

1 KENT B. GOSS (State Bar No. 131499)
 2 VALERIE M. GOO (State Bar No. 187334)
 3 CHRISTOPHER J. CHAUDOIR (State Bar No. 198444)
 ORRICK, HERRINGTON & SUTCLIFFE LLP
 4 777 S. Figueroa Street, Suite 3200
 Los Angeles, California 90017-5855
 Telephone: 213-629-2020
 Facsimile: 213-612-2499
 5 kgoss@orrick.com
 vgoo@orrick.com
 6 cchaudoir@orrick.com

7 Attorneys for Plaintiffs
 8 TEXTRON INNOVATIONS INC. and
 BELL HELICOPTER TEXTRON INC.

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

13 TEXTRON INNOVATIONS INC., a
 14 Delaware corporation; BELL HELICOPTER
 15 TEXTRON INC., a Delaware corporation

16 Plaintiffs,

17 v.

18 HELICOPTER WORLD INC., dba
 CENTURY HELICOPTER PRODUCTS, and
 19 DOES 1-10, inclusive,

20 Defendants.

Case No. C 06-06474 MJJ

**STIPULATION AND
 [REDACTED] ORDER RE
 PRELIMINARY INJUNCTION**

21
 22 WHEREAS, plaintiffs Textron Innovations Inc. ("TII") and Bell Helicopter Textron Inc.
 23 ("Bell Helicopter") have filed an action in the above-entitled Court for *inter alia* for trademark
 24 and trade dress infringement, breach of contract, unjust enrichment, and an accounting against
 25 defendant Helicopter World Inc. dba Century Helicopter Products ("Helicopter World"); and
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1 WHEREAS, TII and Bell Helicopter own the federal registered trademarks for the marks,
2 BELL, JETRANGER, LONGRANGER, COBRA, HUEY, 222 and 47 (the "Trademarks");

3 WHEREAS, TII and Bell Helicopter own the trade dress in the non-functional unique
4 design of the Bell Jetranger, Bell Longranger, Bell 222 and Bell 47, Cobra and Huey helicopters
5 (the "Trade Dress"); and

6 WHEREAS, the Court issued a temporary restraining order against Helicopter World on
7 October 18, 2006; and

8 WHEREAS, the Court set for hearing for an order to show cause re Preliminary Injunction
9 for October 27, 2006; and

10 WHEREAS, the parties to the above-entitled action have mutually agreed to the terms of a
11 Preliminary Injunction without a bond or other security.

12 NOW THEREFORE, it is hereby STIPULATED AND AGREED that Helicopter World,
13 together with their officers, directors, agents, affiliates, servants, employees and attorneys, and
14 those in active concert or participation with each of them, shall be and are hereby RESTRAINED
15 AND ENJOINED, pending final judgment or settlement of this action, from:

16 1. manufacturing, producing, importing, distributing, advertising, selling, offering for
17 sale, moving, or otherwise disposing of, any product bearing any simulation, reproduction,
18 counterfeit, copy, or colorable imitation of any of the Trademarks or Trade Dress;

19 2. using any simulation, reproduction, counterfeit, copy, or colorable imitation of any
20 of the Trademarks or Trade Dress;

21 3. using any false designation of origin or false description that can or is likely to
22 lead the trade, public or individual members thereof to believe that any product manufactured,
23 distributed, or sold by Helicopter World is in any manner associated or connected with TII or Bell
24 Helicopter, or is sold, manufactured, licensed, sponsored or approved or authorized by TII or Bell
25 Helicopter;

26 4. engaging in any other activity constituting an infringement of any of the
27 Trademarks or Trade Dress or otherwise unfairly competing with TII and Bell Helicopter;

28 5. destroying, modifying, disposing of, concealing, or moving product or

1 merchandise (including those in electronic formats) that bear any of the Trademarks or
2 incorporate any of the Trade Dress or that infringe any of the Trademarks or Trade Dress, and any
3 documents (including those in electronic formats) or other tangible things that discuss, describe,
4 mention or relate to such products or merchandise.

5 **IT IS SO STIPULATED.**

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7 Dated: October 26, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

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KENT B. GOSS
VALERIE M. GOO
CHRISTOPHER J. CHAUDOIR

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Attorneys for Plaintiffs
TEXTRON INNOVATIONS, INC. and
BELL HELICOPTER TEXTRON INC.

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15 Dated: October ____, 2006

ERIC F. HARTMAN LAW OFFICES

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ERIC F. HARTMAN

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Attorneys for Defendant
HELICOPTER WORLD dba CENTURY
HELICOPTER PRODUCTS

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22 **IT IS SO ORDERED.**

23

24 Dated: October ____, 2006

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United States District Judge

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1 merchandise (including those in electronic formats) that bear any of the Trademarks or
2 incorporate any of the Trade Dress or that infringe any of the Trademarks or Trade Dress, and any
3 documents (including those in electronic formats) or other tangible things that discuss, describe,
4 mention or relate to such products or merchandise.

5 **IT IS SO STIPULATED.**

7 Dated: October ____, 2006

ORRICK, HERRINGTON & SUTCLIFFE LLP

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CHRISTOPHER J. CHAUDOIR

Attorneys for Plaintiffs
TEXTRON INNOVATIONS, INC. and
BELL HELICOPTER TEXTRON INC.

15 Dated: October 26, 2006

ERIC F. HARTMAN LAW OFFICES

Eric F. Hartman
ERIC F. HARTMAN

Attorneys for Defendant
HELICOPTER WORLD dba CENTURY
HELICOPTER PRODUCTS

22 **IT IS SO ORDERED.**

24 Dated: October 26, 2006

Marin J. Jenkins
United States District Judge