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

UNITED STATES OF AMERICA, Plaintiff, v. ROLEX WATCH U.S.A., INC., Defendant.	Supplemental to Civil Action No. 96-170 Date: February 28, 2006 Civil Part I Judge

STIPULATION FOR ENTRY OF SETTLEMENT AGREEMENT AND ORDER

WHEREAS Plaintiff United States of America filed a Petition for an Order to Show Cause Why Defendant Rolex Watch U.S.A., Inc. Should Not Be Found in Civil Contempt ("Petition to Show Cause") on February 28, 2006;

AND WHEREAS the United States and Rolex Watch U.S.A., Inc. ("Rolex") have agreed upon a resolution of this matter without any admission or determination of wrongdoing by Rolex and without any findings or adjudication with respect to any issue of fact or law;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties that:

1. This Court has jurisdiction over the subject matter of this action and each of the parties to this action.

2. The proposed Settlement Agreement and Order in the form attached may be entered by the Court on the Court's own motion or the motion of the United States at any time, and without further notice to any party or any proceeding.

3. From the signing of this Stipulation, Rolex shall be bound by and comply with the terms of the proposed Settlement Agreement and Order as though they were in full force and effect as an order of the court.

4. The parties' execution of this Stipulation and entry of the proposed Settlement Agreement and Order discharges and settles any and all claims of the United States against Rolex arising out of the violations of Paragraphs VI.C and VI.H of the Final Judgment entered by this court on March 9, 1960, in United States v. The Watchmakers of Switzerland Information Center, Inc., Trade Reg. Rep. (CCH) ¶ 69,655 (S.D.N.Y. Mar. 9, 1960) ("Final Judgment"), from March 9, 1960 to the date of this Stipulation, as alleged in the Petition to Show Cause.

5. Neither this Stipulation nor the proposed Settlement Agreement and Order shall be construed to preclude the United States from bringing an action against Rolex for any violation(s) of the Final Judgment other than the alleged violations described in Paragraph 4 above.

Dated:

ROLEX WATCH U.S.A., INC.

2-24-06

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