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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AKRURA PTE. LTD, a Singapore
company,

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a
Vietnam company, BEGAMOB
GLOBAL, and TRUSTED TOOLS &
UTILITIES APPS,

Defendants.

Case No.: 2:23-cv-000102

[PROPOSED] ORDER ENTERING
FINAL DEFAULT JUDGMENT

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.
Stevenson

1 Before the Court is Plaintiff Akrura PTE LTD (“Plaintiff”)’s motion for the
2 Court to enter final default judgment against Defendants Apero Technologies
3 Group, Begamob Global, and Trusted Tools & Utilities Apps (collectively,
4 “Defendants”). Having reviewed the Complaint, case records and supporting
5 documents regarding Plaintiff’s Rule 55(b) Motion for Default Judgment, the
6 Court hereby orders that:

7 (1) Defendants and all of their agents and representatives, and any other
8 persons and entities acting on Defendants’ behalf or with them, be permanently
9 enjoined and restrained from:

- 10 (i) using Plaintiff’s Blood Pressure mobile application or any of
11 the infringing images, language and interface layouts, as
12 described in Plaintiff’s Complaint and attached exhibits;
- 13 (ii) using mobile applications, images, language or interface
14 layouts, which are substantially similar to Plaintiff’s Blood
15 Pressure mobile application or its images, language and
16 interface layout, as described in Plaintiff’s Complaint and
17 attached exhibits;
- 18 (iii) committing any acts intended to cause consumers to believe
19 that Defendants’ mobile application(s) are offered for download
20 or sold under Plaintiff’s control, authorization, or approval; and
- 21 (iv) creating, providing or offering for download or sale any mobile
22 applications substantially similar to Plaintiff’s Blood Pressure
23 mobile application.

24 (2) Defendants shall, within ten (10) business days after receipt of this
25 Order, remove all of its infringing mobile applications and other infringing content
26 from any online platform;

27 (3) Should Defendants’ infringing mobile applications remain active on any
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1 online platforms of third-party providers after ten (10) business days following
2 Defendants' receipt of this Order, and upon Plaintiff's request to such third-party
3 providers, those third-party providers shall, within ten (10) business days after
4 receipt of this Order, remove Defendants' infringing mobile applications.

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6 Entered this ____ day of _____, 2023

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9 Hon. Josephine L. Staton
U.S. District Judge

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