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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

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WARNER BROS. ENTERTAINMENT
INC.; UNIVERSAL CITY STUDIOS
LLC; UNIVERSAL CITY STUDIOS
PRODUCTIONS LLLP; UNIVERSAL
CONTENT PRODUCTIONS LLC;
UNIVERSAL TELEVISION LLC;
AMAZON CONTENT SERVICES
LLC; COLUMBIA PICTURES
INDUSTRIES, INC.; DISNEY
ENTERPRISES, INC.; NETFLIX
STUDIOS, LLC; OPEN 4 BUSINESS
PRODUCTIONS LLC; PARAMOUNT
PICTURES CORPORATION;
SCREEN GEMS, INC.; and SONY
PICTURES ANIMATION INC.,

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Plaintiffs,

vs.

JASON TUSA; and DOES 1-10 d/b/a
ALTERED.CARBON TV, DIGITAL
UNICORN MEDIA, SINGULARITY
MEDIA, and AREA 51,

Defendants.

Case No. 2:21-cv-05456-VAP-AS

**NOTICE OF DEFENDANTS'
FAILURE TO RESPOND TO
MOTION FOR PRELIMINARY
INJUNCTION**

Judge: Hon. Virginia A. Phillips

Date: Aug. 9, 2021

Time: 2:00 p.m.

Courtroom: 8A

1 On July 8, 2021, Plaintiffs filed a Motion for Preliminary Injunction in this
2 action, seeking to enjoin Defendant Jason Tusa (“Tusa”) from continuing to infringe
3 Plaintiffs’ copyrights, via his latest infringing streaming service, Altered Carbon, or
4 any other. Tusa failed to timely respond to Plaintiffs’ Motion. Pursuant to Local
5 Rule 7-12, the Court may deem his silence as consent to Plaintiffs’ requested relief.

6 Tusa was personally served with a copy of the Motion and all supporting
7 filings on July 10, 2021. Dkt. No. 21 (Proof of Service). His response was due by
8 July 19, 2021. L.R. 7-9. Tusa failed to respond or seek an extension.

9 Plaintiffs are not aware of a legitimate reason why Tusa would be unable to
10 fulfill his obligations to this Court. Tusa was personally served with the Motion.
11 Dkt. No. 21. He is familiar with Plaintiffs and their counsel from their history of
12 negotiating a settlement. Dkt. No. 15, Declaration of Jan van Voorn ¶¶ 32-36. He
13 has previously engaged counsel. *See id.* ¶ 32.

14 Plaintiffs respectfully request that their Motion be granted.

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16 DATED: July 26, 2021

MUNGER, TOLLES & OLSON LLP

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19 By: /s/ Rose Leda Ehler

ROSE LEDA EHLER

Attorneys for Plaintiffs
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