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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

UNIVERSAL CITY STUDIOS
PRODUCTIONS LLLP; UNIVERSAL
CITY STUDIOS LLC; UNIVERSAL
TELEVISION LLC; UNIVERSAL
CONTENT PRODUCTIONS LLC;
DREAMWORKS ANIMATION LLC;
DISNEY ENTERPRISES, INC.;
PARAMOUNT PICTURES
CORPORATION; AMAZON CONTENT
SERVICES LLC; APPLE VIDEO
PROGRAMMING LLC; WARNER
BROS. ENTERTAINMENT INC.;
NETFLIX US, LLC; COLUMBIA
PICTURES INDUSTRIES, INC.; and
SCREEN GEMS, INC.,

Plaintiffs,

vs.

DWAYNE ANTHONY JOHNSON d/b/a
ALLACCESSTV and QUALITY
RESTREAMS; and DOES 1-20,

Defendants.

Case No. **2:21-cv-09361-AB (MRWx)**

**JOINT STIPULATION
REGARDING ENTRY OF
PRELIMINARY INJUNCTION**

Judge: Hon. Andre Birotte Jr.

Action Filed: December 2, 2021

Trial Date: None Set

STIPULATION

WHEREAS, on December 2, 2021, Plaintiffs Universal City Studios Productions LLLP, Universal City Studios LLC, Universal Television LLC, Universal Content Productions LLC, DreamWorks Animation LLC, Disney Enterprises, Inc., Paramount Pictures Corporation, Amazon Content Services LLC, Apple Video Programming LLC, Warner Bros. Entertainment Inc., Netflix US, LLC, Columbia Pictures Industries, Inc., and Screen Gems, Inc. (collectively, “Plaintiffs”) brought this action alleging copyright infringement against Dwayne Anthony Johnson d/b/a AllAccessTV and Quality Restreams (“Defendant”) (Plaintiffs and Defendant are referred as “Party” or “Parties.”), and DOES 1-20;

WHEREAS, on December 8, 2021, Plaintiffs filed a Motion for Preliminary Injunction and supporting documents, ECF Nos. 14-17, on January 28, 2022, Defendant filed an Opposition, ECF No. 36, and on February 4, 2022, Plaintiffs filed a Reply and supporting documents, ECF No. 43;

WHEREAS, in order to streamline this litigation and reduce the cost to the Parties and the Court in adjudicating the claims and requests in Plaintiffs’ Motion for Preliminary Injunction Plaintiffs and Defendant agree that good cause exists for entry of the attached [Proposed] Preliminary Injunction;

THEREFORE, the Parties by and through their respective counsel of record, **STIPULATE AND AGREE** to the following:

1. The Parties agree to entry of a stipulated preliminary injunction in the form of the attached [Proposed] Preliminary Injunction, which the Parties request the Court enter.

2. Defendant denies liability and makes no admission of liability by entry of this Stipulation.

3. Plaintiffs agree that Defendant makes no admission of liability by entry of this Stipulation.

4. The Parties agree that Defendant expressly reserves the right to contest

1 Plaintiffs' request for permanent injunctive relief on any grounds and entry of this
2 Stipulation shall not limit the Parties' ability to make any argument relating to
3 injunctive relief.

4 5. The Parties agree that nothing in this Stipulation shall prejudice or
5 hinder any Party's ability to appeal or challenge on appeal any order or judgment in
6 this case.

7 6. The Parties agree that, except as expressly set forth herein, nothing in
8 this Stipulation shall prevent any Party from advancing any defense or argument in
9 accordance with any Court Scheduling Order, the Federal Rules of Civil Procedure,
10 and/or the Court's local rules. The Parties reserve all rights relating to all other
11 remaining claims and defenses.

12 7. The Parties agree that other than in the above-styled case or any appeals
13 therefrom, this Stipulation may not be used in connection with any other lawsuit or
14 proceeding.

15 8. The Parties agree that Plaintiffs are not required to post a bond relating to the
16 preliminary injunction.

17 9. The Parties agree that, subject to the Court's entry of the [Proposed]
18 Preliminary Injunction, the hearing on Plaintiffs' Motion for Preliminary Injunction,
19 currently set for February 18, 2022, may be vacated and taken off-calendar.

20 IT IS SO STIPULATED.

21
22 DATED: February 17, 2022

DAVIS WRIGHT TREMAINE LLP

23 By: /s/ Sean M. Sullivan
Sean M. Sullivan

24 Elizabeth A. McNamara
25 Sean M. Sullivan
26 Samantha Lachman
DAVIS WRIGHT TREMAINE LLP

27 Attorneys for Plaintiffs
28

1 DATED: February 17, 2022

WILSON LEGAL GROUP P.C.

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14 Attorneys for Defendant

L.R. 5-4.3.4 Attestation

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I hereby attest that all other signatories listed on this document, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: February 17, 2022

DAVIS WRIGHT TREMAINE LLP

By: /s/ Sean M. Sullivan
Sean M. Sullivan

Elizabeth A. McNamara
Sean M. Sullivan
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