

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DISH NETWORK L.L.C.,)
ECHOSTAR TECHNOLOGIES L.L.C.,)
and NAGRASTAR LLC,)
)
Plaintiffs,)
)
v.)
)
EDMUND LAU,)
)
Defendant.)

Case No. 1:14-cv-04292

**JOINT MOTION FOR ENTRY OF AGREED FINAL JUDGMENT
AND PERMANENT INJUNCTION**

Plaintiffs DISH Network L.L.C., EchoStar Technologies L.L.C., and NagraStar LLC (collectively, “DISH Network”), and Defendant Edmund Lau, respectfully file this joint motion for entry of an agreed final judgment and permanent injunction, and in support state:

I. NATURE OF THE CASE

DISH Network brought this action claiming that Defendant unlawfully circumvented the DISH Network security system and intercepted DISH Network satellite television programming. Defendant is alleged to have accomplished this in part by subscribing to a pirate television service known as IKS Rocket. DISH Network claims that Defendant used the IKS Rocket service to obtain control words or keys necessary to decrypt DISH Network’s satellite signal and view copyrighted DISH Network programming without authorization from and without payment to DISH Network.

II. RELIEF REQUESTED

The parties stipulate that a final judgment should be entered in favor of DISH Network on Count I alleging violations of the Digital Millennium Copyright Act, 17 U.S.C. § 1201(a)(1), Count II alleging violations of the Federal Communications Act, 47 U.S.C. § 605(a), and Count III alleging violations of the Electronic Communications Privacy Act, 18 U.S.C. §§ 2511(1)(a) and

2520. The parties have agreed to a confidential settlement sum and therefore do not request an award of damages. The parties do, however, stipulate to the entry of a permanent injunction, which is authorized by Counts I-III. *See* 17 U.S.C. § 1203(b)(1); 47 U.S.C. § 605(e)(3)(B)(i); 18 U.S.C. § 2520(b)(1). A proposed final judgment and permanent injunction has been submitted.

Dated: August 11, 2014

Respectfully submitted,

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