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11	UNITED STATES DISTRICT COURT				
12	DISTRICT OF NEVADA				
13	SOUTHERN DIVISION				
14	RUSSELL ROAD FOOD AND	Case No. 2:13-cv-00776-RFB-NJK			
15	BEVERAGE, LLC,	STIPULATED PERMANENT INJUNCTION			
16	Plaintiff,	AND [PROPOSED] ORDER BETWEEN PLAINTIFF RUSSELL ROAD FOOD AND			
17	VS.	BEVERAGE, LLC AND ALL DEFENDANTS			
17 18	vs. MIKE GALAM, et al. Defendants.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
	MIKE GALAM, et al.	BEVERAGE, LLC AND ALL DEFENDANTS			
18	MIKE GALAM, et al. Defendants.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19	MIKE GALAM, et al. Defendants. MIKE GALAM, et al.,	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20 21	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND BEVERAGE, LLC, et al.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20 21 22	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20 21 22 23	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND BEVERAGE, LLC, et al.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20 21 22 23 24	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND BEVERAGE, LLC, et al.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
18 19 20 21 22 23 24 25	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND BEVERAGE, LLC, et al.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			
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18 19 20 21 22 23 24 25 26 27	MIKE GALAM, et al. Defendants. MIKE GALAM, et al., Counterclaimants, vs. RUSSELL ROAD FOOD AND BEVERAGE, LLC, et al.	BEVERAGE, LLC AND ALL DEFENDANTS Case Filed: May 2, 2013			

Pursuant to Local Rule 6-2 of the District of Nevada's Local Rules of Practice,
Plaintiff Russell Road Food and Beverage, LLC ("Russell Road") and Defendants Mike
Galam, Victor Galam, Jacqueline Galam Barnes, Crazy Horse Too Gentlemen's Club
LLC, Rhino Bare Projects LLC, Rhino Bare Projects 4824 LLC, Canico Capital Group,
LLC, Industrial Road 2440-2497, LLC, Abraham Assil, George Eshaghian, West Best
Capital Group, LLC, SN & GE, LLC, Soleiman Nazarian, Djavid Hakakian, Morris
Nejathaim, Hamed Yazdanpanah, Isaac Javdanfar, Kamran Samooha, Mehran
Sadighpour, Sefox Investement, LLC, El Marino, LLC, Knotting Hill, LLC, IJ Properties,
LLC, and S Double, LLC ("Defendants") (hereinafter "Enjoined Defendants") hereby
stipulate and agree to the entry of a permanent injunction as set forth below.

THE COURT HEREBY FINDS THAT

- 1. Russell Road prevailed on the merits of its trademark infringement claim against Canico Capital Group, LLC, Industrial Road 2440-2497, LLC, Crazy Horse Too Gentlemen's Club LLC, Rhino Bare Projects LLC, Rhino Bare Projects 4824 LLC, Mike Galam, Victor Galam, and Jacqueline Galam Barnes. ECF No. 375. All remaining Defendants are or have been in the past associated and/or affiliated, whether directly or indirectly, in some manner with Canico Capital Group, LLC, such that injunctive relief against the remaining Defendants is appropriate.
- 2. Russell Road has shown that it has suffered and is likely to continue to suffer irreparable harm in the absence of a permanent injunction. Russell Road has made a strong showing of irreparable harm through its submission of evidence that in the absence of a permanent injunction (i) substantial actual confusion has already occurred in the market; (ii) it has suffered, and will continue to suffer, intangible harm to the goodwill of its CRAZY HORSE III mark, (iii) it will be unable to control and maintain the reputation and perception of its CRAZY HORSE III mark, (iv) it will be unable to obtain a reasonable return on its investment of millions of dollars into its CRAZY HORSE III mark; and/or (v) its CRAZY HORSE III mark will be tarnished by being associated with the negative reputation of the former Crazy Horse Too club.

- 3. The balance of equities tips in Russell Road's favor. Russell Road has invested a substantial amount of money into its mark and created substantial goodwill and consumer recognition in its CRAZY HORSE III mark. In contrast, a permanent injunction will not harm the Enjoined Defendants because it only requires the Enjoined Defendants to comply with the law.
- 4. A permanent injunction serves the public interest because it prevents confusion in the market. Here, Russell Road has prevailed on the merits of its trademark claim and, thus, established a likelihood of confusion. Moreover, actual confusion has already occurred.

THEREFORE, IT IS HEREBY ORDERED THAT

- 1. Pursuant to 15 U.S.C. § 1116 and Federal Rule of Civil Procedure 65, this Permanent Injunction Order binds (i) the Enjoined Defendants; (ii) the Enjoined Defendants' officers, agents, servants, employees, and attorneys; and (iii) all other persons who are in active concert or participation with the Enjoined Defendants or the Enjoined Defendants' officers, agents, servants, employees, and attorneys (collectively referred to as "The Enjoined Parties").
- 2. The Enjoined Parties are hereby enjoined from any and all use of (i) the CRAZY HORSE TOO, CRAZY HORSE TOO SALOON, and CRAZY HORSE trademarks and names (alone or in combination with other letters, words, or designs), (ii) any trademarks incorporating the term CRAZY or HORSE or TOO (including designs intended to depict the word CRAZY or HORSE or TOO), (iii) the former CRAZY HORSE TOO design logos attached as Exhibit 1 hereto or any design or mark that incorporates any part of those design logos, and (iv) any abbreviations of any of the foregoing marks such as CH2, CH2LV, CHTOO, CHTOOLV ((i) through (iv) collectively the "Infringing CRAZY HORSE TOO Marks") in connection with the advertising, promotion, operation, or provision of a gentlemen's club or in connection with any business, goods, or services in the adult entertainment industry in the State of Nevada, the United States, and worldwide.

1	3.	The Enjoined Parties, to	the extent that they have the power and ability to
2	do so are ordered to (i) permanently remove all billboards and signage featuring the		
3	Infringing CRAZY HORSE TOO Marks, to the extent such still exist; (ii) permanently		
4	remove or disable all websites that feature—whether in the domain name url or website		
5	itself—the Infringing CRAZY HORSE TOO Marks, to the extent such still exist; (iii)		
6	permanently remove or withdraw all other promotional materials featuring the Infringing		
7	CRAZY HORSE TOO Marks, to the extent such still exist; (iv) permanently remove or		
8	delete all social media accounts and social media pages that contain or feature the		
9	Infringing CRAZY HORSE TOO Marks (including use as usernames or hashtags or as		
10	content in social media messages or on social media pages), to the extent such still		
11	exist.		
12			
13	IT IS SO STIPULATED		
14	Dated:February 1, 2019		Respectfully submitted,
15	Dated.1 ebid	aly 1, 2019	TMW LAW
16			TIVIVV LAVV
17			By /s/ Bruno Tarabichi
18			Bruno Tarabichi Attorneys for Plaintiff
19			Russell Road Food and Beverage, LLC
20	Data de Falone		Danie attelle aukusittad
21	Dated:Febru	ary 1, 2019	Respectfully submitted,
22			AKERMAN LLP
23			Dy Jol Ariol E Storn
24			By /s/ Ariel E. Stern Ariel E. Stern
25			Attorneys for Defendants Canico Capital Group, LLC, Industrial Road 2440-2497,
26			LLC, Abraham Assil, George Eshaghian, West Best Capital Group, LLC, SN &
27			GE, LLC, and Soleiman Nazarian
28			

1	Dated:February 1, 2019	Respectfully submitted,
2		THE LAW OFFICES OF WILLIAM H.
3		BROWN, LTD.
4		
5		By /s/ William Brown
6		William Brown Attorneys for Defendants Mike Galam,
7		Crazy Horse Too Gentlemen's Club LLC, Victor Galam, Jaqueline Galam Barnes,
8		Rhino Bare Projects LLC, and Rhino Bare Projects 4824 LLC
9		
10		
11		
12	Dated:February 1, 2019	Respectfully submitted,
13		LEBEDEV, MICHAEL & HELMI
14		
15		By /s/ Gennady L. Lebedev
16		Gennady L. Lebedev Attorneys for Defendants Djavid
17		Hakakian, Morris Nejathaim, Hamed Yazdanpanah, Isaac Javdanfar, Kamran
18		Samooha, Mehran Sadighpour, Sefox Investement, LLC, El Marino, LLC,
19		Knotting Hill, LLC, IJ Properties, LLC, and S Double, LLC
20		and o Doddie, 220
21		
22		IT IS SO ORDERED:
23		R
24		HON. RICHARD F. BOULWARE UNITED STATES DISTRICT JUDGE
25		ONTED STATES DISTRICT SUDGE
26		DATED: <u>February 14, 2019</u> .
27		
28		
		5 STIPULATED PERMANENT INJUNCTION