

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

Yiwu Baimei Electronic Commerce Co., Ltd.,)	
a Chinese Limited Corporation)	Case: 24-cv-09183
)	
Plaintiff,)	Judge: April M. Perry
)	
v.)	Mag. Judge: Heather K. McShain
)	
The Partnerships And)	
Unincorporated Associations)	
Identified On Schedule "A")	
)	
Defendants.)	

DECLARATION OF L. PITTAWAY

I, Lydia Pittaway, declare and state as follows:

1. I am over 18 years of age.
2. I have personal knowledge of the facts set forth herein.
3. I make this declaration in support of Plaintiff's Supplemental Memorandum in Support of Plaintiff's Motion for Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" (collectively "Defaulting Defendants").
4. I am a licensed attorney and admitted to practice before the Northern District of Illinois.
5. If called upon to do so, I could and would competently testify to the following facts set forth below.
6. I have reviewed the platform production from Aliexpress as to each Defendant. In response to this Court's Discovery Order, Aliexpress provided for each Defendant only an email

address, the number of purported sales, and account balance. Aliexpress also provided the internal identifying numbers called a Merchant Number and Account Number. Aliexpress did not provide a street address, phone number, contact person, or other identifying information for any store.

7. Since 2021, I have worked with numerous e-commerce platforms and third party processors as part of my daily activities in handling intellectual property cases. These platforms include, but are not limited to the platforms Amazon, eBay, Shein, temu, etsy, Newegg, Independent Sites, Paypal, Lianlian, Stripe, Pingpong, Walmart, Aliexpress and Alibaba.

8. Based on my communication with representatives from Aliexpress, I understand that Aliexpress is part of Alibaba Group, a China-based company. All other information I have obtained is also consistent with this understanding.

9. In my experience, I have found that among all the e-commerce platforms and third party processors, including Amazon, eBay, Shein, temu, etsy, Newegg, Independent Sites, Paypal, Lianlian, Stripe, Pingpong, Walmart and Aliexpress/Alibaba Group, only Aliexpress and Alibaba frequently refuse to comply with discovery orders. Specifically, Aliexpress frequently refuses to provide some or all of the information requested in a discovery order or temporary restraining order because it may disagree with whether a court should have issued the order or the extent of information subject to production. When Aliexpress asserts these “objections,” there is no internal process that Aliexpress offers to resolve the dispute. The platform does not provide an “appeal” process, nor does the platform identify the person who made the decision or permit conference between counsel. Ultimately, Aliexpress simply refuses to respond to my emails requesting a conference or contact information for advising counsel.

10. Aliexpress charges a plaintiff \$40.00 per defendant before it will review a case and provide production.

11. On several occasions in cases I have handled involving Aliexpress, Aliexpress has refused to provide supplemental or updated information because it did not believe that it had a continuing obligation to supplement or update information throughout a case.

12. My understanding in handling cases and judgments with Aliexpress is that a judgment against an Aliexpress store must be domesticated in Singapore.

13. I have reviewed the sales data provided by Aliexpress, which reflects that none of the Defendants sold a unit of the infringing products.

14. In my experience, having both the platform production and Defendants' records are critical to obtain reliable sales figures because they frequently conflict with each other. Sometimes the defendant has, unintentionally or not, provided erroneous records and other times the platform produced unreliable and incomplete records. Also, some platforms perform a search of related products to see if a defendant has offered the infringing product in other listings for sale, but Aliexpress does not perform that search to my knowledge.

15. I have reviewed the evidence amassed for infringers for the Hollow Halloween copyright series. This includes evidence against unfilled defendants, as well as evidence against filled defendants. As to this copyright series, Plaintiff has amassed evidence of well over one thousand infringers, and actively pursued lawsuits against approximately one thousand infringers.

16. I have reviewed the production from Aliexpress in this case, which reflects that only Defendant No. 1 had any funds in its account. Defendant No. 1 had funds in its account in the amount of \$1.62.

Executed this 9th of May, 2025 in Ft. Pierce, Florida.

/s/ Lydia Pittaway
Fla. Bar No: 0044790
Ford Banister LLC
305 Broadway - Floor 7
New York NY 10007
Telephone: +1 212-500-3268
lpittaway@fordbanister.com
Attorney for Plaintiff