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**Attorneys for Plaintiffs**

UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION

19 ADIDAS AMERICA, INC., and  
 20 ADIDAS AG,  
 21 Plaintiff,  
 22 v.  
 23 WAH LEI FOOTWEAR (U.S.A.)  
 24 CORPORATION, FU JU (U.S.A.)  
 25 GROUP INC., LA DISCOUNT SHOES,  
 26 SUNNY SHOES CORP., and TOP  
 27 SHOES, INC.  
 28 Defendants.

Case No.: CV08-04969-JFW (JTLx)

**PERMANENT INJUNCTION ON  
 CONSENT (REGARDING WAH LEI  
 FOOTWEAR (U.S.A.)  
 CORPORATION)**

PERMANENT INJUNCTION ON CONSENT

1 This Court, having considered the Complaint on file in this action, and  
2 Defendant Wah Lei Footwear (U.S.A.) Corporation (“Wah Lei”), a California  
3 corporation, having consented to the terms of the judgment and permanent  
4 injunction set forth below, this Court hereby finds as follows:

5 1. Plaintiff adidas AG owns and adidas America, Inc. extensively uses the  
6 Three-Stripe trademark (the “Three-Stripe Mark”), which is covered by valid U.S.  
7 Trademark Registration Nos. 870,136, 1,815,956, 1,833,868, 2,016,963, 2,058,619,  
8 2,278,589, 2,278,591, 2,284,308, 2,909,861, 2,999,646, 3,029,127, 3,029,129,  
9 3,029,135, 3,087,329, and 961,353 (the “Trademark Registrations”). Copies of the  
10 Trademark Registrations are attached hereto collectively as Exhibit A.

11 2. On July 29, 2008, adidas filed a complaint in the instant action claiming,  
12 *inter alia*, that Wah Lei advertised, distributed, offered for sale and sold footwear  
13 bearing four parallel stripes in a manner that infringes adidas’s rights in and dilutes the  
14 distinctive quality of adidas’s Three-Stripe Mark (the “Disputed Footwear”). A  
15 photograph of a representative example of the Disputed Footwear is attached hereto as  
16 Exhibit B.

17 3. The Court has jurisdiction over the subject matter of this action and over  
18 Wah Lei and venue in this action is proper in this judicial district.

19 **IT IS HEREBY ORDERED** that:

20 1. Wah Lei and all its agents, officers, employees, representatives,  
21 successors, assigns, attorneys, and all other persons acting for, with, by, through, or  
22 under authority from Wah Lei, or in concert or participation with Wah Lei, and each  
23 of them, be PERMANENTLY ENJOINED and RESTRAINED, from:

24 a. manufacturing, selling, offering for sale, advertising, promoting,  
25 distributing or displaying the Disputed Footwear;

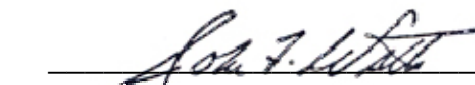
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b. manufacturing, selling, offering for sale, advertising, promoting, distributing or displaying any other footwear bearing the Three-Stripe Mark or any other confusingly similar imitation of adidas's Three-Stripe Mark, including without limitation any footwear having a design, mark, or feature on the side of the upper that consists of (1) the Three-Stripe Mark (in a similar position, size and spacing as depicted in the Trademark Registrations) with one additional stripe; or (2) the Three-Stripe Mark (in a similar position, size and spacing as depicted in the Trademark Registrations) less one of the three stripes;

2. The parties shall bear their own costs, including attorneys' fees.

3. The Court shall have continuing jurisdiction to enforce the provisions of the permanent injunction entered herein.

IT IS SO ORDERED, this 29th day of October, 2008.

  
The Honorable John F. Walter, Judge  
United States District Court