IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

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YOUTUBE, L.L.C., a Delaware corporation, Plaintiff, CHRISTOPHER L. BRADY, an individual,)

Defendant.

CASE NO. 8:19-cv-353

STIPULATION FOR ENTRY OF JUDGMENT AND PERMANENT **INJUNCTION**

IT IS HEREBY STIPULATED by and between Plaintiff YouTube L.L.C. and Defendant Christopher L. Brady, that a Judgment shall be entered to fully and finally dispose of this civil action in favor of YouTube L.L.C. and against Defendant Christopher L. Brady.

IT IS FURTHER STIPULATED that this Judgment shall permanently enjoin Defendant Christopher L. Brady and other persons who are in active concert or participation with him, from directly or indirectly:

Submitting any notices of alleged copyright infringement to YouTube that a. misrepresent that material hosted on the YouTube service is infringing copyrights held or claimed to be held by Brady or anyone Brady claims to represent; and

Misrepresenting or masking their identities in future interactions on or with services b. offered by Google LLC or its affiliates, including but not limited to YouTube services.

The Parties therefore respectfully request that the Court enter the Proposed Judgment and Permanent Injunction, attached hereto.

vs.

DATED October 14, 2019

YOUTUBE, L.L.C., Plaintiff

s/ David H. Kramer David H. Kramer (*pro hac vice*) WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, California 94304 Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: dkramer@wsgr.com

and

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Attorneys for Plaintiff YOUTUBE, L.L.C.

DATED: October 14, 2019

CHRISTOPHER L. BRADY, Defendant,

s/ Daniel E. Klaus Daniel E. Klaus (#17889) Sheila A. Bentzen (#25020) REMBOLT LUDTKE LLP 3 Landmark Centre 1128 Lincoln Mall, Suite 300 Lincoln, NE 68508 Telephone: (402) 475-5100 Email: sbentzen@remboltlawfirm.com dklaus@remboltlawfirm.com

Attorneys for Defendant CHRISTOPHER L. BRADY

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

YOUTUBE, L.L.C., a Delaware corporation,))
Plaintiff,)))
vs.))
CHRISTOPHER L. BRADY, an individual,)))
Defendant.))

CASE NO. 8:19-cv-353

[PROPOSED] JUDGMENT AND PERMANENT INJUNCTION

This matter is before the Court on the parties' Stipulation to Entry of Judgment and Permanent Injunction (Filing No. ____). The Court has reviewed this Stipulation and concludes that it should be approved, and that judgment and a permanent injunction should be entered in favor of Plaintiff YouTube L.L.C. and against Defendant Christopher L. Brady. Accordingly,

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

Defendant Christopher L. Brady and other persons who are in active concert or participation with him, are permanently enjoined from directly or indirectly:

a. Submitting any notices of alleged copyright infringement to YouTube that misrepresent that material hosted on the YouTube service is infringing copyrights held or claimed to be held by Brady or anyone Brady claims to represent; and

b. Misrepresenting or masking their identities in future interactions on or with
services offered by Google LLC or its affiliates, including but not limited to YouTube services.
Dated: _______

Hon. United States District Court Judge