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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 Plaintiffs,

8 v.

9 Xinjie Dai,

10 Defendant.

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

**Declaration of Adam E. Urbanczyk**

11 **Declaration of Adam E. Urbanczyk**

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

13 **1.** I am an attorney at law, duly admitted to practice before, *inter alia*, the Courts of the State of  
14 Illinois and the United States District Court for the Northern District of Illinois. I am the  
15 attorney for Plaintiff, admitted *pro hac vice*. Except as otherwise expressly stated to the  
16 contrary, I have personal knowledge of the following facts and, if called as a witness, I could  
17 and would competently testify to the following.

18 **2.** On May 15, 2025 (CST), I caused to be sent an email to the email address  
19 james Thorntoncontact@gmail.com that contained a link to an archive of Plaintiff's Motion  
20 for Entry of Temporary Restraining Order [Dkt. 9] and supporting declarations [Dkts. 10-16].  
21 A true and correct copy of that email is attached hereto as **Exhibit 1**. I did not receive a  
reply, nor did our email server report that the email bounced or was returned as  
undeliverable.

**3.** On May 23, 2025 (CST), I caused to be sent an email to the email address

jamesthorntoncontact@gmail.com that contained copies of Plaintiff's Motion for Electronic Service of Process [Dkt. 18] and supporting declaration [Dkt. 19]. A true and correct copy of that email is attached hereto as **Exhibit 2**. I did not receive a reply, nor did our email server report that the email bounced or was returned as undeliverable.

4. We have received no response from the Defendant to the foregoing, and I do not believe that Defendant is represented by counsel.

5. On June 16, 2025, I caused to be sent an email to the email address jamesthorntoncontact@gmail.com containing a link to Plaintiffs' Second Motion for Entry of Temporary Restraining Order, Declaration of Yuan Cao, Declaration of Mengdi Zhao, Declaration of Chenyang Ma, Declaration of Adam E. Urbanczyk, and exhibits. A true and correct copy of that email is attached hereto as **Exhibit 3**. I did not receive a reply, nor did our email server report that the email bounced or was returned as undeliverable.

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 16, 2025 at Sarasota, Florida.

Respectfully submitted,

/s/Adam E. Urbanczyk

Adam E. Urbanczyk

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*Counsel for Plaintiffs*