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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

Universal City Studios Productions
LLLP; Columbia Pictures Industries,
Inc.; Disney Enterprises, Inc.;
Twentieth Century Fox Film
Corporation; Paramount Pictures
Corporation; Warner Bros.
Entertainment Inc.; Amazon Content
Services, LLC; and Netflix Studios,
LLC,

Plaintiffs,

vs.

Tickbox TV LLC; Jeffrey Goldstein;
and Carrla Goldstein,

Defendants.

Case No. 2:17-cv-07496-MWF(AS)

**[PROPOSED] PERMANENT
INJUNCTION**

1 Plaintiffs Universal City Studios Productions LLLP, Columbia Pictures
2 Industries, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation,
3 Paramount Pictures Corporation, Warner Bros. Entertainment Inc., Amazon Content
4 Services, LLC, and Netflix Studios, LLC (collectively, “Plaintiffs”) are entitled to a
5 Permanent Injunction against Defendants TickBox TV LLC, Jeffrey Goldstein,
6 Carrla Goldstein, and all of their officers, directors, agents, servants, and employees,
7 and all persons in active concert or participation or in privity with any of them
8 (collectively, “TickBox”).

9 TickBox is hereby RESTRAINED and ENJOINED as follows:

10 1. TickBox shall not at any time on or after the entry of this Permanent
11 Injunction:

12 a. Curate any tile or menu of user options to download or access
13 any “build,” “theme,” “app,” “addon” or other software program that TickBox
14 knows or has reason to know links directly or indirectly to third-party
15 cyberlockers or streaming sites that transmit unauthorized performances of
16 copyrighted motion pictures or television shows (“Subject Software”).

17 Internet Explorer, Google Chrome, Safari, and Firefox are not Subject
18 Software.

19 b. Encourage or induce any person to locate, upload, download,
20 install, or use Subject Software, or knowingly support or assist any person in
21 locating, uploading, downloading, installing, or using Subject Software.

22 c. Knowingly take any action for the purpose or that has the effect
23 of circumventing the requirements of this Permanent Injunction or the
24 Preliminary Injunctions’ requirements (Dkt. 44) that TickBox limit the ability
25 of users of TickBox TV devices to use the devices to access or use Subject
26 Software.

27 2. Within twenty-four (24) hours of receiving written notice that a
28 Plaintiff reasonably asserts that any build, theme, app, or addon available through

1 TickBox devices is Subject Software, TickBox shall remove from or disable access
2 through its menus to such build, theme, app, or addon. If such notice is received
3 after 6:00 p.m eastern time on a Friday, on a Saturday, or before 6:00 p.m. eastern
4 time on a Sunday, TickBox shall complete the removal by 6:00 p.m. eastern time on
5 the immediately following Monday.

6 3. The Court retains jurisdiction to enforce the terms of this Permanent
7 Injunction and the Parties' Settlement Agreement.

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9 **IT IS SO ORDERED**

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11 DATED: _____

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The Honorable Michael W. Fitzgerald
United States District Judge

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