

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DIRECT SOURCE SEAFOOD LLC, a  
Washington limited liability company,

Plaintiff,

v.

AQUA STAR (USA) CORP., a Washington  
corporation; and DOES 1-20, inclusive,

Defendants.

Case No. 2:16-cv-00407-RSL

STIPULATION AND ~~PROPOSED~~ ORDER  
OF DISMISSAL

NOTE ON MOTION CALENDAR:  
March 24, 2017

Plaintiff Direct Source Seafood LLC (“DSS”) and Defendant Aqua Star (USA) Corp.  
 (“Aqua Star”) hereby stipulate as follows:

1. DSS filed its Complaint in this action on March 18, 2016, asserting federal and  
state law claims relating to Aqua Star’s use of DSS’s CHEF’S NET trademarks. (See Dkt. 1.)  
Aqua Star filed its Answer to DSS’s Complaint on April 13, 2016, in which it also asserted a  
counterclaim for declaratory relief regarding the validity of DSS’s CHEF’S NET trademarks.  
(See Dkt. 19.)

2. The parties have agreed to entry of the [Proposed] Permanent Injunction Against  
Defendant Aqua Star (USA) Corp. in the form attached to the parties’ Stipulation for Entry of  
Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal.

3. The parties have further agreed that, upon entry of the [Proposed] Permanent  
Injunction Against Defendant Aqua Star (USA) Corp. by the Court, this action—including all

1 claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs  
2 to either party.

3 SO STIPULATED TO AND AGREED BY:

4 Dated: March 24, 2017

FOCAL PLLC

5 By: s/ Venkat Balasubramani

6 s/ Stacia N. Lay

Venkat Balasubramani, WSBA #28269

7 Stacia N. Lay, WSBA #30594

8 900 1st Avenue S., Suite 201

Seattle, Washington 98134

9 Tel: (206) 529-4827

10 Fax: (206) 260-3966

Email: [venkat@focallaw.com](mailto:venkat@focallaw.com)

Email: [stacia@focallaw.com](mailto:stacia@focallaw.com)

11 Attorneys for Plaintiff

12  
13 Dated: March 24, 2017

By: /s/

14 David L. Prince, CA #113599 *Pro Hac Vice*

Miles L. Prince, CA #298823 *Pro Hac Vice*

15 1912 East Vernon Ave., Suite 100

16 Los Angeles, California 90058

17 Tel: (323) 234-2989

18 Fax: (323) 234-2619

LANE POWELL PC

19 By: /s/ David C. Spellman

20 David C. Spellman, WSBA #15884

1420 Fifth Ave., Suite 4200

21 Seattle, Washington 98101-2338

22 Tel: (206) 223-7392

23 Fax: (206) 223-7107

24 Attorneys for Defendant

1 claims and counterclaims asserted therein—shall be dismissed with prejudice and without costs  
2 to either party.

3 SO STIPULATED TO AND AGREED BY:

4 Dated: March \_\_, 2017

FOCAL PLLC

5 By: s/

6 s/

Venkat Balasubramani, WSBA #28269

7 Stacia N. Lay, WSBA #30594

8 900 1st Avenue S., Suite 201

Seattle, Washington 98134

9 Tel: (206) 529-4827

10 Fax: (206) 260-3966

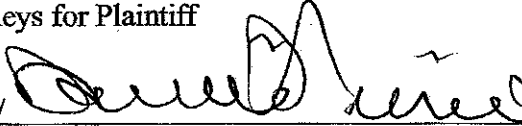
Email: [venkat@focallaw.com](mailto:venkat@focallaw.com)

Email: [stacia@focallaw.com](mailto:stacia@focallaw.com)

11 Attorneys for Plaintiff

12 Dated: March 23, 2017

13 By: /s/

14  David L. Prince, CA #113599 *Pro Hac Vice*

Miles L. Prince, CA #298823 *Pro Hac Vice*

15 1912 East Vernon Ave., Suite 100

16 Los Angeles, California 90058

17 Tel: (323) 234-2989

18 Fax: (323) 234-2619

LANE POWELL PC

19 By: /s/

20 David C. Spellman, WSBA #15884

21 1420 Fifth Ave., Suite 4200

22 Seattle, Washington 98101-2338

23 Tel: (206) 223-7392

24 Fax: (206) 223-7107

25 Attorneys for Defendant

**ORDER**

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED THAT:

1. Having entered the Permanent Injunction Against Defendant Aqua Star (USA) Corp. pursuant to the parties' stipulation for Entry of Permanent Injunction Against Defendant Aqua Star (USA) Corp. and Stipulated Dismissal, this action—including all claims and counterclaims asserted therein—be dismissed with prejudice.

2. The parties shall bear their own attorneys' fees and costs.

IT IS SO ORDERED.

DATED this 28<sup>th</sup> day of March, 2017.



Robert S. Lasnik  
United States District Judge