

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

LEE ANN SHEPARD,

Plaintiff,

v.

LUYANZHENLUHENGSHENGBAIHUODIAN, *et al.*,

Defendants.

Civil Action No. 25-cv-982

Judge Hardy

**DECLARATION OF STANLEY D. FERENCE III IN SUOPRT OF MOTION FOR  
ENTRY OF DEFAULT JUDGMENT, PERMENANT INJUNCTION, DAMAGES  
AWARD, AND TRANSFER OF FROZEN ASSETS**

I, Stanley D. Ference III, hereby affirm as follows:

1. I am over eighteen (18) years of age and not a party to this action. I have never been convicted of a felony or any criminal offense involving moral turpitude, and I am fully competent to attest to the matters stated herein. I have personal knowledge of every statement made in this Certificate of Service and such statements are true and correct.
2. I am an attorney with the law firm of Ference & Associates LLC, which is located at 409 Broad Street, Pittsburgh, Pennsylvania 15143.
3. I am an attorney for the Plaintiff Lee Ann Shepard (“Plaintiff”) in the above-captioned case.
4. I make and submit this Declaration in support of Plaintiff’s Motion for Entry of Default Judgment, Permanent Injunction, Award of Monetary Damages, and Transfer of Frozen Assets (hereinafter “Motion for Default Judgment”) against those Defendants in Schedule “A.”

5. I make and submit that the Defendants by failing to respond to proper service of the Complaint and Amended Complaint have admitted all allegations therein.

6. The Plaintiff served each Defendant on July 23, 2025. No Defendant responded to Requests for Admissions, thus deeming each statement admitted, including, *inter alia*, the following:

**At all times relevant hereto, Plaintiff owned United States Copyright Registration No. VA 2-429-958, VA 2-429-960, and VA 2-429-959 (“Plaintiff’s Work”) and Defendant knew that Plaintiff had the exclusive right to use and license their intellectual property and the goodwill associated therewith.**

**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 Infringing Products featuring, displaying, and/or using Plaintiff’s Work without authorization under your Seller ID(s) and/or Merchant Storefront(s).**

**You knew that you were copying Plaintiff’s Work before you sold the Infringing Products.**

**You have been named as a defendant in past intellectual property infringement cases.**

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

**You made more than \$2,000,000.00 (United States Dollars) in profit on the sales of products that infringe on the Plaintiff’s Work.**

**You began selling the Infringing Products after Plaintiff obtained their federal registrations for Plaintiff’s Work.**

7. I am informed and believe that none of the Defendants are infants or incompetent persons, and upon information and belief, the Servicemembers Civil Relief Act does not apply.

8. Negotiations with the Defendants in Schedule “A” ultimately failed to yield a settlement, no request for extension of time to answer or respond was made, and a clerk’s entry of default was entered against each of them.

I declare under the penalty of perjury laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed this 13<sup>th</sup> day of November, 2025, at Pittsburgh, Pennsylvania.

/s/Stanley D. Ference III  
Stanley D. Ference III  
Pa. ID No. 59899  
[courts@ferencelaw.com](mailto:courts@ferencelaw.com)

FERENCE & ASSOCIATES LLC  
409 Broad Street  
Pittsburgh, Pennsylvania 15143  
(412) 741-8400 – Telephone  
(412) 741-9292 – Facsimile

Attorney for Plaintiff