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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TRADITION CLUB ASSOCIATES,
LLC, a California limited liability
company,

Plaintiff,

v.

TRADITION GOLF CLUB SALES, a
business entity of unknown form, JEFF
LARSON, an individual, and DOES 1-20,
inclusive.

Defendants.

Case No.: EDCV-08-1581-VAP-RCx

~~PROPOSED~~ AGREED PERMANENT
INJUNCTION AND FINAL
JUDGMENT

1 Plaintiff TRADITION CLUB ASSOCIATES, LLC ("ASSOCIATES") AND
2 Defendants CLUB SALES LA QUINTA, LLC, a California limited liability company,
3 incorrectly sued as TRADITION GOLF CLUB SALES, and JEFF LARSON, hereby
4 stipulate and agree, by and through their respective counsel of record, as follows:

5 1. Defendants CLUB SALES LA QUINTA, LLC and LARSON and their
6 principals, agents, servants, employees, attorneys, successors or assigns (collectively
7 referred to as "SALES") are enjoined from offering for sale, selling, marketing,
8 advertising and promoting real estate using the trade names "TRADITION" or
9 "TRADITION GOLF CLUB" in a manner likely to cause confusion, mistake or
10 deception as to the affiliation, connection or association of SALES or its products and
11 services, with ASSOCIATES, or as to the origin of SALES' products and services.

12 2. Each party shall bear its own costs, expenses, and attorneys' fees.

13 3. This is a Final Judgment. However, SALES retains the right to seek
14 dissolution or modification of the injunction pursuant to FRCP 60 should there be a
15 significant change in circumstances or law warranting such relief.

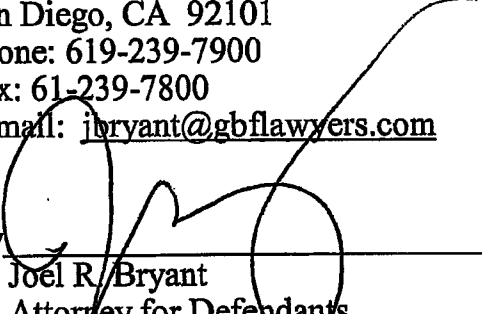
16
17 Dated: March 5, 2009

Virginia A. Phillips
18 Virginia A. Phillips
19 United States District Judge

20 Michael C. Lieb
21 William A. Delgado
22 WILLENKEN WILSON LOH & LIEB LLP
23 707 Wilshire Blvd., Suite 3850
24 Los Angeles, CA 90017
25 Phone: 213-955-9240
26 Fax: 213-955-9250
27 E-mail: wdelgado@willenken.com

28 By William A. Delgado
William A. Delgado
Attorney for Plaintiff
Tradition Club Associates, LLC

1 Joel R. Bryant
2 Green Bryant & French LLP
3 1230 Columbia Street, Suite 700
4 San Diego, CA 92101
5 Phone: 619-239-7900
6 Fax: 61-239-7800
7 E-mail: jbryant@gbflawyers.com

8 By 
9 Joel R. Bryant
10 Attorney for Defendants
11 Club Sales La Quinta, LLC and Jeff Larson
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