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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MAIN SEQUENCE, LTD.,  
JEROLD HAMZA as executor for the  
ESTATE OF GEORGE CARLIN, and  
JEROLD HAMZA in his individual  
capacity,

Plaintiffs,

v.

DUDESY, LLC, WILL SASSO, CHAD  
KULTGEN, and JOHN DOES 1-20,

Defendants.

Case No. 2:24-cv-00711

**JOINT MOTION FOR ENTRY OF  
CONSENT JUDGMENT  
AND PERMANENT INJUNCTION**

Plaintiffs, through undersigned counsel, and defendants, through undersigned  
counsel, stipulate and agree as follows:

WHEREAS, Dudesy, LLC owns and operates the YouTube channel  
@Dudesy.

WHEREAS, Defendants released the video titled “George Carlin: I’m Glad  
I’m Dead (2024) – Full Special” (the “Dudesy Special”) to YouTube on January 9,  
2024.

WHEREAS, Plaintiff Main Sequence Ltd. owns the publicity rights to George  
Carlin’s name image and likeness, and the copyrights to George Carlin’s copyrighted  
works.

WHEREAS, the Dudesy Special generated traffic and additional revenue to  
Dudesy, LLC.

1 WHEREAS, on January 25, 2024, Plaintiffs sued Defendants for violation of  
2 right of publicity and copyright.

3 WHEREAS, on January 31, 2024, Defendants notified Plaintiffs that  
4 Defendants had taken the Dudesy Special down from the @Dudesy YouTube  
5 channel, and taken reasonable steps to remove all known mention of George Carlin  
6 and the Dudesy Special from the Dudesy Podcast and Dudesy’s social media  
7 accounts, including Instagram, Facebook and TikTok.

8 WHEREAS, on April 1, 2024, the parties reached a settlement.

9 THEREFORE,

10 1. the Parties stipulate and agree that this Court has jurisdiction to enter a  
11 stipulated consent judgment and permanent injunction on the following terms and  
12 conditions and that the Court shall have continuing jurisdiction for purposes of  
13 enforcing the stipulated consent judgment permanent injunction over the  
14 undersigned parties, and request that the Court enter that attached [Proposed]  
15 Stipulated Consent Judgment and Permanent Injunction (“Stipulated Consent  
16 Judgment and Permanent Injunction”); and

17 2. the Parties jointly request that this Court enter the herein proposed  
18 stipulated consent judgment and permanent injunction.

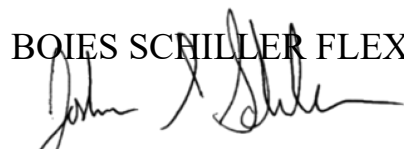
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20 IT IS SO STIPULATED.

21 Respectfully Submitted,

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DUDESY, LLC

By:  \_\_\_\_\_

Its: MEMBER

CHAD KULTGEN

  
\_\_\_\_\_

WILL SASSO

  
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