

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

SURFSHARK LTD et al.,

Defendants.

Civil Action No. 1:21-cv-00643-RDA-MSN

**JOINT STIPULATION FOR DISMISSAL OF DEFENDANT KEEPSOLID, INC. d/b/a/
VPN UNLIMITED WITH PREJUDICE PURSUANT TO FED. R. CIV. P. 41**

Plaintiffs MILLENNIUM FUNDING, INC., SCREEN MEDIA VENTURES, LLC, VOLTAGE HOLDINGS, LLC, MILLENNIUM MEDIA, INC., PARADOX STUDIOS, LLC, DALLAS BUYERS CLUB, LLC, WONDER ONE, LLC, FW PRODUCTIONS, LLC, MILLENNIUM IP, INC., I AM WRATH PRODUCTIONS, INC., FAMILY OF THE YEAR PRODUCTIONS, LLC, AMBI DISTRIBUTION CORP., KILLING LINK DISTRIBUTION, LLC, BADHOUSE STUDIOS, LLC, LF2 PRODUCTIONS, INC., LHF PRODUCTIONS, INC., LAUNDRY FILMS, INC., VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., SPEED KILLS PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., HITMAN 2 PRODUCTIONS, INC. and MORGAN CREEK PRODUCTIONS, INC. (“Plaintiffs”) and Defendant KEEPSOLID, INC. d/b/a/ VPN UNLIMITED (“Defendant KeepSolid”) (Plaintiffs and Defendant KeepSolid collectively, “Parties”), through their counsel, hereby file this joint stipulation for dismissal with prejudice of all claims asserted herein by Plaintiffs against Defendant KeepSolid pursuant to Rules 41(a)(1)(A)(ii) and 41(a)(2) of the *Federal Rules of Civil Procedure*.

Pursuant to the confidential settlement agreement, Plaintiffs have requested and Defendant KeepSolid has agreed to use commercially reasonable efforts to block BitTorrent traffic and access to the following websites located outside of the United States: (1) “YTS” (yts.mx); (2) “PirateBay” (piratebay.org; <https://thepiratebay.org/>; <https://pirate-bay-proxy.org/eng/>; <https://www.tpboxypirate.com>); (3) “RarBg” (<https://rarbg.to/>); (4) “1337x” (<https://1337x.to>; <https://1337x.se>; <https://www.1337x.st/>; <https://www.1377x.ws>; <https://www.1377x.eu>); and (5) Popcorn Time (<https://popcorn-time.tw/>) on its servers in the United States.

Plaintiffs and Defendant KeepSolid do not seek an award of attorney’s fees and/or costs.

No claims, including any counterclaim, cross-claim, or third-party claim, would remain between Plaintiffs and Defendant KeepSolid following dismissal.

Pursuant to Local Rule 7(j) and Rule 78(b) of the *Federal Rules of Civil Procedure*, the Parties waive a hearing and submit the joint stipulation for disposition upon the papers filed.

The Court shall reserve jurisdiction for 180 days for the sole purpose of enforcing the settlement agreement between the parties, but not for any other purposes including Plaintiffs’ claims in the underlying action.

DATED: January 13, 2022

Respectfully submitted,

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