

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

CELINE S.A.,

Plaintiff,

~ against ~

**THE PARTNERSHIPS *and*
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,**

Defendants,

Case No.: 1 : 24 - cv - 6208

Judge: The Honorable Robert W. Gettleman

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CORRECTED AFFIDAVIT BY DEFENDANT BUTABY

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because of the freeze (the original version sent these boxes had been sent back); and (iii.) In paragraph ¶ 26 we included a video tour of our sourcing website showing that the product we sourced did not have any Celine logo.

1. I am older than 18 years and an authorized representative of Butaby.
2. I am personally familiar with the facts and circumstances that I describe below. The information provided below reflects my personal knowledge based on my review of the books and records of Butaby that are kept in its regular course of business and my personal knowledge of Butaby's business practices.
3. I understand that this Affidavit is to be submitted by our United States attorney in support of a Motion to Vacate a Default Judgment and for other related purposes.
4. I further understand that because of the narrow issues before the Court at this time, the goal of this Affidavit is only to provide information specifically about the product that we sold and to confirm that we *have never and could never* sell any product that contained the Celine logo, and also discuss certain websites that – it is alleged – we operate.
5. I remain available to testify (through a translator) at any hearing that the Court may schedule and to otherwise supplement this Affidavit with any further information that the Court may find useful in determining this Motion.
6. This Affidavit was prepared with the assistance of Counsel as to its style. But I personally provided the substantive information in this Affidavit, I personally reviewed and signed the final version as accurately translated for me, and I personally take full and sole responsibility for what this Affidavit says.

B. The Product that We Sold

7. Our U.S. Lawyer has provided us a “Declaration of Phil Groves”, with its Exhibits. I understand that this was submitted to the Court as Electronic Court Filing Document Number 57.

8. Exhibit 1 of that affidavit is a 16-page PDF document.

9. Page 13 shows two bags, which I can confirm appear to be consistent with the bags used by our store when sending out glasses.

10. Page 14 appears to show a picture of a bar code of X00479J5WP and a short version of our product description. So far, so good. That appears to be consistent with our product packaging.

11. Page 15 shows an image of glasses that have *absolutely nothing to do with our product and what we sold*.

12. At no time have we taken in or possessed products with the Celine logo. At no time have we shipped product with the Celine logo. The Grove Declaration is simply not accurate on this point.

13. You do not have to take our word about this. There are at least three lines of objective evidence that show we never sold product with Celine logos on them.

a. Contemporaneous Posting of Product Images by Customers

14. As *explained* in our Affidavit in further support of the Motion to cap the injunction, the Accused ASINs at issue were structured with a parent Amazon Standard Identification Number (ASIN) of B0D1KHG7N1. A “Parent ASIN” is used for a category

of related products.

15. There are six (6) Child ASINs. A Child ASIN is used for a particular product, within a larger category. For the purposes of the accused ASIN, the Child ASINs are:

- (i.) B0D1KXZYDW;
- (ii.) B0D1KT8BRF;
- (iii.) B0D1KTCBZ4;
- (iv.) B0D1KV1XMY;
- (v.) B0D1KTZ94T; and
- (vi.) B0D1KGD6CP

16. The final one – B0D1KGD6CP – is the accused ASIN at issue in this case.

17. Customer reviews on Amazon are clustered based on the parent ASIN. For that reason <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KHG7N1> (the Customer Review Page of the parent ASIN)(a screenshot of which we took and have annexed as Exhibit A) displays 213 global ratings as does:

- (i.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KXZYDW>;
- (ii.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KT8BRF>;
- (iii.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KTCBZ4>;
- (iv.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KV1XMY>;

(v.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KTZ94T>; and

(vi.) <https://www.amazon.com/BUTABY-Sunglasses-Designer-Glasses-Protection/product-reviews/B0D1KGD6CP>

18. Scrolling down to the actual reviews and clicking on the menu radial for “Text, image, video”, change it to “Image and video reviews only”.

19. Doing so filters reviews by those which include either images and videos and which are independently created by purchasers of the product over the past year.

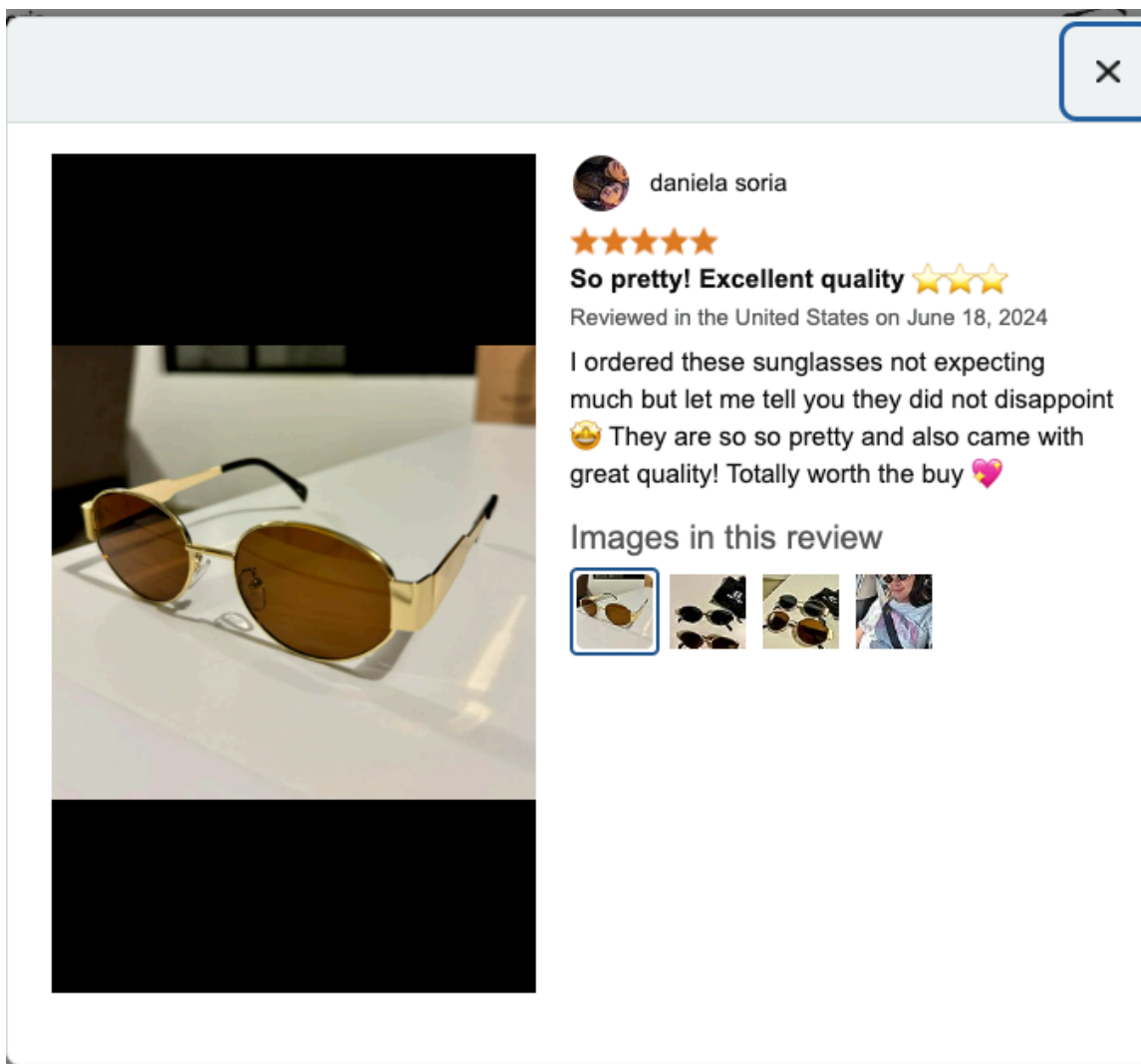
20. A collection of the 41 reviews is annexed as Exhibit B as screenshots/downloaded on February 7, 2025.

21. Each reviews show that there was no logo on the product.

22. Without limitation to the other reviews, we would highlight the clear picture of the hinge in Reviews 8 and 21:



Review 8, Second Picture (Exhibit B, Page 9)



Review 21, Third Picture (Exhibit B, Page 26)

23. Notwithstanding the hearsay upon hearsay by Mr. Groves, the truth is we never sold any product with the Celine logo. And this can be independently verified by showing that *none* of the 41 independent reviews show the Celine logo on our product.

b. Unboxing Video of the Returned Product

24. Available at <https://www.dropbox.com/scl/fi/wsji6ukyngplf2yc28z89f/mmexport1738168074701.mp4?rlkey=fbrbmghnzzzdqfkhp8nvznhqu&dl=0> is a video showing the physical unboxing of the accused product, which was packaged in the defendant's warehouse in China ready to be – but not – sent to Amazon's warehouse due

to the listing being frozen and delisted. It shows there was no Celine logo on the product.

25. Whatever the source of the image provided by Mr. Groves, it is not a picture of the product that we sold. And this can be independently verified by showing that the physical product in our warehouse for that ASIN does not contain the logo.

c. Our Product Sourcing Shows that there was no Logo on our Product

26. Annexed as Exhibit C is a screenshot of our sourcing of the product. It clearly shows that the product at issue *did not* contain the Celine logo. Available at https://www.dropbox.com/scl/fi/mx7i2rqs9owrvhyttzra/mmexport1738889662908_0_C_OMPRESSED.mp4?rlkey=cpdku0ktnhqrg24goqs3ow6g3&dl=0 is a screen capture showing us logged onto the site from which we sourced the product. It shows what and when product was delivered and physical pictures of the product that was delivered. It confirms that there was no logo on the product that we sourced and sold. Consistent with all the evidence we have shown – we never sourced, held, or sold product with Celine logos on them.

27. And again, we are more than willing to allow the Plaintiff to engage in an Inspection of our warehouses to confirm that no product with logos were ever purchased, sold or distributed.

28. Notwithstanding the hearsay claims by Mr. Grove, our sole purchase of the accused product was from a source that only produced and only provided us products that did not contain the Plaintiff's Logo or other IP.

C. The Other Websites

29. I have reviewed links to LTK and MercadoLibre that were provided

by the Plaintiff. I can confirm that we have absolutely nothing to do with those stores, have never had an account with any of those websites, and have never sold marketed or sold product on any of those platforms.

D. Conclusion

30. Available at <https://www.dropbox.com/scl/fi/75fjgomkibkry8v1rwnza/1000023462.mp4?rlkey=zamyjsyd35p9jhs5l9wh4ljoq&dl=0> is my personal testimony about these matters with English and Chinese subtitles, that may help further understanding of the circumstances of this case and how we *have never* sold product with Celine logos on them.

31. As noted above, I remain available to supplement this affidavit with any further documentation that this Court may require and I look forward to the opportunity to testify virtually (if so allowed) at a hearing on any Motion.

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

Executed on this 7th day of February, 2025 (China time)

RESPECTFULLY SUBMITTED,

By: 
王聰, transliterated as Wang Cong