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 17 UNITED STATES DISTRICT COURT  
 18 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION  
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20 DISNEY ENTERPRISES, INC., et al.,

21 Plaintiffs,

22 vs.

24 TTKN ENTERPRISES, LLC d/b/a  
 25 CRYSTAL CLEAR MEDIA, et al.,

26 Defendants.  
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Case No. 2:20-cv-07274-GW-JPR

**STIPULATION REGARDING  
 [PROPOSED] CONSENT  
 JUDGMENT AND PERMANENT  
 INJUNCTION**

Judge: Hon. George H. Wu

1 WHEREAS, on August 12, 2020, Plaintiffs Disney Enterprises, Inc.,  
2 Paramount Pictures Corporation, Amazon Content Services LLC, Warner Bros.  
3 Entertainment Inc., Universal City Studios Productions LLLP, Universal Content  
4 Productions LLC, Netflix Studios, LLC, Columbia Pictures Industries, Inc., and  
5 Studiocanal S.A.S. (collectively “Plaintiffs”) initiated the above-captioned action  
6 against Defendants TTKN Enterprises, LLC d/b/a Crystal Clear Media; Todd Smith;  
7 and Tori Smith (“Defendants”) (all collectively, the “Parties”).

8 WHEREAS, the Parties have reached an agreement to resolve this action, the  
9 full terms and conditions of which are set forth in the Parties’ “Settlement  
10 Agreement,” dated as of November 2, 2020.

11 WHEREAS, the Settlement Agreement is conditioned upon entry by the  
12 Court of a Stipulated Judgment and Permanent Injunction, each in the form set forth,  
13 respectively, in Exhibit 1 and Exhibit 2 hereto.

14 NOW, THEREFORE, the Parties, by and through their undersigned counsel,  
15 hereby stipulate:

16 1. To the entry of the [Proposed] Stipulated Judgment and [Proposed]  
17 Permanent Injunction.

18 2. Defendants irrevocably and fully waive any and all right to appeal the  
19 Stipulated Judgment and Permanent Injunction, to have it vacated or set aside, to  
20 seek or obtain a new trial thereon, or otherwise to attack in any way, directly or  
21 collaterally, its validity or enforceability.

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23 **IT IS SO STIPULATED.**

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DATED: November 2, 2020

MUNGER, TOLLES & OLSON LLP

By:   
ROSE LEDA EHLER  
Attorney for Plaintiffs

DATED: November 2, 2020

MCLAIN LAW FIRM

By:   
ERIK MCLAIN  
Attorney for Defendants

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**FILER’S ATTESTATION**

I, Rose Leda Ehler, am the ECF user whose identification and password are being used to file this **STIPULATION REGARDING [PROPOSED] CONSENT JUDGMENT AND PERMANENT INJUNCTION**. Pursuant to Civil Local Rule 5-4.3.4(a)(2)(i), I hereby attest that the other above-named signatories concur in this filing.

DATED: November 2, 2020

  
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ROSE LEDA EHLER