

1 NAOMI JANE GRAY (SBN 230171)
2 SHADES OF GRAY LAW GROUP, P.C.
3 100 Shoreline Highway, Suite 100B
4 Mill Valley, CA 94941
5 Telephone: (415) 746-9260
6 Facsimile: (415) 968-4328
7 ngray@shadesofgray.law

8 SCOTT ZEBRAK (admitted pro hac vice)
9 OPPENHEIM + ZEBRAK, LLP
10 5225 Wisconsin Avenue NW, Suite 503
11 Washington, D.C. 20015
12 Telephone: (202) 480-2999
13 Facsimile: (866) 766-1678
14 scott@oandzlaw.com

15 Attorneys for Plaintiffs

16 MICHAEL J. IONANNOU (SBN 95208)

17 KEVIN W. ISAACSON (SBN 281067)
18 CLARK A. WALDON (SBN 312696)
19 ROPERS, MAJESKI, KOHN & BENTLEY
20 50 West San Fernando Street, Suite 1300
21 San Jose, CA 95113
22 Telephone: (408) 287-6262
23 Facsimile: (408) 918-4501
24 michael.ioannou@rmkb.com
25 kevin.isaacson@rmkb.com
26 clark.waldon@rmkb.com

27 Attorneys for Defendant
28 YAROSLAV STOLYARCHUK

29 UNITED STATES DISTRICT COURT
30 EASTERN DISTRICT OF CALIFORNIA

31 MCGRAW-HILL GLOBAL
32 EDUCATION HOLDINGS, LLC,
33 PEARSON EDUCATION, INC., and
34 CENGAGE LEARNING, INC.,

35 Plaintiff,

36 v.

37 YAROSLAV STOLYARCHUK,

38 Defendant.

39 Case No. 2:17-cv-01716-WBS-DB

40 **[PROPOSED] FINAL JUDGMENT AND
41 PERMANENT INJUNCTION**

42 Upon the Stipulation for Entry of Judgment and Permanent Injunction Against Defendant
43 Yaroslav Stolyarchuk ("Defendant"), it is here

44 **ORDERED** that final judgment is **ENTERED** for Plaintiffs McGraw-Hill Global
45 Education Holdings, LLC, Pearson Education, Inc., and Cengage Learning, Inc., (hereinafter,
46 "Plaintiffs") against Defendant. Each party shall bear its own costs and expenses, including its
47 attorney's fees.
48

1 It is **FURTHER ORDERED** that a permanent injunction is **ENTERED** in this action.
2 Defendant, along with his agents, servants, representatives, employees, successors, and assigns,
3 and all those acting in concert or in participation with any of them, shall not:

- 4 a. Directly or indirectly infringe any of Plaintiffs' Copyrighted Works¹ or
5 Plaintiffs' Marks;²
6 b. Manufacture, import, distribute, sell, or offer to sell any unauthorized copies
7 of Plaintiffs' Copyrighted Works;
8 c. Knowingly enable, facilitate, permit, assist, solicit, encourage or induce
9 others to manufacture, import, distribute, sell, or offer to sell any
10 unauthorized copies of Plaintiffs' Copyrighted Works;
11 d. Advertise, promote, distribute, sell, or offer to sell any products containing
12 unauthorized reproductions of Plaintiffs' Marks; or
13 e. Knowingly enable, facilitate, permit, assist, solicit, encourage or induce
14 others to advertise, promote, distribute, sell, or offer to sell any products
15 containing unauthorized reproductions of Plaintiffs' Marks.

16 It is **FURTHER ORDERED** that all funds in the accounts listed below shall be
17 transferred to Oppenheim + Zbrak, LLP for the benefit of Plaintiffs:

18 Abebooks.com Account

19 Business/Storefront Name: "Books Liquidation"; Email: stolyary@yahoo.com

20 PayPal Accounts

21 eBay Seller ID:"lissbarney2"; Email: lissbarney@gmail.com

22 eBay Seller ID:"pau-badg"; Email: paulbadger774@gmail.com

23 eBay Seller ID: "brucbrackma 0"; Email: fleemiffy@gmail.com

24 eBay Seller ID: "keviwilcut 0"; Email: ferekyack@gmail.com

25 _____
26 ¹ "Plaintiffs' Copyrighted Works" means any and all textbooks or other copyrighted works, or portions thereof,
27 whether now in existence or later created, regardless of media type, the copyrights to which are owned or controlled
28 by any of the Plaintiffs or their parents, subsidiaries, affiliates, predecessors, successors, and assigns, whether
published in the United States or abroad.

² "Plaintiffs' Marks" means any and all trademarks and service marks, whether now in existence or later created,
which are owned or controlled by any of the Plaintiffs or their parents, subsidiaries, affiliates, predecessors,
successors, and assigns.


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eBay Seller ID: "troessar 0"; Email: jukegraph@gmail.com
eBay Seller ID: "andrepayn7"; Email: qtofpayne@gmail.com
eBay Seller ID: "peteanderso-5"; Email: andersonp1579@gmail.com
eBay Seller ID: "raymonshapir-0"; Email: rshapiro851@gmail.com
eBay Seller ID: "jacharsto 0"; Email: peaslofts@gmail.com
Umpqua Bank - Account No. 39****9181

It is **FURTHER ORDERED** that the Court retains jurisdiction of this matter in law and equity for purposes of enforcing this Order and/or adjudicating claims of violations of this Order.

SO ORDERED.

Dated: January 11, 2019


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE