

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Trademark Rightsholder Identified in Exhibit 1,)	
)	
Plaintiff,)	
)	1:23-cv-16216
v.)	
)	Dist. Judge Sara L. Ellis
The Individuals, Partnerships, and Unincorporated Associations Identified on Schedule A,)	
)	Mag. Judge Sheila M. Finnegan
)	
Defendants)	

Declaration of Adam E. Urbanczyk

I, Adam E. Urbanczyk, in the City of Sarasota, in the State of Florida declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the States of Illinois and Michigan and the District of Columbia, and the U.S. District Court for the Northern District of Illinois, et al. I am an attorney for Plaintiff Trademark Rightsholder Identified in Exhibit 1 (“Plaintiff”). 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 to the following:
2. Pursuant to the temporary restraining order [Dkt. 11] and since the temporary restraining order’s entry, Amazon payment accounts associated with the Defendant Online Stores have been restrained and preserved, and the Infringing Product ASIN have been disabled. Sales and account information for Defendants was produced by Amazon on December 11, 2023.
3. Per discovery provided by Amazon, across all Defendants the average sales volume of Infringing Products alone is approximately 65% greater than the restrained balance. Plaintiff continues its investigation into Defendants’ operations.

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

Executed this December 11, 2023

/s/Adam E. Urbanczyk
Adam E. Urbanczyk