

1 NEAL M. COHEN (SBN 184978)
2 JAMES K. SAKAGUCHI (SBN 181010)
3 WILLIAM A. ENGLISH (SBN 193634)
4 Vista IP Law Group LLP
5 2040 Main Street, 9th Floor
6 Irvine, California 92614
7 Tel: (949) 724-1849
8 Fax: (949) 625-8955

Attorneys for Plaintiff
Vertical Doors, Inc.

SEND/Enter
FILED
CLERK, U.S. DISTRICT COURT
MAR 14 2007
CENTRAL DISTRICT OF CALIFORNIA
BY *SC* DEPUTY

ORIGINAL UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Vertical Doors, Inc., a
California corporation
Plaintiff,
v.
J T BONN, INC., et al.,
Defendants.

SA CV 05-905 JVS (ANx)

**STIPULATED PERMANENT INJUNCTION
AGAINST DEFENDANTS ULTIMATE
PRODUCT CORPORATION, RICHARD
ON, AND VINCENT HUANG; AND
DISMISSAL BETWEEN PLAINTIFF
VERTICAL DOORS, INC. AND
DEFENDANTS ULTIMATE PRODUCT
CORPORATION, RICHARD ON, AND
VINCENT HUANG**

Honorable James V. Selna

2007 MAR 13 PM 3:42
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
SANTA ANA

LOGGED

Plaintiff Vertical Doors, Inc. ("VDI") hereby dismisses all causes of action in the above-captioned action (the "Action") against Defendants Ultimate Product Corporation, Richard On, and Vincent Huang (collectively "UPC"), with prejudice, and with the consent of UPC.

Counterclaimants UPC hereby dismiss all causes of action in the Action against Counterclaim defendant VDI, with prejudice, and with the consent of VDI.

Nothing in this pleading shall affect any other parties in the Action.

THIS CONSTITUTES NOTICE OF ENTRY
AS REQUIRED BY FRCP, RULE 77(d).

ENTERED - SOUTHERN DIVISION
CLERK, U.S. DISTRICT COURT
MAR 19 2007
CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

254

1 Further, it appearing that VDI and UPC have stipulated
2 to entry of the following Order, IT IS HEREBY ORDERED AS
3 FOLLOWS:

4 For purposes of this Order, VDC KITS are any vertical
5 door conversion kits or vertical door hinges intended to be
6 used to allow opening of a vehicle door in a doorway of a vehicle
7 body by rotating the vehicle door in a horizontal plane of motion
8 (a plane of motion relative to a vehicle's orientation, in which
9 a conventional vehicle door opens horizontally) until the vehicle
10 door substantially clears the vehicle body, and then rotating the
11 vehicle door in a vertical plane of motion (a plane of motion
12 substantially orthogonal to the horizontal plane) until the
13 vehicle door substantially clears the doorway.

14
15 1. UPC, named defendants in the above-captioned action,
16 along with their successors, general and limited partners,
17 employees, agents, officers, directors and affiliates, including
18 but not limited to, any and all other persons acting in concert
19 with them, shall not manufacture, use, sell, or offer for sale,
20 in the United States, or import into the United States, any VDC
21 KITS, and may not contribute to or actively induce others to do
22 any of the above, except as follows:

23 a) This paragraph does not apply to VDC KITS lawfully
24 purchased or otherwise lawfully obtained directly from VDI (not
25 from its distributors or any other source); and

26 b) UPC may continue to provide customer service (but not
27 replacement VDC KITS) to their existing customers for their

1 existing VDC KITS, as is reasonably necessary to fulfill any
2 obligations under any warranties to those customers (excluding
3 replacement of VDC KITS, chassis plates, or swingarms).

4
5 2. Within 30 (thirty) days of entry of this Order, UPC
6 shall deliver to VDI, all VDC KITS in their possession, custody,
7 or control, if any, for destruction and/or disposal by VDI.

8
9 3. Within 30 (thirty) days of entry of this Order, UPC
10 shall destroy all advertising and promotional materials,
11 instructions manuals, pamphlets, and the like, in their
12 possession, custody, or control, which refer to or relate to VDC
13 KITS.

14
15 4. Within 30 (thirty) days of entry of this Order, UPC
16 shall modify electronic advertising in their possession, custody,
17 or control, including websites, to remove all references to VDC
18 KITS.

19
20 5. The court may retain jurisdiction over the parties to
21 enforce this Order.

22
23 6. No bond shall be required by VDI in connection with
24 this Order.

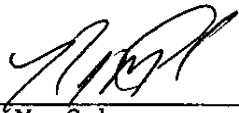
25
26 7. Nothing herein shall be construed as an admission by
27 any party.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8. This Order shall automatically terminate upon the earlier of: a) expiration of the last to expire of United States Patent Nos. 6,845,547, 7,059,655, or any other United States patents claiming priority to either of the applications from which the aforementioned patents issued; or b) if all claims of all of the aforementioned (but non-expired) United States patents are adjudged to be invalid, and all appeals are exhausted.

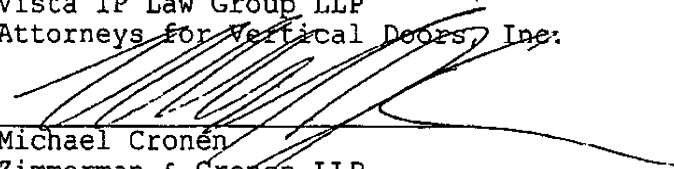
SO STIPULATED

Dated: 3/9/2007



Neal M. Cohen
Vista IP Law Group LLP
Attorneys for Vertical Doors, Inc.


Dated: 3/9/07



Michael Cronen
Zimmerman & Cronen LLP
Attorneys for The UPC Defendants

IT IS SO ORDERED

Dated: 3.14.07

By: 

Hon. James V. Selna
United States District Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I served the foregoing document described as **STIPULATED PERMANENT INJUNCTION AGAINST DEFENDANTS ULTIMATE PRODUCT CORPORATION, RICHARD ON, AND VINCENT HUANG; AND DISMISSAL BETWEEN PLAINTIFF VERTICAL DOORS, INC. AND DEFENDANTS ULTIMATE PRODUCT CORPORATION, RICHARD ON, AND VINCENT HUANG,** to all parties to this action as set forth below, on the date set forth below, in the manner(s) checked below.

By mail service to their attorney(s) of record, at the following address(es):

Counsel for JT Bonn, Inc.; Tony Yip; Bill Yip; John Yip

Ronald M. St. Marie (rmstmarie@chanlaw.com) TEL (213) 225-2600
Chan Law Group LLP FAX (213) 622-1154
1055 W 7th St, Ste 1880
Los Angeles, CA 90017

Counsel For Ultimate Product Corporation; Richard On; Vincent Huang

Harris Zimmerman (harris@zimpatent.com) TEL (510) 465-0828
Michael Cronen (mcronen@zimpatent.com) FAX (510) 465-2041
Zimmerman & Cronen LLP
1330 Broadway, Suite 710
Oakland, California 94612-2506

Executed 3/12/2007, Irvine, California.

Reyna L. Coursen
Reyna Coursen