

M M P Inc v. Forever 21 Inc et al

Doc. 1

1 Mark D. Brutzkus, SBN 128102
 2 Luis A. Garcia, SBN 146876
 3 Michael W. Hicks, SBN 182783
 4 EZRA | BRUTZKUS | GUBNER LLP
 5 21650 Oxnard Street, Suite 500
 6 Woodland Hills, California 91367-4911
 7 Telephone: 818-827-9000
 8 Facsimile: 818-827-9099
 9 E-mail: mbrutzkus@ebg-law.com
 10 lgarcia@ebg-law.com
 11 mhicks@ebg-law.com

FILED
 CLERK, U.S. DISTRICT COURT
 AUG 17 2007
 CENTRAL DISTRICT OF CALIFORNIA
 BY [Signature]

7 Attorneys for Defendants
 8 FOREVER 21, INC., FOREVER 21
 9 RETAIL, INC., FASHION 21
 10 MERCHANDIZING CORPORATION,
 11 FOREVER 21 CAPITAL HOLDINGS,
 12 FOREVER 21 INVESTMENTS, LLC,
 13 FOREVER 21 LOGISTICS, LLC,
 14 FOREVER 21 INTERNATIONAL
 15 HOLDINGS, INC., LONDON EYES
 16 CORPORATION and UNICOLORS, INC.

DOCKETED CAL CM
 AUG 20 2007
 BY [Signature] 002

LOGGED

2007 AUG 14 PM 3:35

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

[Signature]

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

17	M.M.P., INC., a California corporation,) [Assigned to Hon. Gary A. Fees]
18	d.b.a. FABRICS & FABRICS,)
	Plaintiff,) CASE NO. CV07-00696 GAF(PLAx)
19	vs.) STIPULATION OF DISMISSAL
) AND [PROPOSED] ORDER
20	FOREVER 21, INC., a California) [Fed. R. Civ. P. 41(a)(1)]
21	corporation, etc. et al.)
	Defendants.)
22)
23)

25 **IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff
 26 M.M.P, INC., a California corporation ("Plaintiff"), through its attorneys of record,
 27 Roylance, Abrams, Berdo & Goodman L.L.P., and defendants FOREVER 21,
 28

14

1 INC., FOREVER 21 RETAIL, INC., FASHION 21 MERCHANDIZING
 2 CORPORATION, FOREVER 21 CAPITAL HOLDINGS, FOREVER 21
 3 INVESTMENTS, LLC, FOREVER 21 LOGISTICS, LLC and FOREVER 21
 4 INTERNATIONAL HOLDINGS, INC., LONDON EYES CORPORATION and
 5 UNICOLORS, INC. (hereafter collectively referred to as the "Defendants"),
 6 through their of attorney of record, Ezra|Brutzkus|Gubner LLP, that the
 7 Defendants, and each of them, are hereby dismissed *with prejudice* pursuant to
 8 Rule 41(a)(1) of the Federal Rules of Civil Procedure (28 U.S.C.).

9 **IT IS FURTHER STIPULATED AND AGREED** that the Court shall
 10 retain jurisdiction in connection with any violation of the parties' settlement
 11 agreement.

12 Dated: August 14, 2007

ROYLANCE ABRAMS BERDO
& GOODMAN LLP

14 By: Megan E. Gray
 15 MEGAN E. GRAY
 Attorneys for Plaintiff M.M.P., INC.

16 Dated: August 14, 2007

EZRA | BRUTZKUS | GUBNER LLP

18 By: Mark D. Brutzkus
 19 MARK D. BRUTZKUS
 LUIS A. GARCIA
 MICHAEL W. HICKS
 Attorneys for Defendants
 20 FOREVER 21, INC., FOREVER 21
 21 RETAIL, INC., FASHION 21
 22 MERCHANDIZING
 CORPORATION, FOREVER 21
 23 CAPITAL HOLDINGS,
 24 FOREVER 21 INVESTMENTS,
 25 LLC, FOREVER 21 LOGISTICS,
 26 LLC, FOREVER 21
 INTERNATIONAL HOLDINGS,
 INC., LONDON EYES
 CORPORATION and UNICOLORS,
 INC.

[Order on next page]

ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

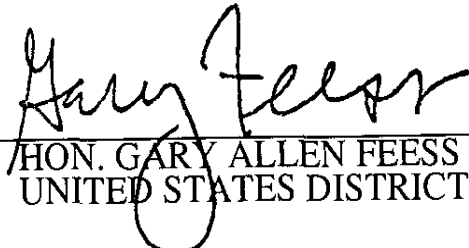
Good Cause having been shown and pursuant to the terms of the Stipulation of Dismissal executed by Plaintiff M.M.P, INC., a California corporation (“Plaintiff”) and defendants FOREVER 21, INC., FOREVER 21 RETAIL, INC., FASHION 21 MERCHANDIZING CORPORATION, FOREVER 21 CAPITAL HOLDINGS, FOREVER 21 INVESTMENTS, LLC, FOREVER 21 LOGISTICS, LLC and FOREVER 21 INTERNATIONAL HOLDINGS, INC., LONDON EYES CORPORATION and UNICOLORS, INC. (“Defendants”) through their respective counsels of record,

SCANNED

IT IS SO ORDERED that Defendants, and each of them, are hereby dismissed *with prejudice* pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure (28 U.S.C.).

IT IS FURTHER ORDERED that the Court shall retain jurisdiction in connection with any violation of the parties’ settlement agreement.

Dated: AUG 17 2007



HON. GARY ALLEN FEESS
UNITED STATES DISTRICT COURT

PROOF OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I am employed in the County of Los Angeles, State of California; I am over the age of 18 years and am not a party to the within action or proceeding. I am employed by the law firm of Ezra, Brutzkus & Gubner, located at 21650 Oxnard Street, Suite 500, Woodland Hills, California 91367-4911, Telephone: (818) 827-9000, Facsimile: (818) 827-9099.

On August 14, 2007, I served the foregoing document described as **STIPULATION OF DISMISSAL AND [PROPOSED] ORDER** on the interested parties in said action, as follows:

Megan E. Gray
ROYLANCE, ABRAMS, BERDO & GOODMAN, LLP
1300 19th Street NW, Suite 600
Washington, DC 20036

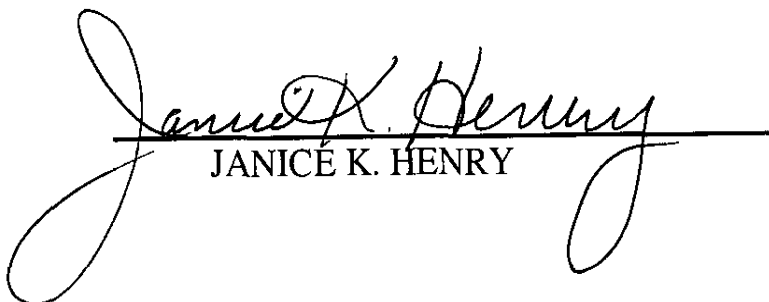
(By Mail) I caused such envelope with postage thereon, fully prepaid, to be placed in the United States mail. Executed on August 14, 2007, at Woodland Hills, California.

(By Facsimile) I caused said document to be sent via facsimile. Executed on _____, 2007, at Woodland Hills, California.

(By Personal Service) I caused such envelope to be delivered by hand to the offices of the addressee. Executed _____, at Encino, California.

(By Federal Express/Express Mail) I caused said document to be sent via Federal Express / Express Mail for next business day delivery. Executed on _____, 2007, at Woodland Hills, California.

(Federal) Executed this 14th day of August, 2007, I declare that I am an employee in the offices of a member of the State Bar of this Court at whose direction the service was made.



JANICE K. HENRY