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12 Attorneys for Plaintiff,
 13 Operation Technology, Inc.

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA
 16 SOUTHERN DIVISION

17 OPERATION TECHNOLOGY, INC.,
 18
 19 Plaintiff,
 20 v.
 21 CYME INTERNATIONAL T & D
 INC.
 22 Defendant.

Case No. SACV 14-00999-JVS (DFMx)
Hon. James V. Selna
**STIPULATED PERMANENT
 INJUNCTION AND CONSENT
 JUDGMENT**

STIPULATED INJUNCTION AND CONSENT JUDGMENT

1 Plaintiff Operation Technology, Inc. (“ETAP”) pursued this action for false
2 advertising under Section 43(a) of the Lanham Act against Defendant CYME
3 International T&D Inc. (“CYME” or “Defendant”). The Parties have entered into a
4 confidential settlement agreement. The Parties, by and through their undersigned
5 counsel, consented to entry of this Permanent Injunction and Consent Judgment.

6 Now, therefore, IT IS HEREBY ORDERED, ADJUDGED, AND
7 DECREED that:

8 **1.** Judgment is entered in favor of Plaintiff ETAP and against Defendant.

9 **a.** The Court previously found on summary judgment that the
10 accused materials are literally false.

11 **i.** Literally false material has been posted in videos
12 associated with “Independent Power Engineers”, “Independent
13 Power.Engineers” and “Independent Engineerse” “channels” on
14 YouTube.

15 **ii.** Literally false material has been distributed via email by
16 the following e-mail accounts: arghavan.e1985@gmail.com;
17 OLA.D.36@gmail.com; sa.sasirana@gmail.com;
18 stan.3626@gmail.com; prashanth.s.9863@gmail.com;
19 independent.power.engineers@gmail.com;
20 powersystem.expertengineer@gmail.com;
21 muhammad.uhjl@gmail.com; ahmed.sh9311@gmail.com;
22 validating.elec.software@gmail.com.

23 **iii.** Literally false material has been posted on the following
24 website: ipengeineers.net.

25 **b.** The Court hereby adopts the following Jury findings: (1) ETAP
26 proved by a preponderance of the evidence that defendant directly engaged in
27 false advertising against ETAP by creating or distributing the accused
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1 statements; (2) ETAP proved by a preponderance of the evidence that Amir
2 Aslani directly engaged in false advertising against ETAP by creating or
3 distributing the accused statements; and (3) ETAP proved by a
4 preponderance of the evidence under the Court’s instructions that Defendant
5 was responsible for Amir Aslani’s conduct.

6 2. All claims are dismissed with prejudice.

7 3. The parties consent to this Court retaining jurisdiction over the action
8 and compliance with the parties’ confidential settlement, and this Consent
9 Judgment and Permanent Injunction.

10 **INJUNCTION ORDER**

11 4. As to Defendant: Defendant and each of its successors, officers,
12 agents, employees, and attorneys and all persons, partnerships or corporations in
13 present or future active concert or participation with Defendant or any other person,
14 partnership or corporation acting on behalf of Defendant, are enjoined from
15 advertising, publishing, repeating or disseminating, whether explicitly or implicitly
16 and whether directly or indirectly, any of the statements the Court held to be
17 literally false (collected in Ex. 200) (or any substantially similar statements
18 disparaging ETAP software unless first verified beyond a reasonable doubt to be
19 from an authentic, legitimate source and not associated with Amir Aslani or
20 Defendant).

21 5. The Court hereby issues the following orders with respect to certain
22 electronic resources, and authorizes ETAP to deliver a copy of this judgment to
23 third parties who may control access to said resources:

24 A. All videos associated with “Independent Power Engineers,”
25 “Independent Power.Engineers,” and any substantially similar named entity,
26 purporting to report problems with ETAP software, are hereby ordered to be
27 taken down from YouTube.

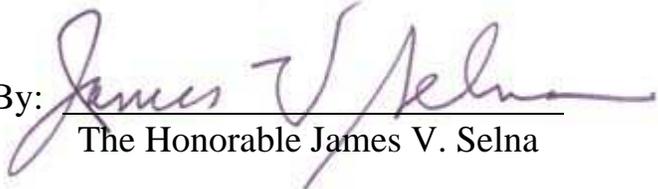
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B. Any domain for ipengeineers.net (currently ONLINENIC, INC.) and any future web site with substantially the same content disparaging ETAP shall be deactivated.

C. The following "gmail" accounts associated with fake experts and fake customers as part of the smear campaign, are hereby ordered to be deactivated from Google: arghavan.e1985@gmail.com; OLA.D.36@gmail.com; sa.sasirana@gmail.com; stan.3626@gmail.com; prashanth.s.9863@gmail.com; independent.power.engineers@gmail.com; powersystem.expertengineer@gmail.com; muhammad.uhjl@gmail.com; ahmed.sh9311@gmail.com; validating.elec.software@gmail.com

IT IS SO ORDERED.

DATED: October 11, 2016

By: 
The Honorable James V. Selna

IT IS SO STIPULATED.

Dated: October 7, 2016

KLARQUIST SPARKMAN, LLP
By: /s/ Kristin L. Cleveland
Kristin L. Cleveland
Salumeh R. Loesch
John D. Vandenberg

Dated: October 7, 2016

JONES DAY
By: /s/ Jeffrey A. LeVee
Jeffrey A. LeVee
Christopher K. Pelham

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SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), Kristin L. Cleveland attests that concurrence in the filing of this document has been obtained from Jeffrey LeVee and that she is authorized to affix Mr. LeVee’s electronic signature to this document.

Dated: October 7, 2016

By: /s/ Kristin L. Celveland