

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PEASE LAW, APC
Bryan W. Pease (SBN 239139)
3960 West Point Loma Blvd., Ste. H-2562
San Diego, CA 92110
Ph. (619) 723-0369
Email: bryan@peaselaw.org

LAW OFFICES OF JOHN T. MAHER
John T. Maher (NYS Bar No. 2357408)
105 E. 122nd St. #4E
New York, NY 10035
Ph. (646) 675-8909
Email: johntmaher@yahoo.com
Pro hac vice application pending

Attorneys for Plaintiffs

FILED
Superior Court of California
County of Los Angeles
04/16/2024

David W. Slayton, Executive Officer / Clerk of Court
By: _____ D. Haro Deputy

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

COMPANION ANIMAL PROTECTION)
SOCIETY, a Delaware nonprofit corporation; and)
ALEXIS SANDOVAL, an individual,)
Plaintiffs,)
vs.)
PUPPY HEAVEN, INC., a Nevada corporation;)
BEN ESHEL, aka BEN ASHEL, an individual;)
KEREN ESHEL, aka KEREN ASHEL, an)
individual; MICHAL ESHEL, aka MICHAL)
ASHEL, an individual; and DOES 1-25,)
Defendants.)

CASE NO. 20STCV32479
STIPULATION AND [PROPOSED]
ORDER

1 TO THE COURT AND ALL PARTIES:

2 WHEREAS COMPANION ANIMAL PROTECTION SOCIETY takes issue with the following
3 paragraphs which appear on Defendant's PUPPY HEAVEN's website at <https://puppyheaven.com/faqs/>:

- 4 • "Team up with breeders who share our dedication to providing top-notch puppies. We're seeking partners who value social and environmental responsibility as much as we do. Say no to subpar breeders - we have a strict zero-tolerance policy. Join us in creating a world where quality and compassion go hand in paw!"
- 5 • "Building lasting, personal bonds with breeders enables us to collaborate closely with the passionate individuals behind the puppies we offer. We make regular visits to our breeders, ensuring continuous enhancement in both the well-being of our puppies and the methods employed in their upbringing. Our breeders are deeply committed to prioritizing the care and attention given to their pets and pups."

6 WHEREAS, Defendant PUPPY HEAVEN agrees, in the interest of compromise, without admitting fault
7 and in order to bring this litigation to timely conclusion to voluntarily remove the above statements from
8 its website; and

9 WHEREAS, removal of these paragraphs will render the hearing set for April 22, 2024 moot;

10 NOW THEREFORE, the parties agree as follows:

- 11 (1) that the above referenced paragraphs will be removed no later than April 17, 2024 at 5:00 p.m.
- 12 (2) that such removal of this paragraphs renders the injunction trial set for April 22, 2024 moot.
- 13 (3) Unless the Court vacates the April 22, 2024 hearing in its entirety, the parties still plan to
14 appear regarding the order to show cause why this matter should not be transferred to limited
15 jurisdiction (*Walker* Hearing).

16 Dated: April 12, 2024

17 By: 

18 Bryan W. Pease, Esq.
19 Attorney for Plaintiffs

20 Dated: April 12, 2024

21 By: 

22 Yossi Noudel
23 Attorney for Defendants

[PROPOSED] ORDER

The Court having reviewed the foregoing stipulation, and good cause appearing therefor,
IT IS HEREBY ORDERED that:

1. Defendant Puppy Heaven removes the following paragraphs from its website at
<https://puppyheaven.com/faqs/>:

- “Team up with breeders who share our dedication to providing top-notch puppies. We’re seeking partners who value social and environmental responsibility as much as we do. Say no to subpar breeders - we have a strict zero-tolerance policy. Join us in creating a world where quality and compassion go hand in paw!”
- “Building lasting, personal bonds with breeders enables us to collaborate closely with the passionate individuals behind the puppies we offer. We make regular visits to our breeders, ensuring continuous enhancement in both the well-being of our puppies and the methods employed in their upbringing. Our breeders are deeply committed to prioritizing the care and attention given to their pets and pups.”

2. Since the removal of the above-referenced paragraphs renders the injunction trial set for April 22, 2024 moot, the Court hereby vacates such hearing.

3. _____
 4. _____
 5. _____
 6. _____

IT IS SO ORDERED.

Dated: 04/16/2024

Randolph M. Hammock
Judge of the Los Angeles Superior Court