

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED KING FILM DISTRIBUTION LTD, D.B.S. :
SATELLITE SERVICES (1998) LTD, HOT :
COMMUNICATION SYSTEMS LTD, CHARLTON :
LTD, RESHET MEDIA LTD, AND KESHET :
BROADCASTING LTD, :

Case No. 1:21-cv-11024-KPF-
RWJ

Plaintiffs, :

-- against -- :

DOES 1-10, d/b/a **Israel.TV**, :

Defendants. :

**[PROPOSED] ORDER TO
SHOW CAUSE FOR
EXPEDITED MOTION FOR
CONTEMPT AGAINST
CLOUDFLARE AND
ALTERNATIVE SERVICE**

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ORDER TO SHOW CAUSE

Upon the Court having reviewed the annexed Declaration of Mark S. Kaufman dated June 7, 2022 and exhibits thereto; the Declaration of Benjamin Berner dated June 7, 2022 and exhibits thereto; the Memorandum of Law dated June 7, 2022 in support thereof; and upon all papers and proceedings heretofore had herein;

LET non-party CloudFlare, Inc. (“CloudFlare”) or its attorneys show cause at Courtroom 618 at the U.S. District Court, Southern District of New York Courthouse, located at 40 Foley Square, New York, New York 10007, on the ___ day of June, 2022 at _____ in the forenoon/afternoon of the day or as soon thereafter as counsel can be heard why an Order should not be made and entered herein:

- A. Pursuant to Fed. R. Civ. P. 65(d)(2), holding CloudFlare in contempt for failure to comply with the Court’s Order for Default Judgment and Permanent Injunction dated April 27, 2022 (the “**Order**”) in favor of plaintiffs United King Film

Distribution Ltd, D.B.S. Satellite Services (1998) Ltd, HOT Communication Systems Ltd, Charlton Ltd, Reshet Media Ltd, and Keshet Broadcasting Ltd (together “**Plaintiffs**”), which Order directs *inter alia* CloudFlare to cease providing services to Defendants, as the owners and operators of the website (the “Website”) located at the domain www.Israel.TV,

- B. Directing CloudFlare to comply with the Order forthwith;
- C. Awarding Plaintiffs attorneys’ fees and costs incurred in connection with this motion, and
- D. Such other and further relief as the Court deems just and appropriate; and

IT IS HEREBY ORDERED that service of copies of this Order to Show Cause (together with all supporting declarations and other documents) on CloudFlare shall be deemed sufficient if made by delivery by UPS Air or other overnight courier to CloudFlare’s offices located at 101 Townsend Street, San Francisco, CA 94107, Attn: Legal Department for receipt by no later than June ___, 2022.

SO ORDERED this ___ day of June, 2022.
