

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LUCIFER LIGHTING COMPANY, a	)	
Texas corporation,	)	
	)	Civil Action No. 07 CV 4327
Plaintiff,	)	
v.	)	
	)	Judge Bucklo
LUZIFERLAMPS SL,	)	Magistrate Judge Schenkier
a foreign corporation,	)	
	)	
and	)	
	)	
EUROPEAN LIGHTHOUSE CORP.,	)	
a Florida corporation,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF FINAL JUDGMENT AND INJUNCTION**

Now comes Plaintiff, Lucifer Lighting Company, by its counsel, and moves this Court enter a Final Judgment and Injunction in the above captioned case. A proposed Final Judgment and Injunction is submitted for the Court’s convenience.

Plaintiff Lucifer Lighting Company (hereinafter “LUCIFER” or “Plaintiff”) sued Defendant LuziferLamps SL (hereinafter “LUZIFER” or “Defendant”), a corporation existing under the law of Spain with its principal place of business located at 41 Calle Pio Xi, Valencia 46017, Spain and Defendant European Lighthouse Corporation (hereinafter “EUROPEAN LIGHTHOUSE” or “Defendant”) a Florida corporation having its principal place of business at 2213 Cypress Island Drive, No. 505, Pompano Beach, Florida 38069. LUZIFER and EUROPEAN LIGHTHOUSE were represented by Counsel, (03/27/2008, Docket Entry 14, Report of Rule 26(f) Planning Meeting) who

never filed an Appearance (03/28/2008 Docket Entry 15, Minute Order). Notice that default would be entered was ordered 09/26/2008, (Docket Entry 19, Minute Order) and default entered 10/10/2008 (Docket entry 20, Minute Order). Consistent with the Scheduling Order, LUCIFER sought discovery of information regarding US sales by Defendants – EUROPEAN LIGHTHOUSE, being believed to be LUCIFER'S distributor. No information was forthcoming, and thus, LUCIFER must rely on Statutory Damages. In the event facts become known regarding these assumptions, or should another measure become available for showing damages to Plaintiff, then LUCIFER will seek to bring those facts to the Court's attention for further potential supplemental relief.

Despite ongoing discussions with Defendant LUCIFER'S European counsel, before and after filing suit, and separately, with counsel for EUROPEAN LIGHTHOUSE and after being advised that EUROPEAN LIGHTHOUSE was no longer represented by counsel, directly with EUROPEAN LIGHTHOUSE, lead counsel for LUCIFER has been unable to resolve the dispute. Accordingly, LUCIFER moves this Court enter Judgment in favor of LUCIFER, on all counts, award Statutory Damages under the Anticybersquatting provisions of the Lanham Act, award Attorney's fees under Federal and state law, and award costs.

LUCIFER suggests that, should the Court desire, it would submit for inspection *in camera* documents showing that LUCIFER's own sales over a time believed to encompass the infringing acts, far exceed the award of Statutory Damages – and therefore the amount of Statutory damages comprise only a fraction of plaintiff, LUCIFER's sales. LUCIFER also requests attorneys fees and would submit for review *in camera*, statements reflecting attorneys fees that agree with the amount requested.

A copy of this Motion and the Proposed Final Judgment and Injunction are being served on Defendant Luzifer and Defendant European Lighthouse at several addresses indicated by research:

(1) European Lighthouse Corp., 2213 Cypress Island Drive, Suite 505, Pompano Beach, FL 33069; 786-282-5720 (Complaint, Internet search and 2007 Annual Report);

(2) Luziferlamps SL d/b/a/ Luzifer Spain, Avenida Reino de Valencia 14, 46370 Chiva., Valencia, Spain, T. +34 96 252 47 80, Fx. +34 96 252 47 95, [info@lzf-lamps.com](mailto:info@lzf-lamps.com) (Internet search);

(3) Craig Sackler, Esq., PO Box 1656, Deerfield Beach, FL, 33443-1656 (Rule 26 (f) report; Martindale-Hubbell).

The undersigned asks Leave to file an Appearance.

Accordingly, LUCIFER moves this Court enter Final Judgment and an Injunction

Dated: July 6, 2009

/s/ David C. Brezina  
David C. Brezina  
Burton S. Ehrlich  
Zareefa Burki Flener

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(312) 427-1300

## CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2009, I served the foregoing **Motion and Proposed Final Judgment** on the following named persons by courier service, facsimile and e-mail transmission, where indicated:

- (1) **European Lighthouse Corp.  
2213 Cypress Island Drive  
Suite 505,  
Pompano Beach, FL 33069  
786-282-5720**
  
- (2) **Luziferlamps SL d/b/a  
Luzifer Spain,  
Avenida Reino de Valencia 14,  
46370 Chiva.,  
Valencia, Spain,**  
  
**Fax +34 96 252 47 95  
[info@lzf-lamps.com](mailto:info@lzf-lamps.com)**
  
- (3) **Craig Sackler, Esq.,  
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