

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

CRISTA FOREST,

Plaintiff,

v.

102RDCFG, et al.,

Defendants.

Case No. 25-cv-1492

FILED UNDER SEAL

DECLARATION OF CRISTA FOREST

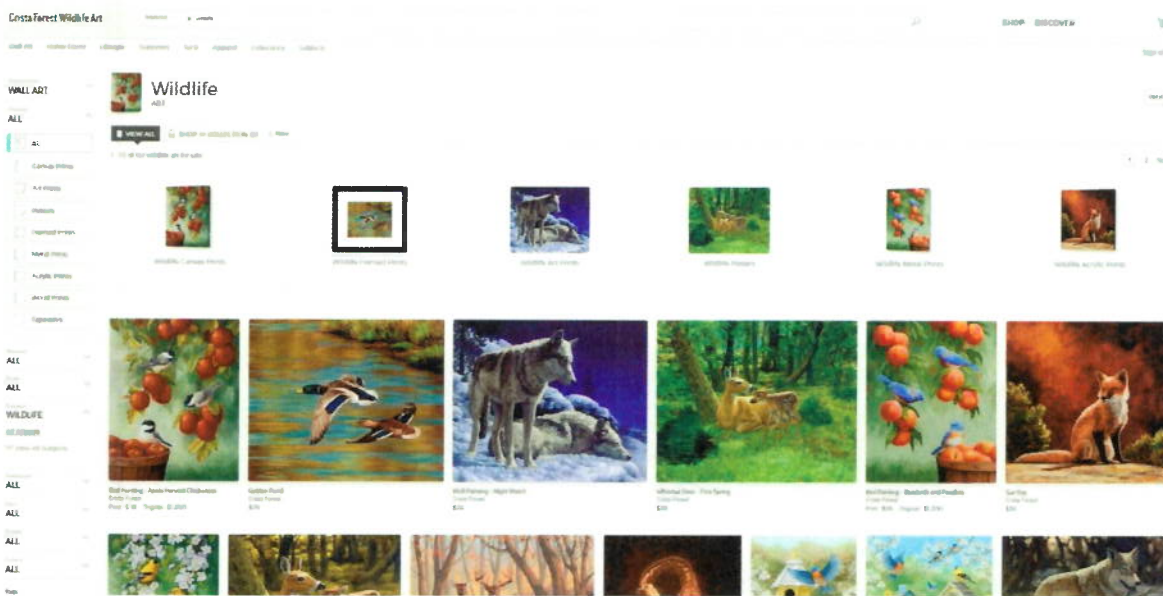
I, Crista Forest, declare and state as follows:

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 Crista Forest 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 name "Crista S. Forest". I am a full-time self-taught wildlife artist. I have always loved to draw, color, and paint animals from a very early age. I have always cared deeply about animals and I try to capture the playful, cute, affectionate, or curious nature of the animals I paint. I hope that giving the viewer a sense of the animal's personality will create an emotional connection, create concern and compassion for our natural world and its inhabitants, and stimulate conservation efforts. I have sold many original paintings to collectors, illustrated three children's books about wildlife, and have had many images successfully published as fine art prints and licensed on various products.

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



<https://crista-forest.pixels.com/art/wildlife>

5. I am the owner of the United States Copyright Registration Nos. VA 2-336-225; VA 2-336-158; VA 2-336-221; VA 2-336-192; VA 2-336-191; VA 2-336-377; and VA 2-336-164 (collectively, the “Crista Forest Works”). True and correct copies of the copyright registrations for the Crista Forest Works are attached to the Complaint as **Exhibit 1**.



6. I control the quality of all materials and content that feature the distinctive Crista Forest Works.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants’ Image
VA 2-336-225	Bluebirds and Peaches		 <p data-bbox="1166 1598 1279 1625">Def #1-4</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-336-158	Apple Harvest Chickadees		 Def #5
VA 2-336-221	Goldfinch Blossoms		 Def #6
VA 2-336-192	Hilltop Retreat		 Def #7
VA 2-336-191	Hummingbird Heaven		 Def #8

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-336-377	MamaSaurus Tyrannosaurus Rex and Baby Dinosaurs		 Def #9-119
VA 2-336-164	DaddySaurus Tyrannosaurus Rex and Baby Dinosaurs		 Def #120-161

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 Crista Forest Works are used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the

Crista Forest Works copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Crista Forest Works and derivative works.

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

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

Crista Forest

Crista Forest