

FILED
CLERK, U.S. DISTRICT COURT
JUL 23, 2014
CENTRAL DISTRICT OF CALIFORNIA
BY: <u> </u> PMC <u> </u> DEPUTY

1 KILPATRICK TOWNSEND & STOCKTON LLP
 DENNIS L. WILSON (State Bar No. 5407)
 2 DWilson@kilpatricktownsend.com
 CAROLINE Y. BUSSIN (State Bar No. 239343)
 3 CBussin@kilpatricktownsend.com
 9720 Wilshire Blvd PH
 4 Beverly Hills, CA 90212-2018
 Telephone: 310-248-3830
 5 Facsimile: 310-860-0363

6 R. CHARLES HENN, JR.
 cHenn@kilpatricktownsend.com
 7 CHARLES H. HOOKER III
 chooker@kilpatricktownsend.com
 8 NICHOLE DAVIS CHOLLET
 nchollet@kilpatricktownsend.com
 9 1100 Peachtree Street, Suite 2800
 Atlanta, GA 30309-4530
 10 Telephone: (404) 815-6500
 Facsimile: (404) 815-6555

NO JS-6

11 Attorneys for Plaintiff
 12 ADIDAS AG AND ADIDAS AMERICA, INC.

13 **UNITED STATES DISTRICT COURT**
 14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

16 ADIDAS AG AND ADIDAS
 AMERICA, INC.,
 17 Plaintiff,
 18 v.
 19 ARRIBA SPORTS, DOING
 20 BUSINESS AS SOCCER
 WAREHOUSE; JOHN DOE,
 21 INDIVIDUALLY AND DOING
 BUSINESS AS ARRIBA SPORTS
 22 AND SOCCER WAREHOUSE;
 MUNDO DEPORTIVO ZAVA
 23 IMPORTS INC., DOING BUSINESS
 AS ARZA SOCCER; ARTURO
 24 ZAVALA, INDIVIDUALLY AND
 DOING BUSINESS AS MUNDO
 25 DEPORTIVO ZAVA IMPORTS INC.
 AND ARZA SOCCER; MAPLE
 26 SPORTS INC.; IMRAN JAVED,
 27 INDIVIDUALLY AND DOING
 BUSINESS AS MAPLE SPORTS

Case No. 2:14-cv-4184-SVW-JEM
~~(PROPOSED)~~ **PERMANENT
 INJUNCTION AGAINST
 DEFENDANTS MUNDO
 DEPORTIVO ZAVA IMPORTS
 INC., DOING BUSINESS AS ARZA
 SOCCER, AND ARTURO ZAVALA,
 INDIVIDUALLY AND DOING
 BUSINESS AS MUNDO
 DEPORTIVO ZAVA IMPORTS
 INC. AND ARZA SOCCER, ON
 CONSENT**

28 **(PROPOSED) PERMANENT INJUNCTION**

1 INC.; MECA IMPORTS, INC.,
2 DOING BUSINESS AS MEGA
3 SOCCER; NAJAM JAVED,
4 INDIVIDUALLY AND DOING
5 BUSINESS AS MECA IMPORTS,
6 INC. AND MEGA SOCCER;
7 RAYMUNDO'S SOCCER; MARCOS
8 GONZALEZ, INDIVIDUALLY AND
9 DOING BUSINESS AS
10 RAYMUNDO'S SOCCER; COOL
11 WHOLESALE; JOHN DOE,
12 INDIVIDUALLY AND DOING
13 BUSINESS AS COOL
14 WAREHOUSE; EQUIPE IMPORTS,
15 INC.; FIDEL GONZALEZ,
16 INDIVIDUALLY AND DOING
17 BUSINESS AS EQUIPE IMPORTS,
18 INC.; G SPORTS; GHALIB SROUR,
19 INDIVIDUALLY AND DOING
20 BUSINESS AS G SPORTS; RIMAB
21 SPORTS, DOING BUSINESS AS
22 RIMABSPORTS.COM; JOHN DOE
23 INDIVIDUALLY AND DOING
24 BUSINESS AS RIMAB SPORTS
25 AND RIMABSPORTS.COM;
26 SUPERGROUP LA; AND
27 EDGARDO LOPEZ,
28 INDIVIDUALLY AND DOING
BUSINESS AS SUPER GROUP LA,
INC.

Defendants.

18 Having considered the Complaint on file in this action, and Defendants Mundo
19 Deportivo Zava Imports Inc. d/b/a Arza Soccer and Arturo Zavala, individually and
20 doing business as Mundo Deportivo Zava Imports Inc. and Arza Soccer (collectively,
21 "Mundo Deportivo") having consented to the terms of the permanent injunction set
22 forth below, this Court hereby finds as follows:

23 1. Plaintiffs adidas America, Inc. and adidas AG (collectively, "adidas")
24 own and extensively use the Three-Stripe trademark (the "Three-Stripe Mark"),
25 which is covered by valid U.S. Trademark Registration Nos. 870,136, 961,353,
26 1,815,956, 1,833,868, 2,016,963, 2,058,619, 2,278,589, 2,278,591, 2,284,308,
27 2,909,861, 2,999,646, 3,029,127, 3,029,129, 3,029,135, 3,063,742, 3,063,745,

1 3,087,329, 3,183,656, 3,183,663, and 3,236,505. adidas uses the Three-Stripe Mark
2 in connection with footwear and apparel, among other goods.

3 2. On May 30, 2014, adidas filed a Complaint claiming, *inter alia*, that
4 Mundo Deportivo was manufacturing, importing, distributing, marketing, promoting,
5 offering for sale, and selling footwear and apparel bearing confusingly similar
6 imitations of adidas's federally registered Three-Stripe Mark (the "Infringing
7 Merchandise"). Photographs of representative examples of the Infringing
8 Merchandise are attached as **Exhibit 1**.

9 3. Mundo Deportivo accepted service of the Summons and Complaint, but
10 have not yet filed an Answer or any other pleading in response to adidas's
11 Complaint.

12 4. The Court has jurisdiction over the subject matter of this action and over
13 Mundo Deportivo, and venue in this action is proper in this judicial district.

14 Accordingly, **IT IS HEREBY ORDERED** that:

15 1. Mundo Deportivo and all of their agents, officers, employees,
16 representatives, successors, assigns, attorneys, and all other persons acting for, with,
17 by, through, or under authority from Mundo Deportivo, or in concert or participation
18 with Mundo Deportivo, and each of them, are **PERMANENTLY ENJOINED and**
19 **RESTRAINED**, from:

- 20 a. importing, manufacturing, producing, advertising, promoting,
21 displaying, distributing, offering for sale, or selling the Infringing
22 Merchandise; and
- 23 b. importing, manufacturing, producing, advertising, promoting,
24 displaying, distributing, offering for sale, or selling any other
25 footwear or apparel bearing the Three-Stripe Mark or any other
26 confusingly similar imitation of adidas's Three-Stripe Mark,
27 including without limitation any footwear or apparel with one

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additional stripe (i.e., four stripes) or less one of the three stripes (i.e, two stripes).

2. This Court shall have continuing jurisdiction to enforce the provisions of the permanent injunction entered herein.

3. The claims asserted in adidas's Complaint are hereby dismissed with prejudice, with each party bearing its own costs, including attorneys' fees.

IT IS SO ORDERED this 22 day of July, 2014.



The Honorable Stephen V. Wilson
United States District Court

1 **STIPULATED AND CONSENTED TO BY:**

2 MUNDO DEPORTIVO ZAVA
3 IMPORTS INC. D/B/A ARZA
4 SOCCER

5 By: *Arturo Zavala*

6 Name: ARTURO ZAVALA

7 Title: PRESIDENT

8 Date: JULY 14TH, 2014

9
10 ARTURO ZAVALA,
11 INDIVIDUALLY AND DOING
12 BUSINESS AS MUNDO
13 DEPORTIVO ZAVA IMPORTS INC.
14 AND ARZA SOCCER

15 By: *Arturo Zavala*

16 Name: Arturo Zavala

17 Date: JULY 14TH, 2014

ON BEHALF OF ADIDAS
AMERICA, INC. and ADIDAS AG

By: *Dennis L. Wilson*
DENNIS L. WILSON
DWilson@kilpatricktownsend.com
CAROLINE Y. BUSSIN
CBussin@kilpatricktownsend.com
9720 Wilshire Blvd PH
Beverly Hills, CA 90212-2018
Telephone: 310-248-3830
Facsimile: 310-860-0363

R. CHARLES HENN, JR.
cHenn@kilpatricktownsend.com
CHARLES H. HOOKER III
chooker@kilpatricktownsend.com
NICHOLE DAVIS CHOLLET
nchollet@kilpatricktownsend.com
1100 Peachtree Street, Suite 2800
Atlanta, GA 30309-4530
Telephone: (404) 815-6500
Facsimile: (404) 815-6555

EXHIBIT 1



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