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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ADOBE SYSTEMS INCORPORATED, a
Delaware Corporation,

Plaintiff,

v.

BUY MAC NOW LLC, a California Limited
Liability Company; JUDY ANN
BAHAEDDIN, an Individual; OMAR
BAHAEDDIN, an Individual also known as
OMAR EDDIN; and DOES 1-10, Inclusive,

Defendants.

Case No.: 3:15-cv-02367-MMC

**[PROPOSED]
PERMANENT INJUNCTION AGAINST
DEFENDANTS BUY MAC NOW LLC
AND OMAR BAHAEDDIN AND
DISMISAL OF ENTIRE ACTION**

Honorable Maxine M. Chesney

The Court, pursuant to the Stipulation for Entry of Permanent Injunction and Dismissal of Entire Action by and between Plaintiff Adobe Systems Incorporated ("Plaintiff"), and Defendants Buy Mac Now LLC and Omar Bahaeddin (collectively, "Defendants"), on the other hand, hereby ORDERS, ADJUDICATES and DECREES that a permanent injunction shall be and hereby is entered against Defendants as follows:

1. **PERMANENT INJUNCTION.** Defendants and any person or entity acting in concert with, or at their direction, including any and all agents, servants, employees, partners,

1 assignees, distributors, suppliers, resellers and any others over which they may exercise control,
2 are hereby restrained and enjoined, pursuant to 15 United States Code (“U.S.C.”) §1116 and 17
3 U.S.C. §502, from engaging in, directly or indirectly, or authorizing or assisting any third party
4 to engage in, any of the following activities in the United States and throughout the world:

5 a. importing, exporting, purchasing, marketing, copying, installing, loading,
6 offering for sale, selling, distributing or dealing in any ADOBE® software programs or
7 computers containing ADOBE® software programs bearing and/or comprised of Plaintiff’s
8 ADOBE®, PHOTOSHOP®, and/or CREATIVE SUITE® trademarks or Plaintiff’s copyrights
9 in relation thereto (collectively, “Plaintiff’s Trademarks and Copyrights”);

10 b. using Plaintiff’s Trademarks and Copyrights, in commerce, and/or any
11 other intellectual property that is confusingly or substantially similar to, or that constitutes a
12 colorable imitation of, any of Plaintiff’s Trademarks and Copyrights, whether such use is as, on,
13 in or in connection with any trademark, service mark, trade name, logo, design, Internet use,
14 website, domain name, metatags, advertising, promotions, solicitations, commercial
15 exploitation, television, web-based or any other program, or any product or service, or
16 otherwise;

17 c. copying or downloading, other than for personal use of a validly licensed
18 and registered software, any ADOBE® software programs bearing and/or comprised of
19 Plaintiff’s Trademarks and Copyrights, including but not limited to the ADOBE®,
20 PHOTOSHOP®, and CREATIVE SUITE® marks and works;

21 d. performing or allowing others employed by or representing them, or
22 under their control, to perform any act or thing which is likely to injure Plaintiff, any of
23 Plaintiff’s Trademarks and Copyrights, and/or Plaintiff’s business reputation or goodwill,
24 including making disparaging, negative, or critical comments regarding Plaintiff or its products;

25 e. engaging in any acts of federal trademark infringement, false designation
26 of origin, unfair competition, dilution, federal copyright infringement, or other act which would
27 tend damage or injure Plaintiff; and/or

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1 f. using any Internet domain name or website that unlawfully includes any
2 of Plaintiff's Trademarks and Copyrights, including but not limited to the ADOBE®,
3 PHOTOSHOP®, and CREATIVE SUITE® marks and works.

4 2. This Permanent Injunction shall be deemed to have been served upon Defendants
5 at the time of its execution by the Court.


6 3. The Court finds there is no just reason for delay in entering this Permanent
7 Injunction against Defendants, and the Court directs immediate entry of this Permanent
8 Injunction against Defendants.

9 4. **NO APPEALS AND CONTINUING JURISDICTION.** No appeals shall be
10 taken from this Permanent Injunction, and the parties waive all rights to appeal. This Court
11 expressly retains jurisdiction over this matter to enforce any violation of the terms of this
12 Permanent Injunction by Defendants.

13 5. **NO FEES AND COSTS.** Each party shall bear its/his own attorneys' fees and
14 costs incurred in this matter.

15 6. **DISMISSAL OF ENTIRE ACTION.** Upon entry of this Permanent Injunction
16 against Defendants, the case shall be dismissed in its entirety.

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18 IT IS SO ORDERED, ADJUDICATED and DECREED this 2nd day of
19 December, 2015.

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22 HON. MAXINE M. CHESNEY
23 United States Senior District Judge
24 Northern District of California
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