

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOSE CORPORATION,

PLAINTIFF,

V.

THE PARTNERSHIPS IDENTIFIED ON SCHEDULE A

DEFENDANTS.

CASE No.:1:26-cv-00011

HONORABLE JUDGE MARY M. ROWLAND

MAGISTRATE JUDGE YOUNG B. KIM

FILED UNDER SEAL

DECLARATION OF ANN MARIE SULLIVAN

I, Ann Marie Sullivan, of the City of Chicago, in the State of Illinois, declare and state as follows:

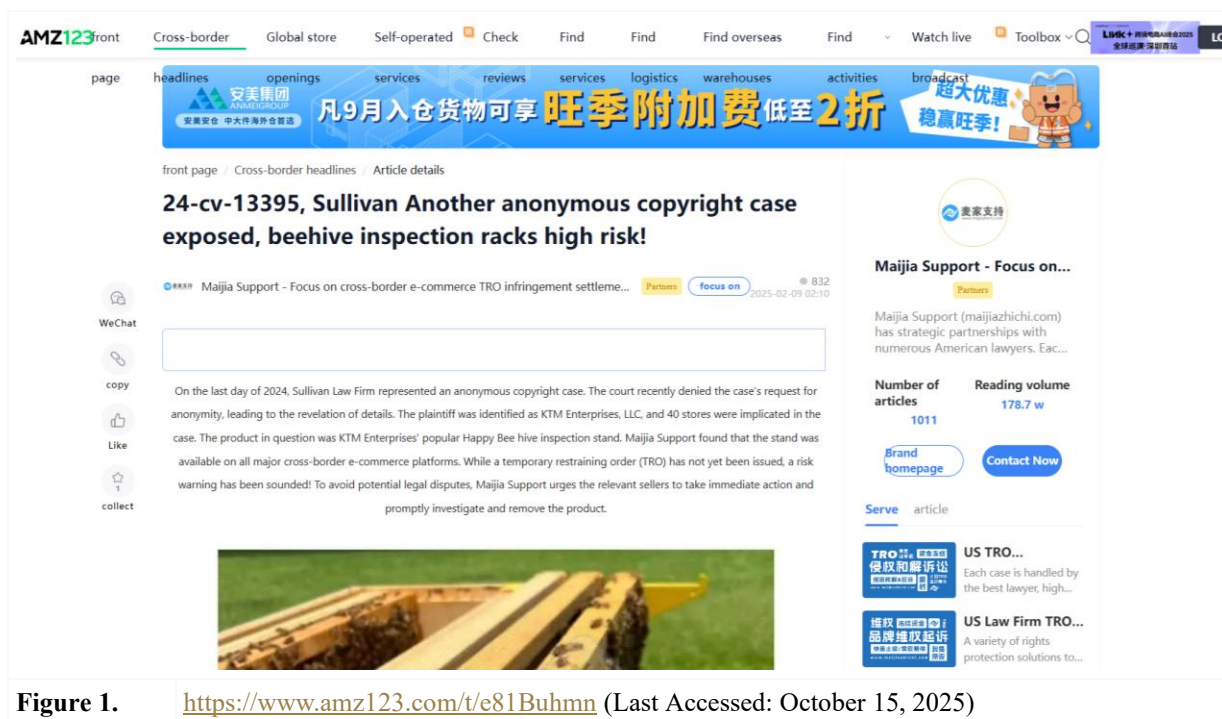
1. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff, Bose Corporation (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

2. I have experience filing trademark infringement and anti-counterfeiting litigation involving primarily foreign-based defendants, and I have knowledge of the behaviors of the defendants’ activities after filing cases.

3. Third-parties routinely work in concert with accused counterfeiters in an effort to facilitate evading enforcement efforts, by operating websites which monitor filing of intellectual property infringement cases (the “Monitoring Websites”), including, but not limited to the following: sellerdefense.cn, saibeip.com, SellerGuard, Global Shield, amz520.com, and Maijia Planet. These Monitoring Websites track counterfeit enforcement lawsuits in this Judicial District,

and when they observe that a copyright or trademark-holder has filed a lawsuit, they publish and announce this activity, often posting the Complaint and other pleadings, and recommend that sellers cease their counterfeiting activity, liquidate their associated financial accounts, and change the payment processors that they currently use to accept payments in their online stores.

4. Another website that works to assist counterfeit sellers is amz123.com, and describes its services as “Cross border sellers are all here Find good services here.” This website also monitors activity in this District, and posts any relevant information, alerting counterfeit sellers to the name and identity of Plaintiff. For example, **Figure 1** and **Figure 2** are examples of articles which advise defendants when Plaintiff’s name had been disclosed:



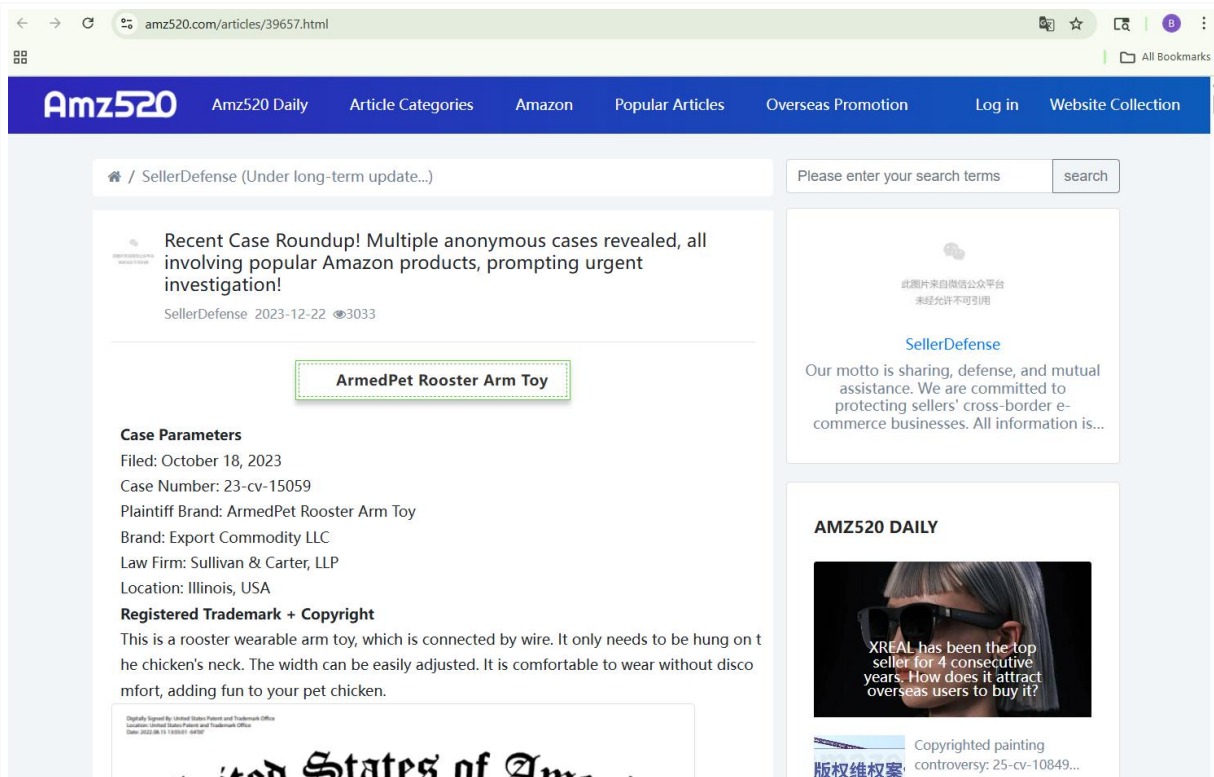


Figure 2. <https://www.amz520.com/articles/39657.html> (Last Accessed: October 15, 2025)

5. Additionally, these Monitoring Websites also publish information for potential defendants regarding asset restraints. For example:

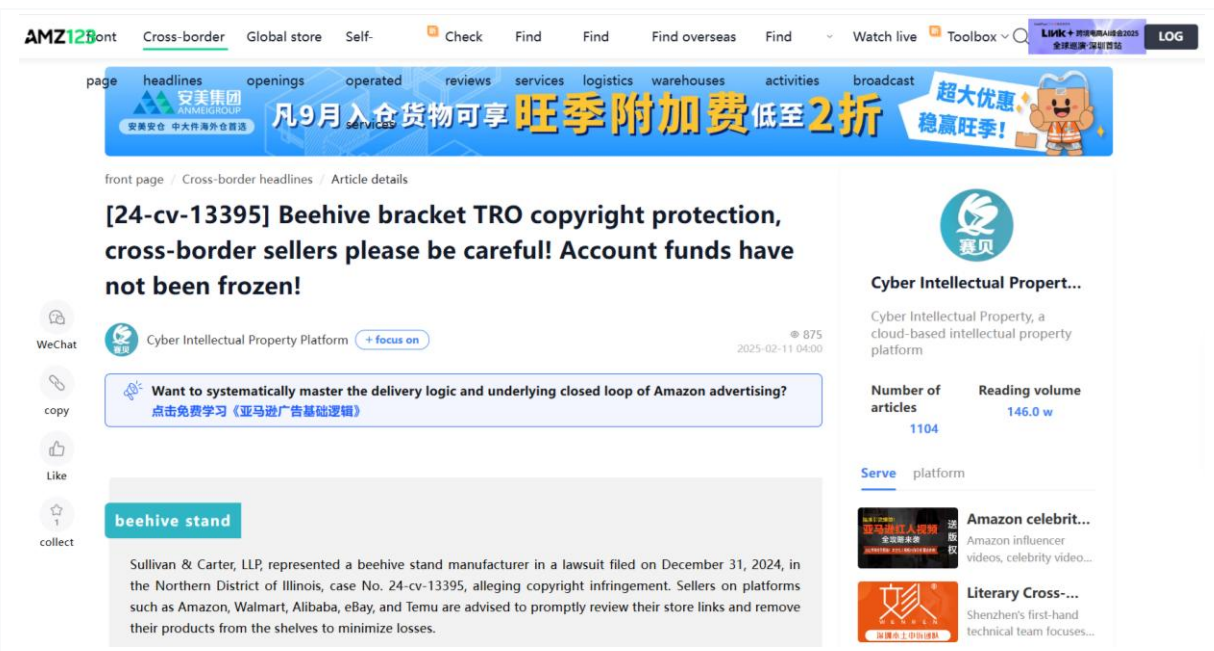


Figure 3. <https://www.amz123.com/t/UjYpFYeS> (Last Accessed: October 15, 2025)

6. The Monitoring Websites encourage potential Schedule A Defendants to use platforms such as WeChat and QQ chat groups to disseminate information about pending cases. For example, in another article posted on the SellerDefense website (**Figure 4**), which also has upwards of 5,195 views, a screenshot of the chat group that sellers are involved in can be seen, and the SellerDefense website provides links to over 15 “WeChat” or “QQ” groups, all of which have reached their maximum capacity.

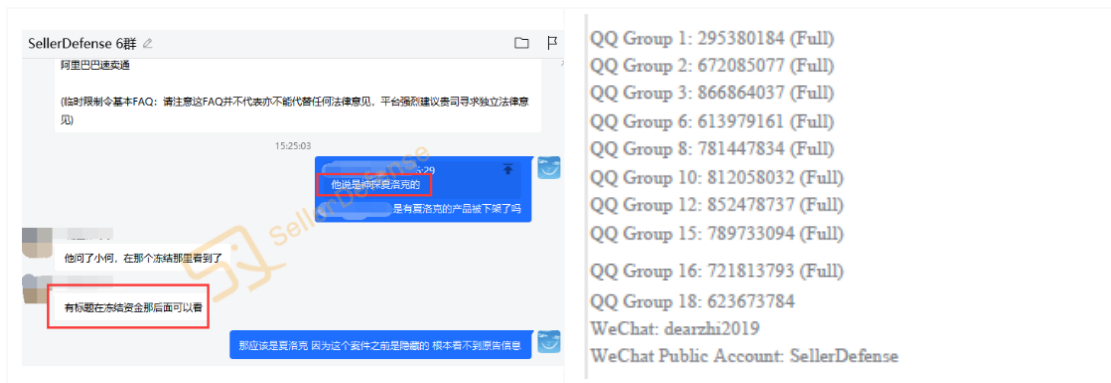


Figure 4. <https://sellerdefense.cn/ams-sherlock-21cv929> (Last Accessed: October 15, 2025)

7. Additionally, the article in **Figure 5** encourages infringers to “forward the above picture” (minute entries in the case) “to your friends on WeChat.” **Figure 6** advertises that “Currently 100,000+ people have joined us.” The article in **Figure 7** advises: “. . . please forward this page, you can join the WeChat group of 10,000 people.”

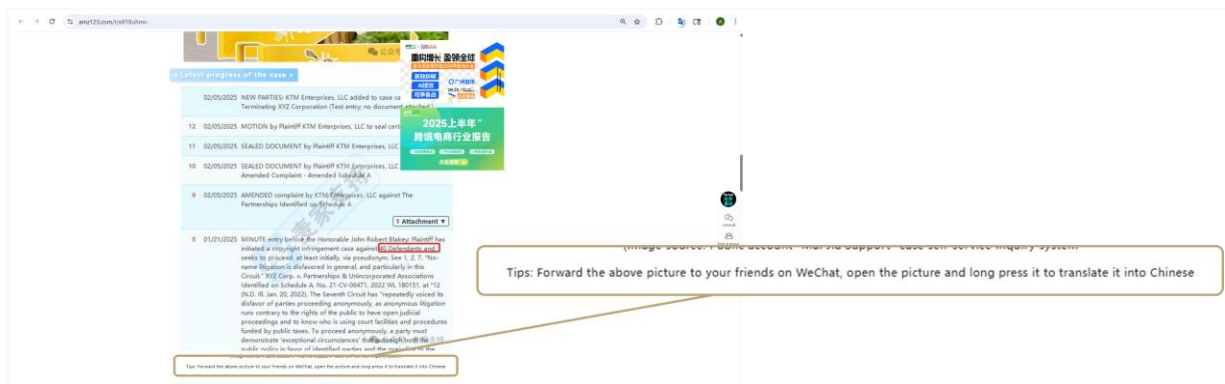


Figure 5. <https://www.amz123.com/t/e81Buhmn> (Last Accessed: October 15, 2025)

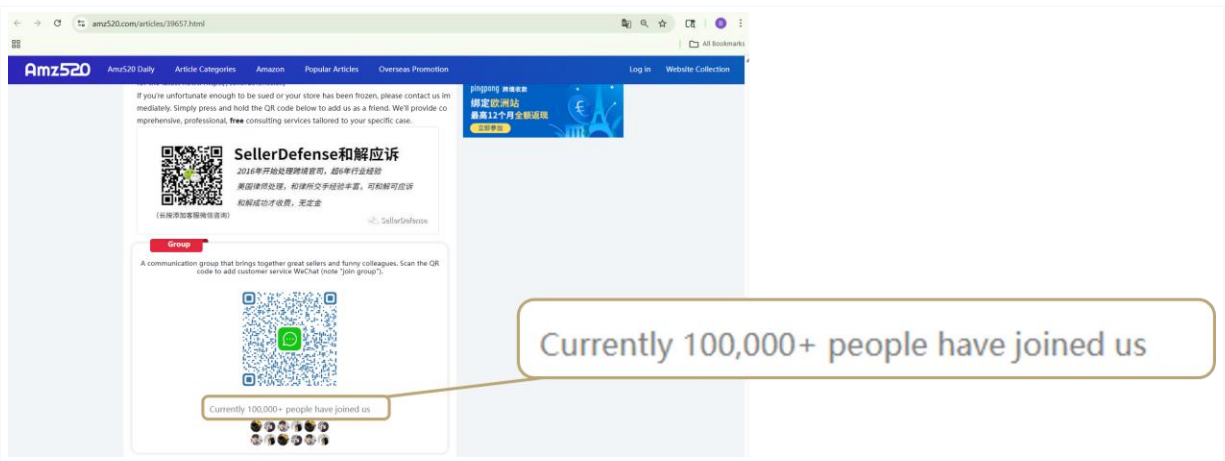


Figure 6. <https://www.amz520.com/articles/39657.html> (Last Accessed: September 15, 2025)

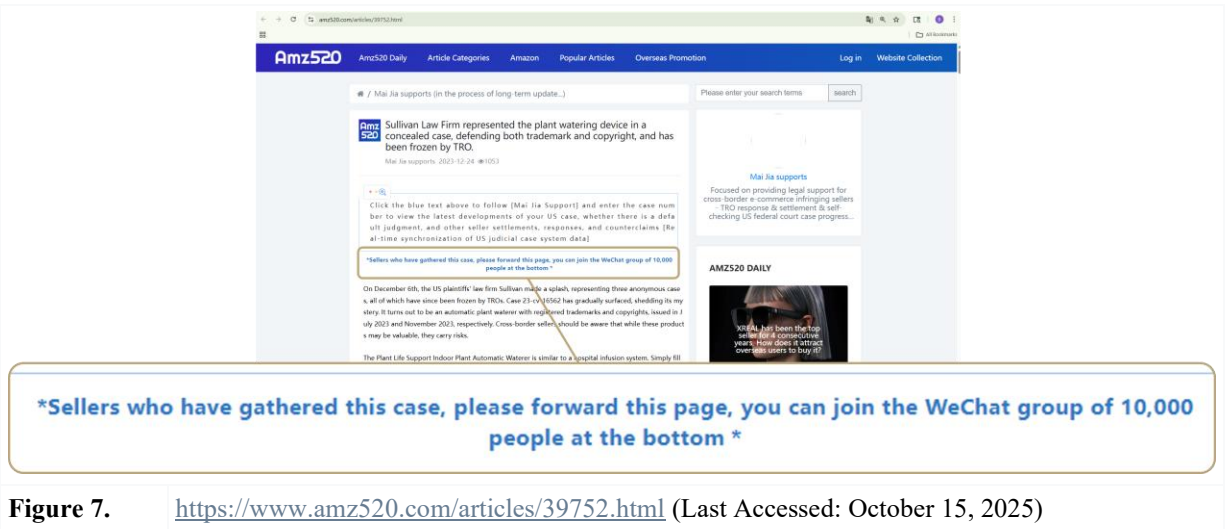


Figure 7. <https://www.amz520.com/articles/39752.html> (Last Accessed: October 15, 2025)

8. While the articles posted on the Monitoring Website are public, chat groups are not; they typically operate in closed forums and either need an invitation to join or must submit a request to join and then be confirmed. This restricted nature of the chat groups effectively make them private, preventing plaintiffs and investigators from easily monitoring the scope of communications. This private nature of the chat groups compounds the problems faced by the IP rights holders, further highlighting the need for sealing the documents to prevent premature disclosure of defendant identities.

9. Additionally, all trademark and copyright infringement cases filed by Sullivan &

Carter, LLP have been posted on Monitoring Websites, and many Monitoring Websites keep an active page for our law firm, listing all of our current and previous cases. For example:

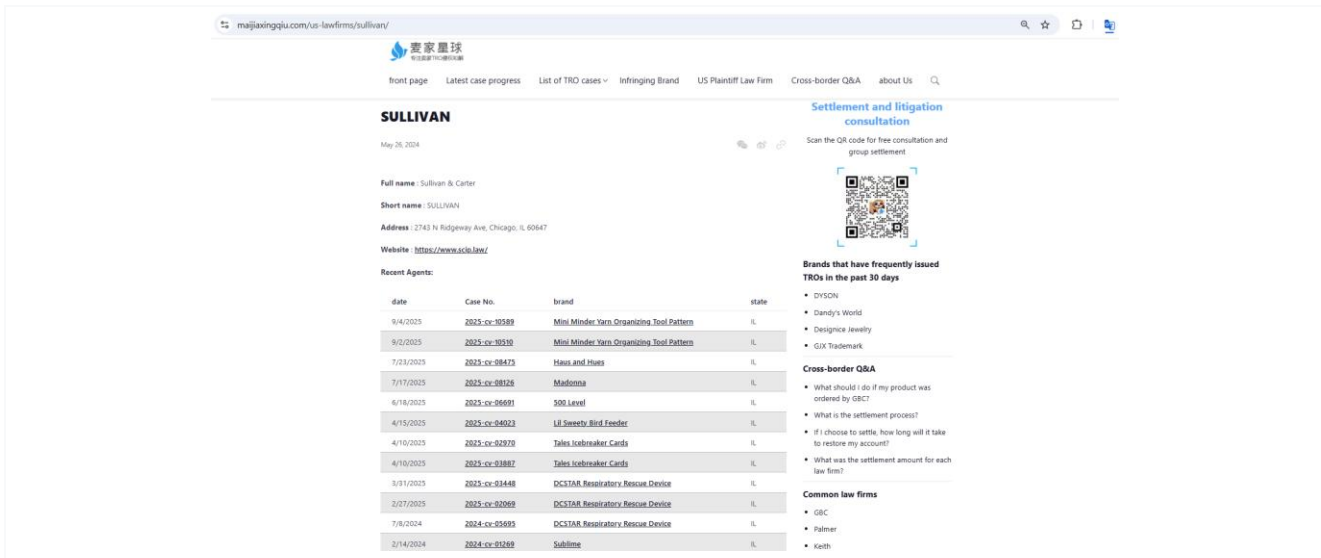
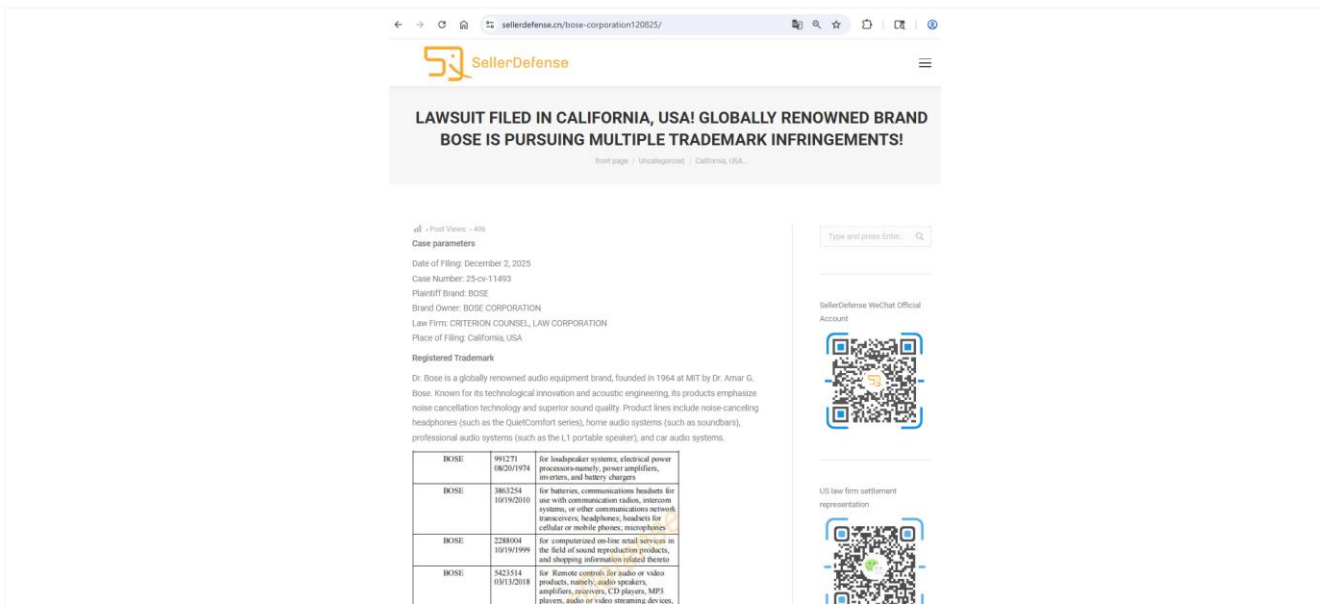


Figure 8. <https://www.maijixingqiu.com/us-lawfirms/sullivan/> (Last Accessed: October 15, 2025)

10. All cases filed by the Plaintiff, Bose Corporation, have been posted on Monitoring Websites including a case filed in California in December 2025 which was immediately posted to the Seller Defense website. See **Figure 9** below. Additionally, previous cases filed by the Plaintiff in this district have also been posted on Monitoring Websites. See **Figure 10** below.



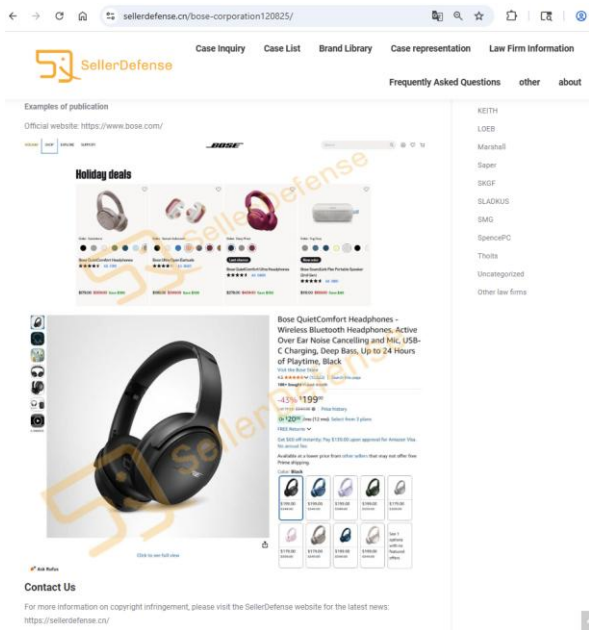


Figure 9. <https://sellerdefense.cn/bose/> (Last Accessed: January 6, 2026)



Figure 10. <https://sellerdefense.cn/bose/> (Last Accessed: January 6, 2026)

11. These Monitoring Websites receive a high volume of viewers, with many counterfeiters checking these websites regularly. For example, please see the table below for the number of views received by the articles cited in this declaration:

FIGURE NO.	DATE ARTICLE PUBLISHED	TOTAL VIEWS (AS OF SEPT. 2025)
Figure 1	February 9, 2025	880
Figure 2	December 22, 2023	3,041
Figure 3	February 11, 2025	875
Figure 4	March 19, 2021	5,203
Figure 7	December 24, 2023	1,055

12. Furthermore, based on data obtained in Plaintiff’s counsel’s experience, out of all defendants in previous cases with analogous facts, roughly 42% of defendants reach out to Plaintiff’s counsel on average; and of those 42% that reach out, at least 65% of those defendants operate more than one defendant store. This pattern also corresponds to defendants’ regular creation of new websites and online marketplace accounts across various platforms, using both the identities listed on Schedule A, and other fictitious names and addresses that remain unknown.

13. When Plaintiff’s identity is known in a lawsuit, Defendants routinely drain their payment processor accounts in order to frustrate Plaintiff’s efforts to prosecute this action and perform an accounting to determine Plaintiff’s lost profits. This assertion is based upon Plaintiff’s counsel’s previous experience in cases involving analogous facts. Plaintiff presents below a sample of relevant data, which demonstrates the difference between cases in which Plaintiff is allowed to proceed anonymously, versus when such a motion is not granted. This data conclusively establishes that there is a higher percentage of Defendants’ financial accounts which are drained prior to the effectuation of the injunctive relief sought when the Plaintiff’s identity is disclosed at the outset of the lawsuit. Please see the table below for demonstrative data illustrating the same:

	Description	Sealed Cases	Public Cases	Totals & Difference
Case Information	Total Number of Cases	39	25	64
	Cases on SellerDefense (or similar websites)	39	25	64
	Percent Posted on SellerDefense	100%	100%	100%
Financial Info.	Average Frozen Amount - Per Defendant	\$ 3,356.35	\$ 2,366.64	\$ 989.70
	Average Number (percent) of Defendants with Zero Balances	37%	44%	8%

14. Attached hereto as **Exhibit 1** are true and correct copies of all articles cited within this Declaration.

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

Executed on January 6, 2026, at Chicago, Illinois.

/s/ Ann Marie Sullivan
Ann Marie Sullivan
COUNSEL FOR PLAINTIFF