

**DECLARATION OF YONGXIANG CHAN**

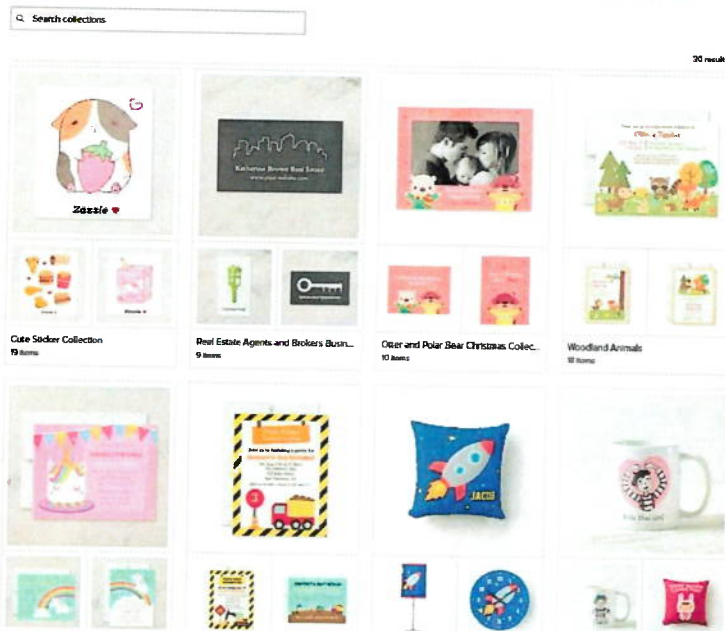
I, YONGXIANG CHAN, declare and state as follows:

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 Rusty Doodle Works and the Plaintiff in this lawsuit. I make this declaration from matters within my knowledge save where otherwise stated.

3. I have been an independent illustrator since 2012, posting my artwork online under the name "Rusty Doodle" on merchandise platforms and social media. My illustrations often feature cute animals and food characters, combined with puns and humor. My hope is that my drawings make people smile and help spread joy to others.

4. I am the official source of products associated with the Rusty Doodle Works (the "Rusty Doodle Products"):



<https://www.zazzle.com/store/rustydoodle/collections>

5. I am the owner of the United States Copyright Registration Nos. VA 2-419-311; VA 2-419-007; VA 2-418-985; VA 2-419-288; VA 2-419-302; VA 2-419-006; VA 2-419-310; VA 2-418-980; VA 2-421-450; VA 2-439-569; and VA 2-439-568 (collectively, the “Rusty Doodle Works”). True and correct copies of the copyright registrations for the Rusty Doodle Works are attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Rusty Doodle Works.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-419-311	Cute Relax A Lot Axolotl Funny Pun		 Def #55
VA 2-419-007	Cute Capybara Chilling With Coconut Drink		 Def #1-19; 56-62; 91-104
VA 2-418-985	Cute Capybara Chilling On Pink Flamingo Pool Float		 Def #20-27; 63-76; 105-167
VA 2-419-288	Chill Capybara Drinking Coconut Juice		 Def #28-30; 77-87; 168-175

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-419-302	Balloons and Cute Axolotl Doodle		 <p>Def #31-35; 176-187</p>
VA 2-419-006	Cute Little Panda Enjoying Boba Tea		 <p>Def #36-37; 88-90; 188-193</p>
VA 2-419-310	Cute Little Penguin Loves Boba Tea		 <p>Def #38; 194-197</p>
VA 2-418-980	Cute Boba Tea Love Doodle		 <p>Def #198-205</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-421-450	Cute Pun Humor You Are my Otter Half		 Def #206-209
VA 2-439-569	Cute Axolotl Drinking Bubble Tea		 Def #39-47; 210-258
VA 2-439-568	Cute Axolotl Loves Eating Japanese Ramen Noodles		 Def #48-54; 259-286

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

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

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

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

*Chan Yongxiang*  
Chan Yongxiang

---