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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

4C4 MEDIA, LLC,

Plaintiff

vs.

MARK HAEFELI; MARK HAEFELI
PRODUCTIONS, INC.; JOHN DOES 1-10
(name being fictitious for individuals whose
identities are currently unknown); and ABC
ENTITIES 1-10 (names being fictitious for
corporate or other legal entities whose
identities currently remain unknown),

Defendants.

Civil Action No.: *19-cv-12288*

**ORDER GRANTING PLAINTIFF'S
PRELIMINARY INJUNCTION**

THIS MATTER HAVING BEEN opened to the Court by the McHattie Law Firm, LLC, attorneys for the plaintiff 4C4 Media, LLC, by way of an Order to Show Cause with Temporary Restraints, for an Order granting Preliminary Injunctive Relief against Defendant Mark Haefeli and Mark Haefeli Productions, Inc., on notice to Defendants' and Defendants' attorney Dennis Sabourin, Esq., attorney for Defendant, and the Court having considered the matter and for good cause showing.

IT IS on this *29th* day of *May*, 2019;

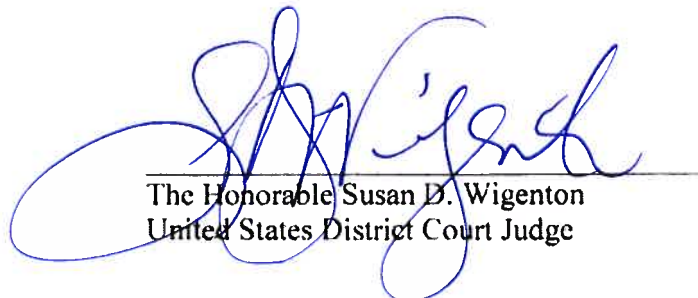
ORDERED, as follows:

1. The Temporary Restraining Order entered May ⁸~~13~~, 2019, is hereby made permanent pending resolution of this action on the merits; and
2. The Defendants, Mark Haefeli and Mark Haefeli Productions, Inc., or anyone of them, or any other entity under Mr. Haefeli's control, and those in active concert with them (the "Defendants"), or receiving instructions and requests from them, including but not limited to Facebook, Twitter, Instagram, LinkedIn, Vimeo, Kicktraq, Filmfreeway, Flickr, receiving notice of this Order are preliminarily enjoined, pending resolution of this action on the merits, from:
 - A. editing, altering, reproducing, distributing, or otherwise publicly displaying: (i) the Film, or (ii) any adulterated, alternate, abbreviated or reconstituted copy of the Film or the Film's outtakes and unused source materials, including one that lists Defendants as the copyright owner (or otherwise attributes ownership to Defendant);
 - B. offering for sale, selling, marketing or promoting: (i) the Film or (ii) any adulterated, alternate, abbreviated or reconstituted copy of the Film or the Film's outtakes and unused source materials, including one that lists Defendants as the copyright owner (or otherwise attributes ownership to Defendant);
 - C. creating derivative works derived from: (i) the Film or (ii) any adulterated, alternate, abbreviated or reconstituted copy of the Film or the Film's outtakes and unused source materials, including one that lists Defendants as the copyright owner (or otherwise attributes ownership to Defendant);
 - D. engaging in acts of interferences with Plaintiff's marketing and selling of: (i) the Film, or (ii) any alternate, abbreviated or reconstituted version of the Film or the

Film's outtakes and unused source materials, including, but not limited to, interfering with Plaintiff's work with existing or prospective vendors for the Film; and

- E. engaging in any other acts which puts a cloud on the ownership, development or distribution of: (a) the Film, or (b) any alternate, abbreviated or reconstituted version of the Film or the Film's outtakes and unused source materials, including, but not limited to, Defendants holding themselves out as the owner of the Film; and
- F. communicating or publicly disseminating any claim or assertion of:
- a. ownership of the Film,
 - b. attributing the Film a work of the Defendants, (through use of words such as "A Mark Haefeli Film", "A Mark Haefeli Productions Film", "An MHP Production", etc., and
 - c. misrepresenting the extent of his creative involvement (sole creator, "100%" written, produced or directed by Mark Haefeli, etc.);
- G. communicating or publicly disseminating any claim or assertion that misrepresents or exaggerates the creation, funding, origin, writing of, producing, financing for or copyright ownership of the Film; and
- H. the Defendants are affirmatively ordered to immediately take down any prior materials, posts, tweets, photos, video, film or other communications violative of the foregoing.

SO ORDERED.



The Honorable Susan D. Wigenton
United States District Court Judge