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Attorneys for Plaintiff/Counter-Defendant
 Lakewood Church

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

FAYER GIPSON LLP

LAKWOOD CHURCH, a Texas nonprofit corporation,

CASE NO. CV14-07404-PSG (MRWx)

Plaintiff,

~~PROPOSED~~ JUDGMENT

v.

ROBERT LEE SMITH JR., a natural person; and DOES 1-10, inclusive,

Judge: Hon. Philip S. Gutierrez
 Courtroom: 880

Defendants.

Hearing Date: N/A
 Hearing Time: N/A

ROBERT LEE SMITH JR., an individual,

Action Filed: Sept. 22, 2014
 Discovery Cut-Off: July 28, 2015
 Motions Cut-Off.: August 11, 2015
 Trial Date: November 3, 2015

Counter-Claimant,

v.

LAKWOOD CHURCH, a Texas nonprofit corporation; LAKWOOD SUMMITS, LLC, a Texas limited liability company; and ZIFFREN BRITTENHAM LLP, a California limited liability partnership,

Counter-Defendants.

~~PROPOSED~~ JUDGMENT

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2 The Court having considered the joint stipulation of plaintiff Lakewood Church
3 (“Plaintiff” or “Lakewood”) and defendant Robert Lee Smith Jr. (“Defendant”) for
4 entry of judgment on Plaintiff’s Complaint (Dkt. No. 1), which asserts a singled cause
5 of action for declaratory relief, and good cause appearing therefor, the joint stipulation
6 is GRANTED and Judgment is hereby entered in favor of plaintiff Lakewood Church
7 and against defendant Robert Lee Smith Jr. on Plaintiff’s Complaint for declaratory
8 relief as follows:

9 The Court hereby declares and decrees that:

- 10 1. Defendant has no legal or contractual entitlement to compensation or
11 credit in connection with any alleged submission of his ideas for
12 entertainment or multimedia projects or ventures to Lakewood and/or
13 its affiliates that occurred at any time up to and including the date of
14 this Judgment, with the exception of the project set forth in Section 3
15 below;
- 16 2. Plaintiff has no legal or contractual duty to compensate or credit
17 Defendant in connection with any alleged submission of his ideas for
18 entertainment or multimedia projects or ventures to Lakewood and/or
19 its affiliates that occurred at any time up to and including the date of
20 this Judgment, with the exception of the project set forth in Section 3
21 below;
- 22 3. Notwithstanding the foregoing, nothing herein shall preclude
23 Defendant from being afforded credit and/or compensation in
24 connection with the feature-length motion picture currently in
25 development, entitled *White Tiger*, in accordance with the applicable
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written agreements concerning this project; and

4. For avoidance of doubt, the above declarations and decrees apply equally to general ideas for project types or ventures, as well as to specific ideas for particular projects or ventures.

This Judgment shall constitute a final judgment in this action for all purposes pursuant to the Federal Rules of Civil Procedure. The Court shall retain jurisdiction over this action to implement and enforce this Judgment and all other decrees and orders necessary or appropriate.

IT IS SO ORDERED, ADJUDGED AND DECREED.

PHILIP S. GUTIERREZ

Dated: August 19, 2015

Hon. Philip S. Gutierrez