

1 CHARLES CARREON, ESQ. (127139)
2165 S. Avenida Planeta
2 Tucson, Arizona 85710
Tel: 520-841-0835
3 Fax: 520-843-2083
Email: chas@charlescarreon.com

4 Attorney for Defendant Charles Carreon
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
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11 CHRISTOPHER RECOUVREUR,
12 Plaintiff,
13 v.
14 CHARLES CARREON,
15 Defendants.

CASE NO. 3:12-cv-03435 RS
OFFER OF JUDGMENT
[RULE 68]

16 Pursuant to F.R.Civ.P. 68, without waiving any defenses or conceding any claims, or that
17 any valid claim is stated by the operative complaint, or that defendant is liable in any manner
18 whatsoever, defendant hereby offers to give judgment on the following specified terms:

19 The Court shall enter a declaration declaring that:

- 20 1. Plaintiff’s domain name “charles-carreon.com,” plaintiff’s use of the domain
21 name, and plaintiff’s current manner of using his web site, do not violate
22 defendant’s rights;
- 23 2. Plaintiff’s use of the domain name “charles-carreon.com,” in its current manner of
24 use, is fair use and protected under the First Amendment, and does not infringe on
25 defendant’s mark;
- 26 3. Defendant is not entitled to an injunction against plaintiff using the domain name
27 “charles-carreon.com” or operating the Web site located at the URL
28 “www.charles-carreon.com;” and

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4. Plaintiff shall take a total money judgment inclusive of costs in the amount of \$725, being the sum of the filing fee and service costs claimed.

Dated: December 3, 2012

CHARLES CARREON, ESQ.

Charles Carreon
2012.12.03
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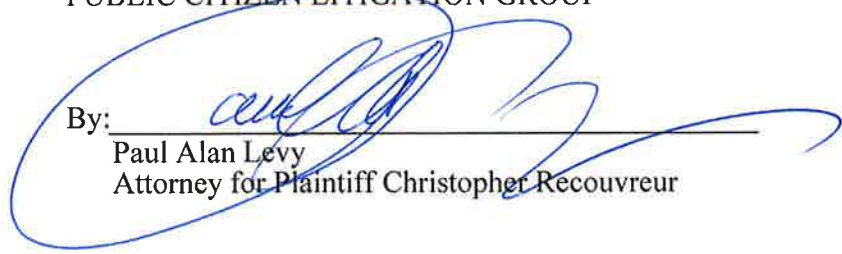


By: _____
Charles Carreon
Attorney for Defendant Charles Carreon

Accepted:

Dated: December 17, 2012

PUBLIC CITIZEN LITIGATION GROUP



By: _____
Paul Alan Levy
Attorney for Plaintiff Christopher Recouvreur