



Defendants' ATN set-top boxes, apps, and service subscriptions. DISH alleges that Defendants contributorily infringed DISH's copyrights in violation of the Copyright Act and 17 U.S.C. § 501.

## **II. Relief Requested**

DISH and Defendants agree that a final judgment should be entered for DISH on Count I of the Complaint (Dkt. 1) alleging inducing and materially contributing to copyright infringement under 17 U.S.C. § 501. DISH and Defendants also agree that damages should be awarded to DISH in the amount of \$16,050,000 pursuant to 17 U.S.C. § 504(c), consisting of \$150,000 per work for 107 of DISH's registered, copyrighted works that Defendants willfully and maliciously infringed. 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.

Dated: January 10, 2023

Respectfully submitted,

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channels by means including satellite, OTT, Internet protocol television ("IPTV"), and Internet.

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*Attorney for Defendants Alfa TV Inc.,  
Hisham Manse Ibrahim, Haitham Mansi,  
and Nezar Saeed Hammo*

### **LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to Local Rule 3.01(g), filing attorney certifies that DISH's counsel conferred with Defendants' counsel on January 10, 2023, and Defendants' counsel agrees to the relief sought in this motion.

### **CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 2023, I electronically filed this Stipulated Motion for Entry of Final Judgment and Permanent Injunction, with the Clerk of the Court using the CM/ECF System, which will send notifications of such filing to the following:

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