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 CENTRAL DISTRICT OF CALIFORNIA
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11 Attorneys for Plaintiff
 12 ADIDAS AG AND ADIDAS AMERICA, INC.

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

15 ADIDAS AG AND ADIDAS
 16 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
 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
 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 ARRIBA SPORTS
 DOING BUSINESS AS SOCCER
 WAREHOUSE, ON CONSENT**

JS-6

(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
29 GROUP LA, INC.

Defendants.

18 Having considered the Complaint on file in this action, and Defendants Arriba
19 Sports d/b/a Soccer Warehouse (“Arriba Sports”), having consented to the terms of
20 the permanent injunction set forth below, this Court hereby finds as follows:

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

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

7 3. Arriba Sports accepted service of the Summons and Complaint on June
8 25, 2014 (answer due July 16, 2014), but has not yet filed an Answer or any other
9 pleading in response to adidas’s Complaint.

10 4. The Court has jurisdiction over the subject matter of this action and over
11 Arriba Sports, and venue in this action is proper in this judicial district.

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

13 1. Arriba Sports and all of its agents, officers, employees, representatives,
14 successors, assigns, attorneys, and all other persons acting for, with, by, through, or
15 under authority from Arriba Sports, or in concert or participation with Arriba Sports,
16 and each of them, are **PERMANENTLY ENJOINED and RESTRAINED**, from:

17 a. importing, manufacturing, producing, advertising, promoting,
18 displaying, distributing, offering for sale, or selling the Infringing
19 Apparel; and

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

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

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


3
4 IT IS SO ORDERED this 26TH day of November, 2014.

5 

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7 _____
8 The Honorable Stephen V. Wilson
9 United States District Court

1 **STIPULATED AND CONSENTED TO BY:**

2 **ARRIBA SPORTS D/B/A SOCCER**
3 **WAREHOUSE**

4 By: 

5 Name: Mukhtar Ahmed Choudry

6 Title: owner

7 Date: 11/18/14

ON BEHALF OF ADIDAS
AMERICA, INC. and ADIDAS AG

By: 
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EXHIBIT 1

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(PROPOSED) PERMANENT INJUNCTION