



1 WHEREAS Plaintiff Adobe Systems Incorporated (“Plaintiff”) filed a Complaint in this  
2 action charging Defendants Reza Davachi, an individual and d/b/a ProjectContactAfrica; Bahareh  
3 Davachi, an individual and d/b/a ProjectContactAfrica; Gayle Barnes, an individual and d/b/a  
4 www.directdeals.com; DirectDeals, LLC; and G.W.J. Sourcenet, Inc. (collectively “Defendants”)  
5 with liability for copyright and trademark infringement;

6 WHEREAS Defendants filed certain Counterclaims against Plaintiff; and

7 WHEREAS the Parties hereto desire and have agreed to settle the controversy between  
8 them.

9 NOW, THEREFORE, Plaintiff and Defendants, by and through their respective counsel of  
10 record, stipulate and agree as follows:

11 1. This Court has jurisdiction over the parties to this action and over the subject matter  
12 hereof pursuant to 17 U.S.C. § 101 *et seq.*, 15 U.S.C. § 1051, *et seq.*, 15 U.S.C. § 1121, and 28  
13 U.S.C. §§ 1331 and 1338.

14 2. Service of process was properly made against Defendants.

15 3. The claims for relief, and each of them, alleged by Plaintiff against Defendants Reza  
16 Davachi, an individual and d/b/a ProjectContactAfrica; Gayle Barnes, an individual and d/b/a  
17 www.directdeals.com; and DirectDeals, LLC, shall be dismissed with prejudice.

18 4. The claims for relief, and each of them, alleged by Plaintiff against Defendants Bahareh  
19 Davachi, an individual and d/b/a ProjectContactAfrica, and G.W.J. Sourcenet, Inc. shall be  
20 dismissed without prejudice.

21 5. The counterclaims for relief, and each of them, alleged by Defendants against Plaintiff  
22 shall be dismissed with prejudice.

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6. No claims remain pending before this Court, and this Action is dismissed in its entirety.

7. Each side shall bear its own fees and costs in relation to this Action.

IT IS SO STIPULATED:

Dated: \_\_\_\_\_

J. Andrew Coombs, A Professional Corp.

By: \_\_\_\_\_

J. Andrew Coombs  
Nicole L. Drey

Attorneys for Plaintiff Adobe Systems Incorporated

Dated: 12-16-11

Lewis & Roca LLP

By:  \_\_\_\_\_

John Krieger  
Attorneys for Defendants Gayle Barnes, an individual  
and d/b/a www.directdeals.com; DirectDeals, LLC;  
and G.W.J. Sourcenet Distribution, Inc.

Dated: \_\_\_\_\_

The Moore Law Team

By: \_\_\_\_\_

Thomas E. Moore III  
Attorneys for Defendants Reza Davachi, an individual  
and d/b/a ProjectContactAfrica, and Bahareh Davachi,  
an individual and d/b/a ProjectContactAfrica

**[PROPOSED] ORDER**

PURSUANT TO REQUEST, IT IS SO ORDERED.

DATED: December 20, 2011



Hon. Samuel Conti  
UNITED STATES DISTRICT JUDGE

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IT IS SO STIPULATED:

Dated: 12/19/11

J. Andrew Coombs, A Professional Corp.

By: Nicole L. Drey  
J. Andrew Coombs  
Nicole L. Drey  
Attorneys for Plaintiff Adobe Systems Incorporated

Dated: \_\_\_\_\_

Lewis & Roca LLP

By: \_\_\_\_\_  
John Krieger

Attorneys for Defendants Gayle Barnes, an individual  
and d/b/a www.directdeals.com; DirectDeals, LLC;  
and G.W.J. Soureenet Distribution, Inc.

Dated: 12/16/11

The Moore Law Team

By: Thomas E. Moore III  
Thomas E. Moore III  
Attorneys for Defendants Reza Davachi, an individual  
and d/b/a ProjectContactAfrica, and Bahareh Davachi,  
an individual and d/b/a ProjectContactAfrica

[PROPOSED] ORDER

PURSUANT TO REQUEST, IT IS SO ORDERED.

DATED: \_\_\_\_\_, 2011

\_\_\_\_\_  
Hon. Samuel Conti  
UNITED STATES DISTRICT JUDGE