

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

Case No. 8:20-cv-00676-MSS-CPT

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN ADAIRE,

Defendant.

_____ /

**JOINT STIPULATION AND MOTION FOR ENTRY OF FINAL
PERMANENT INJUNCTION ORDER
AS TO DEFENDANT**

Plaintiff STRIKE 3 HOLDINGS, LLC (“Strike 3”) and Defendant JOHN ADAIRE, pursuant to Federal Rule of Civil Procedure 65(d), hereby jointly stipulate to the following and move for entry of the Stipulated Final Permanent Injunction Order in the form attached hereto as “Exhibit 1” from this Court. In support thereof, the Parties state as follows:

1. Strike 3 filed its Complaint for copyright infringement against Defendant in this case on March 24, 2020. [DE 1].
2. Strike 3 amended its Complaint for copyright infringement on August 31, 2020. [DE 17].
3. The Parties have trial scheduled to begin on July 17, 2023.

4. Strike 3 and Defendant stipulate to the entry of the Stipulated Final Permanent Injunction Order in the form attached hereto as “Exhibit 1” (the “Permanent Injunction”).

5. Defendant agrees to pay all fees and costs associated in this Litigation as set forth in the Parties’ confidential settlement agreement.

6. Strike 3 and Defendant stipulate that the entry of the Permanent Injunction shall resolve all matters in dispute in this Litigation between them.

7. Defendant further acknowledges the jurisdiction of this Court for purposes of entering and enforcing the Permanent Injunction, and waive:

- a. Any further procedural steps;
- b. Any requirement that the Permanent Injunction contain any findings of fact or conclusions of law; and
- c. Any right to appeal, seek judicial review, or otherwise challenge or contest the validity of the Permanent Injunction.

8. Defendant also acknowledges and agrees that he enters into the Permanent Injunction knowingly and willfully and with full understanding of its terms, having reviewed them after due consideration, and with opportunity to have separate legal counsel review its terms.

WHEREFORE, the Parties respectfully request that the Court accept this Joint Stipulation and Motion and enter the proposed Injunction Order attached hereto as “Exhibit 1,” and for such other and further relief as the

Court deems just and proper.

Dated: July 16, 2023.

Respectfully Submitted,

/s/ Christian W. Waugh

Christian W. Waugh [FBN 71093]

WAUGH PLLC

201 E. Pine Street, Suite 315

Orlando, FL 32801

Email: cwaugh@waugh.legal

Telephone: 321-800-6008

Fax: 844-206-0245

/s/ J. Curtis Edmondson

J. Curtis Edmondson [CSB 236105]

Admitted *pro hac vice*

Edmondson IP Law

9999 SW Wilshire St, Suite 216

Portland, OR 97225

503-336-3749/ FAX: (503) 482-7418

jcedmondson@edmolaw.com

Attorney for Strike 3 Holdings, LLC

Attorney for John Adaire