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12 Attorneys for Plaintiff ARBONNE
 INTERNATIONAL, LLC

14 UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

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16)	
17	ARBONNE INTERNATIONAL, LLC.,)	
18)	Case No. 2:16-cv-01728-JAD-VCF
19	Plaintiff,)	
20	vs.)	
21	NAYAT SEMERCIYAN and NU-VO JEWELS)	FINAL JUDGMENT AND
22	INC., a/k/a NU-VO BIJOUX INC.,)	PERMANENT INJUNCTION BY
23)	STIPULATION AND AGREEMENT OF
24	Defendants.)	THE PARTIES
25)	ECF No. 16

24 Plaintiff, Arbonne International, LLC (“Arbonne”), by and through their counsel, and
 25 Defendant, Nayat Semerciyan (“Semerciyan”), in proper person, collectively the “Parties,”
 26 hereby stipulate and agree to entry of this Final Judgment and Permanent Injunction, as set forth
 27

1 herein. Parties, after having an opportunity to consult with their own legal counsel, hereby
2 stipulate, agree and admit, that factual, legal and other allegations contained in the Complaint
3 filed by Arbonne in this matter are all true and correct. Parties have approved the substance and
4 form of this Stipulated Final Judgment and Permanent Injunction and, based on the Complaint
5 and the factual, legal and/or other findings below and for other good cause otherwise appearing,
6 hereby jointly ask this Honorable Court to approve and enter the same,

7 IT IS HEREBY ORDERED THAT:

8 1. Pursuant to Federal Civil Rule 41(a)(1), Defendant Nu-Vo Jewels Inc. a/k/a Nu-
9 Vo Bijoux Inc. shall be and hereby is dismissed without prejudice.

10 2. This Court has jurisdiction of the subject matter of this action and personal
11 jurisdiction over Semerciyan.

12 3. Venue is proper in this Court.

13 4. Semerciyan was properly served with a copy of the Summons and Complaint on
14 August 19, 2016.

15 5. The injunctive provisions of this Judgment shall apply to Semerciyan, as well as
16 her agents, servants, employees, and those persons or entities in active concert or participation
17 with her (collectively, the "Restrained Parties").

18 6. Arbonne has valid and subsisting trademarks for ARBONNE® (U.S. Trademark
19 Registration Nos. 4,491,258, 3,218,119, 3,159,918, and 1,770,981), ARBONNE
20 INTERNATIONAL® (U.S. Trademark Registration No. 3,159,813), ARBONNE
21 INTELLIGENCE® (U.S. Trademark Registration Nos. 4,629,529 and 3,514,987), ARBONNE
22 ESSENTIALS® (U.S. Trademark Registration Nos. 4,136,385, 4,143,617, 4,143,616, 4,147,378,
23 4,147,377, and 4,136,347), RE9® (U.S. Trademark Registration Nos. 2,982,066 and 3,679,754),
24 and RE9 ADVANCED® (U.S. Trademark Registration Nos. 3,887,045 and 3,887,044), and its
25 "AA Logo" (U.S. Trademark Registration Nos. 3,895,265, 1,280,041, 3,452,663) (collectively,
26 the "Arbonne Registered Trademarks").

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16. As a proximate result of Semerciyan’s actions, Arbonne has suffered and will continue to suffer damage to its business, good will, reputation, and profits for which there is no adequate remedy at law.


17. By copying the Arbonne Registered Copyrights, Semerciyan has committed copyright infringement in violation of 17 U.S.C. § 501.

18. Together, the Arbonne Registered Trademarks and Arbonne Registered Copyrights are referred to herein as the “Arbonne Intellectual Property.”

19. Enforcement of copyright and trademark laws is important to prevent consumer confusion. It is in the public’s interest to enjoin future misuse of the Arbonne Intellectual Property.

Accordingly, with good cause appearing and based on the parties’ stipulation [ECF No. 16], IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that:

1. **All claims against defendant Nu-Vo Jewels Inc. Aga Nu-Vo Bijoux Inc., are DISMISSED with prejudice**, each side to bear its own fees and costs;
2. Semerciyan and the Restrained Parties shall be and hereby are permanently enjoined and restrained from:
 - (a) advertising, selling, or facilitating the advertisement or sale of, via the Internet or otherwise, any goods or products bearing any Arbonne Intellectual Property;
 - (b) using Arbonne Intellectual Property in any manner, including advertising on the Internet; and
 - (c) importing, exporting, manufacturing, producing, distributing, circulating, selling, offerings to sell, advertising, promoting, or displaying any goods or products bearing any Arbonne Intellectual Property.
3. The Clerk of Court is directed to **enter this judgment and close this case.**



Jennifer Dorsey
U.S. District Court Judge
12/27/16