

**FILED**  
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NOV 12, 2014

CENTRAL DISTRICT OF CALIFORNIA  
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 12 ADIDAS AG AND ADIDAS AMERICA, INC.

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

16 ADIDAS AG AND ADIDAS AMERICA, INC.,  
 17 Plaintiff,  
 18 v.  
 19 ARRIBA SPORTS, DOING BUSINESS AS SOCCER  
 20 WAREHOUSE; JOHN DOE, INDIVIDUALLY AND DOING  
 21 BUSINESS AS ARRIBA SPORTS AND SOCCER WAREHOUSE;  
 22 MUNDO DEPORTIVO ZAVA IMPORTS INC., DOING BUSINESS  
 23 AS ARZA SOCCER; ARTURO ZAVALA, INDIVIDUALLY AND  
 24 DOING BUSINESS AS MUNDO DEPORTIVO ZAVA IMPORTS INC.  
 25 AND ARZA SOCCER; MAPLE SPORTS INC.; IMRAN JAVED,  
 26 INDIVIDUALLY AND DOING BUSINESS AS MAPLE SPORTS  
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Case No. 2:14-cv-4184-SVW-JEM

**~~(PROPOSED)~~ PERMANENT INJUNCTION AGAINST DEFENDANTS MAPLE SPORTS, INC. AND IMRAN JAVED, INDIVIDUALLY AND DOING BUSINESS AS MAPLE SPORTS, INC., 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; SUPER  
26 GROUP LA, INC.; AND EDGARDO  
27 LOPEZ, INDIVIDUALLY AND  
28 DOING BUSINESS AS SUPER  
GROUP LA, INC.

Defendants.

Having considered the Complaint on file in this action, and Defendants Maple Sports, Inc. and Imran Javed, individually and doing business as Maple Sports, Inc. (collectively, “Maple Sports”) having consented to the terms of the permanent injunction set forth below, this Court hereby finds as follows:

1. Plaintiffs adidas America, Inc. and adidas AG (collectively, “adidas”) own and extensively use the Three-Stripe trademark (the “Three-Stripe Mark”), which is covered by valid U.S. Trademark Registration Nos. 870,136, 961,353, 1,815,956, 1,833,868, 2,016,963, 2,058,619, 2,278,589, 2,278,591, 2,284,308, 2,909,861, 2,999,646, 3,029,127, 3,029,129, 3,029,135, 3,063,742, 3,063,745, 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 Maple Sports was manufacturing, importing, distributing, marketing, promoting,  
4 offering for sale, and selling apparel bearing confusingly similar imitations of  
5 adidas's federally registered Three-Stripe Mark (the "Infringing Apparel").

6 Photographs of representative examples of the Infringing Apparel are attached as  
7 **Exhibit 1.**

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

11           4.       Imran Javed accepted service of the Summons and Complaint on June 9,  
12 2014 and filed an answer on July 14, 2014.

13           5.       The Court has jurisdiction over the subject matter of this action and over  
14 Maple Sports, and venue in this action is proper in this judicial district.

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

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

21           a.       importing, manufacturing, producing, advertising, promoting,  
22                   displaying, distributing, offering for sale, or selling the Infringing  
23                   Apparel; and

24           b.       importing, manufacturing, producing, advertising, promoting,  
25                   displaying, distributing, offering for sale, or selling any other  
26                   apparel bearing the Three-Stripe Mark or any other confusingly  
27                   similar imitation of adidas's Three-Stripe Mark, including  
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without limitation any apparel with one 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 12<sup>th</sup> day of November, 2014.



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The Honorable Stephen V. Wilson  
United States District Court

1 **STIPULATED AND CONSENTED TO BY:**

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MAPLE SPORTS, INC.

By: Imran Javed

Name: Imran Javed

Title: OWNER

Date: 11-06-14

IMRAN JAVED, INDIVIDUALLY  
AND DOING BUSINESS AS MAPLE  
SPORTS, INC.

By: Imran Javed

Name: Imran Javed

Date: 11-06-14

ON BEHALF OF ADIDAS  
AMERICA, INC. and ADIDAS AG

By: Nichole Davis Chollet  
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# EXHIBIT 1



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