

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
Judge Robert E. Blackburn**

Civil Action No. 14-cv-00323-REB-KLM

COMPLIANCE SOLUTIONS OCCUPATIONAL TRAINERS, INC., a Colorado corporation,

Plaintiff,

v.

SAFETY HELPERS, LLC, DELINQUENT APRIL 1, 2012, a Colorado limited liability company, and
KYLE KNEBEL, an individual,

Defendants.

FINAL JUDGMENT AND ORDER OF STIPULATED PERMANENT INJUNCTION

Blackburn, J.

The matter is before the court on the parties' **Joint Motion For Entry of Final Judgment and Order of Stipulated Permanent Injunction** [#44],¹ filed October 8, 2014. By this motion, the parties represent that they have settled this case and agreed to the entry of a permanent injunction on the terms specified herein. I grant the motion, enter the parties' stipulated injunction, and order the entry of judgment accordingly.

THEREFORE, IT IS ORDERED as follows:

1. That the parties' **Joint Motion For Entry of Final Judgment and Order of Stipulated Permanent Injunction** [#44], filed October 8, 2014, is **GRANTED**;

¹ [#44]" is an example of the convention I use to identify the docket number assigned to a specific paper by the court's case management and electronic case filing system (CM/ECF). I use this convention throughout this order.

2. That defendants Safety Helpers, LLC, a Colorado limited liability company, and Kyle Knebel, an individual, and their representatives, agents, servants, employees, attorneys, or anyone acting in active concert or participation with them, are permanently **ENJOINED**, directly or indirectly, as follows:

a. That defendants will not imitate, copy, or make any use of plaintiff's trade name ("Compliance Solutions") or plaintiff's registered trademark ("Compliance Solutions 'Today's Training... Tomorrow's Solution'") or any confusingly similar trade name or trade mark, including, but not limited to: operating websites with domain names containing the words "Compliance Solutions" together; and maintaining online social media, business, or networking accounts or websites under a name containing the words "Compliance Solutions" together, including, but not limited to, blogs, LinkedIn, Facebook, Twitter, Google Plus, Blogger.com, Manta, Chirppy, You Tube, and Zvents; and

b. That defendants will recall and destroy all marketing, advertising, and promotional materials, online or in print, in the marketplace or in defendants' possession, custody, or control, that use the words "Compliance Solutions" together as part of a trade name or trademark or as part of a domain name or networking account or web site;

3. That defendants are expressly **PERMITTED** to continue to use "Compliance Solvers by Safety Helpers LLC," the domain name www.compliancesolvers.com, and related social media outlets that utilize only the designation "compliance solvers";

provided, however, that in all other instances, defendants shall use the words “compliance solvers” together only in conjunction with the phrase “by Safety Helpers LLC”;

4. That all claims and counterclaims which were or could have been asserted by the parties herein are **DISMISSED**;

5. That each party **SHALL BEAR** its own costs and attorney fees in connection with this action; and

6. That this court **SHALL RETAIN** jurisdiction of this matter as may be necessary or appropriate for the construction or the implementation of this Judgment, for the modification of any of the injunctive provisions hereof, for enforcement of compliance herewith, and for the punishment of violations hereof; and

7. That judgment **SHALL ENTER** on the terms of this order.

Dated October 9, 2014, at Denver, Colorado.

BY THE COURT:



Robert E. Blackburn
United States District Judge