

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE WATCHMAKERS OF SWITZERLAND
INFORMATION CENTER, INC., ET AL

Defendants.

Supplemental to
Civil Action No. 96-170
Date: February 28, 2006

Civil Part I Judge

STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

1. Rolex Watch U.S.A., Inc. ("Rolex"), successor in interest to Defendant the American Rolex Watch Corporation, will file a motion requesting that the Court terminate the Final Judgment entered by this Court on March 9, 1960 in the above-captioned matter ("Final Judgment"). The United States tentatively has agreed to the termination of the Final Judgment, but as a matter of policy does not consent to the termination of judgments without public notice and an opportunity for public comments.
2. Rolex shall publish at its own expense a notice of the proposed termination, in the form attached hereto as [Exhibit A](#), in (a) two consecutive issues of The Wall Street Journal and (b) simultaneous publications in Modern Jeweler and Professional Jeweler – both of which are monthly journals. An Order, in the form attached hereto as [Exhibit D](#), directing such publication, may be filed and entered by the Court forthwith, without further notice to any party or any other proceedings.

3. The United States will publish in the Federal Register a notice, in the form attached hereto as [Exhibit B](#), announcing the motion of Rolex to terminate the Final Judgment and the United States' tentative consent to it, summarizing the Complaint and Final Judgment, describing the procedures for inspection and obtaining copies of relevant papers, and inviting the submission of comments.

4. A period for public comment shall end sixty days after the last publication of the notices required by this Stipulation. Within a reasonable time after the conclusion of the sixty-day public comment period, the United States will file with the Court copies of all comments that it receives and its response to those comments.

5. An Order, a proposed form of which is attached hereto as [Exhibit C](#), terminating the Final Judgment, may be filed and entered by the Court upon the request of any party or by the Court *sua sponte*, at any time after the United States has filed with the Court any comments that it receives and any responses thereto and without further notice to any party or any other proceedings, provided that the United States has not withdrawn its tentative consent. The United States may withdraw its tentative consent at any time before the entry of an Order terminating the Final Judgment by filing a notice of withdrawal of its consent with the Court and serving a copy of said notice upon all other parties.

6. In the event that the United States withdraws its consent, or if the proposed Order terminating the Final Judgment is not entered pursuant to this Stipulation, then this Stipulation shall be of no effect whatsoever; the making of this Stipulation shall be without prejudice to any

party in this or any other proceeding; and the Stipulation shall not thereafter be used in this or any other action or for any other purpose.

Dated:

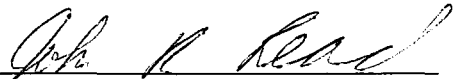
FOR PLAINTIFF
UNITED STATES OF AMERICA



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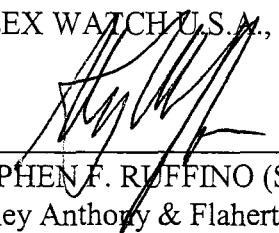


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Dated: February 28, 2006