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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CHANEL INC.,

Plaintiff,

v.

ZHANG YANG, et al.,

Defendants.

No. C 12-4428 PJH

**JUDGMENT AND PERMANENT  
INJUNCTION**

The court having granted plaintiff's Motion for Default Judgment,  
it is Ordered and Adjudged

that judgment be entered in the sum of \$105,350 in favor of plaintiff and against  
defendant, together with post-judgment interest, and that the action be dismissed.

Additionally, the court enters the following permanent injunction against defendant:

Defendant and his officers, agents, servants, employees and attorneys, and all persons  
acting in concert and participation with Defendant are hereby permanently restrained and  
enjoined from:

- a. manufacturing or causing to be manufactured, importing, advertising, or  
promoting, distributing, selling or offering to sell counterfeit and infringing goods  
using Plaintiff's trademarks identified in Paragraph 13 of the Complaint ("the  
Plaintiff's Marks");
- b. using the Plaintiff's Marks in connection with the sale of any unauthorized goods;
- c. using any logo, and/or layout which may be calculated to falsely advertise the  
services or products of Defendant offered for sale or sold via the domain names  
identified in Appendix A hereto (collectively the "Subject Domain Names") and/or any

1 other website or business, as being sponsored by, authorized by, endorsed by, or in  
2 any way associated with Plaintiff;

3 d. falsely representing themselves as being connected with Plaintiff, through  
4 sponsorship or association;

5 e. engaging in any act which is likely to falsely cause members of the trade and/or of  
6 the purchasing public to believe any goods or services of Defendant offered for sale  
7 or sold via the Subject Domain Names and/or any other website or business are in  
8 any way endorsed by, approved by, and/or associated with Plaintiff;

9 f. using any reproduction, counterfeit, copy, or colorable imitation of the Plaintiff's  
10 Marks in connection with the publicity, promotion, sale, or advertising of any goods  
11 sold by Defendant via the Subject Domain Names and/or any other website or  
12 business, including, without limitation, handbags, wallets, shoes, boots, cosmetics,  
13 sunglasses, clothing, watches, or costume jewelry, including necklaces, bracelets,  
14 earrings, brooches, and rings;

15 g. affixing, applying, annexing or using in connection with the sale of any goods, a  
16 false description or representation, including words or other symbols tending to  
17 falsely describe or represent goods offered for sale or sold by Defendant via the  
18 Subject Domain Names and/or any other website or business, as being those of  
19 Plaintiff or in any way endorsed by Plaintiff;

20 h. otherwise unfairly competing with Plaintiff;

21 i. effecting assignments or transfers, forming new entities or associations or utilizing  
22 any other device for the purpose of circumventing or otherwise avoiding the  
23 prohibitions set forth above; and

24 j. using the Plaintiff's Marks, or any confusingly similar trademarks, within domain  
25 name extensions, metatags or other markers within website source code, from use  
26 on any webpage (including as the title of any web page), any advertising links to  
27 other websites, from search engines' databases or cache memory, and any other  
28 form of use of such terms which is visible to a computer user or serves to direct

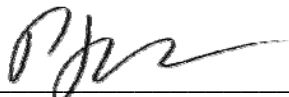
1 computer searches to websites registered by, owned, or operated by Defendant,  
2 including the Internet websites operating under all of the Subject Domain Names.

3 The court also orders the following equitable relief:

- 4 a. In order to give practical effect to the Permanent Injunction, the Subject Domain  
5 Names are hereby ordered to be immediately transferred by Defendant, his  
6 assignees and/or successors in interest or title, and the Registrars to Plaintiff's  
7 control. To the extent the current Registrars do not facilitate the transfer of the  
8 domain names to Plaintiff's control within five (5) days of receipt of this judgment,  
9 the Registries shall, within thirty (30) days, change the Registrar of Record for the  
10 Subject Domain Names to a Registrar of Plaintiff's choosing, and that Registrar shall  
11 transfer the Subject Domain Names to Plaintiff;
- 12 b. Upon Plaintiff's request, the top level domain (TLD) Registry for each of the  
13 Subject Domain Names, within thirty (30) days of receipt of this Order, shall place  
14 the Subject Domain Names on Registry Hold status for the life of the current  
15 registration, thus removing them from the TLD zone files maintained by the Registry  
16 which link the Subject Domain Names to the IP addresses where the associated  
17 websites are hosted; and
- 18 c. Upon Plaintiff's request, the Internet Corporation for Assigned Names and  
19 Numbers ("ICANN") shall take all actions necessary to ensure that the top level  
20 domain Registry responsible for the Subject Domain Names transfers and/or  
21 disables the Subject Domain Names.

22 **IT IS SO ORDERED.**

23 Dated: October 21, 2013

  
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PHYLLIS J. HAMILTON  
United States District Judge

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