IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

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| MAM BABYARTIKEL GMBH, and BAMED AG, | ) | |
| Plaintiffs, | ) | |
| v. | ) | C.A. No. 07-608-SLR |
| LUV N' CARE, LTD., and MUNCHKIN, INC., | ) | |
| Defendants. | ) | |

**STIPULATION TO CONSENT JUDGMENT AND ORDER OF DISMISSAL WITH PREJUDICE**

Subject to the Court's approval, plaintiffs MAM Babyartikel ("MAM") and Bamed AG ("Bamed") and defendant, Munchkin, Inc. ("Munchkin"), by and through their undersigned counsel, hereby jointly stipulate to entry of final judgment as follows:

(1) The claims of United States Patent 6,514,275 ("the '275 patent") entitled "Pacifier" are valid and enforceable.

(2) The claim of United States Design Patent No. D441,083 ("the '083 design patent") entitled "Pacifier" is valid and enforceable.

(3) Munchkin and its officers, agents, servants, employees and attorneys, and all persons in active concert or participation with them who receive actual notice of this Judgment, shall be permanently enjoined and restrained from infringing the claims of the Patents-in-suit, and from making, using, selling, offering for sale or importing into the United States a pacifier having a shield configuration as is pictured in Exhibit A hereto or similar pacifier in such a manner that

could otherwise constitute infringement in the absence of a license to practice the claims of the '275 patent and/or the '083 design patent.

(4) This Consent Judgment shall constitute claim preclusion and issue preclusion as to allegations of infringement of the Patent-in-suit by the pacifier as is pictured in Exhibit A hereto.

(5) The Stipulation of plaintiffs MAM Babyartikel and Bamed AG and defendant, Munchkin, Inc., having been considered by the Court and with good cause appearing, the above entitled action is hereby dismissed with prejudice as to all parties and as to all claims, with each of the parties to bear its own costs and attorney fees. All relief not expressly granted herein is denied, and all rights of appeal are waived.

(6) The Court retains jurisdiction of this action for the purposes of enforcing this Consent Judgment.

SO ORDERED, _____, 2008.

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The Honorable Sue L. Robinson
United States District Judge

The undersigned approve as to the form and entry of the foregoing:

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# EXHIBIT A


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