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6 Attorneys for Plaintiff  
 7 EUN-A CHOI

8 **UNITED STATES DISTRICT COURT**  
 9 **CENTRAL DISTRICT OF CALIFORNIA**

11 EUN-A CHOI, an Individual,  
 12 Plaintiff,

13 v.

14  
 15 INSAN AMERICA, INC., a California  
 Corporation, dba KOREAN BAMBOO  
 16 SALT INSAN USA; EUN MI PAIK, an  
 Individual; and DOES 1-10, inclusive,  
 17  
 18 Defendants.

Case No. cv13-05461 RGR (RZx)

~~PROPOSED~~ ENTRY OF FINAL  
 JUDGMENT AGAINST DEFENDANTS  
 INSAN AMERICA, INC., DBA KOREAN  
 BAMBOO SALT INSAN USA, AND EUN  
 MI PAIK

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 [PROPOSED] ENTRY OF FINAL JUDGMENT AGAINST INSAN AMERICA, INC. AND EUN  
 MI PAIK (CHOI vs. INSAN AMERICA, ET. AL.)

1 Plaintiff, EUN-A CHOI, having commenced this action on or about July 29,  
2 2013, (the "Action") for trademark infringement and other relief against Defendants  
3 INSAN AMERICA, INC., a California Corporation, dba KOREAN BAMBOO SALT  
4 INSAN USA, and EUN MI PAIK, an Individual,, pursuant to the 15 U.S.C. for the  
5 reason that Defendants have engaged in importing, distributing, offering for sale  
6 and/or selling infringing products which Plaintiff has identified in the Complaint in  
7 this Action; Plaintiff having filed for the entry of default and default entered on or  
8 about August 26, 2013 against both Defendants for failure to plead or otherwise  
9 defend in the Action; and Plaintiff having filed on or about August 29, 2013 a Motion  
10 for Default Judgment against both Defendants, seeking statutory damage, attorneys'  
11 fees and costs and the entry of a permanent injunction.

12 **IT IS HEREBY ~~PROPOSED~~ ORDERED**

13 A default judgment in the amount of \$100,000.00 against Defendants INSAN  
14 AMERICA, INC., dba KOREAN BAMBOO SALT INSAN USA, and EUN MI PAIK,  
15 jointly and severally, in favor of Plaintiff.

16 ~~PROPOSED~~ ORDERED, an additional amount of \$ 5,600 for the  
17 attorneys' fees and \$ 587.96 in cost against Defendants INSAN AMERICA,  
18 INC., dba KOREAN BAMBOO SALT INSAN USA, and EUN MI PAIK, jointly and  
19 severally, in favor of Plaintiff.

20 ~~PROPOSED~~ ORDERED, Defendants INSAN AMERICA, INC., dba  
21 KOREAN BAMBOO SALT INSAN USA, and EUN MI PAIK, and their corporate  
22 parent, subsidiaries, directors, officers, agents, servants, employees, representatives,  
23 confederates, and affiliates and any other persons or entities acting in concert or  
24 participation with them, are permanently enjoined and restrained from:  
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- 26 1. Manufacturing, producing, importing, exporting, advertising, marketing,  
27 promoting, supplying, distributing, offering for sale, or selling any products  
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1 which bear the Plaintiff's Trademarks, or any marks substantially and/or  
2 confusingly similar thereto;

- 3
- 4 2. Committing any other acts which falsely represents or which has the  
5 effect of falsely representing that the products and services of Defendants  
6 are licensed by, authorized by, offered by, produced by, sponsored by, or in  
7 any other way associated with Plaintiff;
- 8 3. Otherwise diluting Plaintiff's federally registered trademarks;
- 9 4. Unfairly competing with Plaintiff;
- 10
- 11 5. Assisting, aiding, or abetting any other person or business entity, in  
12 engaging in or performing any of the activities referred to in the above  
13 subparagraph 1 through 4; and it is further:

14 ~~PROPOSED~~ ORDERED, Defendants INSAN AMERICA, INC., dba  
15 KOREAN BAMBOO SALT INSAN USA, and EUN MI PAIK, and their corporate  
16 parent, subsidiaries, directors, officers, agents, servants, employees, representatives,  
17 confederates, and affiliates and any other persons or entities acting in concert or  
18 participation with them, shall discontinue the use of the website www.insanusa.com  
19 and the name of the corporation "INSAN AMERICA, INC." or its fictitious business  
20 name of "KOREAN BAMBOO SALT INSAN USA" in any way not to contain the  
21 word "INSAN," within thirty (30) Days from the service of the entry of judgment; and  
22

23 ORDERED that this Court has jurisdiction over the parties, and the subject  
24 matter of the Action. This Court shall retain jurisdiction to the extent necessary to  
25 enforce this Judgment;

26 SO ORDERED.

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28 Dated: OCT 3 2013

By: R. Gary Klausner  
Hon. R. Gary Klausner  
-3- United States District Court Judge

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Submitted by:

By: /Yong Bom Lee/  
Yong Bom Lee, Attorneys for Plaintiff, EUN-  
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