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6 Attorneys for Defendants and
 Counterclaimants WISE UNICORN
 7 INDUSTRIAL, LTD.; WISE UNICORN
 CRAFTS & GIFTS (HUI YANG)
 8 INDUSTRIAL, LTD.; and UNICORN
 STUDIO INC.

10
 11 **UNITED STATES DISTRICT COURT**
 12 **CENTRAL DISTRICT OF CALIFORNIA**

14 THINKBRONZE, LLC,
 15 Plaintiff,

16 vs.

17 WISE UNICORN INDUSTRIAL,
 18 LTD, et al.,
 19 Defendants.

Case No. CV12-5283 MMM (JEMx)
 Hon. Margaret M. Morrow

**[PROPOSED] PERMANENT
 INJUNCTION**

Complaint Filed: 06/18/2012
 Discovery Cutoff : 09/20/2013
 Pretrial Conference: 11/18/2013
 Trial Date: 12/10/2013

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 21 AND RELATED CROSS-CLAIMS

1 In accordance with the Stipulation for Permanent Injunction entered into by
2 and between Plaintiff and Counter-Defendant ThinkBronze LLC (“ThinkBronze”),
3 Counter-Defendants Steve Marvisi, Parviz Noghrey, and European Bronze (the
4 “ThinkBronze Parties”), third party Felicity International Trading, Inc. (“Felicity”),
5 and Defendants and Counterclaimants Wise Unicorn Industrial, Ltd., Wise Unicorn
6 Crafts & Gifts Industrial, Ltd., and Unicorn Studio, Inc. (the “Unicorn Parties”)
7 (collectively, the “Parties”) entered into pursuant to a the Parties settlement of this
8 matter, the Court orders as follows:

9 1. Counter-defendants Steve Marvisi, Parviz Noghrey, ThinkBronze
10 LLC, European Bronze, and third party Felicity International Trading, Inc., their
11 officers, agents, employees, and those acting in concert or conspiracy with them,
12 including their customers and suppliers, are hereby permanently restrained and
13 enjoined from:

14 (a) manufacturing, copying, importing, offering for sale, or
15 selling any of the sculptures identified in Exhibit A to the First Amended
16 Counterclaim in this case (the “Subject Sculptures”), or any item substantially
17 indistinguishable from the Subject Sculptures; the term “Subject Sculptures”
18 expressly excludes items identified as numbers 56 (Cupid and Psyche) and 65
19 (Napoleon) in Exhibit A;

20 (b) copying, duplicating, selling, renting, marketing, leasing
21 or distributing any unauthorized copies of the Subject Sculptures currently in their
22 possession, custody or control; however, the affected parties may, within six
23 months of the date this injunction is entered, return said items currently in their
24 possession, custody or control to the manufacturers or suppliers from whom they
25 purchased said items, or destroy the items;

26 (c) manufacturing, importing, offering for sale, or selling any
27 merchandise bearing the trademark “Veronese” or any colorable imitation thereof.

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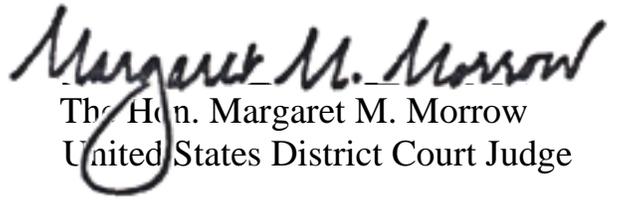
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2. This Court retains jurisdiction over the ThinkBronze Parties and Felicity for the sole purpose of enforcing the permanent injunction as set forth herein;

3. This Action, including the Unicorn Parties' First Amended Counterclaim and Third Party Complaint are hereby dismissed with prejudice; and

4. All Parties are to bear their own attorneys' fees and costs.

Dated: September 26, 2013


The Hon. Margaret M. Morrow
United States District Court Judge