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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MAIN SEQUENCE, LTD.,
JEROLD HAMZA as executor for the
ESTATE OF GEORGE CARLIN, and
JEROLD HAMZA in his individual
capacity,

Plaintiffs,

v.

DUDESY, LLC, WILL SASSO, CHAD
KULTGEN, and JOHN DOES 1-20,

Defendants.

Case No. 2:24-cv-00711

**JOINT MOTION FOR ENTRY OF
CONSENT JUDGMENT
AND PERMANENT INJUNCTION**

Plaintiffs, through undersigned counsel, and defendants, through undersigned
counsel, stipulate and agree as follows:

WHEREAS, Dudesy, LLC owns and operates the YouTube channel
@Dudesy.

WHEREAS, Defendants released the video titled “George Carlin: I’m Glad
I’m Dead (2024) – Full Special” (the “Dudesy Special”) to YouTube on January 9,
2024.

WHEREAS, Plaintiff Main Sequence Ltd. owns the publicity rights to George
Carlin’s name image and likeness, and the copyrights to George Carlin’s copyrighted
works.

WHEREAS, the Dudesy Special generated traffic and additional revenue to
Dudesy, LLC.

1 WHEREAS, on January 25, 2024, Plaintiffs sued Defendants for violation of
2 right of publicity and copyright.

3 WHEREAS, on January 31, 2024, Defendants notified Plaintiffs that
4 Defendants had taken the Dudesy Special down from the @Dudesy YouTube
5 channel, and taken reasonable steps to remove all known mention of George Carlin
6 and the Dudesy Special from the Dudesy Podcast and Dudesy’s social media
7 accounts, including Instagram, Facebook and TikTok.

8 WHEREAS, on April 1, 2024, the parties reached a settlement.

9 THEREFORE,

10 1. the Parties stipulate and agree that this Court has jurisdiction to enter a
11 stipulated consent judgment and permanent injunction on the following terms and
12 conditions and that the Court shall have continuing jurisdiction for purposes of
13 enforcing the stipulated consent judgment permanent injunction over the
14 undersigned parties, and request that the Court enter that attached [Proposed]
15 Stipulated Consent Judgment and Permanent Injunction (“Stipulated Consent
16 Judgment and Permanent Injunction”); and

17 2. the Parties jointly request that this Court enter the herein proposed
18 stipulated consent judgment and permanent injunction.

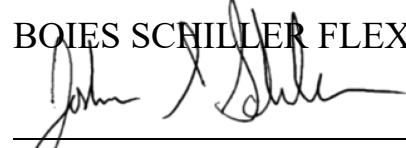
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20 IT IS SO STIPULATED.

21 Respectfully Submitted,

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BOIES SCHILLER FLEXNER LLP



Joshua I. Schiller
jischiller@bsflp.com
2029 Century Park East
Suite 1520
Los Angeles, CA 90017
Telephone: (213) 629-9040
Facsimile: (213) 629-9022


Benjamin Margulis
bmargulis@bsflp.com
Katherine L. Cassirer
kcassirer@bsflp.com
55 Hudson Yards
New York, NY 10001
Telephone: (212) 446-2300
Facsimile: (212) 446-2350

DUDESY, LLC

By: 

Its: MEMBER

CHAD KULTGEN



WILL SASSO