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E-Filed: **12/9/08**
 No-JS6

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14 Attorney for Defendants
 15 DRESS TO IMPRESS and GEVORG TERTERYAN,
 16 erroneously sued as GEVORG TERERYAN

17 **IN THE UNITED STATES DISTRICT COURT**
 18 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

19 GURU DENIM, INC., a California
 20 Corporation,

21 Plaintiff,

22 v.

23 DRESS TO IMPRESS, a Business
 24 Entity Incorporated in California,
 25 GEVORG TERERYAN, an
 26 individual, MAXINE PARIS, INC., a
 Business Entity Incorporated in
 California, XIU WEI LIN, an
 individual, JULIEN UI WANG, an

Case No.: 08-CV-04174 GHK (RZx)

**[PROPOSED] CONSENT
 JUDGMENT AND PERMANENT
 INJUNCTION**

NOTE: CHANGES MADE BY THE COURT

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Individual, and Does 1-10, Inclusive,

Defendants.

Plaintiff GURU DENIM, INC. and Defendants DRESS TO IMPRESS and GEVORG TERTERYAN, erroneously sued as GEVORG TERERYAN, having consented to entry of this Consent Judgment and Permanent Injunction, it is hereby ORDERED, ADJUDGED AND DECREED as follows:

Judgment is hereby entered in favor of Plaintiff and against Defendants on Plaintiff’s First Claim for Federal Trademark Infringement [15 U.S.C. §1114/*Lanham Act* §43(a)]; on Plaintiff’s Second Claim for Federal Copyright Infringement [17 U.S.C. §501(a)]; on Plaintiff’s Third Claim for False Designation of Origin [15 U.S.C. §1125(a)]; on Plaintiff’s Fourth Claim for Trademark Dilution [15 U.S.C. §1125(c); *California Business & Professions Code* §14330]; on Plaintiff’s Fifth Claim for Common Law Copyright Infringement [*California Civil Code* §980]; on Plaintiff’s Sixth Claim for Unfair Business Practices [*California Business & Professions Code* §17200]; and on Plaintiff’s Seventh Claim for Unjust Enrichment.

STIPULATED FACTS

Plaintiff and Defendants, as well as their agents, servants, employees, attorneys, successors and assigns, and all those persons in active concert or participation with them hereby stipulate to the following facts as true and correct as to them only:

(a) Plaintiff owns a registered United States trademark for the “True Religion Brand Jeans World Tour Fashion for the Senses Section Row Seat” label

1 and corresponding artwork under U.S. Reg. No. 2,917,187, registered January 11,
2 2005.

3 (b). Plaintiff owns registered United States trademarks in the pocket
4 stitching pattern that appears on True Religion Brand Jeans pants and the overall
5 stitching pattern on the front of True Religion Brand Jeans pants under U.S. Reg.
6 No. 3,147,244, registered September 16, 2006, and under U.S. Reg. No. 3,219,110,
7 registered March 13, 2007.

8 (c). Plaintiff owns 4 registered United States trademarks in the word mark
9 “True Religion Brand Jeans,” (hereinafter, “the Mark) with assorted designs,
10 characters and artwork (hereinafter, “the Designs”) under the following registration
11 numbers: U.S. Reg. No. 2,761,793, registered September 9, 2003; U.S. Reg. No.
12 3,120,797, registered July 25, 2006; U.S. Reg. No. 3,120,798, registered July 25,
13 2006; U.S. Reg. No. 3,282,490, registered August 21, 2007.

14 (d). Plaintiff owns registered United States trademarks in the word mark
15 “True Religion,” under U.S. Reg. No. 3,162,615, registered October 24, 2006; and
16 under U.S. Reg. No. 3,162,614, registered October 24, 2006.

17 (e). Plaintiff owns two United States Copyrights for the True Religion
18 Brand Jeans Designs under Certificate of Registration number VA 1-192-834,
19 effective date of February 6, 2003, and Certificate of Registration number VA 1-
20 301-845, effective date of April 13, 2005.

21 (f). Plaintiff owns an additional United States Copyright in the
22 “truereigionbrandjeans.com” website under Certificate of Registration number TX
23 6-236-806, effective date of June 1, 2005.

24 (g). Plaintiff owns a United States Design Patent for the stitch pattern
25 applied to True Religion Brand Jeans pants under United States Patent No.
26 D547530, issued July 31, 2007.

1 (h). Plaintiff also owns registered trademarks in the True Religion Brand
2 Jeans Mark and Designs in the following foreign countries or territories: Canada,
3 United Kingdom, European Union, Germany, Australia, Japan, Korea, Mexico,
4 Colombia, Hong Kong, Korea, Norway, Russia, South Africa and Paraguay.

5 (i). Defendants sold alleged counterfeit True Religion Brand Jeans denim
6 pants in the stream of commerce, which infringed on Plaintiff's trademarks and
7 copyrights.

8 **PERMANENT INJUNCTION**

9 Defendants, as well as their agents, servants, employees, attorneys,
10 successors and assigns, and all those persons in active concert or participation with
11 them **who receives actual notice of this injunction** hereby are permanently enjoined
12 from engaging in, committing, or performing, directly or indirectly, all of the
13 following acts:

14 a. using in any manner in connection with Defendants' business or in
15 connection with any other advertising, promotions, solicitations or use for such
16 business, services, or goods bearing the trademarks, trade names, and the
17 copyrights of Plaintiff;

18 b. performing or allowing any act or thing which is likely to injure
19 Plaintiff's business reputation or good will;

20 c. engaging in federal or state copyright and trademark infringement, false
21 designation of origin, unfair competition, and dilution by tarnishment, which
22 would damage or injure Plaintiff; and

23 d. using the Internet, world wide web, or any other domain name to
24 advertise, promote, or sell items bearing the trademarks, trade names, and the
25 copyrights of Plaintiff, or any confusingly similar mark such as the names, marks,
26 and/or trade dress relating to the trademarks, trade names, and the copyrights of
Plaintiff or any colorable imitations thereof.

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MONETARY JUDGMENT

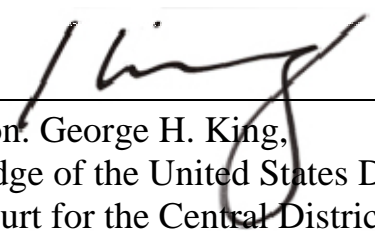
Defendants shall be jointly and severally liable to Plaintiffs for the monetary judgment of Four Thousand Hundred Dollars (\$4,000.00), which shall be payable, in certified funds, and delivered to “Johnson & Pham, LLP” by no later than December 1, 2008.

Except as set forth in any separate written agreement between the parties, each party shall bear its own costs, expenses, disbursements and attorneys’ fees incurred to date.

The Central District of California shall reserve and retain jurisdiction as to any and all disputes arising out of this Consent Judgment and Permanent Injunction by and between Plaintiffs and Defendant.

IT IS SO ORDERED, ADJUDGED AND DECREED.

Dated: 12/8, 2008

By: 
Hon. George H. King,
Judge of the United States District
Court for the Central District of
California

DEFENDANTS’ AGREEMENT AND CONSENT TO JUDGMENT:

Dated: _____, 2008

By: _____
GEVORG TERTERYAN, as an
individual and on behalf of DRESS
TO IMPRESS

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AGREED AND STIPULATED AS TO FORM ONLY:

Dated: _____, 2008

JOHNSON & PHAM, LLP

By: _____
CHRISTOPHER Q. PHAM, ESQ.
Attorney for Plaintiff
GURU DENIM, INC.

Dated: _____, 2008

**ARIS ARTOUNIANS, ATTORNEY AT
LAW**

By: _____
ARIS ARTOUNIANS, ESQ.
Attorney for Defendants
DRESS TO IMPRESS and GEVORG
TERTERYAN