

1 Brent H. Blakely (SBN 157292)  
 2 [bblakely@blakelylawgroup.com](mailto:bblakely@blakelylawgroup.com)  
 3 Cindy Chan (SBN 247495)  
 4 [cchan@blakelylawgroup.com](mailto:cchan@blakelylawgroup.com)  
 5 BLAKELY LAW GROUP  
 915 North Citrus Avenue  
 Hollywood, California 90038  
 Telephone: (323) 464-7400  
 Facsimile: (323) 464-7410

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*Attorneys for Plaintiff Chrome Hearts, LLC*

8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA

11 CHROME HEARTS, LLC.,  
 12 Plaintiff,  
 13 vs.  
 14 THE BLING JEWELRY CO., LLC and  
 ANGELICA CAMPOS, an individual,  
 15 Defendants.

} CASE NO. CV 08-4059 ABC (JTLx)  
 } **ORDER RE CONSENT JUDGMENT**  
 } **INCLUDING A PERMANENT**  
 } **INJUNCTION; VOLUNTARY**  
 } **DISMISSAL WITH PREJUDICE**

17 Plaintiff Chrome Hearts, LLC (“Chrome Hearts” or “Plaintiff”) and Defendants  
 18 The Bling Jewelry Co., LLC and Angelica Campos (hereinafter collectively  
 19 “Defendants”) have entered into a Settlement Agreement and Mutual Release as to the  
 20 claims in the above referenced matter. Defendants, having agreed to consent to the  
 21 below terms, **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** as  
 22 among the parties hereto that:

- 23 1. This Court has jurisdiction over the parties to this Final Judgment and has  
 24 jurisdiction over the subject matter hereof pursuant to 15 U.S.C. § 1121.
- 25 2. Plaintiff Chrome Hearts LLC. is the owner of numerous trademarks,  
 26 including, but are not limited to U.S. Registration Nos. 1,665,791 for CHROME  
 27 HEARTS; 2,307,126 for the CHROME HEARTS plus Horseshoe Design; 2,284,625  
 28 for the CHROME HEARTS plus Dagger Design; 2,216,570 for the CHROME

1 HEARTS plus Scroll Design; 2,407,915 for the Dagger Heart Design; 2,954,539 for  
2 the CH Design (stylized); 3,385,415 for the Cemetery Design; AND 3,385,449 for the  
3 CH plus Design (collectively the “Chrome Hearts Marks”); and owner of numerous  
4 copyright designs, including, but are not limited to Copyright Registration Nos. VA  
5 967-385 for the Framed Charms; VA 705-195 for the Star; VA 946-986 for the Star  
6 Charm; and VA 946-985 for the Star Link Bracelet (hereinafter collectively the  
7 “Copyrighted Designs”);

8         3. Plaintiff has alleged that Defendants distributed and sold jewelry  
9 comprising infringements of Chrome Hearts’ copyrighted Star Charm jewelry design  
10 and bearing a counterfeit of the CHROME HEARTS plus the Scroll Design mark, a  
11 photocopy of which is annexed hereto (herein referred to as “Infringing Product”), and  
12 that such acts constitute copyright infringement, trademark infringement and unfair  
13 competition under the Copyright Laws of the United States, 17 U.S.C. §101 et seq and  
14 the Lanham Trademark Act, 15 U.S.C. §1114(1) and 1125(a).

15         4. Defendants and their agents, servants, employees and all persons in active  
16 concert and participation with them who receive actual notice of this Final Judgment  
17 are hereby permanently restrained and enjoined from infringing upon the Chrome  
18 Hearts trademarks and copyrighted works, either directly or contributorily, in any  
19 manner, including generally, but not limited to manufacturing, importing, distributing,  
20 advertising, selling and/or offering for sale any unauthorized product bearing the  
21 Chrome Hearts trademarks and/or copyrighted works, or words or marks confusingly  
22 similar or substantially similar thereto, and, specifically from:

23                 (a) Importing, manufacturing, distributing, advertising, selling and/or  
24 offering for sale products which picture, reproduce, copy or use the likenesses of or  
25 bear a substantial similarity to any of the Chrome Hearts trademarks and/or  
26 copyrighted works.

27                 (b) Importing, manufacturing, distributing, advertising, selling and/or  
28 offering for sale in connection thereto any unauthorized promotional materials, labels,

1 packing or containers which picture, reproduce, copy or use the likenesses of or bear a  
2 confusing similarity to any of the Chrome Hearts trademarks and/or copyrighted  
3 works.

4 (c) Engaging in any conduct that tends falsely to represent that, or is  
5 likely to confuse, mislead or deceive purchasers, Defendant's customers and/or  
6 members of the public to believe, the actions of Defendant, the products sold by  
7 Defendant in connection with Plaintiff, is sponsored, approved or licensed by Plaintiff,  
8 or is affiliated with Plaintiff.

9 (d) Affixing, applying, annexing or using in connection with the  
10 importation, manufacture, distribution, advertising, sale and/or offer for sale or other  
11 use of any goods or services, a false description or representation, including words or  
12 other symbols, tending to falsely describe or represent such goods as being those of  
13 Plaintiff.

14 5. The parties having agreed that Defendants shall pay to Plaintiff an amount  
15 in settlement of Plaintiff's demand for damages, profits, costs, disbursements and  
16 attorneys' fees based upon Defendant's alleged infringing activities, Defendant's  
17 warranties and representations and obligations to make such payment are incorporated  
18 herein and no other award for damages, profits, costs, disbursements and/or attorneys'  
19 fees is made herein.

20 6. The execution of this Final Judgment by Counsel for the parties and/or by  
21 the Defendant appearing *pro se* shall serve to bind and obligate the parties hereto.

22 7. The jurisdiction of this Court is retained for the purpose of making any  
23 further orders necessary or proper for the construction or modification of this Final  
24 Judgment, the enforcement thereof and the punishment of any violations thereof.  
25 Except as otherwise provided herein, this action is fully resolved with prejudice as to  
26 Defendants The Bling Jewelry Co., LLC and Angelica Campos.

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1 8. This Final Judgment shall be deemed to have been served upon  
2 Defendants at the time of its execution by the Court.

3 **ORDER**

4 IT IS SO ORDERED.

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6 DATED: September 12, 2008



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7 HON. AUDREY B. COLLINS

8 **United States District Judge**

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