

1 (d) using or displaying any VMR mark or any variation thereof,
2 including without limitation V2CIGS[®] or V2, for goods or services in any location,
3 circumstance or environment, including on the Internet, or as domain names, email
4 addresses, meta tags, invisible data, or otherwise engaging in acts or conduct that would
5 cause confusion as to the source, sponsorship or affiliation of Defendants with VMR;

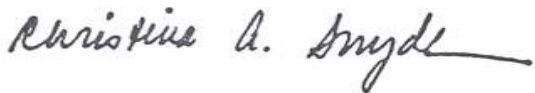
6 9. Any party shall have the right to seek sanctions for contempt, compensatory
7 damages, injunctive relief, attorneys' fees, costs, and such other relief as deemed proper in
8 the event of a violation or failure to comply with any of the provisions hereof. The
9 prevailing party in any such proceeding shall be entitled to recover its attorneys' fees and
10 costs.

11 10. The causes of action between parties, inclusive of all John Does named
12 herein, are hereby dismissed with prejudice, subject to the terms of the Settlement
13 Agreement between the parties.

14 11. The parties shall each bear their respective attorneys' fees and costs incurred
15 in connection with this action.

16 12. This Court will retain continuing jurisdiction over this cause to enforce the
17 terms of this Stipulated Judgment and Permanent Injunction and the Settlement
18 Agreement.

19 SO ORDERED this 13th day of February, 2013.

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21 _____
22 CHRISTINA A. SNYDER
23 UNITED STATES DISTRICT JUDGE
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CONSENTED TO BY:

FELDMAN GALE, P.A.

/s/Todd M. Malynn

Todd M. Malynn

CA State Bar No.: 181595

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AND

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/s/John W. Fagerholm

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