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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GOOGLE LLC,

Plaintiff,

v.

NGUYEN VAN DUC, PHAM VAN THIEN,
and DOES 1-20,

Defendants.

Case No. 23-cv-5824-SK

**[PROPOSED] ORDER GRANTING
PLAINTIFF GOOGLE LLC'S
MOTION FOR DEFAULT
JUDGMENT AGAINST
DEFENDANTS NGUYEN VAN DUC
AND PHAM VAN THIEN**

1 The Court orders as follows:

- 2 1. Plaintiff Google LLC's motion for default judgment is GRANTED.
- 3 2. Defendants Nguyen Van Duc and Pham Van Thien are liable for:
- 4 a. Misrepresentation of Copyright Infringement in violation of 17 U.S.C. § 512(f);
- 5 b. Breach of Contract under California law; and
- 6 c. Intentional Interference with Contractual Relations under California law.
- 7 3. Defendants and their agents, employees, successors, and assigns, and all other persons
- 8 acting in concert with or at the direction of Defendants, are hereby permanently
- 9 enjoined from the following:
- 10 a. Submitting any notifications of copyright infringement or takedown requests to
- 11 Google based on false assertions of rights of copyright ownership;
- 12 b. Creating or attempting to create any Google accounts;
- 13 c. Using any Google products or services to promote any of Defendants' websites
- 14 or products;
- 15 d. Using any Google products or services to harm or attempt to harm any third
- 16 parties, including without limitation Google's Search Ads customers; and
- 17 e. Assisting, aiding, or abetting any other person or entity in engaging or
- 18 performing any of the activities described in subparagraphs (a) through (d)
- 19 above.
- 20 4. This Court shall retain jurisdiction for the purpose of making any further orders to
- 21 construe, modify, or enforce this judgment.

22 **IT IS SO ORDERED.**

23
24
25 Dated: _____, 2024

By: _____