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8 Attorneys for Plaintiffs Deckers
 Outdoor Corporation and Nike, Inc.

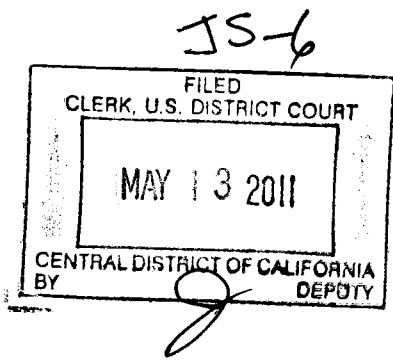
9 Maria Carrillo, an individual and
 d/b/a *www.thesneakersstore.com*
 and The Sneakers Store
 10 *arcie@sonoramed.org*
 [REDACTED]
 11 Diamond Bar, California 91765
 [REDACTED]

12 Defendant, *in pro se*

13 UNITED STATES DISTRICT COURT
 14 CENTRAL DISTRICT OF CALIFORNIA

15 Deckers Outdoor Corporation and Nike,)
 16 Inc.,)
 17 Plaintiffs,)
 v.)
 19 Maria Carrillo, an individual and d/b/a)
 20 *www.thesneakersstore.com* and The)
 Sneaker Store and Does 1 – 10, inclusive,)
 21 Defendants.)

Case No. CV10-4821 CBM (AJWx)
 [PROPOSED] CONSENT DECREE
 PURSUANT TO STIPULATION



22 The Court, having read and considered the Joint Stipulation for Permanent
 23 Injunction that has been executed by Plaintiffs Deckers Outdoor Corporation
 24 (“Deckers”) and Nike, Inc. (“Nike”) (collectively “Plaintiffs”) and Defendant Maria
 25 Carrillo, an individual and d/b/a *www.thesneakersstore.com* and The Sneaker Store
 26 (“Defendant”) in this action:

27 GOOD CAUSE APPEARING THEREFORE, THE COURT ORDERS that this
 28 Permanent Injunction shall be and is hereby entered in the within action as follows:

- 1) This Court has jurisdiction over the parties to this action and over the subject matter hereof pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, et seq., as well as 28 U.S.C. § 1338(a) and 28 U.S.C. § 1331.
- 2) Service of process was properly made on Defendant.
- 3) Nike owns or controls the pertinent rights in and to the trademarks listed in Exhibit “A” attached hereto and incorporated herein by this reference (The trademarks identified in Exhibit “A” are collectively referred to herein as the “Nike Trademarks”).
- 4) Deckers owns or controls the pertinent rights in and to the trademarks attached hereto as Exhibits “B” and “C” and incorporated herein by this reference (The trademarks identified in Exhibits “B” and “C” are collectively referred to herein as the “Deckers Trademarks”).
- 5) The Nike Trademarks and the Deckers Trademarks are collectively referred to herein as the “Plaintiffs’ Trademarks.”
- 6) Defendant has made unauthorized uses of the Plaintiffs’ Trademarks or substantially similar likenesses or colorable imitations thereof.
- 7) Defendant and her agents, servants, employees and all persons in active concert and participation with her who receive actual notice of the Injunction are hereby restrained and enjoined, pursuant to 15 U.S.C. § 1116, from:
 - a) Infringing the Plaintiffs’ Trademarks, either directly or contributorily, in any manner, by:
 - i) Importing, manufacturing, distributing, advertising, selling and/or offering for sale any unauthorized products which picture, reproduce, copy or use the likenesses of or bear a confusing similarity to any of the Plaintiffs’ Trademarks (“Unauthorized Products”);
 - ii) Importing, manufacturing, distributing, advertising, selling and/or offering for sale in connection thereto any unauthorized promotional

1 materials, labels, packaging or containers which picture, reproduce, copy
2 or use the likenesses of or bear a confusing similarity to any of the
3 Plaintiffs' Trademarks;

4 iii) Engaging in any conduct that tends falsely to represent that, or is
5 likely to confuse, mislead or deceive purchasers, Defendant's customers
6 and/or members of the public to believe, the actions of Defendant, the
7 products sold by Defendant, or Defendant herself is connected with either
8 Nike or Deckers, is sponsored, approved or licensed by either Nike or
9 Deckers, or is affiliated with Nike or Deckers;

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

15 8) Defendant is ordered to deliver for destruction all Unauthorized Products,
16 including footwear, and labels, signs, prints, packages, dyes, wrappers, receptacles
17 and advertisements relating thereto in her possession or under her control bearing any
18 of the Plaintiffs' Trademarks or any simulation, reproduction, counterfeit, copy or
19 colorable imitations thereof, and all plates, molds, heat transfers, screens, matrices and
20 other means of making the same.

21 9) This Injunction shall be deemed to have been served upon Defendant at the time
22 of its execution by the Court.

23 10) The Court finds there is no just reason for delay in entering this Injunction and,
24 pursuant to Rule 54(a) of the Federal Rules of Civil Procedure, the Court directs
25 immediate entry of this Injunction against Defendant.

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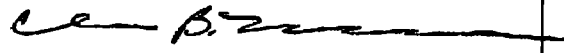
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1 9) The Court shall retain jurisdiction of this action to entertain such further
2 proceedings and to enter such further orders as may be necessary or appropriate to
3 implement and enforce the provisions of this Injunction.

4 10) The above-captioned action, shall, upon filing by Plaintiff of the Settlement
5 Agreement, Stipulation for Entry of Judgment and Judgment Pursuant to Stipulation,
6 and requesting entry of judgment against Defendant, be reopened should Defendant
7 default under the terms of the Settlement Agreement.

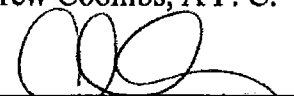
8 11) This Court shall retain jurisdiction over Defendant for the purpose of making
9 further orders necessary or proper for the construction or modification of this consent
10 decree and judgment; the enforcement hereof; the punishment of any violations
11 hereof, and for the possible entry of a further Judgment Pursuant to Stipulation in this
12 action.

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15 DATED: 5/13/11



Hon. Consuelo B. Marshall
United States District Judge

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18 PRESENTED BY:
J. Andrew Coombs, A P. C.

19
20 By: 

J. Andrew Coombs
Annie S. Wang
21 Attorneys for Plaintiffs Deckers
22 Outdoor Corporation and Nike, Inc.

23 Maria Carrillo, an individual and
d/b/a www.thesneakersstore.com and The Sneaker Store

24
25 By: 

Maria Carrillo
26 Defendant, *in pro se*

EXHIBIT A

Nike Registrations

Trademark	Registration Number	Registration Date
AIR-SOLE	1,145,812	January 13, 1981
SWOOSH	1,200,529	July 6, 1982
NIKE	1,214,930	November 2, 1982
Nike [™] and Swoosh [™] Design	1,237,469	May 10, 1983
Nike [®]	1,277,066	May 8, 1984
Swoosh [®] Design	1,284,385	July 3, 1984
NIKE AIR w/Swoosh device	1,284,386	July 3, 1984
NIKE AIR	1,307,123	November 27, 1984
Air Jordan [®]	1,370,283	November 12, 1985
Swoosh device on shoe	1,323,342	March 5, 1985
Swoosh device	1,323,343	March 5, 1985
NIKE w/Swoosh device	1,325,938	March 19, 1985
AIR JORDAN	1,370,283	November 12, 1985
AIR MAX	1,508,348	October 11, 1988
AIR TRAINER	1,508,360	October 11, 1988
Jump Man device	1,558,100	September 26, 1989
Nike Air [®]	1,571,066	December 12, 1989
AIR SKYLON	1,665,479	November 19, 1991
AIR SOLO FLIGHT	1,668,590	December 17, 1991
AIR FLIGHT	1,686,515	May 12, 1992
AIR DESCHUTZ	1,735,721	November 24, 1992
Jump Man device	1,742,019	December 22, 1992
AIR TRAINER MAX	1,789,463	August 24, 1993
AIRMAX in oval	2,030,750	January 14, 1997
AIR UPTempo in crest	2,032,582	January 21, 1997
AIR with Swoosh device	2,068,075	June 3, 1997
NIKE with Swoosh device	2,104,329	October 7, 1997
ACG NIKE in triangle	2,117,273	December 2, 1997
Nike [®]	2,196,735	October 13, 1998
Nike [™] and Swoosh [™] Design	2,209,815	December 8, 1998
Stylized "B"	2,476,882	August 14, 2001
NIKE ALPHA PROJECT as device	2,517,735	December 11, 2001
WAFFLE RACER	2,652,318	November 19, 2002
PHYLITE	2,657,832	December 10, 2002

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TRUNNER	2,663,568	December 17, 2002
DRI-STAR	2,691,476	February 25, 2003
PRESTO	2,716,140	May 13, 2003
TRIAx	2,810,679	February 3, 2004
WAFFLE TRAINER	2,893,674	October 12, 2004
THERMA-STAR	2,960,844	June 7, 2005
NIKE SHOX	2,970,902	July 19, 2005
Basketball player outline	2,977,850	July 26, 2005
NIKEFREE	3,087,455	May 2, 2006
AIR FORCE I	3,520,484	October 21, 2008

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EXHIBIT B

UGG U.S. Registration No. 3,050,925

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 3,050,925

United States Patent and Trademark Office

Registered Jan. 24, 2006

**TRADEMARK
PRINCIPAL REGISTER**

UGG

**DECKERS OUTDOOR CORPORATION (DELA-
WARE CORPORATION)
495-A SOUTH FAIRVIEW AVENUE
GOLETA, CA 93117**

FIRST USE 12-28-1979; IN COMMERCE 12-28-1979.

**FOR: MEN'S, WOMEN'S AND CHILDREN'S
FOOTWEAR, NAMELY, BOOTS, SHOES, CLOGS,
SLIPPERS; MEN'S, WOMEN'S AND CHILDREN'S
CLOTHING, NAMELY, COATS, JACKETS,
PONCHOS; WOMEN'S CLOTHING, NAMELY,
SKIRTS, MUFFS; CHILDREN'S BUNTINGS, IN
CLASS 25 (U.S. CLS. 22 AND 39).**

**THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.**

SER. NO. 78-976,129, FILED 1-21-2005.

**BARBARA A. LOUGHRAN, EXAMINING ATTOR-
NEY**

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EXHIBIT C

Sun Logo U.S. Registration No. 2,314,853

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

Reg. No. 2,314,853

United States Patent and Trademark Office

Registered Feb. 1, 2000

**TRADEMARK
PRINCIPAL REGISTER**



WELLS FARGO BANK, N.A. (CALIFORNIA NA-
TIONAL BANKING ASSOCIATION)
495-A S. FAIRVIEW
GOLETA, CA 93117 BY ASSIGNMENT UGG HOLD-
INGS, INC. (CALIFORNIA CORPORATION)
GOLETA, CA 93117

FOR: FOOTWEAR, IN CLASS 25 (U.S. CLS. 22
AND 39).
FIRST USE 10-0-1996; IN COMMERCE 3-0-1997.
SN 75-249,238, FILED 2-28-1997.

GEORGE LORENZO, EXAMINING ATTORNEY