

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

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<b>DELTA SIGMA THETA SORORITY, INC.</b>	)	
1707 New Hampshire Avenue, NW	)	
Washington, DC 20009	)	
	)	Case No. _____
<i>Plaintiff,</i>	)	
	)	
<b>v.</b>	)	
	)	
<b>LETISHA D. BIVINS,</b>	)	
1260 Oxford Lane	)	
Naples, FL 34105	)	
	)	
<b>ALPHONSO D. GOINS</b>	)	
1260 Oxford Lane	)	
Naples, FL 34105	)	
	)	
<b>FRATHOUSE CLOTHING, LLC</b>	)	
1260 Oxford Lane	)	
Naples, FL 34105	)	
	)	
<i>Defendants.</i>	)	
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**PLAINTIFF’S APPLICATION FOR A PRELIMINARY INJUNCTION**

Plaintiff, Delta Sigma Theta Sorority, Inc. (“Delta”), by counsel, and pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, respectfully moves for entry of a preliminary injunction to enjoin defendants Letisha D. Bivins, Alphonso D. Goins, and Frathouse Clothing, LLC. (“Defendants”) from infringing on Delta’s trademarks and engaging in activities designed to damage its reputation and goodwill. The grounds for this Application are set forth in the accompanying memorandum of points and authorities (“Memorandum”).

Plaintiff respectfully requests that the Court, pursuant to Local Rule 65.1(d), schedule a hearing within 21 days of the filing of this Application. As set forth more fully in the Memorandum, an expedited hearing on this Application is essential in order to avoid imminent irreparable injury to Delta resulting from Defendant's actions.

WHEREFORE, Delta respectfully requests that the Court enter an order enjoining Defendants, their agents, servants, employees, attorneys and all others in active concert or participation with any of them, during the pendency of this action, from:

1. Manufacturing, transporting, promoting, advertising, publicizing, distributing, offering for sale or selling any goods bearing any trade name, registered or common law trademark or service mark that is owned by or that is confusingly similar to Delta's marks;

2. Falsely implying Delta's endorsement of Defendants' goods or engaging in any act or series of acts which, either alone or in combination, constitutes unfair methods of competition with Delta and from otherwise interfering with or injuring Delta's marks or the goodwill associated therewith;

3. Engaging in any act which is likely to dilute the distinctive quality of Delta's marks and/or injures Delta's reputation;

4. Representing or implying that Defendants are in any way sponsored by, affiliated with, endorsed, or licensed by Delta; and

5. Assisting, inducing, aiding, or abetting any other person or business entity from engaging in or performing any of the above-enumerated activities.

Respectfully Submitted,

/s/ Devarieste Curry

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Dated: February 26, 2013