1 2 3 4 5 6	KAWAHITO SHRAGA & WESTRICK James K. Kawahito (No. 234851) e-mail: jkawahito@kswlawyers.com NOELLE SHANAHAN CUTTS (No. 2 e-mail: noelle@kswlawyers.com 1990 South Bundy Dr., Suite 280 Los Angeles, CA90025 Telephone: (310) 746-5302 Facsimile: (310) 593-2520	
7	ATTORNEYS FOR PLAINTIFF SOUTHERN CALIFORNIA DARTS ASSOCIATION	
8	LINUTED CTATES DISTRICT COLDT	
9	UNITED STATES DISTRICT COURT	
10	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
11	WESTERN DIVISION	
12	SOUTHERN CALIFORNIA DARTS	CASE NO. 2:12-CV-01899RGK
13	ASSOCIATION, a California	FA-riand H. D. C.
14	unincorporated association,	[Assigned to the Hon. R. Gary Klausner]
15	Plaintiff,	
16	VS.	PLAINTIFF'S NOTICE OF
17	SOUTHERN CALIFORNIA DARTS ASSOCIATION, INC., a California	MOTION AND MOTION FOR PRELIMINARY INJUNCTION
	corporation, DINO M. ZAFFINA, an	
18	individual, and DOES 1-10,	[MEMORANDUM OF POINTS AND
19		AUTHORITIES IN SUPPORT OF
20		PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION;
21	Defendants.	DECLARATIONS OF L. DAVID
22		IRETE, MATT CANALE AND
23		NAOMI STRAUS; APPENDIX OF
- 1	Doc 8	AUTHORITIES FILED
24		CONCURRENTLY HEREWITH; [PROPOSED] ORDER LODGED
25		CONCURRENTLY HEREWITH
26		
27		Date: April 16, 2012
28		Time: 9:00 a.m. Courtroom: 850
		Courtioonii. 630

NOTICE OF MOTION & MOTION FOR PRELIMINARY INJUNCTION

## TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 16, 2012 at 9:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom 850 of this Court, located at 255 East Temple Street, Los Angeles, CA 90012, Plaintiff Southern California Darts Association, pursuant to Federal Rule of Civil Procedure 65(b) and the Lanham Act, 15 U.S.C. §1116(a), will and hereby does move this Court for an Order granting Plaintiff's Motion for Preliminary Injunction and for entry of the [Proposed] Order, lodged concurrently herewith, enjoining Defendants, pending final judgment in this matter, from:

- (1) using the SCDA Marks in any manner;
- (2) using any internet or other URLs containing the words "Southern California Darts Association," "SCDA," or "SoCal Darts"; and
- (3) representing to the public, including but not limited to Association Members and Host Pubs, that Defendants have rights to the SCDA Marks.

SCDA also requests that the order affirmatively require Defendants to:

- (1) file a notice of discontinuance of the trade name or a change of corporation name with the Secretary of State; and
- (2) issue a notice to the Host Pubs, Association Members, and other darts organizations containing a fair summary of this court's decision, attached to the Proposed Order as Exhibit A.

Dated: March 19, 2012

KAWAHITO SHRAGA & WESTRICK LLP James K. Kawahito

By: <u>/s/ James Kawahito</u>
Attorneys for Plaintiff Southern California Darts
Association