

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:21-cv-01261-SKC

Millennium Funding, Inc. *et al*,

Plaintiffs,

v.

Sharktech *et al.*,

Defendants.

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**STIPULATION FOR DISMISSAL OF DEFENDANT SHARKTECH, INC. WITH  
PREJUDICE PURSUANT TO FED. R. CIV. P. 41**

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Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiffs MILLENNIUM FUNDING, INC., VOLTAGE HOLDINGS, LLC, LHF PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., AFTER II MOVIE, LLC, MILLENNIUM MEDIA, INC., WONDER ONE, LLC, HITMAN TWO PRODUCTIONS, INC., MILLENNIUM IP, INC., I AM WRATH PRODUCTIONS, INC., KILLING LINK DISTRIBUTION, LLC, VENICE PI, LLC, RAMBO V PRODUCTIONS, INC., MON, LLC, NIKOLA PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., WONDER ONE, LLC, YAR PRODUCTIONS, INC., DALLAS BUYERS CLUB, LLC, and SF FILM, LLC (“Plaintiffs”) and Defendant SHARKTECH, INC. (“Sharktech” and collectively with Plaintiffs, the “Parties”), through their counsel, hereby file this joint stipulation for dismissal with prejudice of all claims asserted herein by Plaintiffs against Defendant Sharktech.

Pursuant to 17 U.S.C. 512(j)(B)(ii) and a confidential settlement agreement, Plaintiffs have requested and Defendant Sharktech has agreed to use commercially reasonable efforts to block the following alleged piracy websites located outside of the United States, by blocking their associated, currently-known IP addresses: (1) “YTS” (yts.mx; yts.movie); (2) “PirateBay” (<https://pirate-bay-proxy.org/eng/>; piratebay.org); (3) “RarBg” (<https://rarbg.to/>); and (4) “1337x” (<https://www.1337x.tw/>; <https://www.1377x.is/>).

The Parties will bear their own costs and attorneys’ fees.

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

This Stipulation has been executed by counsel for Plaintiffs and counsel for Defendant Sharktech.

This stipulation does not terminate the matter as claims remain against other Defendants PRIVATE INTERNET ACCESS, INC. and DOES 1-5.

DATED: October 5, 2021.

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Attorneys for Defendant Sharktech, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of October, 2021, I electronically filed the foregoing **STIPULATION FOR DISMISSAL OF DEFENDANT SHARKTECH, INC. WITH PREJUDICE PURSUANT TO FED. R. CIV. P. 41** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following counsel:

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