

Honorable Ricardo S. Martinez

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LHF PRODUCTIONS, INC.,

Plaintiff,

v.

MOHAMMED KHAN, an individual,

Defendant/Counterclaimant.

Civil Action No. 17-cv-782RSM

STIPULATED MOTION AND ORDER TO
AMEND COMPLAINT

As attested to by the signatures below, this matter comes before the Court on the parties’ stipulated motion to amend the complaint to add Faisal Raza as a party to the action. A copy of the proposed amended pleading is attached as Exhibit A, per LCR 15.

Plaintiff filed this action against various Doe Defendants in the United States District Court for the Western District of Washington for copyright infringement, 17 U.S.C. §§ 101, et seq. (Dkt. 10), of Plaintiff’s motion picture entitled *London Has Fallen* (“Motion Picture”), registered with the United States Copyright Office, Reg. No. PA 1-982-831.

Defendant Mohammed Khan was subsequently identified and joined in the case as Doe 3, the subscriber associated with Internet Protocol address 98.246.65.97 on 2017-04-24 14:48:13 UTC. Defendant Khan denied responsibility and has a counterclaim against Plaintiff for a declaratory judgment action of noninfringement.

STIPULATED MOTION AND ORDER TO AMEND COMPLAINT

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LHF 17-782 stip amend.docx

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1 Defendant Khan then has identified his roommate, Faisal Raza, as the responsible party.
2 Mr. Raza has agreed to be substituted for Defendant Khan.

3 The parties, after conferral and investigation, now appear to join Faisal Raza and fully and
4 finally resolve claims between the parties and the matters before the Court pursuant to a
5 Confidential Settlement Agreement.

6 Plaintiff will have ten (10) days to file a Second Amended Complaint (SAC) from the date
7 this order is signed.

8 Once the Court permits amendment of the complaint to add Faisal Raza, the parties
9 (Plaintiff, Defendant Khan and Defendant Raza) will move the Court for entry of a Stipulated
10 Consent Judgment to effect the terms of their settlement. Counsel for Mr. Raza has agreed that the
11 amended complaint will be deemed served on Mr. Raza as of the date of the Court's order on this
12 motion.

13 In the event that a Stipulated Consent Judgment is not filed by the Plaintiff and Defendant
14 within ten (10) days after the filing of the SAC, then the Parties stipulate the SAC will be dismissed
15 with prejudice.

16 Good cause being shown, the Court hereby GRANTS the stipulated motion. Plaintiff may file
17 an amended complaint joining Faisal Raza.

18 SO ORDERED this 18 day of October 2017.

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21 RICARDO S. MARTINEZ
22 CHIEF UNITED STATES DISTRICT JUDGE
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1 SO STIPULATED AND RESPECTFULLY SUBMITTED October 18, 2017.

2 s/ David A. Lowe, WSBA No. 24,453

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7 *Attorneys for Plaintiff*

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Attorneys for Defendant/Counterclaimant

Khan and Defendant Raza

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