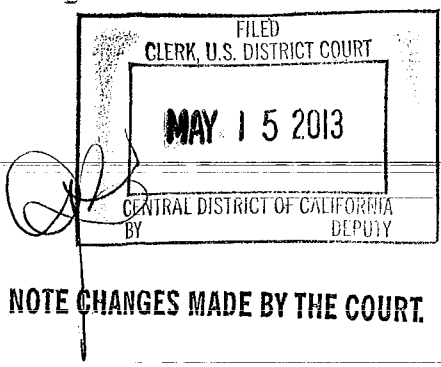


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6 *Attorneys for Plaintiff*  
 7 *Guru Denim, Inc.*

8 UNITED STATES DISTRICT COURT  
 9 CENTRAL DISTRICT OF CALIFORNIA

11 GURU DENIM, INC., a California  
 12 Corporation dba TRUE RELIGION  
 13 BRAND JEANS,

13 Plaintiff,

14 vs.

15 TRI-STAR TRADING, INC., a New  
 16 York Corporation; JENUINE, an  
 17 unknown business entity; JC & JQ,  
 18 INC., a California Corporation; JAE O.  
 19 HA, an individual; and DOES 1-10,  
 20 inclusive,

18 Defendants.

) CASE NO. CV 12-02163 GHK (AGRx)  
 ) ~~PROPOSED~~ CONSENT JUDGMENT  
 ) INCLUDING PERMANENT  
 ) INJUNCTION AND VOLUNTARY  
 ) DISMISSAL OF ACTION WITH  
 ) PREJUDICE AS TO DEFENDANTS  
 ) STREET DENIM, INC. and YOUSEF  
 ) ALTHKEFATI

20 WHEREAS Plaintiff Guru Denim, Inc. dba True Religion Brand Jeans and  
 21 **Defendants Street Denim, Inc. and Yousef <sup>AL THKEFATI</sup> Althkefati** (sued as "Youseff Althefuti")  
 22 have entered into a Settlement Agreement and Mutual Release as to the claims in the  
 23 above referenced matter. Defendants, having agreed to consent to the below terms, it  
 24 is hereby:

25 **ORDERED, ADJUDGED, and DECREED** as among <sup>these</sup> the parties hereto <sup>only</sup> that:

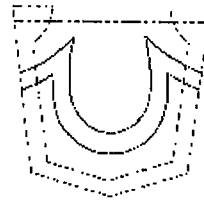
26 1. This Court has jurisdiction over the parties to this Final Consent Decree  
 27 and has jurisdiction over the subject matter hereof pursuant to 15 U.S.C. § 1121.  
 28

1           2.     Plaintiff is the owner of the trademark registrations for word marks  
2     “TRUE RELIGION” (registrations include but are not limited to U.S. Reg. Nos.  
3     3,628,973 and 3,162,614) and “TRUE RELIGION BRAND JEANS” (registrations  
4     include but are not limited to U.S. Reg. Nos. 2,761,793 and 3,120,797), as well as  
5     various composite trademarks comprising said word marks and assorted design  
6     components (collectively “True Religion Marks”).

7           3.     True Religion’s “U” marks, ~~which~~ are well-known and highly recognized. K  
8     True Religion has used the “U” marks in association with the sale of goods, including  
9     jeans, jackets, and shorts, since as early as 2002. One of the “U” marks was registered  
10    at the U.S Patent and Trademark office in 2006. Since then, True Religion has used  
11    various composites and variations of the “U” marks on its goods, most of which have  
12    been registered with the United States Patent and Trademark Office. Registrations for  
13    the “U” marks include, but are not limited to the following (collectively “True  
14    Religion’s “U” Marks”).



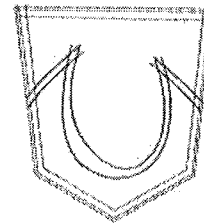
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19     (U.S. Reg. No. 3,561,466)



20     (U.S. Reg. No. 3,147,244)



21  
22  
23  
24     (U.S. Reg. No. 3,482,001)



25     (U.S. Reg. No. 3,568,127)

26           4.     Plaintiff has alleged that Defendants’ purchase, importation, distribution,  
27     advertisement, offering for sale, and sale of products which infringe upon True  
28

1 Religion's "U" Marks constitute trademark infringement, trademark dilution, and  
2 unfair competition under the Lanham Trademark Act, and under the common law.

3 5. Defendants and their agents, servants, employees and all persons in active  
4 concert and participation with them who receive actual notice of this Final Consent  
5 Decree are hereby permanently restrained and enjoined from infringing upon  
6 Plaintiff's trademarks either directly or contributorily in any manner, including:

7 (a) Manufacturing, purchasing, producing, distributing, circulating,  
8 selling, offering for sale, importing, exporting, advertising, promoting, displaying,  
9 shipping or marketing goods bearing a mark or feature identical and/or confusingly  
10 similar to the True Religion Marks;

11 (b) Delivering, holding for sale, returning, transferring or otherwise  
12 moving, storing or disposing in any manner any products bearing marks identical  
13 and/or confusingly similar to Plaintiff's True Religion Marks;

14 (c) Using the True Religion Marks or any reproduction, counterfeit,  
15 copy or colorable imitation thereof in connection with the manufacture, importation,  
16 distribution, advertisement, offer for sale and/or sale of merchandise comprising not  
17 the genuine products of Plaintiff, or in any manner likely to cause others to believe that  
18 Defendants' products are connected with Plaintiff or Plaintiff's genuine merchandise;

19 (d) Committing any other acts calculated to cause purchasers to believe  
20 that Defendants' products are Plaintiff's genuine merchandise or associated with  
21 Plaintiff in any way <sup>if they are not</sup>

22 (e) Assisting, aiding or attempting to assist or aid any other person or  
23 entity in performing any of the prohibited activities referred to in Paragraphs 5(a) to  
24 5(d) above.

25 6. Plaintiff and Defendants shall bear their own costs and attorneys' fees  
26 associated with this action.

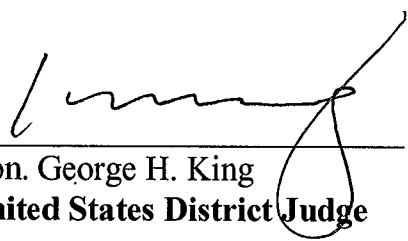
27 7. The execution of this Consent Decree shall serve to bind and obligate the  
28 parties hereto.

1           8.     The jurisdiction of this Court is retained for the purpose of making any  
2 further orders necessary or proper for the construction or modification of this Final  
3 Judgment, the enforcement thereof and the punishment of any violations thereof.

4 Except as otherwise provided herein, this action is fully resolved <sup>+ dismissed</sup> with prejudice as to  
5 Defendants Street Denim, Inc. and Youseff Althefuti.

6  
7 **IT IS SO ORDERED.**

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10 DATED: 5/14, 2013

  
\_\_\_\_\_  
Hon. George H. King  
United States District Judge

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