

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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**FORD MOTOR COMPANY,**

*Plaintiff,*

vs.

**HONORABLE NANCY G. EDMUNDS**

**CIVIL ACTION NO. 99-74205**

**ROBERT LANE,  
d/b/a WARNER PUBLICATIONS,**

*Defendant.*

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ROBERT C.J. TUTTLE (P25222)  
FRANK A. ANGILERI (P45611)  
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*Of Counsel*

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*Attorney for Defendant*

**STIPULATED PERMANENT INJUNCTION**

Having been advised that the parties have reached settlement terms and have agreed to the entry of this Stipulated Permanent Injunction, it is **ORDERED, ADJUDGED, and DECREED:**

1. Plaintiff, Ford Motor Company, is a Delaware corporation having a principal place of business at The American Road, Dearborn, Michigan 48021. As used herein, "Ford" includes Ford Motor Company and all subsidiaries and affiliates thereof.

2. Defendant, Robert Lane resides in the State of Michigan at 4450 Westland, Dearborn, Michigan. As used herein, "Lane" includes Robert Lane, his attorneys, agents, employees and all persons working or affiliated or associated with "blueovalnews.com."

3. This Court has subject matter jurisdiction over the claims asserted under 15 U.S.C. § 1121, 28 U.S.C. § 1331 and 1332(a) and supplemental jurisdiction over the state law claim pursuant to 28 U.S.C. § 1367.

4. Venue is proper in this Court pursuant to 28 U.S.C. § 1391.

5. Lane and those persons in active concert or participation with Lane who receive actual notice of this Stipulated Permanent Injunction by personal service or otherwise, are **permanently enjoined** from (1) committing any acts of infringement of Ford's copyrights, including unpublished works known or which should have been known by Lane to have been prepared by a Ford employee within the scope of his or her employment, or specially ordered or commissioned by Ford, if not prepared by an employee; (2) interfering with Ford's contractual relationship with its employees by soliciting Ford's employees to provide or deliver Ford trade secrets or other confidential information; (3) using any of Ford's trademarks or any other mark likely to be confused with any of Ford's trademarks; (4) posting or otherwise disseminating Ford documents; and (5) posting or disseminating information from Ford documents not of a public concern.

6. Ford does not waive any right to seek damages and/or additional injunctive relief in the future, including but not limited to damages from Lane for, and/or an injunction

enjoining Lane from, posting or otherwise disseminating information that is not enjoined above but which Ford believes violates its trade secret or other rights.

7. The parties shall bear their own costs and attorney fees.

8. The Court shall retain jurisdiction over the subject matter and parties hereto for the purpose of enforcing the terms of this Stipulated Permanent Injunction. In the event of a breach of the terms of the Stipulated Permanent Injunction, Ford shall be entitled to injunctive relief and contempt sanctions.

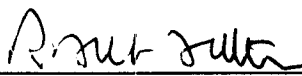
**IT IS SO ORDERED.**

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HONORABLE NANCY G. EDMUNDS  
United States District Judge


Dated: \_\_\_\_\_

**STIPULATED TO AND AGREED:**

  
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ERNIE L. BROOKS (P22875)  
ROBERT C.J. TUTTLE (P25222)  
FRANK A. ANGILERI (P45611)  
**Brooks & Kushman P.C.**

*Attorneys for Plaintiff*  
FORD MOTOR COMPANY

Date: 12-20-00

  
\_\_\_\_\_  
C. MARK PICKRELL  
*Attorney for Defendant*  
ROBERT LANE, individual and  
d/b/a WARNER PUBLICATIONS

Date: 11/8/00