## 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.

1

2

7

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

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

Defendants.

Case No. 2:24-cy-00711

[PROPOSED] STIPULATED CONSENT JUDGEMENT AND PERMANENT INJUNCTION

- 1. Defendants created and released the video titled "George Carlin: I'm Glad I'm Dead (2024) Full Special" (the "Dudesy Special") to YouTube on January 9, 2024 without Plaintiffs' knowledge or consent and in violation of Plaintiffs' rights.
- 2. Defendants are hereby PERMANENTLY RESTRAINED AND ENJOINED FROM uploading, posting or broadcasting the Dudesy Special on the Dudesy Podcast, or in any content posted to any website, account or platform (including, without limitation, YouTube and social media websites) controlled by Defendants.
- 3. Defendants are hereby PERMANENTLY RESTRAINED AND ENJOINED FROM using George Carlin's image, voice or likeness on the Dudesy Podcast, or in any content posted to any website, account or platform (including, without limitation, YouTube and social media websites) controlled by Defendants without the express written approval of the Plaintiffs.
- 4. Uploads of the Dudesy Special to YouTube or elsewhere on the internet by Third Parties shall violate this Order, although Defendants shall not be liable for such

2728

uploads, nor shall Defendants be deemed to have violated this Order based on uploads by a Third Party. For purposes of this paragraph, "Third Party" shall mean any natural person or entity other than Defendants that is not related to, employed by, or an agent of, any of the Defendants and is not acting at the direction of any of the Defendants.

5. This Court shall retain jurisdiction over this action for purposes of implementing and enforcing the final judgment and any additional orders the Court deems necessary and appropriate. The Parties irrevocably and fully waive and relinquish any argument that venue in or jurisdiction by the Court is improper or inconvenient.

**SO ORDERED**, this day of April, 2024.

United States District Judge Maame Ewusi-Mensah Frimpon