

**BEFORE THE
FEDERAL MARITIME COMMISSION**

DOCKET NO. 14 -10

ECONOCARIBE CONSOLIDATORS, INC.

COMPLAINANT

V.

AMOY INTERNATIONAL, LLC.

RESPONDENT

**COMPLAINANT'S REPLY TO RESPONDENT'S OPPOSITION TO MOTION FOR
PARTIAL SUMMARY JUDGMENT**

DECLARATION OF SHANSHAN LIANG

Shanshan Liang, under 28 USC § 1746, declares the following.

1. I, Shanshan Liang, am over the age of 18 and I am fully competent to testify to and have personal knowledge of the matters stated in this Declaration; every statement of fact herein or incorporated herein by reference is true and correct to the best of my knowledge, belief, and experience.

2. I submit this declaration in support of Complainant's Reply to Respondent's Opposition to Motion for Partial Summary Judgment. I am familiar with the facts and circumstances of the matters referenced in this Declaration.

3. I have worked as an associate attorney in The Mooney Law Firm since August 2014, and as a law clerk beginning 2013.

4. I have been involved in this case since the filing of this Complaint, assisting Neil B. Mooney, Esq. with legal research and drafting legal documents.

5. On or about January 15, 2015, out of my own curiosity of the meaning of "Amoy", I randomly searched the term "Amoy International Krystal Lee" in Google.com. Tradekey.com's Amoy page came up from the search.

6. I explored the search results and found that Amoy described itself to the general public as a "used tires scrap" dealer.

7. I used various other search terms including "Amoy International used tires," "Amoy International used rubber" etc., and found several other web sites on which Amoy held itself out as a used tires/rubber dealer . I also found Amoy offering to sell four containers of used tires in China, the same number as are at issue in this case, at the same time and in the same country where the tires at issue in this case were shipped by Amoy.

8. I saved all these pages by printing them as PDFs on January 15, 2015.

9. These printed web pages were submitted in support of this Reply as Exhibits 2 and 3.

10. I informed Econocaribe about these web pages. Econocaribe independently searched and confirmed to me that it found the same web pages with the search terms as I did.

11. The printed web pages were shown to Econocaribe during the preparation of this reply.

12. The domain name address and dates of printing accurately reflect from which websites and when these web pages were printed.

13. These pages are still available on the Internet.

14. I declare under penalty of perjury that the foregoing is true and correct. This declaration is executed by me on February 12, 2015 in Tallahassee, Florida.

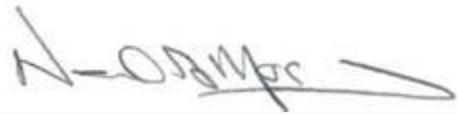


Shanshan Liang

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **COMPLAINANT'S REPLY TO RESPONDENT'S OPPOSITION TO MOTION FOR PARTIAL SUMMARY JUDGMENT - DECLARATION OF SHANSHAN LIANG** was sent to the below-mentioned counsel via email on February 12, 2015.

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Attorneys for Respondent
AMOY INTERNATIONAL LLC.



Neil B. Mooney, Esq.