

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

<b>BULLESEYEBORE, INC.,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:24-cv-00246-RDB
	)	
<b>LANDBASE TRADING CO. LTD, and</b>	)	
	)	
<b>MANNER TRADING CO . LTD, and</b>	)	
	)	
<b>Maoyun Zhou, and</b>	)	
	)	
<b>Yanbo Zhao, and</b>	)	
	)	
<b>DOES 1-9</b>	)	
	)	
Defendants.		

**Declaration of Andrew C. Aitken  
in Support of Plaintiff’s Motion for Temporary Restraining Order**

I, Andrew C. Aitken, being over the age eighteen and competent to testify to the matter set forth herein, declare and state as follows:

1. I am an attorney having an address is at 6710 Democracy Blvd., Suite 555, Bethesda, Md 20814. I am a member in good standing of the bars of Maryland and the District of Columba and admitted to practice before the US District Courts in Maryland, the District of Columbia, Colorado, and the court of appeals for the 4<sup>th</sup> Circuit, the 6<sup>th</sup> Circuit, and the Federal Circuit. I am also admitted to the practice before the US Patent and Trademark Office.

2. I represent Plaintiff Bullseyebore Inc. (“Bullseyebore”) in the above-captioned matter.

3. I make this declaration in support of Plaintiff Bulleyesbore's Motion for Temporary Restraining Order and other Relief and this declaration is based upon personal knowledge, or when so qualified, on information and belief, and such statements are true and accurate to the best of my belief.

4. Exhibit A attached hereto is a true and correct copy of Plaintiff's predecessor in interest, New Governance Inc. sales receipts that corroborate sales of the Bullseyebore branded products as early as January of 2023.

5. Exhibit B attached hereto is a true and correct copy of a printout from Plaintiff's Website, [www.Bullseyebore.com](http://www.Bullseyebore.com) that was first published October 2023 which included photographs and videos created by Plaintiff and on which It published its Bullseyebore trademarks.

6. Exhibit C attached hereto is a true and correct copy of Plaintiff's YouTube page on which its published videos and its Bullseyebore trademarks.

7. Exhibit D attached hereto is a true and correct copy of Plaintiff's TikToK page on which its published videos and its Bullseyebore trademarks.

8. Exhibit E attached hereto is a true and correct copy of Plaintiff's Instagram page on which its published videos and its Bullseyebore trademarks.

9. Exhibit F attached hereto is a true and correct copy of Plaintiff's Facebook page on which its published videos and its Bullseyebore trademarks.

10. Exhibit G attached hereto is a true and correct copy of n Instagram page dated December 29, from Plaintiff's affiliate Raven builders that garnered more than 529,000 "likes" and, on information and belief, more than 70 Million views.

11. Exhibit H attached hereto is a true and correct copy of Plaintiff's certificate of

registration No. VA 2-378-708, issued by the US Copyright Office.

12. Exhibit I attached hereto is a true and correct copy of the photographs submitted to the Copyright Office in the application that led to Registration No. VA 2-378-708.

13. Exhibit J attached hereto is a true and correct copy of web site screen captures from each of the Defendants' web stores as set forth in Schedule A of the Verified Complaint that have been annotated to show the infringement of Plaintiffs copyrighted photographs and its Trademarks.

14. Exhibit K is a true and accurate summary of the Domain name registrars that have hosted the Defendant Websites listed in Schedule A to the Verified Complaint and Exhibit J. The summary shows that Namesilo, LLC and Alibaba Cloud Computing Ltd host each of the Defendants' Web Stores and includes an analysis of advertisements made on Meta, Inc.'s platform (Facebook and Instagram).

15. Exhibit L attached hereto is a true and correct copy of a record relating to Landbase Trading Co. Ltd. ("Landbase Trading") from commercial website operated by Suite.Endole, <https://suite.endole.co.uk/insight/company/13277590-landbase-trading-co-limited> Endole.com that provides commercial information on UK corporate entities.

16. Exhibit M attached hereto is a true and correct copy of a record relating to Manner Trading Co. Ltd. ("Manner Trading") from commercial website Suite.Endole that provides commercial information on UK corporate entities.

<https://suite.endole.co.uk/insight/company/13831914-manner-trading-co-limited>.

17. Exhibit N attached hereto is a true and correct copy of a screen capture from the Defendant Butterfly-flowers website reporting more than 5,000 unit sales of the accused "AlignDrill Pro" product.

18. In this circumstances, it is submitted that the notice requirements of Rule 65 should be excused in view of the clear infringement of both copyright and trademarks and the danger of the destruction of evidence. Further, since the evidence strongly suggests that these foreign-based Defendants are defrauding consumers, if advance notice is given, it is likely that the existing Web Stores will be closed, new stores will be opened, and sales will continue to be diverted from Plaintiff Bullseyebore, Inc. from alternative new sites. In addition, any funds that remain in PayPal or merchant accounts that were improperly gained from the infringement will likely be removed from the reach of the U.S. courts if the Defendants are provided notice. Ten of Defendants Web Stores do not provide any information regarding in the identity of the owner. The remaining Web Stores that are owned by Landbase Training and Manner Trading and, in view of the shared director are related and are likely commonly controlled and, on further information and belief, are connected to Chinese suppliers. In view of the similarities of the sites, on information and belief, all are related in a counterfeiting conspiracy scheme.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

Signed and dated this 26th day of January, 2024, in Bethesda, Maryland.



Andrew C. Aitken