

1 Joel R. Weiner (SBN 139446)
joel.weiner@kattenlaw.com
2 Gloria Franko Shaw (SBN 246390)
gloria.shaw@kattenlaw.com
3 KATTEN MUCHIN ROSENMAN LLP
2029 Century Park East, Suite 2600
4 Los Angeles, CA 90067-3012
Telephone: 310.788.4400
5 Facsimile: 310.788.4471

6 Attorneys for Defendants

7 Neville L. Johnson (SBN 66329)
Douglas L. Johnson (SBN 209216)
8 JOHNSON & JOHNSON LLP
439 North Canon Drive, Suite 200
9 Beverly Hills, California 90210
Telephone: (310)975-1080
Facsimile: (310)975-1095
10 Email: njohnson@jllplaw.com
djohnson@jllplaw.com

11 Thomas V. Girardi (SBN 36603)
12 Howard B. Miller (SBN 31392)
GIRARDI | KEESE
13 1126 Wilshire Boulevard
Los Angeles, California 90017
14 Telephone: (213)977-0211
Facsimile: (213)481-1554
15 Email: tgirardi@girardikeese.com
hmiller@girardikeese.com

16 Attorneys for Plaintiff

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 BENGAL MANGLE
20 PRODUCTIONS, LLC,

21 Plaintiff,

22 vs.

23 SETH MACFARLANE; FUZZY DOOR
PRODUCTIONS, INC.; MEDIA
24 RIGHTS CAPITAL II, L.P.; MRC II
DISTRIBUTION COMPANY, L.P.;
25 THUNDER BUDDIES, LLC;
UNIVERSAL PICTURES;
26 UNIVERSAL STUDIOS HOME
ENTERTAINMENT, LLC;
27 UNIVERSAL CITY STUDIOS, LLLP;
and DOES 1-10, inclusive,

28 Defendants.

) Case No. 2:14-cv-5498

) **[PROPOSED] ORDER ON**
) **STIPULATION FOR DISMISSAL OF**
) **COMPLAINT AND ENTIRE ACTION**
) **WITH PREJUDICE**

) [Fed. R. Civ. 41(a)(1)]

1 Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, and the
2 stipulation of the parties, the Court orders as follows:

3 This action, including all claims and allegations asserted by plaintiff Bengal
4 Mangle Productions, LLC ("Plaintiff") against defendants Seth MacFarlane, Fuzzy
5 Door Productions, Inc., Media Rights Capital II, L.P., MRC II Distribution Company
6 L.P., Thunder Buddies, LLC, Universal Pictures, a division of Universal City Studios
7 LLC, Universal Studios Home Entertainment LLC, and Universal City Studios LLC,
8 incorrectly sued as Universal City Studios LLLP, (together, "Defendants") in
9 Plaintiff's Complaint for Copyright Infringement, is hereby DISMISSED IN ITS
10 ENTIRETY WITH PREJUDICE.

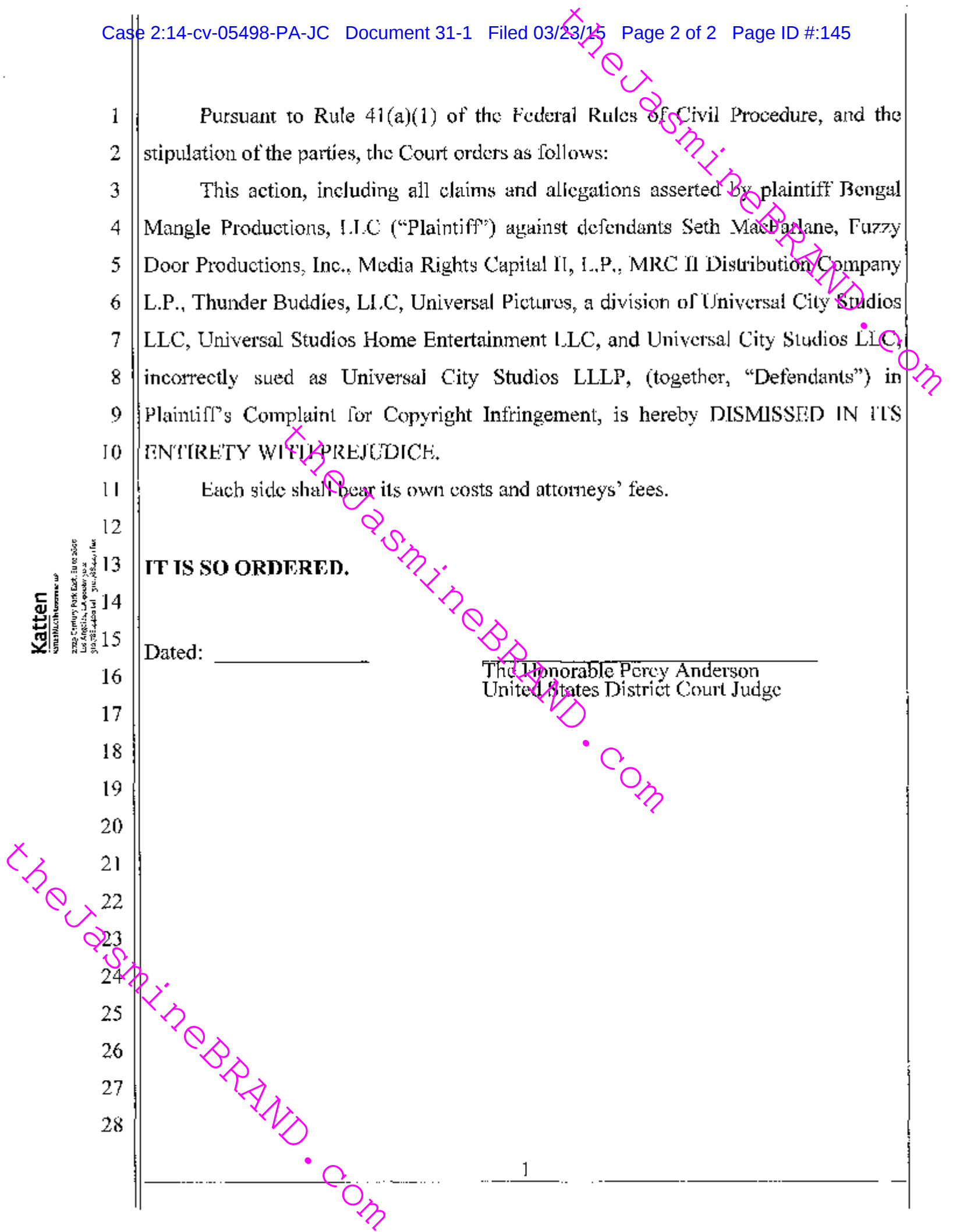
11 Each side shall bear its own costs and attorneys' fees.

12
13 **IT IS SO ORDERED.**

14
15 Dated: _____

16 The Honorable Percy Anderson
17 United States District Court Judge
18
19
20
21
22
23
24
25
26
27
28

Katten
SmartMatch Commerce LLP
2200 Century Park East, Suite 2600
Los Angeles, CA 90007
310.201.4400 or 310.201.4401 fax



1 Joel R. Weiner (SBN 139446)
joel.weiner@kattenlaw.com
2 Gloria Franke Shaw (SBN 246390)
gloria.shaw@kattenlaw.com
3 KATTEN MUCHIN ROSENMAN LLP
2029 Century Park East, Suite 2600
4 Los Angeles, CA 90067-3012
Telephone: 310.788.4400
5 Facsimile: 310.788.4471

6 Attorneys for Defendants

7 Neville L. Johnson (SBN 66329)
Douglas L. Johnson (SBN 209216)
8 JOHNSON & JOHNSON LLP
439 North Canon Drive, Suite 200
Beverly Hills, California 90210
9 Telephone: (310)975-1080
Facsimile: (310)975-1095
10 Email: njohnson@jllp.com
djohnson@jllp.com

11 Thomas V. Girardi (SBN 36603)
12 Howard B. Miller (SBN 31392)
GIRARDI | KEESE
13 1126 Wilshire Boulevard
Los Angeles, California 90017
14 Telephone: (213)977-0211
Facsimile: (213)481-1554
15 Email: tgirardi@girardikeese.com
hmiller@girardikeese.com

16 Attorneys for Plaintiff

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA

19 BENGAL MANGLE
20 PRODUCTIONS, LLC,

21 Plaintiff,

22 vs.

23 SETH MACFARLANE; FUZZY DOOR
PRODUCTIONS, INC.; MEDIA
24 RIGHTS CAPITAL II, L.P.; MRC II
DISTRIBUTION COMPANY, L.P.;
25 THUNDER BUDDIES, LLC;
UNIVERSAL PICTURES;
26 UNIVERSAL STUDIOS HOME
ENTERTAINMENT, LLC;
27 UNIVERSAL CITY STUDIOS, I,LLP;
and DOES 1-10, inclusive,

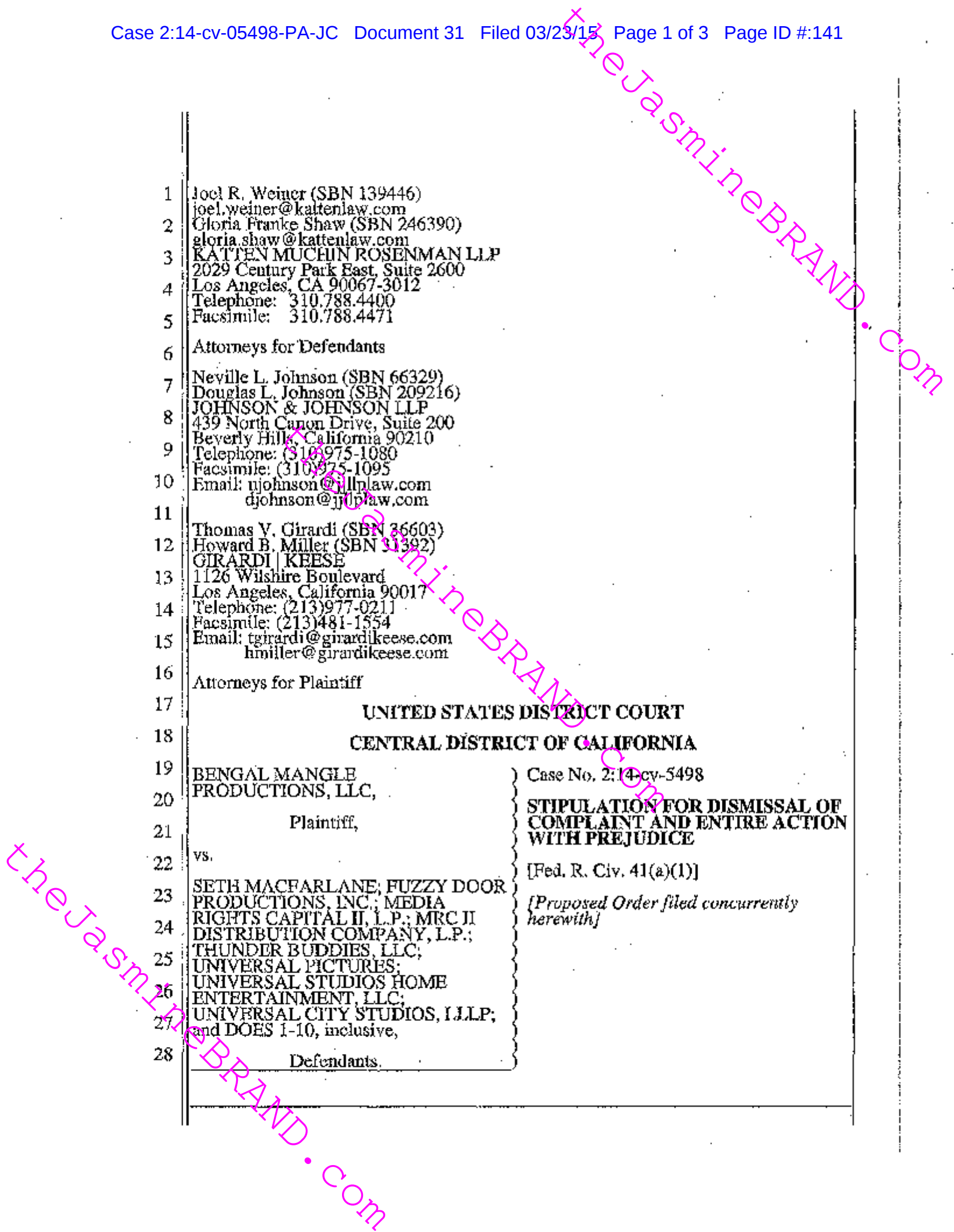
28 Defendants.

Case No. 2:14-cv-5498

STIPULATION FOR DISMISSAL OF
COMPLAINT AND ENTIRE ACTION
WITH PREJUDICE

[Fed. R. Civ. 41(a)(1)]

[Proposed Order filed concurrently
herewith]



1 Plaintiff Bengal Mangle Productions, LLC ("Plaintiff"), on the one hand, and
2 defendants Seth MacFarlane, Fuzzy Door Productions, Inc., Media Rights Capital II,
3 L.P., MRC II Distribution Company L.P., Thunder Buddies, LLC, Universal Pictures,
4 a division of Universal City Studios LLC, Universal Studios Home Entertainment
5 LLC, and Universal City Studios LLC, incorrectly sued as Universal City Studios
6 L.L.P. (together, "Defendants"), on the other hand, through their respective counsel of
7 record, hereby stipulate as follows:

8 1. On July 15, 2014, Plaintiff filed a Complaint for Copyright Infringement
9 initiating this action.

10 2. In the Complaint, Plaintiff alleged, among other things, that Defendants'
11 character, Ted, from the motion picture entitled *Ted*, was copied from and infringes
12 Plaintiff's character, Charlie, an anthropomorphic teddy bear from a web series.
13 Defendants denied Plaintiff's claims and allegations.

14 3. Plaintiff and its counsel are now satisfied that, based on discovery
15 produced in the action, the character Ted was independently created by Seth
16 MacFarlane using his own efforts and creativity and was not copied from Plaintiff's
17 Charlie character.

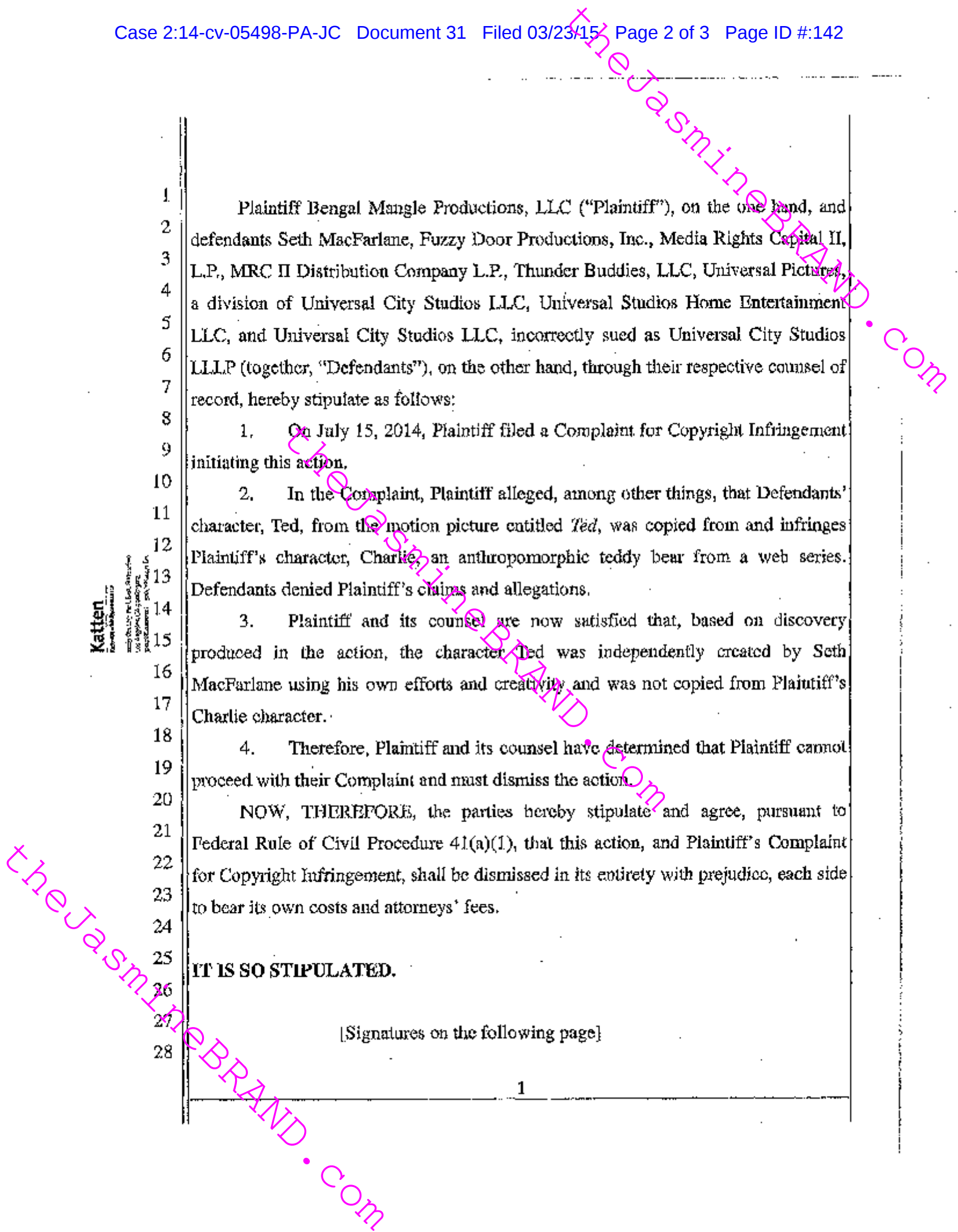
18 4. Therefore, Plaintiff and its counsel have determined that Plaintiff cannot
19 proceed with their Complaint and must dismiss the action.

20 NOW, THEREFORE, the parties hereby stipulate and agree, pursuant to
21 Federal Rule of Civil Procedure 41(a)(1), that this action, and Plaintiff's Complaint
22 for Copyright Infringement, shall be dismissed in its entirety with prejudice, each side
23 to bear its own costs and attorneys' fees.

24
25 **IT IS SO STIPULATED.**

26
27 [Signatures on the following page]
28

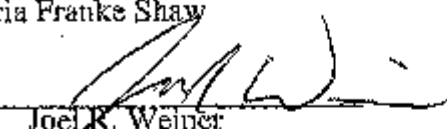
Katten
Katten Law Firm
1000 R Street, N.W.
Washington, D.C. 20004
Tel: 202.462.3000
Fax: 202.462.3001



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Dated: March 18, 2015


KATTEN MUCHIN ROSENMAN LLP
Joel R. Weiner
Gloria Franke Shaw

By: 
Joel R. Weiner

Attorneys for Defendants SEFH
MACFARLANE; FUZZY DOOR
PRODUCTIONS, INC.; MEDIA RIGHTS
CAPITAL II, L.P.; MRC II DISTRIBUTION
COMPANY L.P.; THUNDER BUDDIES,
LLC; UNIVERSAL PICTURES, a division of
Universal City Studios LLC; UNIVERSAL
STUDIOS HOME ENTERTAINMENT LLC;
and UNIVERSAL CITY STUDIOS LLC,
incorrectly sued as Universal City Studios
LLP

Dated: March 18, 2015

JOINSON & JOHNSON LLP
Neville L. Johnson
Douglas L. Johnson

By: 
Douglas L. Johnson

-and-

GIRARDI KEESE
Thomas V. Girardi
Howard B. Miller

By: 
Howard B. Miller

Attorneys for Plaintiff BENGAL MANGLE
PRODUCTIONS, LLC

Katten
MUCHIN ROSENMAN LLP
Los Angeles, CA 90017
www.katten.com