

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOCUMENT
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DATE FILED: OCT 26 2012

WALTER ARNSTEIN, INC. d/b/a THE
NATURAL SAPPHIRE COMPANY,

Plaintiff,

v.

TRANSPACIFIC SOFTWARE PVT LTD,
and PRASHANT TELANG,

Defendants.

Case No. 11 CV 5079 (AJN)

ATN

PROPOSED ORDER
FOR DEFAULT JUDGMENT

This action, having commenced on July 22, 2011; by the filing of the Summons and Original Complaint, and the Amended Complaint having been filed on October 18, 2011, and a copy of the Summons and Amended Complaint having been personally served upon the President of Defendant TransPacific Software Pvt. Ltd. ("Defendant TPS") on March 1, 2012, and Defendant TPS not having the answered the Amended Complaint, and the time for answering the Amended Complaint having expired, it is:

ORDERED, ADJUDGED AND DECREED: That the plaintiff Walter Arnstein, Inc. d/b/a The Natural Sapphire Company ("NSC") have judgment against Defendant TPS:

1. enjoining TPS, together with all of its officers, agents, servants, employees, representatives, attorneys and assigns, and all other persons, firms, or companies in active concert or participation with it from directly or

indirectly posting negative reviews about NSC, online on Web sites, blogs, forums, in chat rooms, and otherwise;

2. ordering TPS to remove all such false reviews, including, but not limited to, the reviews listed below:

- i. <http://www.scaminformer.com/scam-report/the-natural-sapphire-company-michael-arnstein-natural-c47046.html>
- ii. <http://www.scaminformer.com/scam-report/the-natural-sapphire-company-thenaturalsapphirecompany-com-c22150.html>
- iii. <http://www.scaminformer.com/scam-report/the-natural-sapphire-company-credit-card-info-is-unsafe-c38737.html>
- iv. <http://www.scaminformer.com/scam-report/the-natural-sapphire-company-walter-arnstein-caution-the-c56989.html>
- v. <http://www.scaminformer.com/scam-report/want-to-ruin-your-engagement-then-buy-from-new-york-based-the-natural-sapphire-company-fraud-company-c76063.html>
- vi. <http://the-natural-sapphire-company.pissedconsumer.com/the-natural-sapphire-company-credit-card-20110824257445.html>
- vii. <http://the-natural-sapphire-company.pissedconsumer.com/the-natural-sapphire-company-www-thenaturalsapphirecompany-com-are-fraudsters-20110514237589.html>
- viii. <http://the-natural-sapphire-company.pissedconsumer.com/the-natural-sapphire-company-tricks-consumers-by-pitching-their->

[sapphires-as-investment-grade-in-re-20111028271158.html](http://www.ripoffreport.com/jewelers/the-natural-sapphire/the-natural-sapphire-company-w-2c541.htm)

- ix. <http://the-natural-sapphire-company.pissedconsumer.com/want-to-ruin-your-engagement-then-buy-from-new-york-based-the-natural-sapphire-company-20120224299768.html>
- x. <http://the-natural-sapphire-company.pissedconsumer.com/want-to-up-your-engagement-buy-sapphire-engagement-ring-from-new-york-based-nsc-20120301301307.html>
- xi. <http://www.ripoffreport.com/jewelers/the-natural-sapphire/the-natural-sapphire-company-w-2c541.htm>
- xii. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-m-8b50f.htm>
- xiii. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-n-6a662.htm>
- xiv. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-ac56f.htm>
- xv. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-ebe3b.htm>
- xvi. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-w-e88f1.htm>
- xvii. <http://www.ripoffreport.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-1b3fe.htm>

- xviii. <http://www.badbusinessbureau.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-1f853.htm>
- xix. <http://www.badbusinessbureau.com/jewelry-stores/the-natural-sapphire/the-natural-sapphire-company-1b3fe.htm>
- xx. <http://creditcardforum.com/credit-card-fraud/2592-natural-sapphire-company-credit-card-not-masked.html>
- xxi. <http://www.scampond.com/the-natural-sapphire-company-www.thenaturalsapphirecompany.com-are-fraudsters-/1233>
- xxii. <http://www.scampond.com/?id=805&scam=The+Natural+sapphire+Company+Credit+card+confidentiality+issue>
- xxiii. <http://www.complaintsboard.com/complaints/the-natural-sapphire-company-c492073.html>
- xxiv. <http://www.complaintsboard.com/panel.php?action=groups&subaction=viewdiscussions&id=2936>
- xxv. <http://www.complaintsboard.com/complaints/natural-blue-sapphire-for-engagement-ring-c495482.html>
- xxvi. <http://www.complaintsboard.com/complaints/the-natural-sapphire-company-new-york-c559958.html>
- xxvii. <http://www.complaintsboard.com/complaints/the-natural-sapphire-company-ny-new-york-c591544.html>
- xxviii. <http://www.scamchasers.com/reviews/the-natural-sapphire-the-natural-sapphire-company-michael-arnstein-natural-c47046.html>

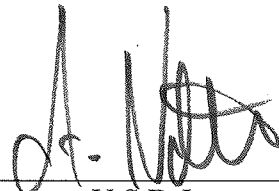
- xxix. <http://www.shamscam.com/the-natural-sapphire-company-a2959.html>
- xxx. <http://www.complaintnow.com/The-Natural-Sapphire-Company/complaint/complaints/thread/print/158127/169323>
- xxxi. <http://www.reviewstalk.com/complaints-reviews/natural-blue-sapphire-for-engagement-ring-113123.html>
- xxxii. <http://www.chargebackforum.com/gl/credit-card-debt/12072-natural-sapphire-company-credit-card-not-masked.html>
- xxxiii. <http://www.scam.com/showthread.php?t=141289>
- xxxiv. <https://www.facebook.com/naturalsapphires>
- xxxv. <https://plus.google.com/114346244658060191008/buzz>
- xxxvi. <https://plus.google.com/113566895405250626510>
- xxxvii. <https://plus.google.com/109856985025259285424>
- xxxviii. <http://twitter.com/#!/buyingsapphire>
- xxxix. <http://pinterest.com/civetapp/jewelry-web-sites-designs-by-transpacific/>
- xl. <http://digg.com/naturalsapphire/>
- xli. <http://SapphireEngagementRings.blogspot.com/>
- xlii. <http://www.NaturalSapphireCompany.net/>
- xliii. <http://blog.naturalsapphirecompany.net/>
- xliv. <http://www.TheNaturalSapphireCompany.org/>
- xlv. <http://sapphireengagementrings.blogspot.in/>
- xlvi. <http://naturalsapphirerings.tumblr.com/>

- xlvi. <http://ebay.naturalsapphirecompany.net/>
- xlvi. <http://www.NaturalSapphireCompany.com>
- xlix. <http://blip.tv/araja-south/the-natural-sapphire-company-credit-card-scam-behind-the-scene-expose-5863390>
- 1. http://digg.com/news/lifestyle/the_natural_sapphire_company_credit_card_scam_behind_the_scene_expose
- li. http://www.stupidvideos.com/video/science_technology/The_Natural_sapphire_Company_New_York_doctored_images_behind_the_scene_expose/#390684
- lii. <http://www.myspace.com/video/580205264/the-natural-sapphire-company-behind-the-scene-story/108567395>
- liii. <http://pinterest.com/transpacific/jewelry-web-sites-designs-by-transpacific/>
- liv. <http://www.weddingwire.com/reviews/the-natural-sapphire-company-new-york/c07678d1409e38c9.html>

- 3. enjoining TPS from assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in the above paragraphs (1) and (2);
- 4. granting such other and further relief as the Court may deem just and proper under the circumstances.

DATED: New York, New York
~~August~~, 2012

OCT 26,



U.S.D.J.

This document was entered on the docket
on _____.

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