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7 Attorney for Defendant Charles Carreon

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10  
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

17:00:53 -07'00'

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