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15 THE UNITED STATES DISTRICT COURT
16 FOR THE NORTHERN DISTRICT OF CALIFORNIA

17 CHANEL, INC.,) Case No. C-09-04979 MHP
18)
19 Plaintiff,) ~~PROPOSED~~ PERMANENT
20) INJUNCTION
21 v.)
22)
23 RENE PALEY d/b/a)
24 CHEAP-CHANEL-WATCHES.COM;)
25 and DOES 1-10,)
26)
27 Defendants.)
28)

29 THIS MATTER having come before the Court upon Plaintiff, Chanel, Inc.’s (“Chanel” or
30 “Plaintiff”) Motion for Final Default Judgment against Defendant Rene Paley (“Paley” or the
31 “Defendant”), the Court having granted the Motion, does hereby:

32 ORDER AND ADJUDGE that Defendant Paley, and his respective officers, agents, servants,
33 employees and attorneys, and all persons in active concert and participation with him are hereby
34 restrained and enjoined from:

35 (a) manufacturing or causing to be manufactured, importing, advertising, or promoting,

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

2 (b) using the Chanel Marks in connection with the sale of any unauthorized goods;

3 (c) using any logo, and/or layout which may be calculated to falsely advertise the
4 services or products of cheap-chanel-watches.com, mywatchsky.com, replica-watches-mall.com,
5 wristfavorite.com, zenroad.com, 21cnshoes.com, bagspal.com, chanelwatcheszone.com, led-
6 lighting-cn.com, lovebagclub.com, offerreplicawatches.com, replica-brand-watches.com, replica-
7 watches-swiss.com, sport-shoes-zone.com, tastefulwatch.com, watcheslibrary.com, wristlike.com,
8 and and/or any other website or business, as being sponsored by, authorized by, endorsed by, or in
9 any way associated with Chanel;

10 (d) falsely representing himself as being connected with Chanel, through sponsorship or
11 association;

12 (e) engaging in any act which is likely to falsely cause members of the trade and/or of the
13 purchasing public to believe any goods or services of Rene Paley, cheap-chanel-watches.com,
14 mywatchsky.com, replica-watches-mall.com, wristfavorite.com, zenroad.com, 21cnshoes.com,
15 bagspal.com, chanelwatcheszone.com, led-lighting-cn.com, lovebagclub.com,
16 offerreplicawatches.com, replica-brand-watches.com, replica-watches-swiss.com, sport-shoes-
17 zone.com, tastefulwatch.com, watcheslibrary.com, wristlike.com, and/or any other website or
18 business, are in any way endorsed by, approved by, and/or associated with Chanel;

19 (f) using any reproduction, counterfeit, copy, or colorable imitation of the Chanel Marks
20 in connection with the publicity, promotion, sale, or advertising of any goods sold by Rene Paley,
21 cheap-chanel-watches.com, mywatchsky.com, replica-watches-mall.com, wristfavorite.com,
22 zenroad.com, 21cnshoes.com, bagspal.com, chanelwatcheszone.com, led-lighting-cn.com,
23 lovebagclub.com, offerreplicawatches.com, replica-brand-watches.com, replica-watches-swiss.com,
24 sport-shoes-zone.com, tastefulwatch.com, watcheslibrary.com, wristlike.com, and/or any other
25 website or business, including, without limitation, watches, handbags, wallets, sunglasses, belts,
26 shoes, and/or boots;

27 (g) affixing, applying, annexing or using in connection with the sale of any goods, a false
28

1 description or representation, including words or other symbols tending to falsely describe or
2 represent goods by Rene Paley, cheap-chanel-watches.com, mywatchsky.com, replica-watches-
3 mall.com, wristfavorite.com, zenroad.com, 21cns shoes.com, bagspal.com, chanelwatcheszone.com,
4 led-lighting-cn.com, lovebagclub.com, offerreplicawatches.com, replica-brand-watches.com,
5 replica-watches-swiss.com, sport-shoes-zone.com, tastefulwatch.com, watcheslibrary.com,
6 wristlike.com, and/or any other website or business, as being those of Chanel or in any way endorsed
7 by Chanel;

8 (h) offering such goods in commerce;

9 (i) otherwise unfairly competing with Chanel;

10 (j) secreting, destroying, altering, removing, or otherwise dealing with the unauthorized
11 products or any books or records which contain any information relating to the importing,
12 manufacturing, producing, distributing, circulating, selling, marketing, offering for sale, advertising,
13 promoting, renting or displaying of all unauthorized products which infringe the Chanel Marks; and

14 (k) effecting assignments or transfers, forming new entities or associations or utilizing
15 any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth
16 above.

17 IT IS SO ORDERED

18 Dated: 3/25/2010

