

1 KIMBERLY D. HOWATT (SBN: 196921)
 khowatt@gordonrees.com
 2 TIMOTHY P. LINDELL (SBN: 208966)
 tlinde@l@gordonrees.com
 3 GORDON & REES LLP
 101 W. Broadway, Suite 2000
 4 San Diego, CA 92101
 Telephone: (619) 696-6700
 5 Facsimile: (619) 696-7124

6 Attorneys for Plaintiff CHOICE HOTELS INTERNATIONAL, INC.

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 8 UNITED STATES DISTRICT COURT
 9 EASTERN DISTRICT OF CALIFORNIA

<p>10 CHOICE HOTELS INTERNATIONAL, INC., a Delaware Corporation,</p> <p>11</p> <p>12 Plaintiff,</p> <p>13 vs.</p> <p>14 SHRI LAXMI NARYAN HOSPITALITY GROUP OF SACRAMENTO, INC., a California Corporation; and 15 WATKINS/SACRAMENTO INN, LLC, a California Corporation,</p> <p>16 Defendants.</p>	<p>) CASE NO. 2:14-cv-1926 JAM AC</p> <p>)</p> <p>) STIPULATION AND JOINT MOTION FOR ENTRY OF PERMANENT INJUNCTION</p> <p>)</p> <p>) Date: n/a Time: n/a</p> <p>) Judge: John A. Mendez</p>
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 20 **STIPULATION AND JOINT MOTION FOR ENTRY OF**
 21 **PERMANENT INJUNCTION**

22 Plaintiff Choice Hotels International, Inc. (“Plaintiff” or “Choice Hotels”) and
 23 Defendants Shri Laxmi Naryan Hospitality Group of Sacramento, Inc. (“SLNH
 24 Group”) and Watkins/Sacramento Inn, LLC (“Watkins”) hereby submit the following
 25 stipulation and joint motion for entry of a Permanent Injunction.

26 1. Choice Hotels, SLNH Group, and Watkins (collectively the “Parties”)
 27 have entered into an agreement settling their disputes and hereby stipulate to the
 28 entry of this Stipulated Permanent Injunction.

1 2. Plaintiff owns the CLARION® family of marks identified in Plaintiff’s
2 Complaint filed herein. (Dkt. No. 1). The CLARION® family of marks are valid
3 and distinctive. Pursuant to 15 U.S.C. §§ 1114 & 1125(a) and federal and state
4 common law trademark rights, Plaintiff seeks to, among other things, enjoin SLNH
5 Group and Watkins (together “Defendants”) from the unauthorized use or
6 contribution to the use of the CLARION® family of marks in commerce.

7 3. Entry of a permanent injunction will achieve the purposes of the
8 Lanham Act and federal and state common law related to trademark infringement,
9 including protection of the ownership and integrity of the CLARION® family of
10 marks and protection of the public from confusion in the marketplace.

11 4. The Parties have reached a settlement agreement concerning all other
12 matters in controversy.

13 **IT IS SO STIPULATED**

14 Dated: March 13, 2015

GORDON & REES LLP

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16 By: /s/
 KIMBERLY D. HOWATT
 TIMOTHY P. LINDELL
17 Attorneys for Plaintiff CHOICE
HOTELS INTERNATIONAL, INC.

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19 Dated: February 28, 2015

LAW OFFICES OF KIRK RIMMER

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21 By: /s/
 KIRK RIMMER
22 Attorney for Defendant SHRI LAXMI
NARYAN HOSPITALITY GROUP OF
SACRAMENTO, INC.

23
24 Dated: March 12, 2015

LAW OFFICES OF STEPHAN
PARSHALL

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26 By: /s/
 STEPHAN PARSHALL
27 Attorney for Defendant
WATKINS/SACRAMENTO INN, LLC

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1 **ORDER**

2 Having been stipulated to by and between the Parties and for good cause
3 having been shown:

4 1. **Permanent Injunction.** Defendants, including each of their respective
5 agents, employees, officers, and representatives, and all those in active concert or
6 participation with them, are permanently, and forever **ENJOINED** from using or
7 contributing to the use of Plaintiff’s CLARION® family of marks as identified in the
8 Complaint filed herein (Dkt. No. 1), or any similar marks, without the consent of
9 Choice Hotels. The Court further **ORDERS** Defendants to deliver to Plaintiff any
10 items in their possession, custody, or control bearing any of the CLARION® family
11 of marks. The Court further **ORDERS** Defendants to file a sworn statement of
12 compliance as provided in 15 U.S.C. §1116(a).

13 2. **Non-Appealability.** This Stipulated Permanent Injunction is final and
14 may not be appealed by any party.

15 It is **SO ORDERED.**

16 Dated: March 20, 2015

17 /s/ John A. Mendez
18 John A. Mendez
19 U.S. District Court Judge
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