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17 Attorneys for Plaintiff DASSAULT SYSTÈMES
 18 SOLIDWORKS CORPORATION

19 IN THE UNITED STATES DISTRICT COURT
 20 NORTHERN DISTRICT OF CALIFORNIA

21 DASSAULT SYSTÈMES SOLIDWORKS
 22 CORPORATION,

23 Plaintiff,

24 vs.

25 BLISSERA CORP.,
 26 SUREN ALEXANIAN,
 27 and
 28 JOHN DOE

Defendants.

Case No.: 5:23-cv-03190-CRB

Hon. Charles R. Breyer

**STIPULATED MOTION FOR ENTRY
 OF FINAL JUDGMENT BY CONSENT
 AND PERMANENT INJUNCTION
 ORDER**

Complaint Filed: June 27, 2023

1 **BACKGROUND**

2 1. Plaintiff is the creator, author, and owner of the software coder for the
3 SOLIDWORKS software package.

4 2. Plaintiff owns copyright registrations for the SOLIDWORKS software
5 package, including those shown in Table 1 below.

6

Registration Number	Registration Name
TX 0005225647	SolidWorks 2000
TX 0005666476	SOLIDWORKS 2001 PLUS
TX 0008895494	SOLIDWORKS 2019
TX 0008885576	SOLIDWORKS 2020
TX 0009074914	SOLIDWORKS 2022
TX 0009277249	SOLIDWORKS 2023

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13 Table 1

14 3. Through its monitoring technology, DS SolidWorks detected at least 125
15 uses of unlicensed and unauthorized copies of the SOLIDWORKS software on at least
16 seven computers having Media Access Control (“MAC”) addresses as shown below in
17 Table 2 (the “Computers”).

18

Computer	MAC Addresses
1	3cf86248d33f 3cf86248d33e 00012e71d9a0 3cf86248d342 00012e71d99f
2	34f39aa5656c 9c5c8e024349 34f39aa56569 34f39aa56568
3	887873e8e3bb 887873e8e3ba 887873e8e3be

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27 Table 2

1 4. Plaintiff filed a complaint against the Defendants alleging the Defendants
2 violated U.S. copyright laws by downloading and using, without authorization, Plaintiff's
3 SOLIDWORKS software package.

4 TO THE COURT AND TO ALL PARTIES AND/OR THEIR ATTORNEYS OF
5 RECORD:

6 Pursuant to *Local Rule 7-1*, Plaintiff DASSAULT SYSTÈMES SOLIDWORKS
7 CORPORATION (hereinafter "Plaintiff") and Defendants BLISSERA CORP. and
8 SUREN ALEXANIAN (hereinafter "Defendants"), by and through their respective
9 counsel, hereby stipulate as follows:

10 1. WHEREAS, Plaintiff filed Case No. 3:23-cv-03190 in the United States
11 District Court for the Northern District of California; and

12 2. WHEREAS, Plaintiff and Defendants have reached a negotiated settlement
13 that they desire to have entered as a consent judgement, and, accordingly, they hereby
14 respectfully request that the court enter the relief in the form agreed by the Parties and
15 shown in the [Proposed] Consent Judgement and Permanent Injunction attached hereto as
16 Exhibit "A" and filed concurrently herewith.

17 DATED this 16th day of April, 2024..

18
19 HARNESS, DICKEY & PIERCE, PLC

20 By: /s/Glenn E. Forbis

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22 Jeremiah J. Foley (*Pro Hac Vice*)

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27 AND

28 HARRINGTON, FOXX, DUBROW &

CANTER, LLP

Edward W. Lukas, Jr., State Bar No. 155214

GORDON REES SCULLY

MANSUKHANI,LLP

By: /s/ Reid E. Damman

Reid E. Dammann

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CORP. and SUREN ALEXANIAN

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5 **Attorneys for DASSAULT SYSTÈMES**
6 **SolidWorks CORPORATION**

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CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2024, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will be served by operation of the Court’s electronic filing system upon all counsel of record and ECF participants.

/s/ Jeremiah Foley
Jeremiah J. Foley
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18 SOLIDWORKS CORPORATION

19 IN THE UNITED STATES DISTRICT COURT
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA

21 DASSAULT SYSTÈMES SOLIDWORKS
22 CORPORATION,

23 Plaintiff,

24 vs.

25 BLISSERA CORP. AND SUREN ALEXANIAN

26 Defendants.

Case No. 3:23-cv-03190-CRB

~~PROPOSED~~ **CONSENT JUDGMENT AND
PERMANENT INJUNCTION**

Complaint Filed: June 27, 2023

27 1. Plaintiff DASSAULT SYSTÈMES SOLIDWORKS CORPORATION
28 (“Dassault” or “Plaintiff”) is the creator, author, and owner of the software code for the
DS SolidWorks’ SOLIDWORKS software package.

1 5. Plaintiff filed a complaint against Defendants alleging Defendants violated
2 U.S. copyright laws by downloading and using, without authorization, Plaintiff's
3 SOLIDWORKS software package.

4 6. Defendants have denied and continue to deny all allegations in the complaint.
5 By entering into this Consent Judgment, the Defendants do not admit any violation of law,
6 and it does not constitute evidence of an admission by Defendants regarding any issue of
7 law or fact alleged in the Complaint.

8 The Court, having considered the request of the Parties to enter the following relief,
9 and such relief appearing reasonable under the circumstances, the Court finds as follows:

10 On June 27, 2023, Plaintiff filed Case No.: 3:23-cv-03190-CRB in the United
11 States District Court for the Northern District of California. Plaintiff and Defendants have
12 now stipulated to the entry of the following Consent Judgment.

13 The Parties agree and the Court finds as follows:

14 A. Plaintiff brought this action asserting its registered U.S. copyrights.

15 B. The Court has subject matter jurisdiction over this action.

16 C. The Court has personal jurisdiction over Defendants.

17 D. The Parties have reached agreement to resolve this matter and request that the

18 Court enter the following relief.

19 Therefore, JUDGMENT IS HEREBY ENTERED in favor of Dassault Systèmes
20 SolidWorks Corporation.

21 Pursuant to Fed. R. Civ. P. 65, IT IS HEREBY ORDERED that Defendants
22 BLISSERS CORP. and SUREN ALEXANIAN, and its employees, agents, related
23 companies, all persons under the direction of Defendants, and other persons in active
24 concert or participation with any of them and who receive actual notice of this Order
25 (together, the "Enjoined Parties"), are hereby permanently prohibited from using any
26 copies of DS SolidWorks' SOLIDWORKS software package without being the lawful
27 owner of appropriate licenses permitting such use.

28 IT IS FURTHER HEREBY ORDERED that Defendants BLISSERA CORP. and

1 SUREN ALEXANIAN pay Twenty Thousand Dollars (\$20,000 USD) by April 30, 2024.
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4 IT IS FURTHER HEREBY ORDERED that each Party shall bear its own costs and
5 attorneys' fees. This Court specifically retains jurisdiction of this matter for purposes of
6 enforcing the terms of the Consent Judgment. This is a final order and judgement.
7

8 **IT IS SO ORDERED**

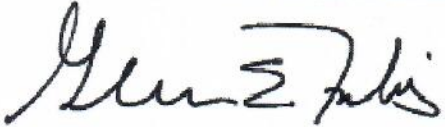
9 **DATED this 17th day of April, 2024.**
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13 UNITED STATES DISTRICT JUDGE
14 Hon. Charles R. Breyer
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**DASSAULT SYSTÈMES
SOLIDWORKS CORPORATION**



Signature

Printed Name: Glenn E. Forbis

Title: Power of Attorney for Plaintiff

Execution Date: April 10, 2024

BLISSERA CORP.



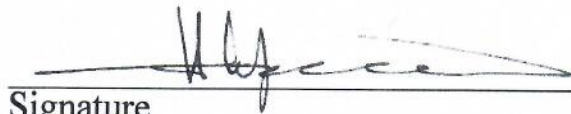
Signature

Printed Name: Suren Alexanian

Title: CEO

Execution Date: April 11, 2024

SUREN ALEXANIAN



Signature

Printed Name: Suren Alexanian

Title: Self

Execution Date: April 11, 2024