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U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

4C4 MEDIA, LLC,

Plaintiff,

v.

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.

**ORDER TO SHOW CAUSE FOR A
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

THIS MATTER having been brought before the Court by Plaintiff, through its counsel, by Order to Show Cause, on Notice to the Defendants via counsel, seeking a temporary restraining order and preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and L.Cv.R.65.1, and upon the Complaint, Certification of Robert S. Gregory and Memorandum of Law submitted herewith, the Court having determined that good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause shown;

IT IS on this 8th day of May, 2019,

ORDERED that the Defendants appear and show cause on the 15th day of May, 2019, before the United States District Court for the District of New Jersey,

Hon. Susan D. Wigenton, USDJ, at the Martin Luther King Jr. US Courthouse, located at NEWARK, New Jersey 07101, at 11 o'clock in the fore noon, or as soon thereafter as counsel can be heard, why an Order should not be entered:

1. Temporarily Restraining Defendants from editing, altering, reproducing, distributing, or otherwise publicly displaying: (a) the film, with the working name "A Billion Dollar Power Station" (the "Film"), or (b) 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);
2. Temporarily Restraining Defendants from offering for sale, selling, marketing or promoting: (a) the Film, or (b) 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);
3. Temporarily Restraining Defendants from creating derivative works derived from: (a) the Film, or (b) any adulterated, alternate, abbreviated or reconstituted copy of the Film or the Film's outtakes and unused source materials, including, but not limited to, one that lists Defendants as the copyright owner (or otherwise attributes ownership to Defendant);
4. Temporarily Restraining Defendants from engaging in acts of interferences with Plaintiff's marketing and selling 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, interfering with Plaintiff's work with existing or prospective vendors for the Film; and
5. Temporarily Restraining Defendants from engaging in any other acts which put 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 it is further **ORDERED** that:

1. Pending further hearing on this Order to Show Cause, Defendants are temporarily enjoined and restrained 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.

2. A copy of this Order to Show Cause, and to the extent not already served, a copy of the Complaint, Certification of Robert S. Gregory and Memorandum of Law submitted in support of this application, together with a summons, shall be served upon the Defendants personally within 3 days of the date hereof, in accordance with FRCP 4.

3. The Plaintiff must file with the Court its proof of service of the pleadings on the Defendants no later than three (3) days before the return date.

4. Defendants shall file and serve a written response to this Order to Show Cause and proof of service by Mon., May 13, 2019, ^{at 4 PM.} You must send a courtesy copy of your opposition papers directly to Judge Wigenton, whose address is: 50 Walnut St., Courtroom 5C, New Jersey _____.

5. The Plaintiff must file and serve any written reply to the Defendants' opposition to the Order to Show Cause by Tues, May 14, 2019, ^{at 4 PM.} A courtesy copy of the reply papers must be sent directly to the chambers of Judge Wigenton.

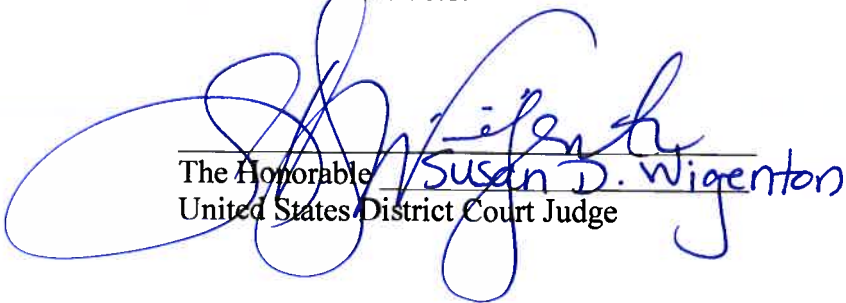
6. If the Defendants do not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default,

provided that the Plaintiff files a proof of service and a proposed form of Order at least three (3) days prior to the return date.

7. If the Plaintiff has not already done so, a proposed form of Order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than three (3) days before the return date.

8. The Court will notify the parties whether it will entertain argument on the return date of the Order to Show Cause in accordance with Local Civil Rule 78.1.

SO ORDERED.


The Honorable Susan D. Wigenton
United States District Court Judge