

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 26-26668-CIV-ALTONAGA/Reid

**SHENZHEN XINBENCHUANG
ELECTRONICS CO., LTD.,**

Plaintiff,

v.

**THE INDIVIDUALS, PARTNERSHIPS
AND UNINCORPORATED ASSOCIATIONS
LISTED ON SCHEDULE “A,”**

Defendants.

SUPPLEMENTAL DECLARATION OF COLE CARLSON REGARDING SERVICE

I, Cole Carlson, declare as follows:

1. I am lead trial counsel for Plaintiff, Shenzhen Xinbenchuang Electronics Co., Ltd., and a member of The Florida Bar. I have personal knowledge of the facts stated in this declaration, which concern the steps I took, or that were taken at my direction, to identify and verify the address of each Defendant. I submit this declaration in support of Plaintiff’s Renewed Expedited Ex Parte Motion for Leave to Effect Service of Process by Alternative Means [ECF No. 25] (the “Motion”).

2. To preserve the sealing the Court ordered on October 7, 2026 [ECF No. 20], this declaration identifies Defendants only by their Schedule A numbers. Each Defendant’s seller identifier, disclosed business name, disclosed address, and registry information appear in the Per-Defendant Service Chart lodged under seal as Exhibit A to the Motion.

A. Exhibit A and a Correction to the Original Motion

3. I prepared Exhibit A. The information in column 5 of Exhibit A for each Defendant is drawn from the sources described in this declaration and is accurate as of the date I sign it.

4. The original motion for alternative service stated that Plaintiff had searched each Defendant's disclosed business name in the public business registry and "determined that none of the businesses accord with the addresses listed on Amazon." [ECF No. 18 ¶ 3]. That statement was inaccurate. When the original motion was filed on October 6, 2026, registry searches had been run only for Defendants 1 through 7, and the registered address of Defendant 1 matched the address it disclosed to Amazon. The results set out below and in Exhibit A replace that statement.

B. The Addresses Defendants Disclosed to Their Marketplaces

5. On September 30, 2026, I reviewed the seller profile of each Defendant and recorded the business name and address each one disclosed. (Carlson Inv. Decl. [ECF No. 11-2] ¶ 10). Twenty-three Amazon Defendants disclose a business address in mainland China. Defendant 20 discloses an address in Kowloon, Hong Kong. The Walmart.com seller pages for Defendants 25, 26, and 27 display a romanized Chinese business name and a telephone number beginning with the +86 country code for China, but no street address.

C. Business Registry Searches

6. I searched the Defendants' disclosed business names using the free company search offered by QCC at qcckyc.com, a commercial service operated by QCC Tech Pte. Ltd. that compiles registration data for mainland Chinese entities from government sources. QCC is not itself the official registry. I was unable to use the official National Enterprise Credit Information Publicity System (gsxt.gov.cn) from the United States because China appears to block IP addresses from the United States.

7. For each Defendant, I entered the romanized business name it disclosed and compared the results with that name. For each matching entity, QCC's free search displays the registered name in Chinese characters and in English, the entity's Unified Social Credit Code

(“USCC”), and its registered industry. The free search does not display the entity’s registered address for every result. Undersigned did as much online searching as possible in an attempt to determine the addresses of each Defendant.

8. Under the Chinese national standard for the USCC (GB 32100-2015), the third through eighth characters of the code identify the administrative division of the authority that registered the entity. Where I note below that a USCC is consistent with a disclosed address, I mean that those characters correspond to the district in which the disclosed address lies. That correspondence is not a match of street addresses.

9. On October 1 and 2, 2026, I searched Defendants 1 through 7. The results were as follows.

(a) Defendant 1: one matching entity, listed as active. Its registered address matches the address Defendant 1 disclosed to Amazon.

(b) Defendant 2: two registered entities correspond to the disclosed romanized name.

(c) Defendants 3, 5, and 6: one matching entity each. The address did not appear to match what was displayed on Amazon.

(d) Defendant 4: at least ten registered Shenzhen entities share the romanized name Defendant 4 disclosed. The disclosed name does not identify any one of them.

(e) Defendant 7: one matching entity. The address Defendant 7 disclosed is designated a centralized registration address (集中登记地), a shared address used for registration purposes rather than the premises of a particular business.

10. On October 13, 2026, I searched Defendants 8 through 19 and 21-24 and was not able to determine whether the disclosed Amazon address was a valid address.

13. For Defendants 25 through 27, Walmart.com displays no street address to search. The romanized business name Defendant 26 displays is the same as the business name Defendant 14 discloses on Amazon, and that name corresponds to the single registered entity identified for Defendant 14.

E. Marketplace Subpoenas

15. On October 9, 2026, Plaintiff served the subpoenas the Court authorized on October 7, 2026 [ECF No. 19] on Amazon.com, Inc. and Walmart Inc.

F. Email Addresses

16. Each Defendant operates through an Amazon.com or Walmart.com seller account. In my experience enforcing intellectual property rights against marketplace sellers, both marketplaces require a seller to maintain an email address on its account and use that address for communications about orders, payments, and account status. Plaintiff is still waiting on production from Amazon and Walmart regarding this information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 13, 2026, in Tampa, Florida.

/s/ Cole Carlson
Cole Carlson