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

20	LEAPFROG ENTERPRISES, INC., a)	Case No. 2:14-cv-06752-JFW-MAN
21	Delaware corporation,)	
22	Plaintiff,)	AMENDED
23	v.)	[PROPOSED] FINAL JUDGMENT
24	NAVYSTAR COMPANY LTD., a Hong)	
25	Kong Corporation; VICTOR G.)	
26	PETRONE & SON, INC., a California)	Judge John F. Walter
27	Corporation,)	
28	Defendants.)	

1 Upon consideration of the parties’ Stipulation for Entry of Consent Judgment
2 and [~~Proposed~~] Final Judgment, and good cause appearing therefore, it is HEREBY
3 ADJUDGED ORDERED AND DECREED that final judgment is hereby entered as
4 follows:

5 1. The Parties have reached an amicable settlement of this action. Neither
6 the Parties’ settlement nor Stipulation for Entry of Consent Judgment shall be
7 considered an admission of fault or liability by any Party;

8 2. Plaintiff is the owner of the distinctive and protectable trade dress,
9 examples of which are attached hereto as Exhibit A, containing all of the following
10 non-functional elements (the “Alleged Trade Dress”):

- 11 a. A distinctive green background comprising most of the package;
- 12 b. A bright orange circular shape, with white lettering inside, indicating the
13 recommended age of product users;
- 14 c. An irregularly shaped green circle with white shading and green text for the
15 LeapFrog name; and
- 16 d. Bubble style lettering, in orange, blue and white, for the product name;

17 3. Defendants have previously shipped to and sold to companies in the
18 United States, including in this District, educational products for children using
19 packaging, examples of which are attached hereto as Exhibit B (the “Accused Trade
20 Dress”);

21 4. Defendants represent and warrant that their last shipment of products
22 bearing the Accused Trade Dress to the United States took place on October 15,
23 2014;

24 5. Defendants and their partners, officers, agents, servants, employees,
25 owners, representatives and all other persons, firms or corporations in active concert
26 or participation with Defendants, shall immediately cease and permanently refrain
27 from making (or having made), using, importing, offering for sale, or selling
28 anywhere any products bearing the Accused Trade Dress;

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6. The Final Judgment shall be enforceable upon entry. The Parties hereby waive findings of fact, conclusions of law, a statement of decision and any right to set aside the Final Judgment, appeal therefrom, seek a new trial, or otherwise contest the validity of the Final Judgment;

7. This Court shall retain jurisdiction to enforce the terms of the Parties' settlement agreement, and resolve any disputes regarding compliance with the Final Judgment. Each party shall bear its own fees and costs.

Date: May 13, 2015



HONORABLE JOHN F. WALTER
UNITED STATES DISTRICT COURT JUDGE

EXHIBIT A

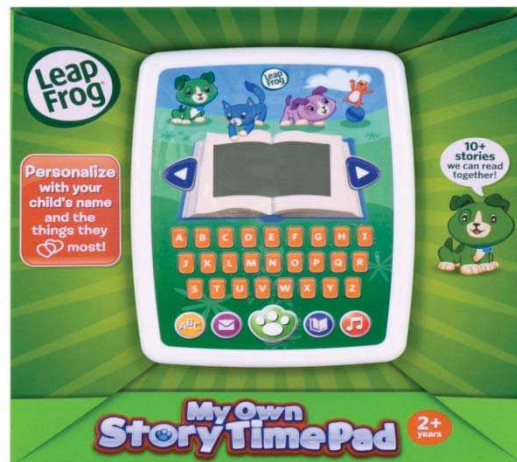
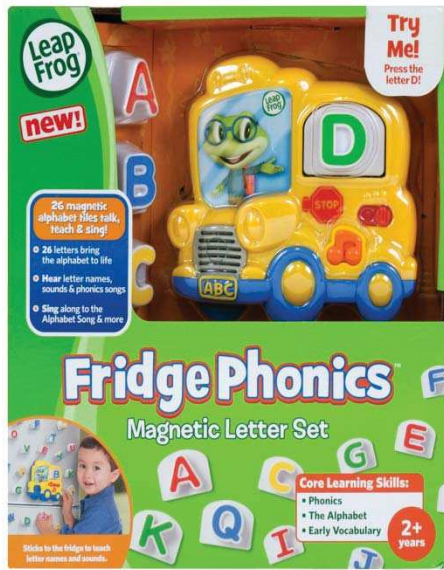










EXHIBIT B





