

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ATELIER EUMORI,

Plaintiff,

v.

THE PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A",

Defendants.

Civil Action No. 2:26-cv-899

JURY TRIAL DEMANDED

FILED UNDER SEAL

PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and this Court's Temporary Restraining Order, Plaintiff Atelier Eumori ("Plaintiff") requests that Defendant ("Defendant") respond and produce the following documents, electronically stored information, and tangible things within five business days and in accordance with the definitions and instructions set forth below. Defendant's duty to supplement its responses to these requests is governed by Rule 34 of the Federal Rules of Civil Procedure.

INSTRUCTIONS

1. All objections or answers to Requests for Production that fail or refuse fully to respond to any Request for Production on the ground of any claim of privilege or for any other reason shall:

- a. state the nature of the claim or privilege or other ground of objection;

- b. state all facts relied upon in support of the claim of privilege or other ground of objection or related thereto;
- c. identify all documents related to the claim of privilege or other ground of objection;
- d. identify all persons having knowledge of any facts related to the claim of privilege or other ground of objection; and
- e. identify all events or transactions related to the claim of privilege or other grounds of objection.

2. If, after conducting a reasonable investigation, a full answer cannot be provided for any request for the production of documents, state that such is the case and answer to the fullest extent possible, stating what responsive documents or information are available, what documents or information cannot be provided, why the documents or information are unavailable, and what efforts were made to obtain the unavailable documents or information.

3. Documents from any single files should be produced in the same order as they were found in such file.

4. If any documents responsive to these requests have been destroyed, describe the content of such document, the location of any copies of such document, the date of such destruction and the name of the person who ordered or authorized such destruction.

5. In producing the documents requested, indicate the specific request(s) pursuant to which each document is being produced.

6. In answering each response contained herein, identify each person who assisted or participated in preparing or supplying any of the information given in answer to or relied upon in preparing a response to that request.

7. These requests are continuous in nature, and pursuant to Fed. R. Civ. P. 26(e), Defendant is under a duty to timely supplement or amend each prior response to a request for production if Defendant learns that the response is in any respect incomplete or incorrect, or if any information or documents are hereafter acquired.

DEFINITIONS

For the purpose of these Interrogatories, the following words and phrases have the following meanings:

1. “Defendant”, “You”, and “Your” refers to Defendant, and its respective past and present officers, directors, affiliates, brokers, agents, representatives, employees, servants, and all persons acting directly or indirectly under their control, including any attorney.

2. The “Infringing Products” refers to those products or similar products sold or offered for sale by You on the Amazon.com, Walmart.com, ebay.com, Temu.com, Alibaba.com, AliExpress.com and other Platforms under the product Ids listed on Schedule A associated with Plaintiff’s Complaint.

3. The “Patent-in-Suit” refers to U.S. Design Patent asserted in Plaintiff’s Complaint.

4. “Person” refers to all natural persons, male or female, and all types and kinds of business or other entities, including, but not limited to, corporations, partnerships, joint ventures, associations and sole proprietorships and any reference to an individual person, either singularly or as part of a defined group, includes that person’s employees, agents, legal representatives, non-legal representatives, personal representatives, attorneys, heirs, successors, and assigns, and includes any other person or entity acting on or for the

behalf of such individual person.

5. Any matter involving a corporation, or any other entity also refers to and includes any and all parents, subsidiaries, predecessors, successors, affiliates, partners, joint venturers, agents, employees, representatives, accountants, investment bankers, or attorneys acting on behalf of the corporation or other entity.

6. “Document” or “Documents” are used herein in their broadest sense as set forth in the Federal Rules of Civil Procedure. These words mean and include all written, printed, typed, recorded, or graphic matter of every kind and description, both originals and copies, and all attachments and appendices, within your possession, custody or control. Without limiting the foregoing, the terms “Document” and “Documents” shall include all agreements, contracts, communications, correspondence, letters, opinion letters, telegrams, telexes, telefaxes, messages, memoranda, records, reports, books, summaries or other records of telephone conversations or interviews, summaries or other records of personal conversations or interviews, minutes, summaries, other records of meetings and conferences, statements obtained from witnesses, summaries or other records of negotiations, other summaries, diaries, diary entries, calendars, appointment books, time records, instructions, work assignments, forecasts, progress reports, statistical data, statistical statements, financial statements, work sheets, work papers, drafts, graphs, charts, tables, accounts, analytical records, consultants’ and experts’ reports, appraisals, bulletins, notes, notices, marginal notations, notebooks, telephone records, bills, statements, records of obligation and expenditure invoices, lists, journals, printouts, compilations, tabulations, analyses, studies, surveys, expense reports, microfilm, microfiche, tape or disc recordings, sound recordings, video recordings, film, tape, photographs, programs, electronic mail (“e-

mail”) and data compilations from which information can be obtained (including matter used in data processing), and other printed, written, handwritten, typewritten, recorded, stenographic, computer-generated, computer- stored, or electronically stored matter, however and by whomever produced, prepared, reproduced, disseminated, or made). The words “Document” and “Documents” also include all copies of documents by whatever means made, except that where a document is produced, identical copies of it that do not contain any markings, additions, or deletions that are different from the original do not have to be separately produced.

7. “Communication” or “Communications” means, without limitation, any transmission, conveyance or exchange of a word, statement, fact, thing, idea, Document, instruction, information, demand or question by any medium, whether by written, oral or other means.

8. The words “or” and “and” shall be read in the conjunctive and in the disjunctive wherever they appear, and neither of these words shall be interpreted to limit the scope of these Interrogatories.

9. “Relates” or “relating” means, in addition to its customary and usual meaning, discussing, referring to, pertaining to or concerning.

DOCUMENTS TO BE PRODUCED

REQUEST FOR PRODUCTION NO. 1:

For each of the Defendants listed in Schedule A in this case, all documents and things relating to or evidencing all revenues, including, but not limited to net ordered units, and price per unit, generated from and/or associated with the purchase, distribution, and/or sale of the Infringing Products referenced by the ASIN associated with Defendant listed in Schedule A.

REQUEST FOR PRODUCTION NO. 2:

Documents and things sufficient to show the total number of sales for each of the Infringe Products, on a monthly basis, from and after the issue date of the Patent-in-Suit.

REQUEST FOR PRODUCTION NO. 3:

All documents and things relating to or evidencing each and every financial account used in conjunction with the Infringing Products since the issue date of the Patent-in-Suit.

Dated: June 15, 2026

Respectfully submitted,

By: /s/ Xiyang Zhang
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2026, a copy of the foregoing served on Defendant pursuant to this Court's Sealed Temporary Restraining Order authorizing service by email.

By: /s/ Xiyang Zhang
Xiyang Zhang