

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

LOUIS VUITTON MALLETIER, S.A.,

Plaintiff,

vs.

AKANOC SOLUTIONS, INC., et al.,

Defendants.

) Case No.: C 07-3952 JW (HRL)

)

)

) **VERDICT FORM ON CONTRIBUTORY  
TRADEMARK INFRINGEMENT  
CLAIM REGARDING:**

)

) **RRGNL.COM**

)

)

)

)

)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1. Has **RRGNL.com** used a trademark of Louis Vuitton Malletier in commerce in the United States in connection with the sale or advertising of goods?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please sign and date form.

2. If yes, was RRGNL.com’s use of a Louis Vuitton Malletier trademark likely to confuse an appreciable number of reasonably prudent buyers exercising ordinary care, as to the source of the product?

Yes \_\_\_\_\_ No \_\_\_\_\_

If no, please sign and date form.

3. If yes, which trademark(s) were directly infringed by RRGNL.com?

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) in a Circle Design – Class 18

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) and Monogram Canvas Design – Class 18

\_\_\_\_\_ LOUIS VUITTON – Class 18

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) Design – Class 18

\_\_\_\_\_ LOUIS VUITTON MALLETIER A PARIS in Rectangle – Class 16, 18

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) in Epi Leather Design – Class 18

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) and Monogram Canvas Pattern Design – Class 25

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) Design – Class 16, 25

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) and Monogram Canvas Design – Class 16

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) – Class 14, 24

\_\_\_\_\_ LOUIS VUITTON World Mark – Class 16, 18, 24, 25

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) Design – Class 34

\_\_\_\_\_ LOUIS VUITTON – Class 34

\_\_\_\_\_ Louis Vuitton (Interlocked Letters) Design – Class 25

\_\_\_\_\_ LOUIS VUITTON PARIS and Damier (pattern design) – Class 18

4. If yes, how was/were the trademark(s) directly infringed by RRGNL.com?

\_\_\_\_\_  
\_\_\_\_\_

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

5. Did Louis Vuitton establish that the person(s) who operate RRGNL.com are United States citizens?

Yes \_\_\_\_\_ No \_\_\_\_\_

6. Did Louis Vuitton establish that the direct infringement of Louis Vuitton Malletier's trademark(s) by RRGNL.com have a substantial effect on United States commerce?

Yes \_\_\_\_\_ No \_\_\_\_\_

7. Did each defendant individually intentionally persuade or influence RRGNL.com to infringe Louis Vuitton Malletier's trademark(s)?

As to Managed Solutions Group, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Akanoc Solutions, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Steve Chen: Yes \_\_\_\_\_ No \_\_\_\_\_

8. Did each defendant individually directly control RRGNL.com's direct infringement of Louis Vuitton Malletier's trademark(s)?

As to Managed Solutions Group, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Akanoc Solutions, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Steve Chen: Yes \_\_\_\_\_ No \_\_\_\_\_

9. Did each defendant individually monitor the infringement of Louis Vuitton Malletier's trademark(s) on RRGNL.com's website?

As to Managed Solutions Group, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Akanoc Solutions, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_

As to Steve Chen: Yes \_\_\_\_\_ No \_\_\_\_\_

10. If yes to 7, 8 or 9, for each trademark RRGNL.com directly infringed, list each such trademark, if any, that each defendant contributorily infringed? If none, please so indicate.

Managed Solutions Group, Inc. \_\_\_\_\_

\_\_\_\_\_

Akanoc Solutions, Inc. \_\_\_\_\_

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

\_\_\_\_\_  
Steve Chen \_\_\_\_\_

11. Could RRGNL.com directly infringe Louis Vuitton Malletier’s trademark(s) without using the Internet Service Provider defendants’ Internet hosting services?

Yes \_\_\_\_\_ No \_\_\_\_\_

12. Did each defendant who received notice regarding RRGNL.com take reasonable actions after it received notice from Louis Vuitton Malletier of alleged trademark infringement?

As to Managed Solutions Group, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_  
As to Akanoc Solutions, Inc.: Yes \_\_\_\_\_ No \_\_\_\_\_  
As to Steve Chen: Yes \_\_\_\_\_ No \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Jury Foreperson