

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

PROMIER PRODUCTS, INC.,

Plaintiffs,

v.

GEAROSZ, *et al.*,

Defendants.

Civil Action No. 25-cv-497

Judge Colville

**FILED UNDER SEAL**

**PLAINTIFFS' EXPEDITED INTERROGATORIES**

AND NOW come Plaintiffs, by and through its attorneys, and serve the following Expedited Interrogatories on each Defendant in this action. In accordance with the Court Order dated May 8, 2025 ("TRO"), your responses are due no later than fourteen (14) days after these Interrogatories are served on you.

**DEFINITIONS**

1. Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Complaint, Plaintiff's *Ex Parte* Application, and/or the TRO.
2. The terms "Defendant," "you," and "your" refer to the Defendant listed on Amended Schedule A, including all affiliates and subsidiaries, receiving these Interrogatories.
3. The terms "concerning" or "relating to" (or any forms thereof) mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating, or relevant to.

As indicated, the terms necessarily include information which is in opposition to as well as in support of the position(s) and claim(s) of the parties in this civil action.

4. The terms “communication” or “communications” refer to any transmission of information, the information transmitted, and any process by which information is transmitted, and will include written communications, electronic communications, and oral communications.

5. The term “person” refers to natural persons, firms, proprietorships, associations, partnerships, corporations and every other type of organization or entity.

6. The terms “document” or “documents” refer to all written, typed, printed, recorded, filmed or reproduced by any other mechanical process, photographic, or graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated, or made, in any form, whether originals or copies, now or formerly in your possession, custody, or control, including, but not limited to: letters; correspondence; e-mails; memoranda; records; books; minutes of all types of meetings; contracts; subcontracts; agreements; exhibits; attachments; intra-office and inter-office communications; analyses; bulletins; regulations, rules, directives, advisory opinions, manuals, proposals; estimates; recommendations; opinions; messages; instructions; notes; notebooks; measurements; designs; sketches; drawings; blueprints; data sheets; telephone records; tapes; computer stored data; computer disks; diaries; desk calendars; work sheets; reports; facsimiles; records of telephone conversations, meetings and conferences; notes and records of conversations or interviews; invoices; bills; statements; accounts; checks; drafts; notices; computer printouts; computer tapes; photographs; slides; negatives; motion pictures; video recordings; tape or other voice recordings and transcriptions thereof; data compilations from which information can be obtained, translated, if necessary, by you through detection devices into reasonably usable form; and any other

writings or recordings or data compilations from which information can be obtained in your actual or constructive possession, custody, or control, including drafts and multiple versions of documents containing marginalia or other comments or notes not appearing on the original. If any document was, but is no longer, in your possession or subject to your control, identify the document and identify its disposition, including, where applicable, the person who currently has possession and/or control of it.

7. The words “identify” or “identity” mean when used in reference to:
  - (a) a document, to state separately: (i) its type (letter, report, memorandum, etc.); (ii) its date; (iii) its subject matter; (iv) the identity of each author or signer; and (v) its present location and the identity of its custodian;
  - (b) an oral statement, communication, conference or conversation, to state separately: (i) its date and the place where it occurred; (ii) its substance; (iii) the identity of each person(s) participating in the communication or conversation; and (iv) the identity and location of all notes, memoranda or other documents memorializing, referring to or relating to the subject matter of the statement;
  - (c) a natural person or persons, to state separately: (i) the full name of each such person; (ii) his or her present or last known business address, or his or her present or last known residential address; and (iii) the employer of the person at the time to which the request or interrogatory is directed and the person’s title or position at that time; and
  - (d) an organization or entity (other than a natural person), a company, a corporation, a firm, an association, or a partnership, to state separately:
  - (e) the full name and type of organization or entity; (ii) the date and state of organization or incorporation, if a business entity; (iii) the address of each of its principal places of business and headquarters; and (iv) the nature of the business conducted or services rendered.
8. Respond separately and in writing to each interrogatory.
9. In answering these interrogatories, furnish all information that is known to you,

your attorneys, agents, advisers, employees or persons otherwise acting on your behalf. If any of these requests for information cannot be answered in full, answer them to the fullest extent

possible, state the reasons for your inability to answer the remainder, and state fully the information, knowledge, or belief you now have concerning the unanswered portions.

10. Each interrogatory shall be construed as referring to information now within the knowledge, possession, custody or control of you or your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, as well as any information, knowledge, data, document, or communication that subsequently is obtained or discovered by you or by your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, that demonstrates that any answer originally provided in response to these requests for information was either incorrect or incomplete. Such supplemental information is to be supplied promptly to the party propounding these interrogatories with a designation as to which request the information is responsive.

11. If you do not answer an interrogatory because you claim the information requested is privileged, as to each such interrogatory, state the privilege claimed, set forth the facts relied upon to support your claim of privilege, and identify each document and/or communication upon which you base your claim of privilege.

12. If any document forms a part of or the entire basis for any answer, identify that document.

13. If any responsive document or portion of a responsive document is withheld from production on a claim of privilege, work-product protection, or other discovery immunity, such document should be identified on a privilege log which states, as to each such document: the name, affiliation, and job title of its author(s); the name, affiliation, and job title of its recipient(s); the name, affiliation, and job title of any copyholder(s); the date of the document;

the basis for the claim of privilege, protection or immunity; and the request to which the document is responsive.

14. These interrogatories are ongoing, and you are required to file supplemental answers and/or provide additional documents as additional information becomes available.

### **INTERROGATORIES**

1. Identify yourself, including stating your true name and physical address.

**ANSWER:**

2. Identify the name and location and URL of any and all websites that you own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on any Third Party Service Provider platform that you own and/or operate.

**ANSWER:**

3. Identify each of your Financial Accounts, including stating the account details for each account, which should include the account numbers and current account balances.

**ANSWER:**

4. State the steps taken by you to comply with the TRO.

**ANSWER:**

5. Identify each Infringing Product that you have sold.

**ANSWER:**

6. For each product identified by you in your answer to interrogatory number 5, state:

- (a) The identity of each individual involved in, or with knowledge of, the conception, research, and development of the product, including but not limited to the packaging in the products are packaged;
- (b) The date the product was launched, first sold, or offered for sale by you;
- (c) The number of units of products that you have sold since their launch, broken down by month;
- (d) The U.S. dollar sales that you have earned from the products since their launch, broken down by month;
- (e) The profits that you have earned from the products since their launch, broken down by month;
- (f) The identity of each individual with knowledge of the number of units sold, dollar sales, and profits that you have earned from the products since their launch;
- (g) The amount of products and/or packaging in which the products are packaged currently in inventory;
- (h) The identity of each entity involved in the research, conception, and/or development of the products and/or packaging in which the products are packaged;
- (i) The identity of each entity involved in manufacturing and/or supplying the products and/or packaging in which the products are packaged.

**ANSWER:**

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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FERENCE & ASSOCIATES LLC

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Attorneys for Plaintiffs

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**PLAINTIFFS' EXPEDITED REQUESTS FOR PRODUCTION OF DOCUMENTS**

AND NOW come Plaintiffs, by and through their attorneys, and serve the following Expedited Requests for Production of Documents on each Defendant in this action. In accordance with the Court Order dated May 8, 2025 ("TRO"), your responses are due no later than fourteen (14) days after these Interrogatories are served on you.

**DEFINITIONS**

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2. The terms "Defendant," "you," and "your" refer to the Defendant listed on Amended Schedule A, including all affiliates and subsidiaries, receiving these Requests for Production.
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6. The terms “document” or “documents” refer to all written, typed, printed, recorded, filmed or reproduced by any other mechanical process, photographic, or graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated, or made, in any form, whether originals or copies, now or formerly in your possession, custody, or control, including, but not limited to: letters; correspondence; e-mails; memoranda; records; books; minutes of all types of meetings; contracts; subcontracts; agreements; exhibits; attachments; intra-office and inter-office communications; analyses; bulletins; regulations, rules, directives, advisory opinions, manuals, proposals; estimates; recommendations; opinions; messages; instructions; notes; notebooks; measurements; designs; sketches; drawings; blueprints; data sheets; telephone records; tapes; computer stored data; computer disks; diaries; desk calendars; work sheets; reports; facsimiles; records of telephone conversations, meetings and conferences; notes and records of conversations or interviews; invoices; bills; statements; accounts; checks; drafts; notices; computer printouts; computer tapes; photographs; slides; negatives; motion pictures; video recordings; tape or other voice recordings and transcriptions thereof; data compilations from which information can be obtained, translated, if necessary, by you through detection devices into reasonably usable form; and any other

writings or recordings or data compilations from which information can be obtained in your actual or constructive possession, custody, or control, including drafts and multiple versions of documents containing marginalia or other comments or notes not appearing on the original. If any document was, but is no longer, in your possession or subject to your control, identify the document and identify its disposition, including, where applicable, the person who currently has possession and/or control of it.

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  - (a) a document, to state separately: (i) its type (letter, report, memorandum, etc.); (ii) its date; (iii) its subject matter; (iv) the identity of each author or signer; and (v) its present location and the identity of its custodian;
  - (b) an oral statement, communication, conference or conversation, to state separately: (i) its date and the place where it occurred; (ii) its substance; (iii) the identity of each person(s) participating in the communication or conversation; and (iv) the identity and location of all notes, memoranda or other documents memorializing, referring to or relating to the subject matter of the statement;
  - (c) a natural person or persons, to state separately: (i) the full name of each such person; (ii) his or her present or last known business address, or his or her present or last known residential address; and (iii) the employer of the person at the time to which the request or interrogatory is directed and the person’s title or position at that time; and
  - (d) an organization or entity (other than a natural person), a company, a corporation, a firm, an association, or a partnership, to state separately:
  - (e) the full name and type of organization or entity; (ii) the date and state of organization or incorporation, if a business entity; (iii) the address of each of its principal places of business and headquarters; and (iv) the nature of the business conducted or services rendered.

### **INSTRUCTIONS**

1. Respond separately and in writing to each document request.
2. In answering these requests for information, furnish all the information that is known to you, your attorneys, agents, advisers, employees or persons otherwise acting on your

behalf. If any of these requests for information cannot be answered in full, answer them to the fullest extent possible, state the reasons for your inability to answer the remainder, and state fully the information, knowledge, or belief you now have concerning the unanswered portions.

3. Each request for information shall be construed as referring to information now within the knowledge, possession, custody or control of you or your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, as well as any information, knowledge, data, document, or communication that subsequently is obtained or discovered by you or by your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, that demonstrates that any answer originally provided in response to these requests for information was either incorrect or incomplete. Such supplemental information is to be supplied promptly to the party propounding these requests for information with a designation as to which request the information is responsive.

4. If you do not answer a request for information because you claim the information requested is privileged, as to each such request, state the privilege claimed, set forth the facts relied upon to support your claim of privilege, and identify each document and/or communication upon which you base your claim of privilege.

5. If any document forms a part of or the entire basis for any answer, identify that document.

6. If any responsive document or portion of a responsive document is withheld from production on a claim of privilege, work-product protection, or other discovery immunity, such document should be identified on a privilege log which states, as to each such document: the name, affiliation, and job title of its author(s); the name, affiliation, and job title of its recipient(s); the name, affiliation, and job title of any copyholder(s); the date of the document;

the basis for the claim of privilege, protection or immunity; and the request to which the document is responsive.

7. These requests are ongoing and you are required to file supplemental answers and/or provide additional documents as additional information becomes available.

### **REQUESTS FOR PRODUCTION**

1. Produce all documents sufficient to identify your true name and physical address.

**RESPONSE:**

2. Produce all documents concerning the name and location and URL of any and all websites that you own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on any Third-Party Service Provider platform that you own and/or operate.

**RESPONSE:**

3. Produce all documents concerning your manufacture, sale and/or offer for sale of Infringing Product, including the complete sales records for any and all sales of Infringing Product, including number of units sold, price per unit, total gross revenues received (in U.S. dollars) and dates thereof.

**RESPONSE:**

4. Produce all documents sufficient to show the account details for all of your Financial Accounts, including the account numbers and current account balances.

**RESPONSE:**

5. Produce all documents concerning the steps taken by you to comply with the TRO.

**RESPONSE:**

6. For each Infringing identified by you in your answer to interrogatory number 5, produce a sample of the Infringing and all documents concerning:

- (a) the sales, profits, or revenue that you projected to earn from the product;
- (b) the number of units of product that you have sold;
- (c) the dollars sales that you have actually earned from the product;
- (d) the profits that you have actually earned from the product;
- (e) the launch or rollout of the product;
- (f) contracts you have with manufacturers or suppliers of the product and/or the packaging in which the product is packaged;

- (g) the manufacturers or suppliers of the product and/or the packaging in which the product is packaged; and
- (h) the customers to whom you sold the product and/or the packaging in which the product is packaged.

**RESPONSE:**

- 5. Produce all documents that refer to the false advertising.

**RESPONSE:**

- 6. Produce all documents that refer to Plaintiffs'.

**RESPONSE:**

- 7. Produce all documents that you or your agent had with Plaintiffs or any representative of Plaintiffs.

**RESPONSE:**

- 8. Produce all documents concerning any communications you or your agent had with any Third-Party Service Provider.

**RESPONSE:**

9. Produce all documents concerning the false advertising.

**RESPONSE:**

10. Produce all documents concerning communications from consumers that refer to the false advertising, including but not limited to communications from consumers that indicate confusion as to the source or origin of the Plaintiffs' Product and/or the Infringing Product.

**RESPONSE:**

11. Produce a copy of each web page on which you sold and/or offered for sale Infringing Product.

**RESPONSE:**

12. Produce all documents concerning communications from manufacturers, distributors, retailers, suppliers, vendors, or brokers about the Infringing Product.

**RESPONSE:**

13. Produce all documents concerning your customers for the Infringing Product, including documents sufficient to identify your customers.

**RESPONSE:**

/s/ Stanley D. Ference III

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Pa. ID No. 59899

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**PLAINTIFFS' EXPEDITED REQUESTS FOR ADMISSIONS**

AND NOW comes Plaintiffs, Promier Products, Inc., by and through their attorneys, and serve the following Expedited Requests for Admissions on each Defendant in this action. In accordance with Fed. R. Civ. P. 26 and 36, and with the Court Order dated May 8, 2025 (“TRO”), your responses are due no later than fourteen (14) days after these Requests for Admissions are served on you.

**DEFINITIONS**

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3. The terms “concerning” or “relating to” (or any forms thereof) mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, noting,

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if necessary, by you through detection devices into reasonably usable form; and any other writings or recordings or data compilations from which information can be obtained in your actual or constructive possession, custody, or control, including drafts and multiple versions of documents containing marginalia or other comments or notes not appearing on the original. If any document was, but is no longer, in your possession or subject to your control, identify the document and identify its disposition, including, where applicable, the person who currently has possession and/or control of it.

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  - (a) a document, to state separately: (i) its type (letter, report, memorandum, etc.); (ii) its date; (iii) its subject matter; (iv) the identity of each author or signer; and (v) its present location and the identity of its custodian;
  - (b) an oral statement, communication, conference or conversation, to state separately: (i) its date and the place where it occurred; (ii) its substance; (iii) the identity of each person(s) participating in the communication or conversation; and (iv) the identity and location of all notes, memoranda or other documents memorializing, referring to or relating to the subject matter of the statement;
  - (c) a natural person or persons, to state separately: (i) the full name of each such person; (ii) his or her present or last known business address, or his or her present or last known residential address; and (iii) the employer of the person at the time to which the request or interrogatory is directed and the person’s title or position at that time; and
  - (d) an organization or entity (other than a natural person), a company, a corporation, a firm, an association, or a partnership, to state separately:
  - (e) the full name and type of organization or entity; (ii) the date and state of organization or incorporation, if a business entity; (iii) the address of each of its principal places of business and headquarters; and (iv) the nature of the business conducted or services rendered.

### **INSTRUCTIONS**

1. Respond separately and in writing to each request.

2. These requests for admission shall be construed as referring to information now within the knowledge, possession, custody or control of you or your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, as well as any information, knowledge, data, document, or communication that subsequently is obtained or discovered by you or by your attorneys, agents, advisers, employees or persons otherwise acting on your behalf, that demonstrates that any answer originally provided in response to these requests for information was either incorrect or incomplete. Such supplemental information is to be supplied promptly to the party propounding these requests for information with a designation as to which request the information is responsive.

3. If you do not answer a request for admission because you claim the information requested is privileged, as to each such request, state the privilege claimed, set forth the facts relied upon to support your claim of privilege, and identify each document and/or communication upon which you base your claim of privilege.

4. If you deny a request for admission, set forth your reason and identify and produce any document relied upon in your denial.

**REQUESTS FOR ADMISSIONS**

1. At all times relevant hereto, Plaintiff owned and operated The LitezAll.com independent website and the Premier Products, Inc. Amazon.com online marketplace storefront.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

2. At all times relevant hereto, Plaintiff owned the LITEZALL<sup>®</sup>, KODIAK<sup>®</sup>, ILLUMIBRITE<sup>®</sup>, and HANDZFREE<sup>®</sup> lighting brands.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

At all times relevant hereto, Plaintiff advertised, sold and distributed a variety of lighting products (“Plaintiff’s Product”), including flashlights, using the Amazon.com online marketplace, its independent retail website, and in retail stores.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

3. At all times relevant hereto, Defendant knew that Plaintiff tested the maximum lumen output of all products offered for sale and advertised the products accurately in accordance with the results, and that exaggerated product listings may make Defendant’s product appear more desirable to consumers than Plaintiff’s.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

4. Despite having the knowledge that you had no license or legal authority to do so, you engaged in the activity of promoting and otherwise advertising, selling, offering for sale, and/or distributing falsely advertised goods under your Seller ID or Seller IDs.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

5. You knew that you were falsely advertising goods before you sold them.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

6. You are offering and selling falsely advertised goods in order to directly compete with Plaintiffs’ Product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

7. You have been named as a defendant in past false advertising cases.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

8. You view the cost of defending this lawsuit and any damages that the Plaintiffs might recover as a cost of running your counterfeiting business.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

9. You intentionally copied, counterfeited, and sold Plaintiff's goods in order to benefit from Plaintiffs' fame, reputation, and goodwill to divert Plaintiffs' profits into your business.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

10. You cooperated, coordinated, and communicated with the other Defendants in order to take control of online market and search results for "high lumens" and "super bright flashlights" or other confusingly similar terms calculated to cause the online market search engine to return your listing instead of Plaintiffs' Product when a buyer searched for those terms.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

11. At all times relevant hereto, you have been engaged in the fraudulent promotion, advertisement, distribution, offering for sale, and/or sale of goods that are falsely advertised Product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

12. At all times relevant hereto, you had no authority to make, use, offer to sell, or sell, or import into the United States any device that infringes on any of the claims of the Plaintiffs' Patent.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

13. You intentionally make, use, offer to sell, or import into the United States falsely advertised Product with English language packaging and instructions.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

14. You made more than \$50,000.00 (United States Dollars) in profit on the sales of the falsely advertised goods.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

15. You made more than \$1,000,000.00 (United States Dollars) in profit on the sales of the falsely advertised goods.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

16. Your profits from selling the falsely advertised goods are greater than your funds that have been restrained in this action.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

17. You made more than \$2,000,000.00 (United States Dollars) in profit on the sales of the falsely advertised goods.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

18. You have sold more than 50,000 units of goods that were falsely advertised product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

19. You have sold more than 100,000 units of goods that were falsely advertised product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

20. You have sold more than 150,000 units of goods that were falsely advertised product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

21. You made at least \$20.00 profit on each falsely advertised product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

22. There is a consumer demand for the Plaintiffs' Product advertised, sold, and distributed on the Amazon.com online marketplace and Litezall.com website.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

23. The consumer demand for the Plaintiff's Product is based on the company's reputation among consumers, the public, and the trade as a premium flashlight company that provides high-quality products.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

24. The consumer demand for the Plaintiff's Product is based on the actual quality of the products offered by Plaintiff.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

25. Plaintiff has the capability to meet the consumer demand for Plaintiffs' Product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

26. In the absence of your sales of your falsely advertised products, your customers would have purchased Plaintiffs' Product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

27. But for your false claims, Plaintiffs would have made a substantial portion of the sales you made of falsely advertised products.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

28. The claims you set forth regarding the falsely advertised products are literally false.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

29. You had actual knowledge of the literally falsity of these claims prior to publishing the product listings.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

30. You did not subject your products to luminous flux or any other photometric testing to establish a basis for the claims set forth in your advertisements and product listings.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

31. Prior to commencement of this lawsuit you did not have an objectively reasonable defense to Plaintiff's claim of false advertisement.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

32. You knew or should have known that your claims would actually deceive or are likely to deceive the consuming public.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

33. You willfully misrepresented the characteristics and/or qualities of the products you were advertising.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

34. You intentionally exaggerated the lumen output of your product and used these claims to advertise and promote your falsely advertised product.

**ADMITTED:** \_\_\_\_\_ **DENIED:** \_\_\_\_\_

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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