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8 Attorneys for Plaintiffs
9 Playmore Corporation and SNK NEOGEO USA Corporation

10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
12 **SOUTHERN DIVISION - SANTA ANA**

13 PLAYMORE CORPORATION,
14 and SNK NEOGEO USA
15 CORPORATION,

16 Plaintiffs,

17 vs.

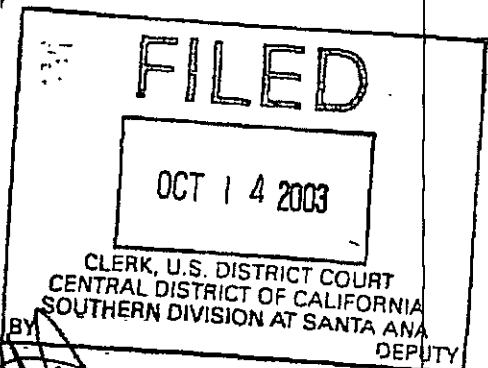
18 ARCADE INFINITY, INC.,
19 WORLDWIDE VIDEO
20 ENTERTAINMENT, INC., DION
21 DAKIS, d.b.a. NEOGEO FREAK,
22 and CHRIS RAY,

23 Defendants.

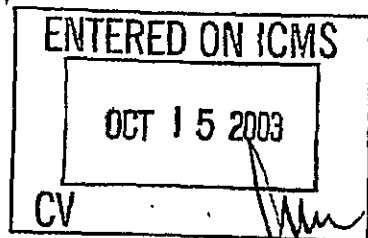
) Case No. SA CV 02-1107 DOC MLGx

) **STIPULATED PERMANENT**
) **INJUNCTION AGAINST**
) **DEFENDANTS DION DAKIS,**
) **d.b.a. NEOGEO FREAK, AND**
) **CHRIS RAY**

24
25 Plaintiffs SNK Playmore Corporation (formerly "Playmore Corporation")
26 ("Playmore") and SNK NEOGEO USA CORPORATION ("SNK") (collectively
27 "Plaintiffs") on the one hand, and Defendants Dion Dakis, d.b.a. NeoGeo Freak
28 ("Dakis") and Chris Ray ("Ray") (collectively "Defendants"), on the other hand,



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1 hereby agree and stipulate to the following Permanent Injunction against
2 Defendants, as follows:

3 **1. FINDINGS OF FACT:**

4 (a) Playmore and SNK have filed a Complaint for, inter alia, copyright
5 infringement against Defendants, among others.

6 (b) On December 4, 2002, this Court granted Playmore and SNK's ex parte
7 application for Temporary Restraining Order, Order to Show Cause, Order for
8 Seizure or Impoundment, and Temporary Order Sealing the File.

9 (c) On December 11, 2002, Playmore and SNK, with the assistance of the
10 United States Marshal Service, executed the Court's seizure and impoundment
11 order on Defendants. Upon searching one of Defendants' places of business,
12 Plaintiffs located and seized allegedly infringing video game cartridges, video
13 game player machines ("one slots"), various hardware, and printed materials.

14 (d) On January 15, 2003, The Honorable Judge David O. Carter of the U.S.
15 District Court for the Central District (Southern Division) issued, an Order
16 granting Plaintiffs' application for Preliminary Injunction against Defendant Dakis,
17 d.b.a. NeoGeo Freak.

18 (e) On January 31, 2003, NeoGeo Freak, who was then discovered to be a
19 fictitious business name of Dion Dakis, filed an Answer to the Complaint.

20 (f) On March 12, 2003, Plaintiffs filed a First Amended Complaint
21 terminating NeoGeo Freak and adding Defendants Dakis and Ray.

22 (g) On May 6, 2003, Ray filed his Answer to the First Amended Complaint.

23 (h) On May 22, 2003, Dakis filed his Answer to the First Amended
24 Complaint.

25 (i) On June 18, 2003, a settlement conference was held by Discovery
26 Magistrate Marc L. Goldman wherein Plaintiffs reached an agreement on a full and
27 complete settlement of the case with, among others, Dakis and Ray.
28

1 (j) In consideration of the Settlement and Release Agreement and for other
2 good and valuable consideration, the receipt and sufficiency of which is hereby
3 acknowledged, this Stipulation is to remedy Plaintiffs' irreparable harm and lack of
4 adequate remedy without a permanent injunction.

5 **THEREFORE,**

6 **2. IT IS HEREBY ORDERED** that pursuant to 17 U.S.C. §§ 502 & 503,
7 Defendants, their officers, directors, agents, servants, employees and attorneys, and
8 all those acting or attempting to act in active concert or participation with them, are
9 PERMANENTLY ENJOINED AND RESTRAINED from directly or indirectly
10 engaging in any of the following actions:

11 (a) Renting, selling, offering for sale, distributing, exploiting, copying,
12 marketing, advertising, promoting, transferring, shipping, licensing, handling, or
13 otherwise moving or disposing of, in any manner, any unauthorized video game
14 cartridges, video game player machines, hardware, and printed products, for those
15 video games delineated in the moving papers such as "The King of Fighters 2002,"
16 and those games set forth in Exhibit A ("Playmore Products");

17 (b) Destroying, hiding, moving, transferring, returning or otherwise moving
18 or disposing of, in any manner, any unauthorized video game cartridges, video
19 game player machines, hardware, and printed products, for those Playmore
20 Products;

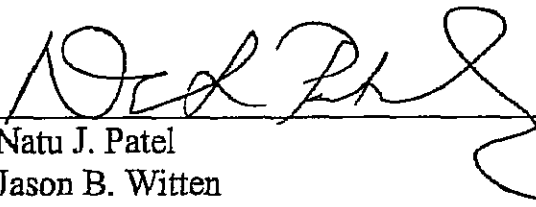
21 (c) Destroying, hiding, moving, transferring, or otherwise moving or
22 disposing of, in any manner, any documents or computer records related to the
23 acquisition, import, export, transfer, shipping, sale, or distribution of any
24 unauthorized video game cartridges, video game player machines, hardware, and
25 printed products, for those Playmore Products, except in compliance with this
26 Order or in connection with a request from Plaintiffs' counsel in this action; and

27 (d) Assisting, aiding, or abetting any other person or business entity in
28

1 engaging or performing any of the activities referred to in the preceding
2 subparagraphs 2(a) through 2(c).

3 **3. IT IS FURTHER ORDERED** that the Five Thousand Dollar (\$5,000)
4 bond previously posted by Plaintiffs is hereby discharged to Plaintiffs for that
5 portion of the above captioned matter as against Defendants Ray and Dakis.

6
7 Respectfully Submitted,
8 WANG & PATEL, PC

9 
10 Natu J. Patel
11 Jason B. Witten
12 Attorneys for Plaintiffs
13 SNK Playmore Corporation and SNK
14 NEOGEO USA Corporation

Dated: 9/30/03

15 DION DAKIS

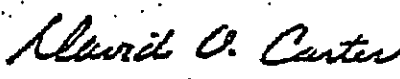
16
17 _____ Dated: _____
18 Dion Dakis, for himself and as the d.b.a.
19 of NeoGeo Freak

20 CHRIS RAY

21
22 _____ Dated: _____
23 Chris Ray, for himself

24 **IT IS SO ORDERED.**

25 Dated this 14 day of ^{October} ~~September~~, 2003

26
27 
28 HONORABLE DAVID O. CARTER
UNITED STATES DISTRICT COURT JUDGE

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Respectfully Submitted,
WANG & PATEL, PC

Dated: _____

Natu J. Patel
Jason B. Witten
Attorneys for Plaintiffs
SNK Playmore Corporation and SNK
NEOGEO USA Corporation

DION DAKIS

Dated: 9/29/03

~~Dion Dakis, for himself and as the d.b.a.~~
~~of NeoGeo Freak~~

CHRIS RAY

Dated: _____

Chris Ray, for himself

IT IS SO ORDERED.

Dated this ____ day of September, 2003

HONORABLE DAVID O. CARTER
UNITED STATES DISTRICT COURT JUDGE

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11 Natu J. Patel
12 Jason B. Witten
13 Attorneys for Plaintiffs
14 SNK Playmore Corporation and SNK
15 NEOGEO USA Corporation

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17 DION DAKIS

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20 Dion Dakis, for himself and as the d.b.a.
21 of NeoGeo Freak

22 CHRIS RAY

23
24 _____ Dated: 9/29/03

25 Chris Ray, for himself

26
27 **IT IS SO ORDERED.**

28 Dated this ____ day of September, 2003

HONORABLE DAVID O. CARTER
UNITED STATES DISTRICT COURT JUDGE

List of Playmore Corporation and SNK NEOGEO USA CORPORATION Titles

1. ADK - Gan Gan - Japanese
2. Aero Fighters 2 - English
3. Aero Fighters 2 - Sonic Wings 2 - Japanese
4. Aero Fighters 3 - Japanese only
5. Aggressors of Dark Kombat - English
6. Alpha Mission 2
7. Andro Dunos
8. Art of Fighting
9. Art of Fighting 2
10. Art of Fighting 3 - English
11. Art of Fighting 3 - Japanese
12. Bang Bead
13. Bang Busters
14. Baseball Stars Professional
15. Baseball Stars 2
16. Blazing Star - Japanese only
17. Blue's Journey - English
18. Blue's Journey - Raguy - Japanese
19. Breakers - Japanese
20. Breakers Revenge
21. Burning Fight
22. Captain Tomaday
23. Crossed Swords
24. Crossed Swords 2
25. Cyberlip
26. Double Dragon - English
27. Double Dragon - Japanese
28. Eightman
29. Fatal Fury - English
30. Fatal Fury - Japanese
31. Fatal Fury 2
32. Fatal Fury Special - English
33. Fatal Fury Special - Japanese
34. Fatal Fury 3 - English
35. Fatal Fury 3 - Japanese
36. Fight Fever
37. Flip Shot
38. Football Frenzy
39. Galaxy Fight - English
40. Galaxy Fight - Japanese
41. Ganryu
42. Ghost Pilots
43. Goal Goal Goal

44. Ironclad
45. Kabui Klash - Japanese
46. Karnov's Revenge
47. Karnov's Revenge/Fighter History Dynamite - Japanese
48. King of Fighters '94 - English
49. King of Fighters '94 - Japanese
50. King of Fighters '95 - English
51. King of Fighters '95 - Japanese
52. King of Fighters '96 - English
53. King of Fighters '96 - Japanese
54. King of Fighters '97 - English
55. King of Fighters '97 - Japanese
56. King of Fighters '98 - English
57. King of Fighters '98 - Japanese
58. King of Fighters '99 - English
59. King of Fighters '99 - Japanese
60. King of Fighters 2000 - English
61. King of Fighters 2000 - Japanese
62. King of Fighters 2001 - English
63. King of Fighters 2001 - Japanese
64. King of Fighters 2002 - English
65. King of Fighters 2002 - Japanese
66. King of Fighters 2002 Plus - English
67. King of Fighters 2002 Plus - Japanese
68. King of the Monsters
69. King of the Monsters - Japanese
70. King of the Monsters 2
71. Kizuna Encounter - English
72. Kizuna Encounter - Japanese
73. Last Blade, The - English
74. Last Blade, The - Japanese
75. Last Blade 2, The - English
76. Last Blade 2, The - Japanese
77. Last Resort
78. League Bowling
79. Legend of Success Joe - Japanese
80. Magical Drop
81. Magician Lord
82. Mahjong Bakatonosama - Japanese only
83. Mahjong Janshin Densetsu - Japanese only
84. Mahjong Kyo Retsuden - Japanese only
85. Mahjong Minasano - Japanese only
86. Mark of the Wolves - English
87. Mark of the Wolves - Japanese
88. Master of Syougi

89. Matrimalee
90. Metal Slug - English
91. Metal Slug - NGF (economy version)
92. Metal Slug - Japanese
93. Metal Slug 2 - English
94. Metal Slug 2 - Japanese
95. Metal Slug X - English
96. Metal Slug X - Japanese
97. Metal Slug 3 - English
98. Metal Slug 3 - Japanese
99. Metal Slug 4
100. Mutation Nation - English
101. Mutation Nation - Japanese
102. Nam 1975 - English
103. Nam 1975 - Japanese - plastic (extremely rare)
104. Neo Driftout
105. Neo Turfmasters - English
106. Neo Turfmasters - Japanese
107. NeoGeo Cup 98 - Japanese
108. Nightmare in the Dark
109. Ninja Combat
110. Ninja Commando
111. Ninja Masters - English
112. Ninja Masters - Jjapanese
113. Overtop - Japanese only
114. Pleasure Goal
115. Power Spikes 2
116. Prehistoric Isle 2
117. Pulstar - Japanese only
118. Quiz Chibi Marukochan Deluxe
119. Quiz Detective
120. Quiz Detective 2
121. Quiz King of Fighters
122. Rage of the Dragons
123. Ragnagard - Japanese
124. Real Bout Fatal Fury
125. Real Bout Fatal Fury - Japanese
126. Real Bout Fatal Fury Special - English
127. Real Bout Fatal Fury Special - Japanese
128. Real Bout Fatal Fury 2 - English
129. Real Bout Fatal Fury 2 - Japanese
130. Riding Hero
131. Robo Army
132. Samurai Showdown - English
133. Samurai Showdown 2 - Euro - NeoGeo logo

134. Samurai Showdown 2 - Japanese
135. Samurai Showdown 3 - English
136. Samurai Showdown 3 - Japanese
137. Samurai Showdown 4 - English
138. Samurai Showdown 4 - Japanese
139. Savage Reign
140. Sengoku - English
141. Sengoku - Japanese
142. Sengoku 2 - English
143. Sengoku 2 - Japanese
144. Sengoku 3 - English
145. Sengoku 3 - Japanese
146. Shock Troopers
147. Shock Troopers: 2nd Squad - Japanese
148. Soccer Brawl
149. Spin Master - English
150. Spin Master - Miracle Adventure
151. Stakes Winner
152. Stakes Winner 2 - Japanese only
153. Street Hoops
154. Strikers 1945 PLUS
155. Super Dodgeball
156. Super Sidekicks
157. Super Sidekicks 2
158. Super Sidekicks 3
159. Super Spy, The
160. Thrash Rally
161. Top Hunter - English
162. Top Hunter - Japanese
163. Top Players Golf
164. 2020 Super Baseball
165. Twinkle Star Sprites - Japanese only
166. Ultimate 11, The - English
167. Ultimate 11, The - Japanese
168. Viewpoint
169. V-Liner
170. Voltage Fighter Gowcaizer - English
171. Voltage Fighter Gowcaizer - Japanese
172. Windjammers - Flying Power Disc - Japanese
173. World Heroes
174. World Heroes 2
175. World Heroes 2 Jet
176. World Heroes Perfect - English
177. World Heroes Perfect - Japanese
178. Warlocks of the Fates
179. World Soccer 96
180. Zed Blade