

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

NICOLETTE RAHNER,

Plaintiffs,

v.

XIANCHUANBAIBAI, *et al.*,

Defendants.

Civil Action No. 26-cv-57

Judge Cercone

**DECLARATION OF STANLEY D. FERENCE  
IN SUPPORT OF REQUEST TO ENTER DEFAULT AGAINST DEFENDANTS**

I caused the complaint and a summons in this action to be served on the Defendants on the dates as set forth in ECF No. 27; at the time within which such Defendants may answer or otherwise move as to the complaint has expired; that such Defendants have not answered or otherwise moved and that the time for such Defendants to answer or otherwise move has not been extended.

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

Executed in Pittsburgh, Pennsylvania on May 20, 2026.

/s/ Stanley D. Ference III