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

COACHELLA MUSIC  
FESTIVAL, LLC and  
GOLDENVOICE, LLC,

Plaintiffs

v.

ROBERT TREVOR SIMMS,  
FILMCHELLA, KYLE BLIVEN,  
WYATT DENNY, and DOES 4-20,

Defendants.

) Case No. 2:17-cv-06059 RGK (GJSx)

) **[PROPOSED] STIPULATED ORDER**  
) **ENTERING PERMANENT**  
) **INJUNCTION AND FINAL**  
) **JUDGMENT**

) Hon. R. Gary Klausner

1 The Court, having read and considered the stipulation of the parties and the record  
2 in this case, it is **ORDERED** that the stipulation is **GRANTED**.

3  
4 **IT IS HEREBY ORDERED THAT:**

5 1. For the purposes of this Order, the following definitions shall apply:

6 a. Defendant’s Marks means: COACHELLA FOR MOVIES,  
7 COACHELLA FILM FESTIVAL, FILMCHELLA,  
8 FILMCHLLA, and FILMCOACHELLA;

9 b. Plaintiffs’ Marks means: COACHELLA VALLEY MUSIC  
10 & ARTS FESTIVAL, COACHELLA FESTIVAL,  
11 COACHELLA FEST, COACHELLA, CHELLA, CHELLA  
12 FESTIVAL, and CHELLA FEST; and

13 c. Enjoined Terms means: Defendant’s Marks, or any  
14 confusingly similar designation, in whole or in part, thereto;  
15 and Plaintiffs’ Marks, or any confusingly similar  
16 designation, in whole or in part, thereto.

17 2. Defendant Robert Trevor Simms (“Defendant”), and his, agents, servants,  
18 employees, and attorneys, and all other persons acting in concert with or participation  
19 with him who receive notice of the Court’s Order are permanently enjoined from using in  
20 commerce any of the Enjoined Terms.

21 3. Defendant shall transfer the domain names filmcoachella.com,  
22 filmchella.com and filmchlla.com to Plaintiffs.

23  
24 4. It is further **ORDERED** that, Defendant, and his officers, agents, servants,  
25 employees and attorneys, and all other persons acting in concert with or participation  
26 with Defendant who receive actual notice of the Court’s permanent injunction, shall not  
27 assist, aid, or abet any other person or business entity in engaging in or performing any of  
28 the activities recited in paragraph 2 of this Order.

1           5.     This Court has jurisdiction over the parties and the subject matter of this  
2 action. This Court shall retain jurisdiction to the extent necessary to enforce this  
3 Permanent Injunction.

4           6.     This Action is dismissed with prejudice as to all defendants, other than  
5 Robert Trevor Simms.

6           7.     All relief not expressly granted herein is **DENIED**.

7           8.     Each party shall bear its own costs, expenses, and attorneys' fees.

8           This is a Final Judgment, and except as to this stipulated injunction, all claims and  
9 counterclaims are hereby dismissed with prejudice.

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11           **IT IS SO ORDERED.**

12           DATED: October 04, 2018



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R. Gary Klausner  
U.S. District Judge