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Attorney for Plaintiffs UN4 Productions, Inc., and Millennium Funding, Inc.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

	WRP
UN4 Productions, Inc., and) Case No.: 1:19-cv-92-SOM-RLP
Millennium Funding, Inc.) (Copyright)
Plaintiffs,) STIPULATED CONSENT
vs.) JUDGEMENT BETWEEN
) PLAINTIFFS AND DEFENDANT
GARY MITCHELL GRAHAM) GARY MITCHELL GRAHAM
Defendant.)
)
)
)

As attested to by the signatures of Defendant GARY MITCHELL GRAHAM and counsel for the Plaintiffs below, this matter comes before the Court on the parties' Stipulated Consent Judgment.

Plaintiffs have filed a First Amended Complaint [Doc. #11] alleging Direct

and Contributory Copyright Infringement against Defendant GARY MITCHELL GRAHAM.

The parties, after conferral and investigation, now appear, Defendant GARY MITCHELL GRAHAM *pro se* and Plaintiffs through counsel to fully and finally resolve all claims between the parties and the matters before the Court and have moved for entry of this Stipulated Consent Judgment.

WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this case between the parties as follows:

- 1. This Court has jurisdiction over the parties and venue is proper.
- 2. Plaintiffs have valid and enforceable copyrights in the original copyrighted works as identified in Exhibits 2-3 to the First Amended Complaint [Docs. ##11-2, 11-3].
- 3. Although denying liability, Defendant GARY MITCHELL GRAHAM concedes to using websites of an entity referred to as "The Pirate Bay" to download torrents associated with Copyright protected motion pictures and the software application µtorrent to watch said motion pictures and as alleged in the First Amended Complaint.
- 4. Pursuant to stipulation of the parties, the below Money Judgment,
 Permanent Injunction and Order is to be entered against Defendant GARY
 MITCHELL GRAHAM.

MONEY JUDGMENT

A Money Judgment is awarded in favor of Plaintiffs and against Defendant

GARY MITCHELL GRAHAM in the amount of \$2,900 (Two Thousand Nine

Hundred Dollars) for costs, fees and damages.

PERMANENT INJUNCTION

Defendant GARY MITCHELL GRAHAM is hereby PERMANENTLY

ENJOINED from directly, contributorily or indirectly infringing Plaintiffs' rights

in their motion pictures, including without limitation by using the Internet to

reproduce or copy any of Plaintiffs' motion pictures, except pursuant to a lawful

written license from Plaintiffs.

This Court will retain jurisdiction until June 10, 2021 for the purposes of

enforcing the Permanent Injunction and Order.

Except as provided herein, each party is to bear their own costs and fees.

With entry of this Stipulated Consent Judgment, this matter is terminated.

DATED: Kailua-Kona, Hawaii, May 31, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper

Kerry S. Culpepper

Attorney for Plaintiffs

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DATED: Kailua, Hawaii, 6-5-19, 2019.

GARY MITCHELL GRAHAM

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Defendant

APPROVED AND SO ORDERED:



/s/ Susan Oki Mollway
Susan Oki Mollway
United States District Judge