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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 Chenyang Ma**

11 I, Chenyang Ma, 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 Chenyang Ma. I am a Manager of Plaintiff Dengzhou Muiyi Commerce Co. Ltd., d/b/a  
16 ZJT. I am knowledgeable of or have access to business records concerning all information  
17 referenced herein, including, but not limited to, Plaintiff's cup lid products, sales, on-line  
18 sales, advertising, marketing, and media coverage. I made this declaration from matters  
19 within my own knowledge unless otherwise stated.
- 20 3. Due to Defendant's infringement complaint on Amazon, over 2812 units of Plaintiff's cup lid  
21 products designated with Amazon Standard Identification Numbers (ASIN) B0DS25STRT,  
22 B0DSVWN96V, B0DS24KNPG, B0DRFPDHRN, B0DS289CXP, B0DJVL2ZDW,  
23 B0DJVK8J8K and B0DRFNCLMH ("Products") are now subject to Amazon's Auto  
24 Removal policy, which means all such Products in inventory will be disposed and destroyed  
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1 by Amazon on June 15, 2025 and June 20, 2025. Attached **Exhibit A** is the screenshot of  
2 Plaintiff's Amazon.com storefront ZJT (the "Amazon Storefront"). The inventory is worth  
3 more than \$56211.88 in sales revenue.

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

6 Executed on this June 5, 2025 at Dengzhou, China.

7 Chenyang Ma  
8 Chenyang Ma  
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27 Declaration of Chenyang Ma  
28 2:25-cv-00536

AU LLC  
444 W LAKE ST 17<sup>TH</sup> FLOOR  
CHICAGO, IL 60606  
(312) 715-7312

# Exhibit A



