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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

<p>ANTIAGING INSTITUTE OF CALIFORNIA, INC., a California corporation</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SOLONOVA, LLC, a California Limited Liability Company; EASY LIVING HEALTH, a business of unknown formation; DEEPAK CHOPRA, an individual; TISHCON CORP., a New York Corporation; and RAJ CHOPRA, an individual; DOES 1-100</p> <p style="text-align: right;">Defendants.</p>	<p>Case No.: CV-15-03416 AB (FFMx)</p> <p>[PROPOSED] STIPULATED FINAL JUDGMENT</p> <p>The Hon. André Birotte Jr. Courtroom: 7B – 7th Fl. 350 W. 1st St. Los Angeles, CA 90012</p>
<p>TISHCON CORP., a New York corporation,</p> <p style="text-align: right;">Counterclaimant,</p> <p style="text-align: center;">v.</p> <p>ANTIAGING INSTITUTE OF CALIFORNIA, INC., a California corporation,</p> <p style="text-align: right;">Counter-Defendant.</p>	

A. Trademark Applications

1. Plaintiff hereby abandons its applications with the U.S. Patent and Trademark Office (“USPTO”) seeking to trademark “LiquiCalcium” (Serial No. 86507597), and “LiquiCalcium 6 Plus” (Serial No. 86513049).

1 2. Plaintiff and its officers, agents, directors, and employees, or
2 affiliates, whether acting directly or indirectly, shall immediately take all actions
3 necessary to withdraw the above mentioned applications with prejudice, and shall not
4 seek to file any new trademark applications that have any substantial similarity to the
5 Mark.

6 3. Plaintiff and its officers, agents, directors, and employees, or
7 affiliates, whether acting directly or indirectly, are hereby permanently enjoined from
8 any use of the marks “LiquiCalcium,” “LiquiCalcium 6 Plus,” “LIQUI-CALCIUM”
9 (the “Marks”) or any mark that is substantially similar to the Marks.

10 4. Plaintiff and its officers, agents, directors, and employees, or
11 affiliates, whether acting directly or indirectly, shall not oppose Tishcon’s application
12 to trademark “LIQUI-CALCIUM” (Serial No. 86715779), and shall take all
13 reasonably necessary actions within Plaintiff’s or its employees, agents, directors,
14 employees or affiliate’s control, to remove any existing opposition to or suspension of
15 Tishcon’s application.

16 **B. Dismissal of Claims**

17 5. Plaintiff hereby dismisses, with prejudice, all claims against
18 Defendants, their employees, directors, officers, agents, or successors and assigns,
19 contained in the First Amended Complaint (Dkt. No. 75).

20 6. Subject to the right to enforce the provisions of Paragraphs 1
21 through 4 hereof, Tishcon hereby dismisses all claims against Plaintiff, their
22 employees, directors, officers, agents, or successors and assigns, contained in
23 Tishcon’s counterclaims contained in the answer to the FAC (Dkt. No. 103).

1 Dated: February ____, 2017

STUBBS ALDERTON & MARKILES, LLP

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4 By: _____
Anthony M. Keats
5 Konrad K. Gatien

6 Dated: February 21, 2017

7 MCCARTHY FINGAR, LLP

8
9 By: _____
10 Phillip C. Landrigan (*pro hac vice*)
Zahir A. Virani (*pro hac vice*)
11
12 Attorneys for Defendants
SOLANOVA, LLC, DEEPAK CHOPRA,
13 TISHCON CORP. and RAJ CHOPRA

14 Dated: February ____, 2017


T. SEAN BUTLER, ESQ.

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16
17 By: _____
T. Sean Butler, Esq.

18 Attorney for Plaintiff,
19 ANTIAGING INSTITUTE OF CALIFORNIA,
20 INC.

21 **IT IS SO ORDERED:**

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23
24 Dated: March 1, 2017

25 

26 Hon. André Birotte Jr.
27 UNITED STATES DISTRICT JUDGE