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11 Attorneys for Plaintiff  
LIONS GATE FILMS INC.

12  
13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**  
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17 LIONS GATE FILMS INC.,

18 Plaintiff,

19 v.

20 AHMED SALEH, an individual;  
21 AMIEL ELBAR, an individual;  
MUHAMMAD JAVED ASHRAF, an  
22 individual; TOM MESSCHENDORP,  
an individual; JEROME GILLAN, an  
23 individual; LUCAS LIM, an  
individual; and JOHN DOES 1-4,  
24 inclusive,

25 Defendants.

Case No. 2:14-cv-06033-MMM-AGR

**STIPULATION FOR ENTRY OF  
FINAL JUDGMENT UPON  
CONSENT AGAINST JEROME  
GILLAN**

1 Pursuant to Federal Rules of Civil Procedure 54 and 58 and Local Rules 5-4.4  
2 and 7-1, Plaintiff Lions Gate Films Inc. (“Lions Gate”) and defendant Jerome Gillan  
3 (“Gillan”) (collectively the “Parties”) hereby agree and stipulate as follows:

4 WHEREAS, Lions Gate has alleged that Gillan has infringed its rights in  
5 the film “The Expendables 3” (the “Film”); and

6 WHEREAS, the Parties have reached a confidential settlement under which  
7 Gillan has accepted financial and other obligations to resolve Lions Gate’s claims  
8 against him; and

9 WHEREAS, as part of the confidential settlement Gillan consents to this  
10 Court’s jurisdiction and has agreed to entry of the Proposed Final Judgment Upon  
11 Consent as to Jerome Gillan submitted herewith.

12 NOW, THEREFORE, the Parties hereby stipulate and respectfully request that  
13 the Court enter the Proposed Final Judgment Upon Consent as to Jerome Gillan  
14 submitted herewith.

15 IT IS SO STIPULATED.

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DATED: June 25, 2015

Respectfully submitted,  
KILPATRICK TOWNSEND & STOCKTON  
LLP

By: /s/ Christopher T. Varas

CHRISTOPHER T. VARAS

Attorneys for Plaintiff

Lions Gate Films Inc.

DATED: June 12, 2015

By:

DocuSigned by:

Jerome Gillan

JEROME GILLAN