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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 DISH NETWORK L.L.C.,

20 Plaintiff,

21 vs.

22 JADOO TV, INC., et al.,

23 Defendants.
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) Case Number: 3:20-cv-01891-CRB (LB)

)
) **STIPULATION FOR ENTRY OF FINAL**
) **JUDGMENT AND PERMANENT**
) **INJUNCTION: ORDER**

) Judge: Hon. Charles R. Breyer
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1 This stipulation is filed jointly by Plaintiff DISH Network L.L.C (“DISH”) and Defendants
2 Jadoo TV, Inc. and Sajid Sohail. DISH and Defendants request that the Court enter a final judgment
3 and permanent injunction against Defendants.

4 **I. Nature of the Case**

5 This is a copyright infringement case in which DISH sued Defendants Sajid Sohail and
6 Jadoo TV, Inc. (“Jadoo”), a company that sells set-top boxes and mobile applications that
7 consumers use to receive television channels and video-on-demand content. On June 3, 2023, the
8 Court granted DISH’s motion for summary judgment finding no genuine dispute of material facts
9 as to Defendants Jadoo TV, Inc. and Sajid Sohail’s liability for direct, contributory, and vicarious
10 copyright infringement in violation of the Copyright Act, 17 U.S.C. § 501. (Dkt. 270.) More
11 specifically, the Court found that Defendants transmitted television channels and content
12 exclusively licensed to DISH (“Works”). (*Id.*) The Court also found that Sajid Sohail was
13 personally liable for the infringement because, as Jadoo’s founder, CEO, director, and majority
14 shareholder, he was the “guiding spirit” behind the infringement. (*Id.*) On August 28, 2023, the
15 parties submitted joint briefing on damages, entitlement to attorney’s fees and costs, and injunctive
16 relief. (Dkt. 277.)

17 **II. Relief Requested**

18 DISH and Defendants agree that a final judgment should be entered for DISH on Counts I,
19 II, and III of the Amended Complaint (Dkt. 194) for direct, contributory, and vicarious copyright
20 infringement under 17 U.S.C. § 501. DISH and Defendants also agree that damages should be
21 awarded to DISH in the amount of \$24,969,911, consisting of statutory damages of \$14,550,000
22 for 97 registered Works (calculated at \$150,000 per Work) and Defendants’ profits of \$10,419,911
23 for 159 unregistered Works. 17 U.S.C. § 504(b), (c)(2). In addition, DISH and Defendants agree
24 to the Court’s entry of a permanent injunction, which is authorized pursuant to 17 U.S.C. § 502. A
25 proposed final judgment and permanent injunction is being submitted concurrently with this
26 stipulation.

1 Dated: November 27, 2024

/s/ Stephen M. Ferguson

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19 *Attorneys for Defendants JadooTV, Inc. and Sajid Sohail*

21 **FILER'S ATTESTATION**

22 Pursuant to Civil L.R. 5-1(h), the undersigned attests that concurrence in the filing of this
23 document has been obtained from each of the other signatories.

24 /s/ Stephen M. Ferguson

25 Stephen M. Ferguson

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DISH NETWORK L.L.C.,)	Case No. 20-cv-01891-CRB
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Plaintiff,)	
)	FINAL JUDGMENT AND PERMANENT
v.)	INJUNCTION
)	
JADOO TV, INC., et al.,)	
)	
Defendants.)	
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Having considered the Stipulation for Entry of Final Judgment and Permanent Injunction filed by Plaintiff DISH Network L.L.C (“DISH”) and Defendants Jadoo TV, Inc. and Sajid Sohail, and good cause appearing, the Court approves the stipulation and ORDERS as follows:

- On June 3, 2023, the Court granted DISH’s motion for summary judgment finding no genuine dispute of material facts as to Defendants Jadoo TV, Inc. and Sajid Sohail’s liability for direct, contributory, and vicarious copyright infringement in violation of the Copyright Act, 17 U.S.C. § 501. (Dkt. 270.)
- Judgment is entered for DISH and against Defendants Jadoo TV, Inc. and Sajid Sohail on Counts I, II, and III of the Amended Complaint (Dkt. 194) for direct, contributory, and vicarious copyright infringement under the Copyright Act, 17 U.S.C. § 501.
- DISH is awarded damages of \$24,969,911 against Defendants Jadoo TV, Inc. and Sajid Sohail, consisting of statutory damages of \$14,550,000 for 97 of DISH’s registered

1 copyrighted works that Defendants willfully infringed (calculated at \$150,000 per work) and
2 Defendants' profits of \$10,419,911 for 159 of DISH's unregistered copyrighted works that
3 Defendants infringed. 17 U.S.C. § 504(b), (c)(2). Defendants shall be jointly and severally liable
4 to DISH for the damages award.

5 4. Upon receiving actual notice of this order by personal service or otherwise,
6 Defendants Jadoo TV, Inc. and Sajid Sohail, along with their officers, agents, servants, employees,
7 and any other persons that are acting in active concert or participation with any of the foregoing,
8 are permanently enjoined from:

9 a. publicly performing in the United States any works that air on the ATN
10 Bangla, ATN News, NTV Bangla, SAB, Sony SET, SET MAX, and Times Now channels
11 during any time period that DISH has the exclusive right to publicly perform such works;

12 b. materially contributing to or inducing the public performance of any such
13 works in the United States, including by providing any streaming service or streaming
14 device knowing that such works are accessible using that service or device; and

15 c. receiving any financial benefit from the public performance of such works
16 in the United States, including through subscription fees or advertising revenue, if they had
17 the right and ability to control that public performance of such works.


18 5. This permanent injunction takes effect immediately.

19 6. Each party is to bear its own attorneys' fees and costs.

20 7. The Court retains jurisdiction for the purpose of enforcing this permanent injunction.

21 **IT IS SO ORDERED.**

22 Dated: December 2, 2024

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24 CHARLES R. BREYER
25 United States District Judge
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