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13 Attorneys for Plaintiffs
(pending admission pro hac vice)

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 AUDI AG, a German corporation,
17 VOLKSWAGEN AG, a German
18 corporation and VOLKSWAGEN
GROUP OF AMERICA, INC., a
New Jersey corporation,

19 Plaintiffs,

20 vs.

21 ONUNWA KELECHI IWUAGWU,
 an individual, and
 22 OKIXTREME, a business of
 unknown origin doing business as
 23 AUDIBADGES.COM,
 AUTO ACCESSORIES,
 24 AUTOBADGES.COM,
 CHROME CAR LETTERS.COM,
 25 EUROBADGEZ.COM,
 OKIXTREME.COM, and
 26 ZZPDECALS.COM,

27 Defendants.

Case No.: 2:17-cv-06706-RSWL-SS

**STIPULATED FINAL JUDGMENT
AND PERMANENT INJUNCTION**

Honorable Judge Ronald S.W. Lew
United States District Judge

1 Plaintiffs Audi AG, Volkswagen AG, and Volkswagen Group of America,
2 Inc. (collectively “Audi and VW”) on the one hand, and defendants Onunwa
3 Kelechi Iwuagwu and OKIXTREME dba Audibadges.com, Auto
4 Accessories.com, Autobadges.com, Chromecarletters.com, Eurobadgez.com,
5 Okixtreme.com, and Zzpdecals.com (collectively “Defendants”) on the other
6 hand, by and through their attorneys of record, hereby agree and stipulate to the
7 following Permanent Injunction and Order of Dismissal With Prejudice regarding
8 Defendants’ use of Audi’s and VW’s trademarks and trade dress, including, but
9 not limited to, AUDI®, the AUDI RINGS®, the AUDI GRILLE DESIGN®,
10 RS4®, VW®, and the B IN WINGS® trademarks (hereinafter the “Audi and VW
11 Marks”).

12 **PERMANENT INJUNCTION**

13 1. Defendants and their owners, shareholders, officers, directors,
14 employees, agents, successors, and all persons acting in concert or in participation
15 with any of them are hereby permanently enjoined from:

16 (a) imitating, copying, or making unauthorized use of any of the Audi
17 and/or VW Marks, counterfeits thereof, or any confusingly similar variations
18 thereof;

19 (b) importing, manufacturing, producing, distributing, circulating,
20 selling, offering for sale, advertising, promoting or displaying any product or
21 good, including, but not limited to, any grilles, automobile badges, or other goods
22 bearing the Audi and/or VW Marks or any simulation, reproduction, counterfeit,
23 copy, or any confusingly similar variation of any of the Audi and/or VW Marks;

24 (c) using any simulation, reproduction, counterfeit, copy or confusingly
25 similar variation of the Audi and/or VW Marks or trade dress in Defendants’
26 business name, Internet domain name(s) (i.e. *audibadges.com*), or in connection
27 with the promotion, advertisement, display, sale, offering for sale, manufacture,
28 production, circulation or distribution of any service or product;

1 (d) using, registering, maintaining registrations for, or transferring to
2 anyone other than to Audi and VW any Internet domain name that incorporates
3 the Audi and/or VW Marks, including but not limited to *audibadges.com*.
4 Defendants are further ordered to transfer immediately to Audi and VW
5 *audibadges.com*, or any other domain names that use names, words, or
6 designations, similar to the Audi and/or VW Marks;

7 (e) using any false designation of origin or false description, including
8 without limitation, any letters or symbols constituting the Audi and/or VW Marks
9 or trade dress, or performing any act, which can, or is likely to lead members of
10 the trade or public to believe that Defendants and/or any service or product
11 manufactured, distributed or sold by Defendants is in any manner associated or
12 connected with Audi and/or VW, or is sold, manufactured, licensed, sponsored,
13 approved or authorized by Audi and/or VW; and

14 (f) instructing, assisting, aiding or abetting any other person or business
15 entity in engaging in or performing any of the activities referred to in
16 subparagraphs (a) through (e) above.

17 2. Defendants are further ordered to deliver to Audi and VW and their
18 counsel for destruction all products, labels, tags, signs, prints, packages, videos,
19 and advertisements in their possession or under their control, bearing or using any
20 or all of the Audi and/or VW Marks or any confusingly similar variation thereof,
21 and all plates, molds, matrices and other means of making the same, pursuant to
22 15 U.S.C. § 1118. Alternatively, the parties have agreed to allow Defendants to
23 destroy these items locally, rather than engage in the extra expense of delivering
24 these items to Audi and VW

25 3. Defendants are further ordered to file with the Court and serve upon
26 Audi's and VW's counsel within thirty (30) days after entry of this judgment, a
27 report in writing under oath, setting forth in detail the manner and form in which
28 Defendants have complied with the above.

