

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

DEL PARSON,

Plaintiff,

v.

SCHEDULE A DEFENDANTS, *et al.*,

Defendants.

Case No. 25-cv-1699

FILED UNDER SEAL

DECLARATION OF DEL PARSON

I, DEL PARSON, 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 Lost Lamb 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 who produces work under the name "Del Parson." Growing up, my father was an art professor and would often take my family on painting excursion campouts. I found my father's love of art to be contagious. I went on to earn my Master of Fine Arts degree from Brigham Young University and became a gallery and portrait artist. After losing my wife and daughter in a car accident, I felt the Spirit of God helping me through the tough times. I began to paint religious subjects to give others the sense of hope that I found and to share my love of life.

4. I am the official source of products associated with the Lost Lamb Work (the "Lost Lamb Products"):



<https://ansadagroup.com/downloads/tag/del-parson/>



5. I am the owner of the copyright registrations for the Del Parson copyrighted works, which include United States Copyright Registration No. VA 1-638-968 (the “Lost Lamb Work”). A true and correct copy of the copyright registration for the Lost Lamb Work is attached to the Complaint as **Exhibit 1**.

6. I control the quality of all materials and content that feature the distinctive Lost Lamb Work.

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

Reg. Number	Title of Work	Copyrighted Work	Defendants’ Image
VA 1-638-968	Lost Lamb		 Def #1-374

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 Lost Lamb Work is used on unauthorized goods. I am further irreparably harmed by the unauthorized use of the Del Parson copyrighted materials because infringers take away my ability to control the nature and quality of products bearing the Lost Lamb Work and derivative works.

12. I am further irreparably damaged due to a loss of exclusivity. The copyright rights in the Lost Lamb Work is meant to be exclusive rights.

13. The marketing and distribution of the Lost Lamb Work and derivative works are aimed at growing and sustaining sales. When infringers use the Lost Lamb Work without authorization, the exclusivity associated with the Lost Lamb 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 Lost Lamb Work create the impression that the copyright rights associated with the Lost Lamb Work may be infringed with impunity. The Lost Lamb Work is distinctive and signifies 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 Lost Lamb Work cannot be compensated for financially since it erodes my ability to monetize the Lost Lamb 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 November 3, 2025.

Del Parson