

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

NIFTY HOME PRODUCTS, INC.,

Plaintiff,

v.

LADYNANA US, *et al.*,

Defendants.

Civil Action No. 22-994

(Judge Schwab)

**DECLARATION OF STANLEY D. FERENCE III**

I, STANLEY D. FERENCE III, hereby declare as follows:

1. I am an attorney with the law firm of Ference & Associates LLC (“the Ference Firm”), located at 409 Broad Street, Pittsburgh, Pennsylvania 15143 and represent Nifty Home Products, Inc. (“Nifty”) in the above-referenced action. Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. Attached hereto as Exhibit A is a true and correct copy of Exhibit 3B to the Complaint. This exhibit includes the Copyright Registration Certificate and deposit copy for U.S. Copyright Registration No. VA 2-214-107 for “Talisman Designs Website Photographs,” a group of 5 images.

3. Attached hereto as Exhibit B is a true and correct copy of Exhibit 3C to the Complaint. This exhibit includes the Copyright Registration Certificate and deposit copy for U.S. Copyright Registration No. VA 2-218-985 for “Pig Face,” a sculpture.

4. Attached hereto as Exhibit C is a true and correct copy of the evidence materials from the *Declaration of Dee Odell* previously filed at ECF No. 12 for each of the Defendants that are the subject of the renewed motion for default judgment (the “Defaulting Defendants”) filed by Plaintiff Nifty Home Products, Inc. (“Nifty”).

5. All of the Defaulting Defendants have infringed five of Nifty’s copyrighted works, except for the following four Defendants who have infringed four of Nifty’s copyrighted works: (Def. No. 28) Ding/Shenzhen Dingkunhui Network Technology, (Def. No. 29) shenzhenshimeihuidawangluokejiyouxiangongsi, (Def. No. 30) XiaMen Shi AiDeMan XinXiKeJi YouXian GongSi, (Def. No. 31) Shenzhen Xiaoyanzifei Network Technology Co., Ltd., (

6. Nifty is seeking statutory damages in the amount of \$150,000 for each work infringed by the Defaulting Defendants, up to four works. Thus, from each Defaulting Defendant Nifty is seeking \$600,000 in statutory damages.

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.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Pittsburgh, Pennsylvania  
March 30, 2025

/Stanley D. Ference III/  
Stanley D. Ference