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16	UNITED STATES DISTRICT COURT				
17	NORTHERN DISTRICT OF CALIFORNIA				
18	SAN FRANCISCO DIVISION				
19	DIGITATE WORK I I G		G 31 1 22	01001 CDD (ID)	
20	DISH NETWORK L.L.C.,	)		0-cv-01891-CRB (LB)	
21	Plaintiff,	)	STIPULATION F JUDGMENT AND	OR ENTRY OF FINAL D PERMANENT	
22	VG.	)	INJUNCTION: O		
23	VS.	)			
24	JADOO TV, INC., et al.,	)	Judge: Hon. Charle	es R. Breyer	
25	Defendants.	)			
26		)			
27		)			
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This stipulation is filed jointly by Plaintiff DISH Network L.L.C ("DISH") and Defendants Jadoo TV, Inc. and Sajid Sohail. DISH and Defendants request that the Court enter a final judgment and permanent injunction against Defendants.

## I. Nature of the Case

This is a copyright infringement case in which DISH sued Defendants Sajid Sohail and Jadoo TV, Inc. ("Jadoo"), a company that sells set-top boxes and mobile applications that consumers use to receive television channels and video-on-demand content. On June 3, 2023, the Court granted DISH's motion for summary judgment finding no genuine dispute of material facts as to Defendants Jadoo TV, Inc. and Sajid Sohail's liability for direct, contributory, and vicarious copyright infringement in violation of the Copyright Act, 17 U.S.C. § 501. (Dkt. 270.) More specifically, the Court found that Defendants transmitted television channels and content exclusively licensed to DISH ("Works"). (*Id.*) The Court also found that Sajid Sohail was personally liable for the infringement because, as Jadoo's founder, CEO, director, and majority shareholder, he was the "guiding spirit" behind the infringement. (*Id.*) On August 28, 2023, the parties submitted joint briefing on damages, entitlement to attorney's fees and costs, and injunctive relief. (Dkt. 277.)

## II. Relief Requested

DISH and Defendants agree that a final judgment should be entered for DISH on Counts I, II, and III of the Amended Complaint (Dkt. 194) for direct, contributory, and vicarious copyright infringement under 17 U.S.C. § 501. DISH and Defendants also agree that damages should be awarded to DISH in the amount of \$24,969,911, consisting of statutory damages of \$14,550,000 for 97 registered Works (calculated at \$150,000 per Work) and Defendants' profits of \$10,419,911 for 159 unregistered Works. 17 U.S.C. § 504(b), (c)(2). In addition, DISH and Defendants agree to the Court's entry of a permanent injunction, which is authorized pursuant to 17 U.S.C. § 502. A proposed final judgment and permanent injunction is being submitted concurrently with this stipulation.

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20					
21	FILER'S ATTESTATION				
22	A THE STATE OF THE				
23	Pursuant to Civil L.R. 5-1(h), the undersigned attests that concurrence in the filing of th				
	document has been obtained from each of the other signatories.				
24	/s/ Stephen M. Ferguson				
25	Stephen M. Ferguson				
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copyrighted works that Defendants willfully infringed (calculated at \$150,000 per work) and Defendants' profits of \$10,419,911 for 159 of DISH's unregistered copyrighted works that Defendants infringed. 17 U.S.C. § 504(b), (c)(2). Defendants shall be jointly and severally liable to DISH for the damages award.

- 4. Upon receiving actual notice of this order by personal service or otherwise, Defendants Jadoo TV, Inc. and Sajid Sohail, along with their officers, agents, servants, employees, and any other persons that are acting in active concert or participation with any of the foregoing, are permanently enjoined from:
  - publicly performing in the United States any works that air on the ATN Bangla, ATN News, NTV Bangla, SAB, Sony SET, SET MAX, and Times Now channels during any time period that DISH has the exclusive right to publicly perform such works;
  - b. materially contributing to or inducing the public performance of any such works in the United States, including by providing any streaming service or streaming device knowing that such works are accessible using that service or device; and
  - receiving any financial benefit from the public performance of such works c. in the United States, including through subscription fees or advertising revenue, if they had the right and ability to control that public performance of such works.
  - 5. This permanent injunction takes effect immediately.
  - 6. Each party is to bear its own attorneys' fees and costs.
  - 7. The Court retains jurisdiction for the purpose of enforcing this permanent injunction.

## IT IS SO ORDERED.

Dated: December 2, 2024

CHARLES R. BREYER

United States District Judge

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