

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

Case No. 21-CV-61332-RAR

**CHANEL, INC.,**

Plaintiff,

v.

**ANALUXURYFASHION, *et al.***

Defendants.

**DECLARATION OF HAO WHEN IN SUPPORT OF  
DEFENDANT SHENZHEN XINSU IMPORT AND EXPORT CO., LTD.'S  
MOTION TO SET ASIDE FINAL DEFAULT JUDGMENT**

I, Hao Wen, being sworn, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this Declaration, and if called as a witness, could testify competently thereto. I make this declaration in support of Defendant Shenzhen Xinsu Import and Export Co., Ltd.'s Motion to Set Aside Final Default Judgment.

2. I am the authoritative representative for Defendant Shenzhen Xinsu Import and Export Co., Ltd.

3. On July 27, 2021, I received an e-mail from counsel for Plaintiff which informed me that a lawsuit had been filed naming my company as a defendant.

4. With the assistance of local Chinese counsel, I was referred to Ricco Washburn. Our company retained Mr. Washburn shortly after.

5. My company was advised that we should appeal the final default judgment, and Mr. Washburn filed notices of appeal on November 11, 2022.

6. During this time, I believed that Mr. Washburn working on the appeal, however, I

was advised in early-August that our appeal should be voluntarily dismissed by Mr. Washburn.

7. On October 5, 2022, I contacted Edward Chen of the Law Offices of Edward Chen, and asked for assistance to determine exactly what was going on with the case.

8. On October 10, 2022, my company formally retained Mr. Chen to represent the company in this case.

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

Executed on October 13, 2022, in Shenzhen, People's Republic of China.

Hao Wen

Hao Wen