

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

VOLTAGE HOLDINGS, LLC;)	
WONDER ONE, LLC; VENICE PI,)	
LLC; and MON, LLC,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
EARTHLINK, LLC,)	
)	
<i>Defendant.</i>)	
)	

CIVIL ACTION NO.
1:22-cv-02576-SEG

**JOINT STIPULATION FOR DISMISSAL OF DEFENDANT EARTHLINK,
LLC WITH PREJUDICE PURSUANT TO FED. R. CIV. P. 41**

Plaintiffs VOLTAGE HOLDINGS, LLC, VENICE PI, LLC, WONDER ONE, LLC; and MON, LLC (“Plaintiffs”) and Defendant EARTHLINK, LLC (“Defendant”) (collectively, “Parties”), through their counsel, hereby file this joint stipulation for dismissal with prejudice of all claims asserted herein by Plaintiffs against Defendant in accordance with Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

In accordance with the judgments in the cases of *Venice PI, LLC et al. v. Nguyen Dinh Manh et al.*, 1:19-cv-00169-LEK-KJM, Doc. #77 (D. Haw. 2020) and *Wicked Nevada, LLC v. Senthil Vijay Segaran*, 1:19-cv-00413-SOM-KJM, Doc. #25

(D. Haw. 2019), against the operators of the website YTS.MX where Senthil Vijay Segaran and Techmodo Limited, the operator of the foreign-based website “YTS” (yts.mx), admitted that YTS distributed torrent files for pirating U.S. copyright protected motion pictures including Plaintiffs, Plaintiffs have requested and Defendant has agreed to request its wholesale providers to use commercially reasonable efforts to block access to YTS on their servers in the United States used for Defendant’s services.

Plaintiffs and Defendant do not seek an award of attorney’s fees and/or costs.

No claims, including any counterclaim, cross-claim, or third-party claim, would remain between Plaintiffs and Defendant following dismissal.

Pursuant to Rule 78(b) of the *Federal Rules of Civil Procedure*, the Parties waive a hearing and submit the joint stipulation for disposition upon the papers filed.

The Court shall reserve jurisdiction for 180 days for the sole purpose of enforcing the settlement agreement between the parties.

Dated: October 4, 2022

Respectfully submitted,

/s/ Evan A. Andersen
Evan A. Andersen
Georgia Bar No. 377422
SRIPLAW, P.A.
3372 Peachtree Road
Suite 115

/s/ Lawrence A. Slovensky
Lawrence A. Slovensky
Georgia Bar No. 653005
KING & SPALDING LLP
1180 Peachtree St., NE
Suite 1600

Atlanta, GA 30326
evan.andersen@sriplaw.com

Kerry S. Culpepper, Esq.
(Admitted Pro Hac Vice)
CULPEPPER IP, LLLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Tel.: (808) 464-4047
Fax.: (202) 204-5181
Email: kculpepper@culpepperip.com
Attorneys for Plaintiffs

Atlanta, GA 30309
404-572-4600
404-572-5100 (Fax)
lslovensky@kslaw.com

Kenneth L. Steinthal
(Admitted Pro Hac Vice)
KING & SPALDING LLP
50 California Street
Suite 3300
San Francisco, CA 94111
ksteinthal@kslaw.com

David P. Mattern
(Admitted Pro Hac Vice)
KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Suite 900
Washington, D.C. 20006-4707
dmattern@kslaw.com
*Attorneys for Defendant EarthLink,
LLC*

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on October 4, 2022, a true and correct copy of the foregoing document was served by electronic mail by the Court's CM/ECF System to all parties listed below on the Service List.

/s/ Evan A. Andersen
EVAN A. ANDERSEN

SERVICE LIST

Lawrence A. Slovensky
Georgia Bar No. 653005
KING & SPALDING LLP
1180 Peachtree St., NE
Suite 1600
Atlanta, GA 30309
404-572-4600
404-572-5100 (Fax)
lslovensky@kslaw.com

Kenneth L. Steinthal
(Admitted Pro Hac Vice)
KING & SPALDING LLP
50 California Street
Suite 3300
San Francisco, CA 9411
ksteinthal@kslaw.com

David P. Mattern
(Admitted Pro Hac Vice)
KING & SPALDING LLP
1700 Pennsylvania Avenue, NW
Suite 900
Washington, D.C. 20006-4707
dmatter@kslaw.com
*Attorneys for Defendant EarthLink,
LLC*