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 8 INGRID & ISABEL, LLC

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA

12 INGRID & ISABEL, LLC,

13 Plaintiff,

14 v.

15 BENTIBO, a business organization form,  
 16 unknown, and JINLIANG QIAN, an  
 17 individual,

18 Defendants.

Case No. 18-cv-01856-HSG

**~~PROPOSED~~ ORDER FOR PERMANENT  
 INJUNCTION AGAINST DEFENDANTS  
 BENTIBO AND JINLIANG QIAN**

**DATE: MAY 17, 2019**  
**TIME: 9:30 AM**  
**JUDGE: HON. JOSEPH C. SPERO**  
**COURTROOM: G**

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 21 The Court, having considered Plaintiff Ingrid & Isabel, LLC’s (“Ingrid & Isabel”) Motion  
 22 for Default Judgment and a Permanent Injunction Against Defendants Bentibo and Jinliang Qian  
 23 (“Defendants”), Memorandum of Points and Authorities, in Support of its Motion for Default  
 24 Judgment, the Declaration of Ilene H. Goldberg, the default entered by the clerk on file herein, the  
 25 Complaint, and all of the other relevant papers and pleadings on file with the Court in this matter,  
 26 now enters its permanent injunction as follows:

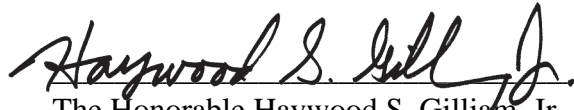
27 Defendants Bentibo and Jinliang Qian, their directors, principals, officers, attorneys, agents,  
 28 servants, managers, employees, dba’s, affiliates, representatives, successors, and assigns, and all

1 those acting in concert or participation with them shall be, and hereby are, PERMANENTLY  
2 ENJOINED and RESTRAINED from directly or indirectly:

- 3 a. Making, using, offering for sale, advertising and/or selling any product that  
4 infringes—either directly and/or indirectly—the Patents-in-Suit and/or the  
5 BELLABAND Trademark;
- 6 b. Using any statements and images on any website, including but not limited to  
7 the Amazon.com website, and any advertising, packaging, and any marketing  
8 materials that describe, explain, show, demonstrate, or illustrate the function  
9 of any product in a manner that suggests, induces, infers, or indicates use or  
10 methods of use that constitutes an infringement of the Patents-in-Suit,  
11 including but not limited to statements and/or words such as “cover”, “hide”,  
12 “hold-up”, “cover your unbuttoned pants”, “hide unbuttoned pants and  
13 skirts”, “holds up maternity jeans and pants that are too loose”, “hold up your  
14 pants with a maternity band”, and similar language;
- 15 c. Using the BELLABAND Trademark, or any confusingly similar name or  
16 trademark, in connection with advertising, promoting, selling or distributing  
17 maternity band or belly band products;
- 18 d. Purchasing, registering or using BELLABAND or BELLABAND as a user  
19 name, domain name, keyword or online advertising trigger;
- 20 e. Any online advertising or keyword advertising for maternity bands or belly  
21 bands without the term BELLABAND and BELLABAND as a “negative  
22 match” keyword;
- 23 f. Promoting Defendants’ website or products by using BELLABAND or  
24 similar terms in the source code or its online advertising, or in meta tags, or  
25 in any way to trigger the retrieval or online search ranking of its website;
- 26 g. Assisting, aiding, or abetting any other person or business entity in engaging  
27 in or performing any of the activities referred to in paragraphs (a)-(f) above.  
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**IT IS SO ORDERED:**

DATED: 6/18/2019

  
The Honorable Haywood S. Gilliam, Jr.  
United States District Court Judge

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