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Attorney for Plaintiffs  
Venice PI, LLC,  
MON LLC,  
Millennium Funding, Inc.,  
Bodyguard Productions, Inc.,  
TBV Productions, LLC,  
UN4 Productions, Inc., and  
Hunter Killer Productions, Inc.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

Venice PI, LLC, et al.,	)	<b>Case No.: 1:19-cv-169-LEK-KJM</b>
	)	<b>(Copyright)</b>
Plaintiffs,	)	
vs.	)	
	)	<b>STIPULATED CONSENT</b>
NGUYEN DINH MANH, et al.	)	<b>JUDGMENT BETWEEN</b>
	)	<b>PLAINTIFFS AND DEFENDANT</b>
Defendants.	)	<b>NGUYEN DINH MANH</b>
	)	
	)	

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**STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFFS AND  
DEFENDANT NGUYEN DINH MANH**

As attested to by the signatures of Defendant NGUYEN DINH MANH, and  
counsel for the Plaintiffs Venice PI, LLC, MON LLC, Millennium Funding, Inc.,

Bodyguard Productions, Inc., TBV Productions, LLC, UN4 Productions, Inc., and Hunter Killer Productions, Inc. (collectively “Plaintiffs”) below, this matter comes before the Court on the parties’ joint Stipulated Consent Judgment.

Plaintiffs have filed a First Amended Complaint [Doc. #63] alleging that that Defendant NGUYEN DINH MANH is liable for intentional inducement and contributory copyright infringement per 17 U.S.C. §101 for streaming Plaintiffs’ motion pictures (shown in Exhibit 1 [Doc. #63-1] of the FAC) from his website yifymovies.is in violation of Plaintiffs’ exclusive right of public performance.

The parties, after conferral and investigation, now appear, Defendant NGUYEN DINH MANH *pro se* and Plaintiffs through counsel to fully and finally resolve all claims between the parties and the matters before the Court and have moved for entry of this Stipulated Consent Judgment.

WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this case between the parties as follows:

1. This Court has jurisdiction over the parties and venue is proper.
2. Plaintiffs have valid and enforceable copyrights in the original copyrighted works as identified in Exhibit “1” [Doc. #63-1] of the First Amended Complaint.
3. NGUYEN DINH MANH acknowledges that he has received independent legal advice from counsel or has had the opportunity to seek advice

from counsel, with respect to the facts and this Stipulated Consent Judgment and that he is competent in the English language.

4. Defendant NGUYEN DINH MANH denies liability but admits that he downloaded copies of Plaintiffs' motion pictures from websites such as YTS.AM, rarbg.to and 1337x.to and streamed said copies from his websites yifymovies.is, 123Moviesfree.is, Gomoviesfree.is, Fmoviesfree.is, 9movies.is and watchasap.is.

5. Pursuant to stipulation of the parties, the below Money Judgment, Permanent Injunction and Order is to be entered against Defendant NGUYEN DINH MANH.

6. Plaintiffs and Defendant NGUYEN DINH MANH agree to service of process via email or airmail at the email addresses and mailing addresses provided below for any notices to comply with the below Permanent Injunction and Order, and waive any requirement under the Hague Convention or other judicial treaty requiring the legal process be translated into any language other than English.

### **MONEY JUDGMENT**

A Money Judgment is awarded in favor of Plaintiffs against NGUYEN DINH MANH in the amount of \$1,050,000 (one million and fifty thousand dollars) for damages (\$150,000 for each of the seven motion pictures).

**PERMANENT INJUNCTION**

NGUYEN DINH MANH is hereby PERMANENTLY ENJOINED from directly, contributorily or indirectly infringing Plaintiffs' rights in their motion pictures;

NGUYEN DINH MANH is hereby PERMANENTLY ENJOINED from streaming Plaintiffs' motion pictures absent a valid license.

This Court will retain jurisdiction until December 31, 2020 for the purposes of enforcing the Money Judgement, Permanent Injunction and Order.

Except as provided herein, each party is to bear their own costs and fees. With entry of this Consent Judgment, this matter is terminated with respect to Defendant NGUYEN DINH MANH.

DATED: Kailua-Kona, Hawaii, December 9, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper  
Kerry S. Culpepper  
Attorney for Plaintiffs  
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DATED: Da Lat, Vietnam, December 10, 2019.

/s/Manh  
NGUYEN DINH MANH, appearing *pro se*  
70E – BUI TH XUAN  
PHNG 01, A LT, LAM NG  
Da Lat, 650000  
VIETNAM  
justyousmileme@gmail.com

APPROVED AND SO ORDERED:



/s/ Leslie E. Kobayashi  
Leslie E. Kobayashi  
United States District Judge

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*Venice PI, LLC, et al. v. NGUYEN DINH MANH, et al;* Case No. 1:19-cv-00169-LEK-KJM; *STIPULATED CONSENT JUDGMENT*