

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

DEBRA COULES,

Plaintiff,

v.

YIMASHIXINWENWANGLUO, *et al.*,

Defendants.

Case No. 25-cv-1493

**FILED UNDER SEAL**

**DECLARATION OF DEBRA COULES**

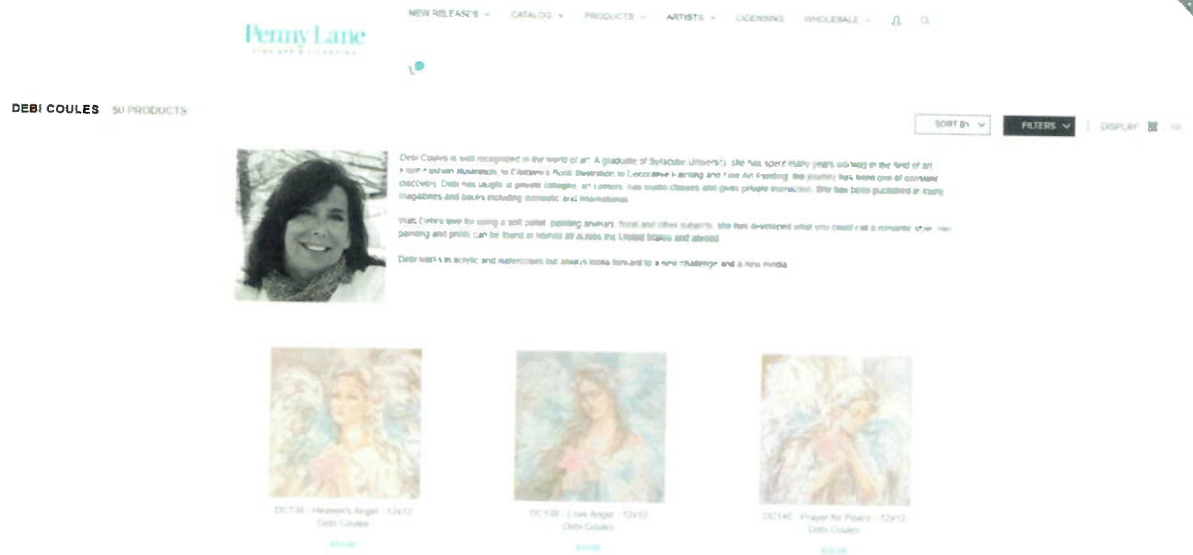
I, DEBRA COULES, declare and state as follows:

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 creates all the Debra Coules 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 who produces work under the name "Debra Coules." I am a graduate of Syracuse University and have spent many years working in the field of art. From Fashion illustration, to Children's Book Illustration to Decorative Painting and Fine Art Painting, the journey has been one of constant discovery. I teach at private colleges and art centers in addition to private instruction. My work has been published in many magazines and books including domestic and international. I have developed a romantic style stemming from my love for using a soft pallet, painting animals, floral, and other subjects. My paintings and prints can be found in homes across the United States and abroad. I specialize in acrylic and watercolors but always look forward to a new challenge and a new media.

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



<https://pennylanefineart.com/collections/debi-coules>



5. I am the owner of the copyright registrations for the Debra Coules copyrighted works, which include United States Copyright Registration Nos. VA 2-431-409; VA 2-446-143; VA 2-431-756; VA 2-431-513; VA 2-431-760; and VA 2-431-519 (the “Debra Coules Works”). True and correct copies of the copyright registrations for the Debra Coules Works are attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Debra Coules Works.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants’ Image
VA 2-431-409	"La Vie En Rose"		 Def #1-86, 163-168

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-446-143	Mother's Roses		 Def #87-108, 169-173
VA 2-431-756	Faith		 Def #109-123, 174-191
VA 2-431-513	"Life Is Beautiful"; Live, Love, Laugh		 Def #124-137, 192-195
VA 2-431-760	"My Angel"		 Def #138-150
VA 2-431-519	"HYDRANGEAS 50 CENTS"		 Def #151-162

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

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

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

*Debra Coules*

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Debra Coules