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3 **UNITED STATES DISTRICT COURT**  
4 **FOR THE WESTERN DISTRICT OF WASHINGTON**  
5 **AT SEATTLE**

6 Dongguan Zhouda Technology Co. Ltd, et al.,

7 Plaintiff,

8 v.

9 Xinjie Dai,

10 Defendant.

CASE NO. 2:25-cv-00536-TL

**Declaration of Mengdi Zhao**

11 I, Mengdi Zhao, of the City of Dengzhou, China declare as follows:

- 12 1. This declaration is based upon my personal knowledge of the facts stated herein or on the  
13 business records that were made at the time or in the regular course of business. If called as a  
14 witness, I could and would testify to the statements made herein.
- 15 2. I am Mengdi Zhao. I am a manger of Plaintiff Dengzhou Sandstorm Trading Co., Ltd. d/b/a  
16 Sandstorm2024. I am knowledgeable of or have access to business records concerning all  
17 information referenced herein, including, but not limited to, Plaintiff's cup lid products, sales,  
18 on-line sales, advertising, marketing, and media coverage. I made this declaration from  
19 matters within my own knowledge unless otherwise stated.
- 20 3. Due to Defendant's infringement complaint on Amazon, over 2586 units of Plaintiff's cup lid  
21 products designated with Amazon Standard Identification Numbers (ASIN) B0DSFSMMT9,  
22 B0DSFRWP1T, B0DSFSJ1ZP, B0DSFRHWP8, B0DSFQ2YJL, B0DSFTZM6V,  
23 B0DSFR2JLZ, B0DSFR44S2, B0DSZXZH73, B0DSFTSZJS, B0DSFRPY6B,  
24 B0DSFR4V8X and B0DSFRGDDL("Products") are now subject to Amazon's Auto Removal  
25  
26

27 Declaration of Mengdi Zhao  
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AU LLC  
444 W LAKE ST 17<sup>TH</sup> FLOOR  
CHICAGO, IL 60606  
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policy, which means all such Products in inventory will be disposed and destroyed by

Amazon on June 20, 2025 and June 26, 2025. Attached **Exhibit A** is the screenshot of

Plaintiff's Amazon.com storefront Sandstorm2024 (the "Amazon Storefront"). The inventory

is worth more than \$48823.68 in sales revenue.

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 on this June 5, 2025 at Dengzhou, China.

Mengdi Zhao  
Mengdi Zhao

# Exhibit A



对 9 件商品进行排序										
搜索 SKILL, ASIN 或 P/N										
按名称排序   按已启用										
31 件商品										
<input type="checkbox"/>	SKU 标题	商品名称 ASIN	PNSKU	当前商品价格	可用	商品规格日期	最近商品规格制作日期	无在库商品的提醒	订单配送方	全部保存
<input type="checkbox"/>	EZ-4MB-05AK 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J39MF	18.88	343	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	YEL-Q0T-2JAJ 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J39MFZ	18.88	262	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	VHS-TZE2-YANZ 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3TMEZ	18.88	263	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	QB-QAMC-IFFG 商品	2 Pack Detachable ProTear Lid for Stanley 30 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J39K0Z	18.88	199	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	DA-HMB-0BGJ 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3FJLR	18.88	267	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	SV-SNZN-2BPC 商品	2 Pack Detachable ProTear Lid for Stanley 30 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J29KLV	18.88	90	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	GS-2PUG-PPVY 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3TMFJ	18.88	200	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	NV-BEAD-E4BP 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3HFT	18.88	215	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	6E-QZTW-NBQ 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3TMT	18.88	214	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	OT-J0DA-96KR 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J38FJ	18.88	200	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	10-FFPQ-RWVG 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J39KL	18.88	213	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	VL-CKAS-HPHE 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J6YED	18.88	194	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>
<input type="checkbox"/>	4GLKYBY-GKOT 商品	2 Pack Detachable ProTear Lid for Stanley 40 oz Tumbler with Stanley Lids 40oz Leakproof Flip Straw Lid for Stanley BICOF5A4G2	X004J3TMF9	18.88	196	06/20/2025 共需	03/21/2025	需要替换零件 (查看电子零件)	亚马逊	<div>替换零件选择</div>