

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

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Attorneys for Defendants JadooTV, Inc. and Sajid Sohail

FILER'S ATTESTATION

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

25 /s/ Stephen M. Ferguson
26 Stephen M. Ferguson