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Attorney for Plaintiff
42 Ventures, LLC

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

42 Ventures, LLC,)	Case No.: 1:20-cv-228-DKW-WRP
)	(Trademark)
Plaintiff,)	
vs.)	STIPULATED CONSENT
)	JUDGMENT BETWEEN
Patrick Rend, et al.)	PLAINTIFF AND DEFENDANT
)	PATRICK PETROV
Defendants.)	
)	
)	

**STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFF
AND DEFENDANT PATRICK PETROV**

As attested to by the below signatures of counsel for Plaintiff 42 Ventures, LLC (“Plaintiff”) and Defendant Patrick Petrov, this matter comes before the Court on the parties’ joint Stipulated Consent Judgment.

Plaintiff has filed a First Amended Complaint alleging that Defendant Patrick Petrov is liable for trademark infringement and unfair competition for *inter alia* using a mark “YTS” identical and confusingly similar to Plaintiff’s registered

trademark YTS (Reg. No. 6,025,651) in his website YTS.WS.

The parties, after conferral and investigation, now appear, Defendant Patrick Petrov, *pro se*, and Plaintiff through counsel to fully and finally resolve all claims between the parties and the matters before the Court and have moved for entry of this Stipulated Consent Judgment.

WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this case between the parties as follows:

1. The parties agree that the Court has personal jurisdiction over the parties and venue is proper.
2. The parties agree that Plaintiff has a valid and enforceable trademark as identified in Exhibit “1” of the First Amended Complaint.
3. Defendant Patrick Petrov acknowledges that he has received independent legal advice from counsel or has had the opportunity to seek advice from counsel, with respect to the facts and this Stipulated Consent Judgment.
4. Defendant Patrick Petrov denies liability but acknowledges that his website uses the name “YTS.WS” that is identical and confusingly similar to Plaintiff’s registered trademark.
5. Pursuant to stipulation of the parties, the below Money Judgment, Permanent Injunction and Order is to be entered against Defendant Patrick Petrov.

6. The Parties give the Court authority to modify the permanent injunction and the time period for which it will retain jurisdiction to enforce the money judgment and permanent injunction of this Stipulated Consent Judgment.

MONEY JUDGMENT

A Money Judgment is awarded in favor of Plaintiff 42 Ventures, LLC against Defendant Patrick Petrov in the amount of \$200,000 (Two hundred thousand dollars) for damages.

PERMANENT INJUNCTION

Defendant Patrick Petrov and those under his control are hereby PERMANENTLY ENJOINED from directly, contributorily or indirectly infringing Plaintiff's rights in its registered trademark.

Defendant Patrick Petrov agrees to remove the "YTS" label from his website YTS.WS within 30 days of entry of this Stipulated Judgment.

Defendant Patrick Petrov agrees to redirect the domain YTS.WS to a new non-infringing domain within 90 days of entry of this Stipulated Judgment.

This Court will retain jurisdiction until December 31, 2021 for the purposes of enforcing the Money Judgment, Permanent Injunction and Order.

Except as provided herein, each party is to bear their own costs and fees. With entry of this Consent Judgment, this matter is terminated with respect to Defendants Patrick Petrov and Patrick Rend aka Ivan Petrovic.

June 10

DATED: Kailua-Kona, Hawaii, May ___, 2020.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper

Kerry S. Culpepper

Attorney for Plaintiff

June 10

DATED: Moscow, Russia, May ___, 2020.



Patrick Petrov *pro se*

DATED: June 10, 2020 at Honolulu, Hawai'i.
APPROVED AND SO ORDERED:



/s/ Derrick K. Watson
Derrick K. Watson
United States District Judge

*42 Ventures, LLC. v. Patrick Rend, et al; Case No. 1:20-cv-00228-DKW-WRP;
STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFF AND
DEFENDANT PATRICK PETROV*