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20 **BILL GRAHAM ARCHIVES LLC**  
21 **D/B/A WOLFGANG’S VAULT**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

22 **BILL GRAHAM ARCHIVES LLC, d/b/a** ) **Case No. 11-cv-4916 SBA**  
23 **WOLFGANG’S VAULT** )  
24 )  
25 Plaintiff, ) **JOINT STIPULATION AND ORDER**  
26 )  
27 v. )  
28 )  
29 **MARWAN ZEIDAN d/b/a THE POSTER** )  
30 **SHOP CAFÉ; HAIGHT ASHBURY** )  
31 **POSTERS, INC., a California Corporation;** )  
32 **AFTERTHOUGHT ENTERPRISES; and** )  
33 **DOES 1-25.** )  
34 )  
35 Defendants. )

36 WHEREAS, Counsel for Bill Graham Archives LLC (“BGA”), on the one hand, and  
37 Marwan Zeidan (“Zeidan”) and Haight Ashbury Posters, Inc. (“HAP”) (both collectively the “U.S.  
38 Defendants”), on the other hand, have conferred regarding preliminary relief in this matter;

1 WHEREAS, BGA has filed this lawsuit to enforce its copyrights in concert posters (“BGA  
2 concert posters”), including but not limited to those identified in Exhibit B to the Declaration of  
3 Katherine York in support of Plaintiff’s Motion for TRO, Docket No. 7, filed in support of BGA’s *ex*  
4 *parte* Motion for Temporary Restraining Order and Order to Show Cause Why a Preliminary  
5 Injunction Should Not Issue, Docket No. 4 (“Motion for TRO”);

6 WHEREAS, the U.S. Defendants represent that they purchased certain posters for display  
7 and sale without knowledge of the unauthorized reproduction that BGA claims violates its  
8 copyrights;

9 **NOW THEREFORE**, BGA and the U.S. Defendants hereby stipulate as follows pending  
10 resolution of this litigation:

11 Immediately upon execution of this stipulation, and until this litigation is resolved, the U.S.  
12 Defendants shall cease buying, selling, displaying or otherwise distributing any unauthorized  
13 reproductions of the posters that BGA identifies for the U.S. Defendants;

14 Within five business days of execution of this stipulation--or, promptly upon discovering any  
15 such document in the future--the U.S. Defendants shall provide BGA’s counsel with a copy of any  
16 catalogue that lists, displays, or offers for sale unauthorized reproductions of BGA concert posters  
17 (including without limitation those identified by BGA) on any products, including without limitation  
18 posters or stickers, to the extent the U.S. Defendants have not done so already;

19 Within five business days of execution of this stipulation, the U.S. Defendants shall permit a  
20 BGA representative to view its entire inventory (including without limitation posters, stickers, and  
21 t-shirts) at U.S. Defendants business operations, including: Haight Ashbury Posters at 1448 Haight  
22 Street, San Francisco, CA, and The Poster Shop Café at 1821 Haight Street, San Francisco, CA, and  
23 any other location where the U.S. Defendants store inventory. This inspection shall begin at  
24 8:00 a.m. on a mutually convenient date within the specified time frame, and shall last no longer  
25 than one hour. In the unlikely event that more than one hour is required to complete this procedure,  
26 the inspection shall resume immediately following the respective business’s hours of operations.  
27 During this inspection, the BGA representative may make an inventory of unauthorized  
28 reproductions of BGA concert posters in the possession of the U.S. Defendants, if any;





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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 11/28/11

  
\_\_\_\_\_  
The Honorable Sandra Brown Armstrong  
United States District Court Judge