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28 Attorneys for Defendant
ULTRA RPM, INC. d/b/a
PRIVACY REGISTRATION

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

THE NEIMAN MARCUS GROUP,
INC.; BERGDORF GOODMAN,
INC.; AND NM NEVADA TRUST,

Plaintiffs,

vs.

ULTRA RPM, INC. d/b/a PRIVACY
REGISTRATION,

Defendant.

Case No. CV08-01723 MMM (MANx)

**STIPULATED [PROPOSED]
ORDER FOR PERMANENT
INJUNCTION AND FINAL
JUDGMENT**

Hon. Margaret M. Morrow

1 The parties, having reached a full settlement of this matter, hereby stipulate,
2 subject to the approval of the Court, to the entry of the permanent injunction and
3 final judgment set forth below.

4
5 IT IS HEREBY ORDERED THAT:

6 1. Defendant Ultra RPM, INC. d/b/a Privacy Registration and its
7 officers, agents, servants, employees, and attorneys, and those persons in active
8 concert or participation with them who receive actual notice of this Order, are
9 permanently enjoined from:

10 a. Registering or using any domain name that is identical or
11 confusingly similar to the NEIMAN-MARCUS and NEIMAN
12 MARCUS trade names, trademarks, or service marks;

13 b. Registering or using any domain name that is identical or
14 confusingly similar to the BERGDORF GOODMAN trade name,
15 trademarks, or service marks;

16 c. Assisting or aiding and abetting any other person or business
17 entity in registering or using any domain name that is identical or
18 confusingly similar to the NEIMAN-MARCUS and NEIMAN
19 MARCUS trade names or trademarks.

20 d. Assisting or aiding and abetting any other person or business
21 entity in registering or using any domain name that is identical or
22 confusingly similar to the BERGDORF GOODMAN trade name or
23 trademarks.

24 2. This Court has jurisdiction over the parties and the subject matter of
25 this action. This Court shall retain jurisdiction to the extent necessary to enforce
26 this Permanent Injunction.

27 3. All relief not expressly granted herein is DENIED.

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- 4. Each party shall bear its own costs, expenses and attorney's fees.
- 5. This is a Final Judgment.

Dated: _____
Margaret M. Morrow
United States District Judge

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