

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 21-cv-20862-BLOOM/Otazo-Reyes

MILLENNIUM FUNDING, INC., *et al.*

Plaintiffs,

vs.

1701 MANAGEMENT LLC, *et al.*,

Defendants.

**JOINT STIPULATION OF STATEMENT OF UNDISPUTED FACTS AND DISMISSAL
WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs MILLENNIUM FUNDING, INC., VOLTAGE HOLDINGS, LLC, AMBI DISTRIBUTION CORP., AFTER II MOVIE, LLC, MORGAN CREEK PRODUCTIONS, INC., MILLENNIUM FUNDING, INC., BEDEVILED LLC, MILLENNIUM MEDIA, INC., COLOSSAL MOVIE PRODUCTIONS, LLC, YAR PRODUCTIONS, INC., FSMQ FILM, LLC, FW PRODUCTIONS, LLC, MILLENNIUM IP, INC., I AM WRATH PRODUCTION, INC., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., RUPTURE CAL, INC., MON, LLC, SPEED KILLS PRODUCTIONS, INC., MILLENNIUM IP, INC., NIKOLA PRODUCTIONS, INC., WONDER ONE, LLC, BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., GLACIER FILMS 1, LLC, DEFINITION DELAWARE LLC, HANNIBAL CLASSICS INC., JUSTICE EVERYWHERE PRODUCTIONS LLC, PARADOX STUDIOS, LLC, DALLAS BUYERS CLUB, LLC, SCREEN MEDIA VENTURES, LLC and HITMAN 2 PRODUCTIONS, INC. (“Plaintiffs”) and Defendant VPNETWORKS, LLC

d/b/a TorGuard (“Defendant”) (jointly “parties”), through their respective attorneys, enter into this joint stipulation.

The parties agree to the attached Joint Statement of Undisputed Facts.

Pursuant to a confidential settlement agreement, Plaintiffs have requested, and Defendant has agreed to use commercially reasonable efforts to block BitTorrent traffic on its servers in the United States using firewall technology.

The parties stipulate that pursuant to Rules 41(a)(1)(A)(ii) of the *Federal Rules of Civil Procedure*, this action and all claims asserted herein by Plaintiffs against Defendant are hereby dismissed with prejudice, each party to bear its own costs and attorneys’ fees. This Stipulation has been executed by Plaintiffs’ counsel and Defendant’s counsel.

The Court shall reserve jurisdiction for 120 days for the sole purpose of enforcing the settlement agreement between the parties.

DATED: March 3, 2022

Respectfully submitted,

/s/ Joel B. Rothman
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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on March 2, 2022 the foregoing document was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on this day on all those identified on the Service List, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive Notices of Electronic Filing.

s/ Joel B. Rothman
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