

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

JDOG FRANCHISES, LLC.	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	2-15-cv-02780-GJP
	:	
LOUIS VAUGHN JR.	:	
Defendant.	:	
	:	

STIPULATED PERMANENT ORDER OF INJUNCTION

The parties, J DOG FRANCHISES, LLC and LOUIS VAUGHN JR., by and through their undersigned counsel, hereby stipulate and agree that the following be entered as a permanent Order of this Honorable Court and that, if it is made a permanent Order of this Court, it, along with the confidential Mutual Termination and General Release Agreement between the parties, which includes additional terms, shall be a full and final disposition as to all claims asserted by the parties against each other in this action (see ECF doc. no.s 1 and 6).

Defendant, Louis Vaughn Jr. (Vaughn) and anyone else who may be bound under F.R.C.P. 65(d)(2), are enjoined as follows:

1) From the date of this Order up to and until December 18, 2017 (the "Non-Compete Period"), Vaughn is enjoined via this Order from engaging in, directly or indirectly through any third person, a junk removal and/or hauling business within fifteen (15) miles of 1326 Garden Grove Court in Houston, Texas (the "Non-Compete Area"). Further, during the Non-Compete Period, Vaughn is enjoined from advertising, in any way or manner, that he provides junk removal or hauling services within the Non-Compete Area.

2) Vaughn is enjoined from using or displaying, in any manner, including without limitation on or in any signs, stationery, letterheads, forms, electronic matter,

printed matter or advertising (electronic or printed), the proprietary marks J DOG JUNK REMOVAL (U.S. Reg. No: 4253237) and the stylized logo JDog Junk Removal (U.S. Reg. No. 4267383) (the "Marks") or similar names or marks.


3) Vaughn is enjoined from advertising or otherwise holding himself out to the public, directly or indirectly, as a current or former authorized franchisee of Plaintiff or as being in any way sponsored by or connected or associated with Plaintiff.

4) To the extent reasonably possible, Vaughn is enjoined to remove or cause to be removed all internet and social media presence created by him or upon his request, or otherwise under his control, related to the operation of his former JDog franchise.

5) Vaughn is enjoined from doing anything to cause potential purchasers of junk removal services to believe that any services are performed by Defendant, or any business with which he is associated, originate with Plaintiff or are endorsed or sponsored by Plaintiff.

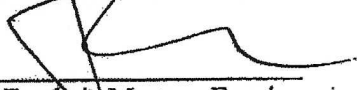
COUNSEL FOR PLAINTIFF

BY:


William B. Jameson, Esquire
Spadea, Lanard & Lignana, LLC
1315 Walnut Street, Suite 1532
Philadelphia, PA 19130

COUNSEL FOR DEFENDANT

BY:


Frank A. Mazzeo, Esquire
Ryder, Lu, Mazzeo, Konieczny, LLC
808 Bethlehem Pike, Suite 200
Colmar, PA 18915

ORDER

AND NOW, this 9th day of ^{February} January, 2016, the Stipulation of Injunction set forth above is APPROVED and shall be entered as an ORDER of the Court. By way of further ORDER, Plaintiff's Application to Vacate Order of Dismissal is DISMISSED as moot.

/s/ Gerald J. Pappert
The Hon. Gerald J. Pappert