

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

| | | |
|--------------------------|---|-----------------------------|
| GLJ, LLC d/b/a O2-COOL, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 08 CV 4412 |
| |) | |
| v. |) | Judge Kennelly |
| |) | Magistrate Judge Cox |
| MANY MINI TOYS, |) | |
| RHODE ISLAND NOVELTY and |) | |
| BULLET LINE INC., |) | |
| |) | |
| Defendants. |) | |

AGREED MOTION FOR
ENTRY OF CONSENT JUDGMENT

NOW COME plaintiff, GLJ, LLC d/b/a O2-Cool ("O2-Cool"), and defendant, Many Mini Toys ("MMT"), by and through their counsel, and respectfully move this Court to enter the Consent Judgment, a copy of which is attached hereto as Exhibit A.

O2-Cool and MMT have agreed to resolve their differences by way of a consent judgment. MMT has agreed to cease all sales of products that O2-Cool contends infringe the claims of U.S. Patent Nos. 5,338,495 and 5,843,344 and has agreed to the entry of a consent judgment acknowledging that U.S. Patent Nos. 5,338,495 and 5,843,344 are valid. In addition, the consent judgment provides for

entry of an injunction against future acts of infringement by MMT of U.S. Patent Nos. 5,338,495 and 5,843,344 (Exhibit A).

WHEREFORE, in view of the foregoing, O2-Cool and MMT request entry of the attached Consent Judgment.

Respectfully submitted,

/s/ Kathleen A. Lyons

KEITH V. ROCKEY (ID #02360624)

KATHLEEN A. LYONS (ID #06186939)

Rockey, Depke & Lyons, LLC

Sears Tower, Suite 5450

233 South Wacker Drive

Chicago, Illinois 60606

Telephone: (312) 277-2006

Facsimile: (312) 441-0570

Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT were served on counsel for defendants in the manner indicated below, this 24th day of February, 2009:

Via CF/ECM

Joseph N. Hosteny III
Niro, Scavone, Haller & Niro, Ltd.
181 West Madison Street, Suite 4600
Chicago, Illinois 60602-4515
jhosteny@hosteny.com

Via CF/ECM

Benjamin M. Hanrahan
Malloy & Malloy, P.A.
2800 S.W. Third Avenue
Miami, Florida 33129
bhanrahan@malloylaw.com

Via E-Mail

Adam L. Brookman, Esq.
Boyle Fredrickson SC
840 North Plankinton Avenue
Milwaukee, Wisconsin 53203
abrookman@boylefred.com
mtg@boylefred.com

Via CF/ECM

Kevin J. McDevitt, Esq.
Lisa A. Iverson, Esq.
Neal & McDevitt, LLC
1776 Ash Street
Northfield, Illinois 60093
kmcdevitt@nealmcdevitt.com
lisa.iverson@nealmcdevitt.com

Via E-Mail

Many Mini Toys
c/o Andrew P. Cooper, Esq.
Hession Bekoff & Cooper, LLP
1103 Stewart Avenue, Suite 200
Gargen City, New York 11530
acooper@hbclaw.net

/s/ Kathleen A. Lyons
One of Plaintiff's Attorneys