

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

LOGARO LLC,

Plaintiff,

v.

ABBRACCIA', et al.,

Defendants.

Civil Action No.

**Declaration of Yirong Zhou**

I, Yirong Zhou, of Temple City, California, declare as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.
2. I am the shareholder of Plaintiff Logaro LLC. I am knowledgeable of or have access to business records concerning all information referenced herein, including, but not limited to, trademarks, copyrights, other intellectual property, sales, on-line sales, advertising, marketing, and media coverage. I make this declaration from matters within my own knowledge unless otherwise stated.
3. Since 2017, Plaintiff has been engaged in the design, distribution, marketing, offering for sale, and sale of ink pad products (the "Genuine Crystal3 Products").

Plaintiff has never ceased using or abandoned the Crystal3 Trademark.

4. Genuine Crystal3 Products are distributed and sold to consumers throughout the United States, including in Georgia, online and through Plaintiff's at e-commerce storefront at [wwlady.com](http://wwlady.com).<sup>1</sup>
5. Genuine Crystal3 Products are known for their distinctive brand. The Crystal3 Trademark is broadly recognized by consumers. Products displaying and sold in connection with the Crystal3 Trademark are associated with the quality and innovation that the public has come to expect from Plaintiff's products. Plaintiff has invested significantly to establish the Crystal3 Trademark and sell products thereunder.
6. Plaintiff is the lawful owner of U.S. Trademark Registration 7,461,035 and maintains the exclusive right to use the Crystal3 Trademark. U.S. Trademark Registration number 7,461,035 was lawfully issued on July 30, 2024, with the named registrant Logaro LLC. A true and correct copy of the Crystal3 Trademark registration certificate is attached hereto as **Exhibit 1**.
7. I perform, supervise, and/or direct investigations related to Internet-based infringement for all Plaintiff's business, including investigations related to the infringement of the Crystal3 Trademark. My investigation shows that Defendants are making, using, offering for sale, selling, and/or importing into the United

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<sup>1</sup> <https://www.wwlady.com/products/crystal3-4pcs-ink-pads-for-kids-craft-ink-stamp-pads-4-colors-diy-ink-pads-for-seals>

States for subsequent sale or use products, namely ink pad products, which infringe directly and/or indirectly the Crystal3 Trademark (the “Counterfeit Products”). I, or someone working under my direction, analyzed each of the e-commerce stores operating under the Seller Aliases identified in the Complaint and determined that Counterfeit Products were being offered for sale to residents of the United States, including Georgia residents. This conclusion was reached through visual inspection of the products listed for sale on each ecommerce store and the price at which the Counterfeit Products were offered for sale, other features commonly associated with e-commerce stores selling Counterfeit Products, and because Plaintiff has not, based on my investigation, granted a license or any other form of permission to Defendants as they are identified with respect to the Crystal3 Trademark. Plaintiff does not provide licenses to the Crystal3 Trademark which allow for the sublicense of such rights, and again none of the Defendants appear to be authorized users of the Crystal3 Trademark. In addition, each ecommerce store offered shipping to the United States, including Georgia. True and correct copies of screenshot printouts showing the active e-commerce stores operating under the Defendant Online Stores reviewed are attached as **Exhibits 2-3**.

8. Defendants have targeted sales to Georgia residents by setting up and operating e-commerce stores that target United States consumers using one or more Defendant Online Stores, offer shipping to the United States, including Georgia,

accept payment in U.S. dollars and, on information and belief, have sold Counterfeit Products to residents of Georgia over the Internet.

9. Defendants concurrently employ and benefit from substantially similar advertising and marketing strategies. For example, Defendants facilitate sales by designing e-commerce stores operating under Seller Aliases so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers. The e-commerce stores operating under the Seller Aliases look sophisticated and accept payment in U.S. dollars via credit cards, Amazon Pay, and/or PayPal. The e-commerce stores operating under the Seller Aliases often include professional content and imagery that make it very difficult for consumers to distinguish such stores from an authorized retailer.
10. On information and belief, Defendants have engaged in deceptive or omissive conduct when registering the e-commerce stores operating under the Seller Aliases by providing false, misleading, and/or incomplete information to the e-commerce platforms. On information and belief, certain Defendants have anonymously registered and maintained the e-commerce stores operating under the Seller Aliases to prevent discovery of their true identities and the scope of their e-commerce operations.
11. On information and belief, Defendants regularly register or acquire new seller aliases for the purpose of offering for sale and selling Counterfeit Products. Such e-commerce store registration patterns are one of many common tactics used by

the Defendants to conceal their identities and the full scope and interworking of their operation, and to avoid being shut down.

12. Even though Defendants operate under multiple fictitious aliases, including on information and belief the Seller Aliases, the e-commerce stores operating under the Seller Aliases often share unique identifiers, such as templates with common design elements which intentionally omit any contact information or other information for identifying Defendants or other storefronts they operate or use. E-commerce stores operating under the Seller Aliases include other notable common features, such as use of the same registration patterns, accepted payment methods, check-out methods, keywords, illegitimate search engine optimization (SEO), advertising tactics, similarities in price and quantities, the same incorrect grammar and misspellings, and/or the use of the same text and images. Additionally, Counterfeit Products for sale by the e-commerce stores operating under the Seller Aliases bear similar irregularities and indicia of being unauthorized, suggesting that the Counterfeit Products were manufactured by and come from a common source and that Defendants are interrelated.

13. On information and belief, Defendants are in constant communication with each other and regularly participate in QQ.com and WeChat chat rooms and through websites such as sellerdefense.cn, kaidianyo.com and kuajingvs.com regarding tactics for operating multiple accounts, evading detection, pending litigation, and potential new lawsuits.

14. Counterfeiters such as Defendants typically operate under multiple seller aliases and payment accounts so that they can continue operating despite Plaintiff's enforcement efforts.

15. On information and belief, Defendants maintain offshore bank accounts and regularly move funds from their e-commerce financial and payment accounts to offshore bank accounts outside the jurisdiction of this Court to allow them to avoid payment of any monetary judgment awarded to a rightsholder, such as myself.

16. On information and belief, Defendants are an interrelated group of infringers working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Counterfeit Products in the same transaction, occurrence, or series of transactions or occurrences. Defendants, without any authorization or license, have jointly and severally, knowingly and willfully offered for sale, sold, and/or imported into the United States for subsequent resale or use products that infringe directly and/or indirectly the Crystal3 Trademark.

17. Monetary damages cannot adequately compensate me for ongoing infringement because monetary damages fail to address the pervasive damage to Plaintiff's control over its rights in the Crystal3 Trademark, the mark's reputation, associated goodwill, and its ability to exploit the Crystal3 Trademark.

Furthermore, monetary damages are difficult, if not impossible, to ascertain due to the inability to calculate measurable damage in dollars and cents caused to

Plaintiff's control over its rights in the Crystal3 Trademark, the mark's reputation, the goodwill associated therewith, and Plaintiff's ability to exploit the Crystal3 Trademark by these acts of infringement.

18. Plaintiff's goodwill and reputation are irreparably damaged by the making, using, offering for sale, selling, or importing of goods that infringe the Crystal3 Trademark. Moreover, consumer confidence in Plaintiff's brand is damaged, which can and will result in a loss of future sales and market share. The extent of harm to Plaintiff's commercial reputation and goodwill and the possible diversion of customers due to loss in brand confidence is largely unquantifiable.

19. Plaintiff is further irreparably harmed by the unauthorized making, using, offering for sale, selling, or importing of goods that infringe the Crystal3 Trademark because infringers take away Plaintiff's ability to control the nature and quality of the Counterfeit Products. Loss of quality control over goods made, used, offered for sale, sold, or imported featuring the Crystal3 Trademark and, in turn, loss of control over Plaintiff's commercial reputation is neither calculable nor precisely compensable.

20. The making, using, offering for sale, selling, or importing of goods featuring the Crystal3 Trademark that are not authorized or produced by Plaintiff is likely causing and will continue to cause consumer confusion, which weakens Plaintiff's brand recognition and reputation. Inferior quality products will result in increased skepticism and hesitation in consumers presented with Genuine Crystal3 Products,

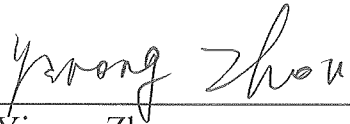
resulting in a loss or undermining of Plaintiff's business reputation and goodwill.

21. I am further irreparably damaged due to a loss of exclusivity. Plaintiff's products are meant to be exclusive from competitors. Plaintiff's marketing efforts and innovative designs are aimed at growing and sustaining sales. When infringers make, use, offer for sale, sell, or import goods featuring the Crystal3 Trademark without Plaintiff's authorization, the exclusivity of its products, as well as its reputation, are damaged and eroded, resulting in a loss of unquantifiable future sales.

22. Plaintiff will suffer immediate and irreparable injury, loss, or damage if an *ex parte* Temporary Restraining Order is not issued.

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 12, June 2026 at Temple City, California.

  
Yirong Zhou