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

LFP IP, LLC,

Plaintiff,

vs.

**4FVSX ENTERPRISES, LLC
D/B/A PUSH CLOTHING
STORES, ROVALL
WASHINGTON, and DOES 1-5,**

Defendants.

Case No.: 2:18-cv-00194-PA-RAO

ORDER RE:

**STIPULATION AND CONSENT
JUDGMENT AND PERMANENT
INJUNCTION ORDER AGAINST
DEFENDANTS
4FVSX ENTERPRISES, LLC
D/B/A PUSH CLOTHING
STORES AND ROVALL
WASHINGTON**

CONSENT JUDGMENT AND PERMANENT INJUNCTION ORDER

1 **Plaintiff LFP IP, LLC (“Plaintiff”) and Defendants 4FVSX**
2 **ENTERPRISES, LLC D/B/A PUSH CLOTHING STORES and ROVALL**
3 **WASHINGTON (collectively, “Defendants”)** stipulate, consent and agree to
4 **the following:**

6 WHEREAS, Plaintiff commenced this action on January 9, 2018, by filing a
7 Complaint against Defendants bringing claims for trademark infringement and
8 unfair competition under the Lanham Act; and

10 WHEREAS, on January 12, 2018, Plaintiff filed a Motion for Preliminary
11 Injunction to stop Defendants from infringing the HUSTLER® Trademarks (the
12 “Motion”); and

14 WHEREAS, before the hearing on the Motion, Plaintiff and Defendants
15 stipulated to the permanent injunction set forth below and agreed to a written
16 settlement agreement (the “Settlement Agreement”); and

18 WHEREAS, the Defendants acknowledge and agree that Plaintiff is the
19 owner of the registered HUSTLER® trademarks set forth in the Complaint; and

21 WHEREAS, the parties agree that this Court has subject-matter and personal
22 jurisdiction over the Defendants; and

24 WHEREAS, the parties hereto understand and agree that this Stipulation and
25 Consent Judgment and Permanent Injunction Order shall be made a part of, and is
26 expressly incorporated into, the Settlement Agreement; and

1 WHEREAS, the parties agree that the Consent Judgment and Permanent
2 Injunction Order below will constitute the final judgment in this matter;

3 NOW, with the consent of Plaintiff and Defendants, and after due
4
5 deliberation, it is hereby:

6 **IT IS HEREBY ORDERED, ADJUDGED and DECREED that:**

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- 8 1. Immediately, upon entry of this Consent Judgment and Permanent
9 Injunction Order, Defendants 4FVSX ENTERPRISES, LLC D/B/A
10 PUSH CLOTHING STORES and ROVALL WASHINGTON, together
11 with their officers, directors, partners, agents, subcontractors, employees,
12 subsidiaries, successors, assigns, licensees and related companies or
13 entities, and all others acting in concert or participating with them or with
14 actual notice of this Order are hereby **permanently enjoined and**
15 **restrained** from using the HUSTLER mark, the “HSTLRS” mark and
16 any confusingly similar variation thereof, in connection with the sale or
17 marketing of apparel items, including but not limited to t-shirts,
18 sweatshirts, baseball caps, hats and lingerie;
- 19
- 20 2. This Consent Judgment and Preliminary Injunction Order is binding upon
21 and shall inure to the benefit of the parties and their respective affiliates,
22 predecessors, successors, assigns, licensees, manufacturers, heirs and
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1 personal representatives and distributors and their respective officers,
2 members, employees, attorneys, and agents;


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4 3. Within fourteen (14) days after entry of this Consent Judgment and
5 Permanent Injunction Order, Defendants shall file with the Court and
6 serve upon Plaintiff's counsel a signed declaration or affidavit setting
7 forth the manner and form in which Defendants have complied with this
8 Consent Judgment and Permanent Injunction Order;

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11 4. Subject to the foregoing Consent Judgment and Permanent Injunction
12 Order, the above-captioned action is hereby dismissed without prejudice,
13 ~~and this Court shall retain jurisdiction over this matter for the purpose of~~
14 ~~enforcing the terms of this Consent Judgment and Permanent Injunction~~
15 ~~Order and the Settlement Agreement, and~~

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18 5. Each Party to this action shall bear their own costs and attorneys' fees.
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21 **IT IS SO ORDERED.**

22 Date: February 01, 2018

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24 United States District Court Judge

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CONSENT JUDGMENT AND PERMANENT INJUNCTION ORDER