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Attorneys for Defendants

Akanoc Solutions, Inc.,

Managed Solutions Group, Inc.

and Steve Chen

UNITED STATES DISTRICT COURT**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

LOUIS VUITTON MALLETTIER, S.A.,

Plaintiff,

vs.

AKANOC SOLUTIONS, INC., MANAGED
SOLUTIONS GROUP, INC., STEVEN CHEN
AND DOES 1 THROUGH 10, INCLUSIVE,

Defendants.

Case No.: C 07-3952 JW (HRL)

**SUPPLEMENTAL JURY
INSTRUCTION NO. 7**

JURY INSTRUCTION No. ____

**CONTRIBUTORY COPYRIGHT INFRINGEMENT - INDUCED, CAUSED OR MATERIALLY
CONTRIBUTED TO DIRECT INFRINGEMENT**

You may not find that a defendant materially contributes to infringing conduct at a particular website if they provide content-neutral services to their customers. A defendant provides content-neutral services if they are not concerned with the content of websites located on their servers (that is, they do not promote websites, require certain content on websites, or hold out certain merchants as being providers of a certain quality of product).

1 *Perfect 10, Inc. v. Visa Intern. Service Ass'n*, 2004 WL 1773349, *3 (N.D.Cal.2004) (“Unlike
2 [*Perfect 10, Inc. v. Cybernet Ventures, Inc.*] Defendants provide **content-neutral services**.
3 Defendants **do not promote** the **websites** that use their services. **Nor do Defendants have content-**
4 **specific regulations** with which merchants must comply before using Defendants services, as
Cybernet did. Defendants do not hold out certain merchants as being providers of a particular quality
of product. Defendants are **concerned solely with the financial aspects of the websites, not their**
5 **content.**”