

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

OBAMA FOR AMERICA

Plaintiff,

v.

DEMSTORE.COM and WASHINGTON  
PROMOTIONS & PRINTING, INC.,

Defendants.

Civil Action No. 1:12-cv-00889 EGS

Jury Trial Demanded

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**[PROPOSED] ORDER ON PLAINTIFF'S APPLICATION FOR A PRELIMINARY  
INJUNCTION**

This matter has come before the Court on Plaintiff Obama for America's ("OFA") application for a preliminary injunction. Having carefully considered the papers and argument before it, the Court hereby GRANTS the application and enters a preliminary injunction enjoining Defendants, and any employees, agents, servants, officers, representatives, directors, attorneys, successors, affiliates, assigns, and entities owned or controlled by Defendants, and all those in active concert or participation with Defendants, and each of them who receives notice directly or otherwise of such injunction from:

1. using the Rising Sun and 2012 Rising Sun Trademark, or any other trademarks that are confusingly similar to the Rising Sun Trademarks, for retail products, or making any other unlawful use of the Rising Sun Trademarks or any other trademarks owned by OFA;
2. using any false designation of origin or false description, or performing any act which is likely to lead members of the trade or public to believe that any product manufactured, imported, distributed, offered for sale, or sold by Defendants is in any

manner associated or connected with OFA, or is licensed, sponsored, approved, or authorized by OFA;

3. engaging in any other activity constituting unfair competition with OFA, or constituting infringement of the Rising Sun Trademarks;

4. taking any action, including the unauthorized use of the Rising Sun Trademarks, that dilutes the unique association between the Rising Sun Trademarks and OFA, or that tarnishes the reputation or image of OFA;

5. disposing of, destroying, altering, moving, removing, concealing, tampering with, or in any manner secreting any business records (including computer records) of any kind, including invoices, correspondence, books of account, receipts or other documentation relating or referring in any manner to any retail services offered in connection with the Rising Sun Trademarks, or any mark or designation that is confusingly similar to any of the Rising Sun Trademarks; and

6. instructing, assisting, aiding or abetting any other person or entity in engaging in or performing any of the activities referred to in subparagraphs (1) through (5) above.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

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Emmet G. Sullivan  
United States District Judge