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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

ANIMAL LEGAL DEFENSE FUND, a
 nonprofit corporation; PEOPLE FOR
 THE ETHICAL TREATMENT OF
 ANIMALS, INC., a nonprofit
 corporation;

Plaintiffs,

v.

THE GREAT BULL RUN, LLC; LONE
 STAR RODEO, LLC; DOES 1-10;
 Defendants.

Case No. 3:14-cv-01171-MEJ

**STIPULATED CONSENT DECREE
 AND ~~PROPOSED~~ ORDER**

1 **TO THIS HONORABLE COURT, ALL PARTIES HEREIN, AND THEIR**
2 **RESPECTIVE ATTORNEYS OF RECORD:**

3 Plaintiffs Animal Legal Defense Fund (“ALDF”) and People for the Ethical Treatment of
4 Animals, Inc. (“PETA”) and Defendants, The Great Bull Run, LLC (“GBR”) and Lone Star
5 Rodeo, LLC (“Lone Star”), by and through their counsel of record, hereby stipulate that the claims
6 in the present matter are settled in accordance with Fed. R. Civ. Pro. 54 and 58. Parties request that
7 the court enter this Stipulated Consent Decree and Order as follows:

8 Whereas, Plaintiffs filed a complaint against Defendants, alleging causes of action for
9 unfair competition under California’s Unfair Competition Law (“UCL”), Cal. Bus. & Prof. Code
10 §§ 17200-10, related to events called “Great Bull Runs” in which bulls and humans ran on the
11 same track, in a manner that Plaintiffs allege violated Cal. Penal Code §§ 597(b), 597b, and 597m;

12 Whereas, Defendant GBR conducted these events and Defendant Lone Star Rodeo supplied
13 bulls for use in these events;

14 Whereas, the Parties now agree that it is in their best interests to resolve the action without
15 litigation and have negotiated this Stipulated Consent Decree and Order in good faith to avoid
16 expensive and protracted litigation;

17 Whereas, the Defendants deny the allegations of the complaint and do not admit any
18 liability arising out of the occurrences alleged in the complaint;


19 Whereas, the Parties recognize, and the Court by entering this Stipulated Consent Decree
20 and Order finds, that this Stipulated Consent Decree and Order has been negotiated by the parties
21 in good faith and implementation of this Stipulated Consent Decree and Order will avoid
22 expensive and protracted litigation, and that this Stipulated Consent Decree and Order is fair and
23 reasonable.

24 Now, therefore, without adjudication or admission of any issue of fact or law, the Parties,
25 by and through the undersigned, agree and stipulate as follows:

1. Defendant The Great Bull Run, LLC agrees to permanently refrain from conducting within the state of California the Great Bull Run or any other event in which bulls and humans run on the same track;
2. Defendant Lone Star Rodeo, LLC agrees to permanently refrain from supplying bulls for the purpose of using them within the state of California for the Great Bull Run or any other event in which bulls and humans run on the same track;
3. Each party shall bear its own costs and attorneys' fees in this action.
4. This Stipulated Consent Decree and Order constitutes the final, complete, and exclusive agreement and understanding among the Parties regarding the settlement embodied in the Stipulated Consent Decree and Order. The Parties acknowledge there are no representations, agreements, or understandings relating to the settlement other than those expressly contained in this Stipulated Consent Decree and Order.
5. The terms of this Stipulated Consent Decree are and shall be binding upon the present and future owners, officers, directors, employees, agents, representative, successors, and assigns of the Great Bull Run, LLC, and Lone Star Rodeo, LLC.
6. Upon entry of this Stipulated Consent Decree and Order by the Court, this Stipulated Consent Decree and Order shall constitute a final judgment between and among the Parties. The Court enters this judgment as a final judgment under Fed. R. Civ. Proc. 54 and 58. The Court retains jurisdiction only as necessary to enforce the terms of the Stipulated Consent Decree and Order and the parties respectively expressly consent to the jurisdiction of this Court for the enforcement of this Stipulated Consent Decree and Order.

IT IS SO STIPULATED.

DATED: March 9, 2015

By: 
Jenni James
PETA Foundation
Attorney for Plaintiffs

By: _____
Alison Buchanan
Hoge Fenton Jones & Appel
Attorney for Defendants

1. Defendant The Great Bull Run, LLC agrees to permanently refrain from conducting within the state of California the Great Bull Run or any other event in which bulls and humans run on the same track;
2. Defendant Lone Star Rodeo, LLC agrees to permanently refrain from supplying bulls for the purpose of using them within the state of California for the Great Bull Run or any other event in which bulls and humans run on the same track;
3. Each party shall bear its own costs and attorneys' fees in this action.
4. This Stipulated Consent Decree and Order constitutes the final, complete, and exclusive agreement and understanding among the Parties regarding the settlement embodied in the Stipulated Consent Decree and Order. The Parties acknowledge there are no representations, agreements, or understandings relating to the settlement other than those expressly contained in this Stipulated Consent Decree and Order.
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6. Upon entry of this Stipulated Consent Decree and Order by the Court, this Stipulated Consent Decree and Order shall constitute a final judgment between and among the Parties. The Court enters this judgment as a final judgment under Fed. R. Civ. Proc. 54 and 58. The Court retains jurisdiction only as necessary to enforce the terms of the Stipulated Consent Decree and Order and the parties respectively expressly consent to the jurisdiction of this Court for the enforcement of this Stipulated Consent Decree and Order.

IT IS SO STIPULATED.

DATED: March 9, 2015

By: _____
Jenni James
PETA Foundation
Attorney for Plaintiffs

By: Alison Buchanan
Alison Buchanan
Hoge Fenton Jones & Appel
Attorney for Defendants

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Agreed:

DATED: March 5, 2015

By: 
Bradford Scudder on behalf of
Defendant THE GREAT BULL RUN, LLC

DATED: _____, 2015

By: _____
Preston Fowlkes, Jr. on behalf of
Defendant LONE STAR RODEO, LLC

DATED: _____, 2015

By: _____
Matthew Liebman on behalf of
Plaintiff ANIMAL LEGAL DEFENSE FUND

DATED: _____, 2015

By: _____
Jeff Kerr on behalf of
Plaintiff PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

IT IS SO ORDERED.

DATED: March 10, 2015

By: 
Honorable Maria-Elena James

1 Agreed:

2 DATED: _____, 2015

By: _____
Bradford Scudder on behalf of
Defendant THE GREAT BULL RUN, LLC

3
4
5 DATED: 3-2, 2015

By: Preston Fowlkes, Jr.
Preston Fowlkes, Jr. on behalf of
Defendant LONE STAR RODEO, LLC

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7
8 DATED: _____, 2015

By: _____
Matthew Liebman on behalf of
Plaintiff ANIMAL LEGAL DEFENSE FUND

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11 DATED: _____, 2015

By: _____
Jeff Kerr on behalf of
Plaintiff PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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16 IT IS SO ORDERED.

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18 DATED: _____, 2015

By: _____
Honorable Maria-Elena James

1 Agreed:


2 DATED: _____, 2015

By: _____
Bradford Scudder on behalf of
Defendant THE GREAT BULL RUN, LLC

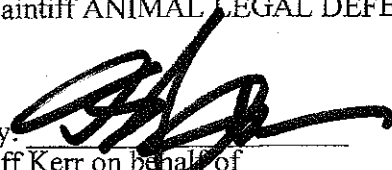
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5 DATED: _____, 2015

By: _____
Preston Fowlkes, Jr. on behalf of
Defendant LONE STAR RODEO, LLC

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8 DATED: March 3, 2015

By: 
Matthew Liebman on behalf of
Plaintiff ANIMAL LEGAL DEFENSE FUND

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11 DATED: MARCH 4, 2015

By: 
Jeff Kerr on behalf of
Plaintiff PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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16 IT IS SO ORDERED.

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18 DATED: _____, 2015

By: _____
Honorable Maria-Elena James