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6 IN THE UNITED STATES DISTRICT COURT  
7 FOR THE DISTRICT OF ARIZONA

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9 We The People, USA, Inc.,

10 Plaintiff,

11 v.

12 Paul Brown and Judy Brown,

13 Defendants.

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) No. CV-07-1789-PHX-SMM

) **STIPULATED PERMANENT**  
) **INJUNCTION**

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16 Pursuant to a settlement agreement, the parties have stipulated that the following  
17 Permanent Injunction (the "Injunction") may be entered by the Court. Therefore,

18 **IT IS HEREBY ORDERED** that,

19 1. Defendant Paul Brown ("Defendant") and, as applicable, his officers, members,  
20 agents, servants, and employees, and any other persons or entities in active concert or  
21 participation with Defendant, are permanently enjoined from:

22 A. Directly or indirectly owning, maintaining, engaging in, or participating  
23 in the operation of a paralegal document preparation service at Defendant's current business  
24 addresses (15224 N. 59th Ave. #15, Glendale, AZ 85306), within Defendant's former  
25 Exclusive Territory, or within the exclusive territory of any We The People franchisee, for  
26 a period of two years, commencing on August 17, 2007;

27 B. Using or disclosing to third parties We The People's trade secrets,

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1 including but not limited to We The People's System, Confidential Operating Manual, and  
2 legal document workbooks; and

3 C. Making any use of the "We The People" name or distinctive Liberty  
4 Bell-like symbol, or any other trademarks, trade names, service marks, or symbols  
5 associated with We The People USA, Inc. (collectively, the "We The People Marks"), any  
6 colorable imitation thereof, or any other confusingly similar marks.

7 2. Defendant is further ordered to immediately and permanently cease use of the  
8 We The People Marks in advertising, forms, manuals, slogans, signs or in any other manner.  
9 Defendant shall not represent or advertise that Defendant was formerly a We The People  
10 franchisee, or that Defendant did business under the We The People Marks or System.

11 3. Defendant is further ordered to ensure, at his own expense, that all uses of the  
12 We The People Marks in connection with Defendant is removed at the earliest possible time  
13 from all telephone directories, directory assistance records, building directories, signboards,  
14 memberships rosters, and every other place and publication.

15 4. Defendant is further ordered to take all action to cancel any assumed name or  
16 equivalent registration that includes any of the We The People Marks.

17 5. Defendant is further ordered to deliver to We The People USA, Inc., or its duly  
18 authorized representative, all materials and papers on which the We The People Marks  
19 appear.

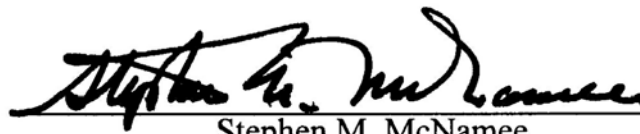
20 6. Defendant is further ordered to assign to We The People USA, Inc. all of  
21 Defendant's interest in the telephone numbers that were used in connection with the operation  
22 of his We The People franchise, and shall execute all documents and instruments and give  
23 all instructions necessary to affect the transfer to We The People USA, Inc.

24 7. Defendant is further ordered that he shall, at his own expense, make such  
25 changes to the signs, displays, and interior décor of his former We The People store as We  
26 The People USA, Inc. reasonably requests in order to effectively distinguish the premises  
27 from its former appearance and from the appearance of other We The People franchises.  
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1 These changes shall be made within 30 days of the date such request is made by We the  
2 People USA, Inc.

3 8. Defendant is further ordered to return to We The People USA, Inc. the  
4 Confidential Operating Manual and all documents and records that are reasonably necessary  
5 or important to the continuation of Defendant's former We The People franchise, including  
6 but not limited to all client and customer lists and pertinent legal documents.

7 DATED this 25th day of September, 2007.

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11 Stephen M. McNamee  
12 United States District Judge  
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