

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

NIKE, INC.)	
)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 07 C 7108
)	
KING SPORTS, INC.,)	Judge Ruben Castillo
D/B/A TURBO POWER GOLF,)	
HUNG YING CHANG,)	Magistrate Jan R. Nolan
KROOKEDSTIX, INC., AND)	
GIGAGOLF, INC.)	
)	
Defendants.)	Jury Trial Demanded

**STIPULATED MOTION FOR ENTRY OF CONSENT
JUDGMENT AND PERMANENT INJUNCTION – KROOKEDSTIX, INC.**

NIKE, Inc. and KrookedStix, Inc. having met, conferred, and agreed to resolve their dispute upon execution of a separate settlement agreement and entry of a consent judgment, Plaintiff, NIKE, Inc., with Defendant’s, KrookedStix, Inc., agreement, respectfully moves for entry of the executed Consent Judgment and Permanent Injunction submitted herewith.

Respectfully submitted,

Dated: February 25, 2008

By: /s Thomas J. Lerdal
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Attorneys for Plaintiff, NIKE, Inc.

CERTIFICATE OF SERVICE

On February 25, 2008, I electronically filed the foregoing STIPULATED MOTION FOR ENTRY OF CONSENT JUDGMENT AND PERMANENT INJUNCTION – KROOKEDSTIX INC. through the Court’s ECF system, which will send a notice via electronic filing to all counsel of record, including:

Mark M. Grossman
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**Attorneys for Defendant,
GigaGolf, Inc.**

In addition, the following parties were served via First Class Mail:

Jonathon P. Palbicke
2130 N. Bonnie Brook Lane,
Waukegan, Illinois, 60087.
President of Defendant, KrookedStix, Inc.

/s Thomas J. Lerdal
Thomas J. Lerdal

3. KrookedStix acknowledges that its offers to sell and/or sales of certain golf clubs, including the Turbo Power XQ V92 Driver, SV2 460 Driver, SV2 Fairway Woods, Turbo Power VOS2 Irons, SV2 OS Irons, Turbo Power SV2 Irons, and Turbo Power V91 Irons infringe the NIKE Design Patents.

4. KrookedStix represents that it has sold no more than 49 clubs that infringe the NIKE Design Patents and that it has no quantity of the clubs listed in paragraph 3 above in inventory.

5. KrookedStix is permanently enjoined and prohibited from making, using, selling, offering to sell, and/or importing into the United States its Turbo Power XQ V92 Driver, SV2 460 Driver, SV2 Fairway Woods, Turbo Power VOS2 Irons, SV2 OS Irons, Turbo Power SV2 Irons, and Turbo Power V91 Irons, or any colorable imitations thereof, and shall not induce others to make, use, sell, or offer to sell such golf products, or cause such products to be imported into the United States.

6. Each party shall bear its own costs and attorney fees.

7. This Court shall retain jurisdiction over the Parties for the purpose of enforcing the terms of this Consent Judgment and Permanent Injunction.

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8. This Order represents a final adjudication of all claims, counterclaims, and defenses that were, or could have been, brought between NIKE and KrookedStix in this case. This Order is intended to be final and shall bind NIKE and KrookedStix, and their affiliates and successors on all issues that were or could have been litigated in this proceeding.

Entered: _____, 2008

Ruben Castillo
United States District Judge

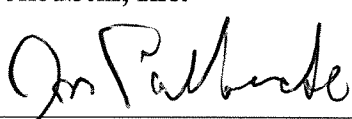
Agreed to:

NIKE, Inc.

By: 

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Thomas J. Lerdal
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KrookedStix, Inc.

By: 

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