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Attorney for Plaintiff  
Wicked Nevada, LLC

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

Wicked Nevada, LLC,	)	<b>Case No.: 1:19-cv-413-SOM-KJM</b>
	)	<b>(Copyright)</b>
Plaintiff,	)	
vs.	)	<b>STIPULATED CONSENT</b>
	)	<b>JUDGMENT BETWEEN</b>
Senthil Vijay Segaran,	)	<b>PLAINTIFF AND DEFENDANT</b>
	)	<b>SENTHIL VIJAY SEGARAN</b>
Defendant.	)	
	)	
	)	
	)	
_____	)	

**STIPULATED CONSENT JUDGMENT BETWEEN PLAINTIFF AND  
DEFENDANT SENTHIL VIJAY SEGARAN**

As attested to by the signatures of Defendant SENTHIL VIJAY SEGARAN and counsel for the Plaintiff Wicked Nevada, LLC below, this matter comes before the Court on the parties' joint Stipulated Consent Judgment.

Plaintiff has filed a First Amended Complaint [Doc. #23] alleging that that Defendant SENTHIL VIJAY SEGARAN is liable for intentional inducement,

contributory and direct copyright infringement per 17 U.S.C. §101 for distributing and promoting torrent files of Plaintiff's motion picture *Extremely Wicked, Shockingly Evil and Vile*.

The parties, after conferral and investigation, now appear, Defendant SENTHIL VIJAY SEGARAN *pro se*, and Plaintiff 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. Plaintiff has a valid and enforceable copyright in the original copyrighted work as identified in Exhibit "3" of the First Amended Complaint [Doc. #23-3].
3. SENTHIL VIJAY SEGARAN 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.
4. SENTHIL VIJAY SEGARAN denies liability but acknowledges that he is Defendant JOHN DOE dba YTS as identified in the original complaint [Doc. #1] and concedes that one or more third parties uploaded the torrent file of Plaintiff's motion picture to the website YTS.LT, and that his website YTS.LT

provided links for distributing the torrent file under the file name “Extremely Wicked, Shockingly Evil, And Vile (2019) [WEBRip] [720p] [YTS.AM]”.

5. Pursuant to stipulation of the parties, the below Money Judgment, Permanent Injunction and Order is to be entered against Defendant SENTHIL VIJAY SEGARAN.

### **MONEY JUDGMENT**

A Money Judgment is awarded in favor of Plaintiff Wicked Nevada, LLC against Defendant SENTHIL VIJAY SEGARAN in the amount of \$150,000 (one hundred fifty thousand dollars) for damages.

### **PERMANENT INJUNCTION**

Defendant SENTHIL VIJAY SEGARAN is hereby PERMANENTLY ENJOINED from directly, contributorily or indirectly infringing Plaintiff’s rights in its motion picture;

Defendant SENTHIL VIJAY SEGARAN is hereby PERMANENTLY ENJOINED from distributing and/or promoting torrent files of Plaintiff’s motion picture.

This Court will retain jurisdiction until November 14, 2021 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.

DATED: Kailua-Kona, Hawaii, December 18, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper  
Kerry S. Culpepper

Attorney for Plaintiff

DATED: London, England, December 18, 2019.



Defendant Senthil Vijay Segaran  
appearing *pro se*

APPROVED AND SO ORDERED:



/s/ Susan Oki Mollway  
Susan Oki Mollway  
United States District Judge

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*Wicked Nevada, LLC v. Senthil Vijay Segaran*; Case No. 1:19-cv-00413-SOM-KJM;  
*STIPULATED CONSENT JUDGMENT*