

**SEALED**

 ORIGINAL

**SEALED**

1 THE UNITED STATES DISTRICT COURT  
 2 FOR THE DISTRICT OF NEVADA

3 CHANEL, INC.,

4 Plaintiff,

5 v.

6 ANTHONY L. WYNN a/k/a ANTHONY  
 7 WYNN, an individual, d/b/a AJC  
 8 JEWELLERY d/b/a AJC JEWELRY  
 9 d/b/a AJC JEWELRY d/b/a AJC and  
 10 DOES 1-10,

11 Defendants.

Case No. 2:14-cv-00534-GMN-GWF

STIPULATED CONSENT PRELIMINARY  
 INJUNCTION AND ORDER CONFIRMING  
 SEIZURE

(FILED UNDER SEAL)

<input checked="" type="checkbox"/> FILED ENTERED	<input type="checkbox"/> RECEIVED SERVED ON COUNSEL/PARTIES OF RECORD
APR 22 2014	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY





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 14 WHEREAS, this action having been commenced by Plaintiff, Chanel, Inc. ("Chanel")  
 15 against the Defendant, Anthony L. Wynn a/k/a Anthony Wynn, an individual, d/b/a AJC  
 16 Jewellery d/b/a AJC Jewellery d/b/a AJC Jewellery d/b/a AJC (the "Defendant"), alleging *inter*  
 17 *alia*, trademark counterfeiting and trademark infringement, and false designation of origin and a  
 18 copy of the Summons, Verified Complaint, Temporary Restraining Order and Seizure Order,  
 19 supporting papers, and Orders issued to date having been served upon the Defendant:

20 IT IS STIPULATED, ORDER, ADJUDGED AND DECREED that:

21 1. This Court has jurisdiction of the subject matter of all counts of this action and  
 22 over all of the named parties hereto.

23 2. Chanel is the owner of the following trademark (the "Chanel Marks") in connection  
 24 with high quality costume jewelry, including, necklaces, bracelets, and earrings, handbags, wallets  
 25 and shoes:

26 Trademark	Registration Number	Registration Date	Class(es)/Goods
27			

Trademark	Registration Number	Registration Date	Class(es)/Goods
CHANEL	0,626,035	May 1, 1956	(Int'l Class: 18) Women's handbags
	1,241,264	June 7, 1983	(Int'l Class: 25) Suits, jackets, skirts, dresses, pants, blouses, tunics, sweaters, cardigans, tee-shirts, coats, raincoats, scarves, shoes and boots
CHANEL	1,241,265	June 7, 1983	(Int'l Class: 25) Suits, jackets, skirts, dresses, pants, blouses, tunics, sweaters, cardigans, coats, raincoats, scarves, shoes and boots
	1,501,898	August 30, 1988	(Int'l Class: 6) Keychains (Int'l Class: 14) Costume jewelry (Int'l Class: 16) Gift wrapping paper (Int'l Class: 25) Blouses, shoes, belts, scarves, jackets, men's ties (Int'l Class: 26) Brooches, buttons for clothing
CHANEL	1,733,051	November 17, 1992	(Int'l Class: 18) Leather goods; namely, handbags, wallets, travel bags, luggage, business and credit card cases, change purses, tote bags, cosmetic bags sold empty, and garment bags for travel
	1,734,822	November 24, 1992	(Int'l Class: 18) Leather goods; namely, handbags, wallets, travel bags, luggage, business card cases, change purses, tote bags, and cosmetic bags sold empty
	3,025,934	December 13, 2005	(Int'l Class: 18) – Handbags

3. Defendant and his respective officers, agents, servants, employees, and attorneys, and all persons in active concert and participation with them are hereby restrained and enjoined, pending termination of this action, from, intentionally and/or knowingly:

A. manufacturing or causing to be manufactured, importing, advertising, or

1 promoting, distributing, selling or offering to sell counterfeit and infringing  
2 goods; bearing the Chanel Marks;

3 B. using the Chanel Marks in connection with the sale of any unauthorized  
4 goods;

5 C. using any logo, and/or layout which may be calculated to falsely advertise  
6 the services or products of the Defendant as being sponsored by,  
7 authorized by, endorsed by, or in any way associated with the Plaintiff;

8 D. using any reproduction, counterfeit, copy, or colorable imitation of the  
9 Chanel Marks in connection with the publicity, promotion, sale or  
10 advertising of any goods sold by the Defendant, including, without  
11 limitation, costume jewelry, including, necklaces, bracelets, and earrings,  
12 handbags, wallets and shoes;

13 E. affixing, applying, annexing or using in connection with the sale of any  
14 goods, a false description or representation, including words or other  
15 symbols tending to falsely describe or represent the Defendant's goods as  
16 being those of the Plaintiff, or in any way endorsed by the Plaintiff;

17 F. offering such goods in commerce; and from otherwise unfairly competing  
18 with the Plaintiff;

19 G. secreting, destroying, altering, removing, or otherwise dealing with the  
20 unauthorized products or any books or records which contain any  
21 information relating to the importing, manufacturing, producing,  
22 distributing, circulating, selling, marketing, offering for sale, advertising,  
23 promoting, renting or displaying of all unauthorized products which  
24 infringe the Chanel Marks; and  
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26 H. effecting assignments or transfers, forming new entities or associations or  
27 utilizing any other device for the purpose of circumventing or otherwise  
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avoiding the prohibitions set forth in subparagraphs (A) through (G).

4. The seizure effected on April 18, 2014 pursuant to this Court's Order is hereby confirmed and the hearings scheduled for April 29, 2014 at 9:00 a.m. are hereby canceled.


5. The seal in this matter is hereby removed, and the Clerk is instructed to return this file to the public portion of the Court records. The bond posted by the Plaintiff in compliance with the Court's Order dated April 14, 2014 is hereby released.

SO STIPULATED:

**Plaintiff: Chanel, Inc.**

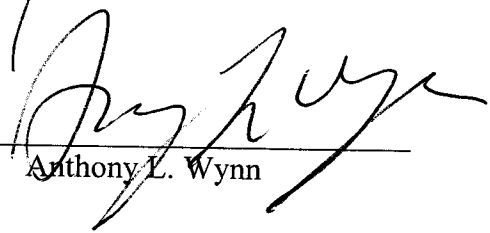
DATED: April 21, 2014

WILSON, ELSER, MOSKOWITZ, EDELMAN  
& DICKER LLP

By:   
J. Scott Burris

**Defendant: Anthony L. Wynn**

DATED: April 21, 2014

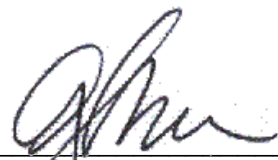
By:   
Anthony L. Wynn

**ORDER**

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that the hearing re (ECF No. 5) Motion for Preliminary Injunction set for 4/29/2014 09:00 AM in LV Courtroom 7D before Chief Judge Gloria M. Navarro is hereby **VACATED**.

**DATED** this 22nd day of April, 2014.

  
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Gloria M. Navarro, Chief Judge  
United States District Court