

KAUFMAN & KAHN, LLP

June 28, 2022

BY ECF

Hon. Katherine Polk Failla
U.S. District Court, S.D.N.Y.
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007

Re: *United King Distribution v. Does 1-10, d/b/a Israel.tv, Israeli-tv.com and Sdarot.com (21-cv-11024, -11025, and -11026)*

To the Honorable Judge Failla:

We are counsel to Plaintiffs in the above related cases. Cloudflare's counsel has consented to and joins in this status letter, without prejudice to its right to review and respond to any motion that is ultimately filed and make any appropriate objections.

Plaintiffs have reached an agreement in principle with Cloudflare. Upon formalizing the agreement, Plaintiffs plan (a) to file a motion to amend the Court's Order for Default Judgment and Permanent Injunction dated April 26, 2022 (the "Order") with a proposed Amended Order for the Court's approval (which is intended to address the concerns of Cloudflare and those the Court raised at our conference on June 17, 2022); and (b) to withdraw with prejudice the pending motion for contempt against Cloudflare, but without prejudice to bringing any future motion to enforce the Court's Order or Amended Order. Cloudflare, in turn, intends to withdraw its request for attorneys' fees and costs incurred in responding to the motion for contempt.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Mark S. Kaufman