

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

Wavve Americas, Inc., a Delaware  
corporation,

Plaintiff,

vs.

Unknown Registrant Of dramacool.ba;  
Asian C, an individual;  
Tommy USA, an individual;  
Watch Asia, an individual;  
Dorothy Bradshaw, an individual;  
Najeeb Ullah Mirani, an individual;  
Baidar Bakht, an individual; and  
Minh Van Ngoc Mym, an individual,

Defendants.

Case No. 2:24-cv-02667-PHX-KML  
**[PROPOSED] ORDER**

The Court, having reviewed Plaintiff's Motion for Default Judgment and Permanent Injunction, and good cause appearing, therefore:

**IT IS SO ORDERED THAT** Plaintiff's Motion is granted;

**IT IS FURTHER ORDERED THAT** each of the Defendants, and all of their officers, agents, servants and employees, and all those persons or entities acting in active concert or participation therewith, and all persons and entities who receive actual notice of this Order, are immediately and permanently enjoined from engaging in any of the following activities by means of any of <dramanice.la>, <runasian.net>, <watchasia.to>, <asianc.sh>, <asianwiki.co>, <dramacool.bg>, <dramacool.com.tr>, <dramacool.com.so>, <dramacool.com.vc>, <dramacool9.co>, <dramacool.tr>, <dramacool.co.ba>,

1 <dramacool.ba>, <dramacool.sr>, <dramacooltv.cz>, and <dramacooli.cz> (“Subject  
2 Domains”), or otherwise:

- 3 i. storing, reproducing, displaying, or distributing any of the Copyrighted  
4 Works that are exclusively licensed to wA for distribution in the United  
5 States, a sample of which is attached as Exhibit F to Plaintiff’s First Amended  
6 Complaint (Dkt. 42) filed on March 27, 2025;
- 7 ii. transmitting, retransmitting, assisting in the transmission of, requesting  
8 transmission of, streaming, hosting or providing unauthorized access to, or  
9 otherwise publicly performing, directly or indirectly, by means of any device  
10 or process, any of the Copyrighted Works;
- 11 iii. selling, advertising, marketing, or promoting any of the Copyrighted Works;
- 12 iv. creating, operating, maintaining, or managing any website in support of the  
13 activities described above;
- 14 v. registering, owning, receiving, or transferring any domain name in support of  
15 the activities described above; and
- 16 vi. creating or providing assistance to others who wish to engage in the activities  
17 described above;

18 **IT IS FURTHER ORDERED THAT** Defendants, and all of their officers, agents,  
19 servants and employees, and all those persons or entities acting in active concert or  
20 participation therewith, and all persons and entities who receive actual notice of this Order,  
21 are further immediately and permanently enjoined from engaging in any activities having  
22 the object or effect of fostering infringement of the Copyrighted Works by means of any of  
23 the Subject Domains, or otherwise, including without limitation engaging in any of the  
24 following activities:

- 25 i. advertising or promoting unauthorized access to or the availability of the  
26 Copyrighted Works;
- 27 ii. encouraging or soliciting others to transmit or reproduce the Copyrighted  
28 Works;

- 1           iii. encouraging or soliciting others to upload, post or index any files that
- 2                 constitute, correspond, point or lead to any of the Copyrighted Works;
- 3           iv. encouraging or soliciting others to offer transmission of the Copyrighted
- 4                 Works; and
- 5           v. providing technical assistance, support services or servers to others engaged
- 6                 in infringement of, or seeking to infringe, the Copyrighted Works;

7           **IT IS FURTHER ORDERED THAT** Plaintiff is entitled to ownership of each of  
8 the Subject Domains, and that Defendants, and all those persons or entities acting in active  
9 concert or participation therewith, and all persons and entities who receive actual notice of  
10 this Order, shall transfer their respective Subject Domains to an account under Plaintiff's  
11 control, which efforts shall be done at Plaintiff's reasonable expense;

12           **IT IS FURTHER ORDERED THAT** service of this Default Judgment and  
13 Permanent Injunction upon Defendants via their respective email addresses as identified in  
14 Plaintiff's Motion is deemed sufficient notice to Defendants under Fed. R. Civ. P. 65. It  
15 shall not be necessary for Defendants to sign any form of acknowledgement of service;

16           **IT IS FURTHER ORDERED THAT** any violation of this Permanent Injunction  
17 shall expose Defendants, and all other persons bound by this Permanent Injunction, to all  
18 applicable penalties, including contempt of Court;

19           **IT IS FURTHER ORDERED THAT** there is no just reason for delay in entering  
20 this Default Judgment and Permanent Injunction and, pursuant to Fed. R. Civ. P. 54(a), and  
21 the Court will direct immediate entry of this Default Judgment and Permanent Injunction.

22           **IT IS FURTHER ORDERED THAT** the Court shall retain jurisdiction of this  
23 action to entertain such further proceedings and to enter such further orders as may be  
24 necessary or appropriate to implement and enforce the provisions of this Default Judgment  
25 and Permanent Injunction.