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RUSS, AUGUST & KABAT  
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JS-6

Attorneys for Plaintiff  
The Honest Company, Inc.

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

THE HONEST COMPANY, INC.  
a Delaware corporation,

CASE NO. 2:17-cv-07115-R-PLA

Plaintiff,

**FINAL JUDGMENT  
AND PERMANENT INJUNCTION  
AGAINST REDMON COMPANY  
INC. d/b/a HONEST HERBAL**

vs.

REDMON COMPANY INC. d/b/a  
HONEST HERBAL, a Colorado  
corporation,

Defendant.

RUSS, AUGUST & KABAT

1           WHEREAS, Plaintiff The Honest Company, Inc. (“The Honest Co.”) is the  
 2 exclusive and sole owner of the rights in various HONEST marks covering a wide  
 3 range of goods and services such as face and body lotions, skin care preparations,  
 4 vitamins, dietary supplements, and retail services featuring consumer products,  
 5 including United States Trademark Registration Nos. 4,744,028; 4,696,715;  
 6 4,664,222; 4,739,478; 5,291,212; 4,720,844; 4,550,028; 4,739,475; 4,713,234;  
 7 4,550,022; 5,036,713; 4,696,706; 4,964,802; 4,878,813; 4,739,220; 3,817,736;  
 8 3,231,281; 4,844,206; and 4,790,677 (collectively the “HONEST Marks”);

9           WHEREAS, Defendant Redmon Company, Inc. d/b/a Honest Herbal  
 10 (“Redmon”) has used names, marks, and logos containing the term, “HONEST  
 11 HERBAL” (collectively, the “HONEST HERBAL Marks”) in connection with  
 12 marketing, offering for sale, and selling CBD Hemp lotions, creams, and  
 13 supplements over the Internet through, among other means, its website  
 14 [www.honestherbal.com](http://www.honestherbal.com) and its social media handles and business network account  
 15 names containing the term “HONEST HERBAL”;

16           WHEREAS, a dispute has arisen between The Honest Co. and Redmon in  
 17 that Redmon’s use of the HONEST HERBAL Marks violates The Honest Co.’s  
 18 rights in the HONEST Marks and constitutes, among other things, trademark  
 19 infringement, false advertising, and unfair competition;

20           WHEREAS, on September 26, 2017, The Honest Co. commenced the  
 21 above-captioned action (“Action”) against Redmon, asserting federal and  
 22 California law claims for trademark infringement, false designation of origin, and  
 23 unfair competition;

24           WHEREAS, on November 27, 2017, Redmon filed an Answer and  
 25 Counterclaims denying liability;

26           WHEREAS, Redmon has elected to rebrand its company and its line of CBD  
 27 Hemp lotions, creams, and supplements under the tradename “Windy Hill Hemp,”  
 28

1 and has agreed to not use the word “HONEST” in its future trademarks, service  
 2 marks, slogans, identifiers, names, handles or designations of origin;

3 WHEREAS, the parties have mutually entered into a full and final  
 4 settlement of the Action, which settlement was memorialized in a certain document  
 5 dated February 22, 2018 (the “Agreement”); and

6 WHEREAS, the Agreement provides, in pertinent part, that Redmon  
 7 consents to the entry of a permanent injunction enjoining any references and uses  
 8 of the term HONEST, including, without limitation, the HONEST HERBAL  
 9 Marks, in any advertisements or other commercial undertakings.

10 NOW, THEREFORE, it is, ORDERED, ADJUDGED, and DECREED  
 11 THAT:

12 1. This Court has jurisdiction over the subject matter of this Action and  
 13 over the parties hereto.

14 2. The Honest Co. is the owner of the HONEST Marks, which are valid  
 15 and enforceable.

16 3. Redmon engaged in marketing, offering for sale, and selling products  
 17 under the HONEST HERBAL Marks.

18 4. Redmon and its owners, officers, members and principals are hereby  
 19 permanently restrained and enjoined from infringing upon The Honest Co.’s  
 20 HONEST Marks, either directly or indirectly, in any manner, including:

21 a. manufacturing, distributing, circulating, advertising, marketing,  
 22 promoting, importing, exporting, displaying, shipping, offering for sale, or selling  
 23 lotions, creams, and supplements under or bearing any mark identical and/or  
 24 confusingly similar to The Honest Co.’s HONEST Marks, including the HONEST  
 25 HERBAL Marks;

26 b. manufacturing, distributing, circulating, advertising, marketing,  
 27 promoting, importing, exporting, displaying, shipping, offering for sale, or selling  
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lotions, creams, and supplements under or bearing any trademark featuring the term HONEST;

c. registering any of the HONEST HERBAL Marks or any mark including the term HONEST;

d. committing any other acts calculated to cause purchasers to believe that the products marketed, offered for sale, or sold by Redmon are The Honest Co.'s products or associated with The Honest Co. in any way; and

e. affirmatively, actively, or knowingly assisting, aiding or attempting to assist or aid any other person or entity in performing, directly or indirectly, any of the prohibited activities referred to in Paragraphs 4(a) to 4(d) above.

5. Each party shall bear its own costs, expenses, and attorneys' fees associated with this Action.

6. The execution of this Final Judgment shall serve to bind and obligate the parties hereto.

7. The Court shall retain exclusive and continuing jurisdiction over this case for the purpose of making any further orders necessary or proper for the construction or modification of this Final Judgment, the enforcement thereof, and the punishment of any violations thereof. Except as otherwise provided herein, this Action is fully resolved with prejudice as to Redmon.

Dated: March 20, 2018



Honorable Manuel L. Real  
United States District Judge

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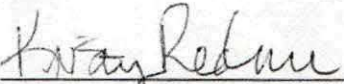
CONSENTS

The undersigned parties to this Action consent to entry of this Final Judgment and Permanent Injunction.

The Honest Company, Inc.

Redmon Company, Inc. d/b/a  
Honest Herbal

By: 

By: 

Name: CRAG GARRARD

Name: Kristy Redmon

Title: EVP

Title: President

Date: February 27, 2018

Date: February 23, 2018

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