

FILED

FEB 20 2013

KIM TURNER, Court Exec. Officer
MARIN CO. SUPERIOR COURT
By: E. [Signature]

1 Clifford A. Chanler, State Bar No. 135534
2 Gregory M. Sheffer, State Bar No. 173124
3 THE CHANLER GROUP
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5 Mill Valley, CA 94941
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8 Attorneys for Plaintiff
9 RUSSELL BRIMER

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 FOR THE COUNTY OF MARIN
12 UNLIMITED CIVIL JURISDICTION

13 RUSSELL BRIMER,

14 Plaintiff,

15 v.

16 LIBERTY APPAREL COMPANY INC., and
17 DOES 1-150,

18 Defendants.

Case No. CIV 1102299

~~[PROPOSED]~~ DEFAULT JUDGMENT
AGAINST LIBERTY APPAREL COMPANY
INC.

Complaint Filed: May 5, 2011

ENTERED

1 Pursuant to California Code of Civil Procedure Section 585, the Court hereby enters final
2 judgment in favor of plaintiff Russell Brimer and against defendant Liberty Apparel Company
3 Inc. as follows:

4 1. Liberty Apparel Company Inc. is permanently enjoined from offering any jeans
5 with belts made from materials containing Lead for sale in California or to any California retailer
6 without providing a clear and reasonable warning of the carcinogenic and reproductive harm
7 associated with Lead, pursuant to Health & Safety Code Section 25249.7(a);

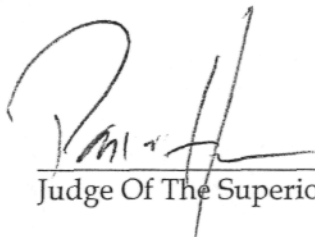
8 2. Liberty Apparel Company Inc. is ordered to pay \$72,000.00 in statutory civil
9 penalties, pursuant to Health & Safety Code Section 25249.7(b);

10 3. Liberty Apparel Company Inc. is ordered to pay \$59,794.50 to The Chanler Group
11 as reimbursement of reasonable attorney fees pursuant to Code of Civil Procedure Section 1021.5
12 and is also ordered to pay The Chanler Group \$610.08 as reimbursement of its reasonable costs.

13 4. All payment amounts required pursuant to Paragraphs 2 and 3 of this Default
14 Judgment are due within thirty (30) days of entry of this Default Judgment. These amounts shall
15 be paid to Brimer's attorneys by check payable to "The Chanler Group" and shall be sent to The
16 Chanler Group at 2560 Ninth Street, Suite 214, Berkeley, California, 94710.

17 IT IS SO ORDERED.

18
19 Dated: 2-10, 2013



Judge Of The Superior Court

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59,794.50+
610.08+
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132,404.580