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

UL LLC,

Plaintiff,

v.

Gangsong Group Corp., a California corporation; Flying Medical USA LLC, a California company; Logistic Public Warehouse, a California company; Thomas Soon Chiah, an individual; Shenzhen Kebe Technology Co. Ltd., a foreign company; Jing Hua Zhou, an individual; Shenzhen Leidisi Electronics Technology Co., Ltd., a foreign company; TRC International Corp., a California corporation; Sum Fortune International Group, a California corporation; Defang USA, LLC, a California company; Sun Defang, an individual; ManSeeManWant LLC, an Illinois company; James Ellenberg, an individual; and John Does 1-10, individuals,

Defendants.



Case No.: 2:17-cv-08166-DSF-Ex

ORDER FOR

**STIPULATED PRELIMINARY
INJUNCTION AS TO DEFENDANTS
GANGSONG GROUP CORP. AKA
LOGISTICS PUBLIC WAREHOUSE
FLYING MEDICAL USA LLC, AND
THOMAS SOON CHIAH**

1 Plaintiff, UL LLC (“UL”), on the one hand, and Defendants Gangsong Group
2 Corp. a/k/a Logistic Public Warehouse, Flying Medical USA LLC, and Thomas Soon
3 Chiah (together, the “Gangsong Defendants”), on the other hand, in the interest of
4 compromise and the efficient resolution of disputes, have entered into a stipulation for
5 entry of a preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and the
6 Lanham Act, 15 U.S.C. §§ 1051, *et seq.* as amended by the Trademark Counterfeiting
7 Act of 1984, Public Law 98-473 (the “Lanham Act”).

8 THEREFORE, IT IS ORDERED that Defendants Gangsong Group Corp. a/k/a
9 Logistic Public Warehouse, Flying Medical USA LLC, and Thomas Soon Chiah, their
10 agents, servants, employees, confederates, attorneys, and any persons acting in concert or
11 participation with them, or having knowledge of this Order by personal service or
12 otherwise, are preliminarily enjoined from:

- 13 (i) imitating, copying, or making any other infringing use of (a) the UL
14 Service Mark and variations thereof (the “UL Service Marks”), and
15 (b) the UL-in-a-circle certification mark  and variations thereof
16 including the enhanced mark  (the “UL Certification Marks”), by
17 the use of Defendants’ mark that is identical to or substantially
18 indistinguishable from the UL Certification Marks (the “Counterfeit
19 Mark”) or any other mark now or hereafter confusingly similar to the
20 UL Service Marks or the UL Certification Marks;
- 21 (ii) manufacturing, assembling, producing, distributing, offering for
22 distribution, circulating, selling, offering for sale, advertising,
23 importing, promoting, or displaying any simulation, reproduction,
24 counterfeit, copy, or colorable imitation of the UL Service Marks, the
25 UL Certification Marks, Defendants’ Counterfeit Mark, or any mark
26 confusingly similar thereto;
- 27 (iii) using any false designation of origin or false description or statement
28 that can or is likely to lead the trade or public or individuals

1 erroneously to believe that any good has been provided, produced,
2 distributed, offered for distribution, circulation, sold, offered for sale,
3 imported, advertised, promoted, displayed, licensed, sponsored,
4 approved, or authorized by or for UL, when such is not true in fact;

5 (iv) using the names, logos, or other variations thereof of the UL Service
6 Marks, the UL Certification Marks, or Defendants' counterfeit mark
7 in any of Defendants' trade or corporate names;

8 (v) engaging in any other activity constituting an infringement of the UL
9 Service Marks, the UL Certification Marks, or of the rights of UL in,
10 or right to use or to exploit the UL Service Marks and the UL
11 Certification Mark; and

12 (vi) assisting, aiding, or abetting any other person or business entity in
13 engaging in or performing any of the activities referred to in the
14 foregoing items (i) through (v);

15 IT IS FURTHER ORDERED that:

16 (1) Gangsong Defendants shall have until November 27, 2017 to produce
17 the documents and information required by the TRO/OSC (Dkt. No. 16 at p. 6, Ins.
18 1-22), which Gangsong Defendants may produce pursuant to
19 "confidential"/nonpublic designation, as to pages, portions, or elements thereof
20 that contain nonpublic, confidential, sensitive, or otherwise, business/proprietary
21 information ("Confidential Information"), and to which Plaintiff may reserve the
22 rights to challenge any such designation(s);

23 (2) Gangsong Defendants shall make the personal laptop and cell phone
24 of Thomas Soon Chiah, and any other agents, employees, officers, or managers of
25 Gangsong Defendants involved in business relating to the other defendants, to
26 make content relevant to the Plaintiff's claims available for forensic imaging no
27 later than November 27, 2017, with imaging performed on-site or in any event not
28 exceeding three (3) days of interruption of device use by the device owner, subject

1 to a protective order and/or other confidentiality designations by Gangsong
2 Defendants to protect the inadvertent disclosure of Confidential Information, and
3 to avoid the disclosure content, files, and other material unrelated to the other
4 defendants or the facts at issue. Gangsong Defendants' counsel shall produce all
5 text messages relating to the other defendants and/or their hoverboards by the close
6 of business on November 27, 2017. The parties' counsel shall work out an agreed
7 forensic discovery protocol relating to production of the content on these devices
8 as soon as reasonably possible.

9 (3) Gangsong Defendants shall immediately provide its counsel with
10 identification of the email addresses used for business relating to the other
11 defendants and/or their hoverboards. The parties' counsel shall work out an agreed
12 e-discovery protocol for searching these e-mail accounts and producing electronic
13 records/documents from them as soon as reasonably possible.

14 (4) Gangsong Defendants shall produce all bank statements from their
15 banks in their possession, custody and control from January 2017 to present,
16 subject to Confidentiality designations and/or protective order, to prevent against
17 the disclosure of Gangsong Defendants' banking or other financial documents.
18 Gangsong Defendants shall produce such bank statements that they can download
19 from the Internet, by close of business on November 27, 2017, subject to the same
20 Confidentiality/protective order provisions. Gangsong Defendants shall request
21 any remaining statements from their bank(s) by the close of business on November
22 27, 2017, and shall promptly produce those bank statements to UL's counsel when
23 received from said bank(s), subject to the same Confidentiality/protective order
24 provisions.

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26 **IT IS SO ORDERED.**
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Dale S. Fischer

DATED: 11/22/17

By: _____

Hon. Dale S. Fischer
United States District Judge

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