

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MICROSOFT CORPORATION, a Washington  
corporation, )

Plaintiff, )

v. )

SOLUTION HAT, LLC, an Indiana limited liability  
company, dba Think Global; and Saurabh Seth, an  
individual, )

Defendants. )

Case No. 1:22-cv-396-TWP-TAB

**STIPULATED MOTION FOR  
PERMANENT INJUNCTION**

**STIPULATION**

Plaintiff Microsoft Corporation (“Microsoft”) and Defendants Solution Hat LLC d/b/a ThinkGlobal and Saurabh Seth (collectively, “Defendants”) by and through their respective counsel of record, notify the Court that the parties have reached a settlement of all claims in this matter. Pursuant to the terms of that settlement, the Parties stipulate and agree to entry of the attached permanent injunction.

DATED: August 31, 2022

**DAVIS WRIGHT TREMAINE LLP**

**ADVITAM IP, LLC**

By s/ Meagan Himes  
Bonnie MacNaughton (*admitted pro hac*)  
920 Fifth Avenue, Suite 3300  
Seattle, Washington 98104  
(206) 757-3150 (Telephone)  
(206) 757-7700 (Facsimile)  
[bonniemacnaughton@dwt.com](mailto:bonniemacnaughton@dwt.com)

By s/ Michele S. Katz (with permission)  
Michele S. Katz (*admitted pro hac*)  
150 S. Wacker Drive, Suite 2400  
Chicago, IL 60606  
(312) 332-7710 (Telephone)  
(312) 332-7701 (Facsimile)  
[mkatz@advitamip.com](mailto:mkatz@advitamip.com)

Meagan Himes (*admitted pro hac vice*)  
1300 SW Fifth Avenue, Suite 2400  
Portland, Oregon 97210  
(503) 241-2300 (Telephone)  
(503) 778-5299 (Facsimile)  
[meaganhimes@dwt.com](mailto:meaganhimes@dwt.com)

**BARNES & THORNBURG LLP**

Jeff M. Barron (27730-49)  
11 South Meridian Street  
Indianapolis, IN 46204-3535  
317-236-1313 (Telephone)  
317-231-7433 (Facsimile)  
[jeff.barron@btlaw.com](mailto:jeff.barron@btlaw.com)

*Attorneys for Plaintiff Microsoft Corporation*

**HOOVER HULL TURNER LLP**

Alice M. Morical (18418-49)  
Christopher D. Wagner (32189-82)  
111 Monument Circle, Suite 4400  
P.O. Box 44989  
Indianapolis, IN 46244  
(317) 822-4400 (Telephone)  
(317) 822-0234 (Facsimile)  
[amorical@hooverhullturner.com](mailto:amorical@hooverhullturner.com)  
[cwagner@hooverhullturner.com](mailto:cwagner@hooverhullturner.com)

*Attorneys for Defendants Solution Hat LLC  
d/b/a ThinkGlobal and Saurabh Seth*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MICROSOFT CORPORATION, a Washington  
corporation, )

Plaintiff, )

v. )

SOLUTION HAT, LLC, an Indiana limited liability  
company, dba Think Global; and Saurabh Seth, an  
individual, )

Defendants. )

Case No. 1:22-cv-396-TWP-TAB

**STIPULATED PERMANENT  
INJUNCTION**

**PERMANENT INJUNCTION**

Pursuant to the stipulation of the parties, IT IS HEREBY ORDERED that Defendant Solution Hat LLC d/b/a ThinkGlobal and its directors, principals, officers, employees, shareholders, agents, successors, assigns, and all others in active concert or participation with them, including but not limited to Defendant Saurabh Seth, are enjoined and restrained from:

1. Using any trademarks registered by or otherwise associated with the Microsoft Corporation (the “Microsoft Trademarks”) or any simulation, reproduction, counterfeit, copy, or colorable imitation of them, in any manner in connection with any advertising, marketing, offer for sale, promotion, display, publication, website, email, or software, without Microsoft’s prior written consent (which it has sole discretion to provide or withhold for any reason);
2. Using any false designation of origin or false or misleading description or false or misleading representation that can or is likely to lead the trade or public or individuals erroneously to believe that any website, email, advertisement, pop-up, or other marketing

material has been produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Microsoft, when such is not true in fact;

3. Engaging in any other activity constituting an infringement or dilution of any of the Microsoft Trademarks, or of Microsoft's rights in, or right to use or to exploit, such trademarks or services marks; and

4. Knowingly assisting any other person or business entity in engaging in or performing any of the activities listed above.

This Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the Parties' settlement agreement and this Stipulated Permanent Injunction.

DATED THIS \_\_\_\_\_ day of \_\_\_\_\_, 2022.

---

UNITED STATES DISTRICT JUDGE

*Service will be made electronically on all ECF-registered counsel of record via email generated by the Court's ECF system.*