

FOLKMAN LAW OFFICES, P.C.

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

HELMER, CONLEY & KASSELMAN,
P.A., et al.,

Plaintiffs,

vs.

HARK AND HARK, et al.,

Defendants.

Civil Action No.: 18-10927

CONSENT ORDER

WHEREAS, on June 22, 2018, Plaintiffs, Helmer, Conley & Kasselmann, P.A., Yaron Helmer, Esquire, and James M. Conley, Esquire, filed a Verified Complaint against Defendants, Hark and Hark, Jeffrey Hark, Esquire, and Richard Q. Hark, Esquire; and

WHEREAS, on June 25, 2018, Plaintiffs filed a Motion for Temporary Restraining Order and Order for Hearing on Preliminary Injunction; and

WHEREAS, on June 26, 2018, the Court entered a Temporary Restraining Order and Order for Hearing on Preliminary Injunction (the "TRO") enjoining Defendants from making use of Plaintiffs' names in certain online advertisements and setting a hearing for preliminary injunction for July 6, 2018; and


WHEREAS, the parties now jointly submit this Consent Order for the approval of and entry by the Court.

IT IS HEREBY ORDERED THAT:

1. Defendants and their officers, partners, agents, subcontractors, servants, employees, and affiliates are hereby permanently enjoined and restrained from:
 - a. Purchasing keywords from search engine operators (e.g., Google, Bing, Yahoo!, and AOL) that are identical or substantially similar to Plaintiffs' names;
 - b. Bidding on keywords that are identical or substantially similar to Plaintiffs' names;
 - c. Making use of Plaintiffs' names in a manner that is likely to confuse actual or potential clients in any form in connection with any of their advertising; and
2. Defendants represent through their Counsel that any bidding on keywords identified in Paragraphs 1(a) and (b), above, was terminated effective June 26, 2018 in accordance with the TRO.
3. Defendants shall, within five (5) days of the date of this Order, provide Plaintiffs' counsel with a sworn declaration signed by Defendants attesting that Defendants have cancelled any and all contracts with search engine operators for keywords that are identical or substantially similar to Plaintiffs' names.
4. Defendants will immediately cease and desist from any further use of Plaintiffs' names or derivations thereon in connection with any advertising or marketing purposes.

Dated this 3rd ^{July} day of ~~June~~, 2018.

at Camden, New Jersey



HON. NOEL L. HILLMAN
UNITED STATES DISTRICT JUDGE

The undersigned hereby apply for and consent to the entry of this Consent Order:

For the Plaintiffs:

For the Defendants:

FOLKMAN LAW OFFICES, P.C.

WEIR & PARTNERS LLP

By:

By:


BENJAMIN FOLKMAN


STEVEN E. ANGSTREICH

Dated:

Dated:

7/3/18

7/3/18