

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BULLSEYEBORE, INC.,

Plaintiff,

v.

LANDBASE TRADING CO. LTD, et al.

Defendants.

CIVIL ACTION NO.  
1:24-cv-00246-RDB

**DECLARATION**

I, Kang Lu, make the following declaration under penalty of perjury, pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am competent to make this declaration. I am a citizen of the People's Republic of China.
2. I am a manager at, and an authorized representative of Adah Technology Co., Limited, a Hong Kong company. I make this declaration based on my own personal knowledge.
3. Adah Technology Co., Limited owns and maintains the following one (1) domain name: vofatiponal.com.
4. We have searched our records for all sales of the allegedly infringing products that are at issue in this case, and provided the total number of such sales to our attorneys. The spreadsheet from our attorneys contain a true and accurate number of all sales of the products both in Maryland and in the United States in general.
5. The product that we sold were manufactured by and originated from a Chinese

company called Weisenjia (Shenzhen) Network Technology Co., Ltd.. When we purchased the goods from them, we had no knowledge that any of the goods were infringing, or that the advertising materials used in the marketing of their goods belonged to or was registered to anyone else.

6. We had never heard of Bullseyebore until this case was started against our company. We never received any cease and desist letters or other notice from Bullseyebore, prior to this case, alleging that there was any infringement.

7. Since learning about the lawsuit, we immediately discontinued the sale of all AlignDrill Pro products and do not intend to resume the sale of any AlignDrill Pro products again because we no longer trust the provider of the goods given the facts and circumstances of this lawsuit.

8. We have also looked up the total amount of assets which are frozen in our PayPal account because of this Court's restraining order. We have provided that information to our attorneys and the information contained in the spreadsheet being submitted to the Court is accurate regarding how much money has frozen.

9. The money is necessary for our business to maintain its operations and carry on the purchase and sale of other goods completely unrelated to the sale of AlignDrill Pro products. The amount of money currently being frozen is grossly disproportionate to the revenue generated from the sales of the allegedly infringing goods.

10. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

Dated: March 19, 2024

By: Kang Lu  
Kang Lu