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**UNITED STATES DISTRICT COURT
FOR THE 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

**CONSENT DECREE AND
PERMANENT INJUNCTION AS TO
DEFENDANTS GANGSONG GROUP
CORP., FLYING MEDICAL USA LLC,
LOGISTIC PUBLIC WAREHOUSE,
AND THOMAS SOON CHIAH**

1 Plaintiff UL LLC (“UL”), and Defendants Gangsong Group Corporation a/k/a
2 Logistic Public Warehouse, Flying Medical USA LLC, and Thomas Soon Chiah,
3 (collectively the “Gangsong Defendants), through their respective counsel of record, have
4 agreed to enter into a stipulated Consent Decree and Permanent Injunction in conjunction
5 with their Settlement Agreement.

6 This order is made with reference to the following facts, which the Gangsong
7 Defendants admit:

8 1. UL asserts it is the owner of the renowned UL-in-a-circle certification mark,
9 and variations thereof, in the United States and abroad, including UL® (stylized) (Reg.
10 No. 782,589), UL® (stylized) (Reg. No. 2,391,140), UL® (Reg. No. 4,201,014), and UL
11 CERTIFIED ® (stylized) (Reg. No. 4,283,962), among other trademark registrations. UL
12 asserts its UL Marks are valid, famous, incontestable, and enforceable.

13 2. The Gangsong Defendants leased 1,500 square feet of the Logistic Public
14 Warehouse to Defendant Shenzhen Kebe Technology Co. Ltd. (“Kebe”) starting on April
15 30, 2017. The Gangsong Defendants were informed by Kebe that Kebe was going to store
16 hoverboards at the warehouse. UL asserted in the Action that these hoverboards, many of
17 which were marked with counterfeit labels bearing the UL Certification Mark, were falsely
18 marketed and sold to U.S. consumers as being certified by UL when they were not. The
19 Gangsong Defendants knew that hoverboards needed to comply with safety standards
20 governing self-balancing scooters (aka “hoverboards.”) The Gangsong Defendants
21 provided “pick and pack” services concerning certain of the orders of hoverboards for
22 Defendants Kebe and Shenzhen Leidisi Electronics Technology Co., Ltd. As one example,
23 the Gangsong Defendants coordinated shipping/logistical services with respect to various
24 hoverboards to Defendants Ellenberg and ManSeeManWant.

25 3. On September 18, 2017, the Los Angeles County Sheriff’s Department
26 conducted a raid of the Logistic Public Warehouse located at 10001 Pioneer Blvd., Santa
27 Fe Springs, California 90670. The Sheriff’s Department seized approximately 2,500
28 hoverboards, many of which were marked with counterfeit labels bearing UL Certification

1 Marks and 2,325 counterfeit UL holographic labels bearing the UL Certification Mark.

2 4. On November 22, 2017, the Court entered a Stipulated Preliminary Injunction
3 as to the Gangsong Defendants. (Dkt. No. 38.) The parties have now entered into a
4 settlement agreement, and as part of that settlement agreement have stipulated to this
5 Consent Decree and Permanent Injunction.

6 It is hereby **ORDERED**, pursuant to Federal Rule of Civil Procedure 65, that the
7 Gangsong Defendants, and each of them, and their respective officers, agents, servants,
8 employees, and attorneys, and all others in active concert or participation therewith, are
9 hereby enjoined and restrained from:

- 10 (i) using any reproduction, counterfeit, copy, or colorable imitation of the UL's
11 Marks, including but not limited to its famous certification mark, in
12 connection with the manufacture, importation, sale, offering for sale, or
13 distribution of goods in the United States, which goods in fact are not certified
14 by UL or are not genuine UL certified products, which such use is likely to
15 cause confusion, or to cause mistake, or to deceive;
- 16 (ii) committing any other acts reasonably calculated to cause purchasers to
17 believe that Defendants' products are authorized or certified by UL, when in
18 fact such products are not authorized or certified by UL;
- 19 (iii) passing off any goods that are not authorized by UL as being certified,
20 approved, or authorized by UL;
- 21 (iv) making, having made, importing, distributing, or offering for sale any
22 hoverboards which are not certified by UL; and
- 23 (v) assisting, aiding, or abetting any other person or business entity in engaging
24 in or performing any of the activities referred to in the above paragraphs (i)
25 through (v), inclusive.

26 Nothing in the Order shall prohibit the Gangsong Defendants, or any of their
27 officers, agents, servants, employees, and those persons in active concert or participation
28 with Defendants, from selling or offering to sell products bearing genuine UL Marks.

