

FILED  
CLERK, U.S. DISTRICT COURT  
AUG 19, 2014  
CENTRAL DISTRICT OF CALIFORNIA  
BY: PMC 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. (*admitted Pro Hac Vice*)  
chenn@kilpatricktownsend.com  
7 CHARLES H. HOOKER III (*admitted Pro Hac Vice*)  
chooker@kilpatricktownsend.com  
8 NICHOLE DAVIS CHOLLET (*admitted Pro Hac Vice*)  
nchollet@kilpatricktownsend.com  
9 1100 Peachtree Street, Suite 2800  
Atlanta, GA 30309-4530  
10 Telephone: (404) 815-6500  
Facsimile: (404) 815-6555

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

13 UNITED STATES DISTRICT COURT  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
15

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 RAYMUNDO'S  
SOCCER AND MARCOS  
GONZALEZ, INDIVIDUALLY AND  
DOING BUSINESS AS  
RAYMUNDO'S SOCCER, ON  
CONSENT

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; SUPER  
26 GROUP LA, INC.; AND EDGARDO  
27 LOPEZ, INDIVIDUALLY AND  
28 DOING BUSINESS AS SUPER  
GROUP LA, INC.

Defendants.

18 Having considered the Complaint on file in this action, and Defendants  
19 Raymundo’s Soccer and Marcos Gonzalez, individually and doing business as  
20 Raymundo’s Soccer (collectively, “Raymundo’s Soccer”) having consented to the  
21 terms of the permanent injunction set forth below, this Court hereby finds as follows:

22 1. Plaintiffs adidas America, Inc. and adidas AG (collectively, “adidas”)  
23 own and extensively use the Three-Stripe trademark (the “Three-Stripe Mark”),  
24 which is covered by valid U.S. Trademark Registration Nos. 870,136, 961,353,  
25 1,815,956, 1,833,868, 2,016,963, 2,058,619, 2,278,589, 2,278,591, 2,284,308,  
26 2,909,861, 2,999,646, 3,029,127, 3,029,129, 3,029,135, 3,063,742, 3,063,745,  
27 3,087,329, 3,183,656, 3,183,663, and 3,236,505. adidas uses the Three-Stripe Mark

1 in connection with footwear and apparel, among other goods.

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

8 3. Raymundo’s Soccer accepted service of the Summons and Complaint  
9 on June 10, 2014, but has not yet filed an Answer or any other pleading in response  
10 to adidas’s Complaint.

11 4. The Court has jurisdiction over the subject matter of this action and over  
12 Raymundo’s Soccer, and venue in this action is proper in this judicial district.

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

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

- 19 a. importing, manufacturing, producing, advertising, promoting,  
20 displaying, distributing, offering for sale, or selling the Infringing  
21 Apparel; and  
22 b. importing, manufacturing, producing, advertising, promoting,  
23 displaying, distributing, offering for sale, or selling any other  
24 apparel bearing the Three-Stripe Mark or any other confusingly  
25 similar imitation of adidas’s Three-Stripe Mark, including  
26 without limitation any apparel with one additional stripe (i.e.,  
27 four stripes) or less one of the three stripes (i.e, two stripes).

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

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

5  
6           IT IS SO ORDERED this 19th day of August, 2014.

7  
8           

9           \_\_\_\_\_  
10           The Honorable Stephen V. Wilson  
11           United States District Court

**STIPULATED AND CONSENTED TO BY:**

RAYMUNDO'S SOCCER

By: Gonzalez Marcos.

Name: Marcos Gonzalez

Title: Owner

Date: July, 18, 2014

MARCOS GONZALEZ,  
INDIVIDUALLY AND DOING  
BUSINESS AS RAYMUNDO'S  
SOCCER

By: Gonzalez Marcos.

Name: Marcos Gonzalez

Date: July, 18, 2014

ON BEHALF OF ADIDAS  
AMERICA, INC. and ADIDAS AG

By: [Signature]  
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**



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28