

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)

SECOND 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. I have reviewed the information provided by the online marketplace Walmart.com for the defendants in this lawsuit. This information included information on the sales by each defendant, including the Defaulting Defendants that are the subject of Nifty’s Renewed Motion for Default Judgment. This information shows that at least five Defaulting Defendants (Def. Nos. 25 (Shenzhen Ruimiaoqian Network Technology Co., Ltd.), 26 (Qingtian Diaocheng Trading Co., Ltd.), 31 (Shenzhen Xiaoyanzifei Network Technology Co., Ltd.), 46 (Peantioia), and 51 (Donewelo)) have had multiple sales to consumers in Pennsylvania.

3. Defendant Nos. 25 (Shenzhen Ruimiaoqian Network Technology Co., Ltd.), 26 (Qingtian Diaocheng Trading Co., Ltd.), 31 (Shenzhen Xiaoyanzifei Network Technology Co., Ltd.) are represented in this action by Attorney Banister. Defendant Nos. 46 (Peantoia) and 51 (Donewelo) are represented in this action by Attorney Urbanczyk.

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

Dated: Pittsburgh, Pennsylvania
April 16, 2026

/Stanley D. Ference III/
Stanley D. Ference