

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 San Francisco Division

4 UNITED STATES OF AMERICA, :
5 Plaintiff, :
6 v. :
7 ROCKYOU, INC. :
8 Defendant. :
9 :
10 _____ :

Case No. 3:12-cv-01487-SI
**STIPULATED MOTION TO ENTER
CONSENT DECREE AND ORDER
FOR CIVIL PENALTIES,
INJUNCTION, AND OTHER RELIEF**

11 Plaintiff, the United States of America, and Defendant, RockYou, Inc., by and through their
12 undersigned attorneys, hereby request that the Court enter the Consent Decree and Order for Civil
13 Penalties, Permanent Injunction, and Other Relief that accompanies this Stipulated Motion. All
14 parties have agreed to the terms of the Decree, as evidenced by their signatures thereon.
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16 On March 21, 2012, counsel for Defendant authorized counsel for Plaintiff to sign and file
17 this Stipulated Motion on behalf of all parties.
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19 //
20 //
21 //

1 Respectfully submitted this 27th day of March, 2012.

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3 FOR THE UNITED STATES OF
4 AMERICA:

5 STUART F. DELERY
6 Acting Assistant Attorney General
7 Civil Division
8 U.S. Department of Justice

9 MAAME EWUSI-MENSAH FRIMPONG
10 Acting Deputy Assistant Attorney General
11 Civil Division

12 MICHAEL S. BLUME
13 Director
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18 s/Alan J. Phelps
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FOR THE DEFENDANT:

s/Garret Rasmussen
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Attorney for Defendant RockYou, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of March, 2012, the undersigned caused a true and correct copy of the above-entitled STIPULATED MOTION TO ENTER CONSENT DECREE AND ORDER FOR CIVIL PENALTIES, INJUNCTION, AND OTHER RELIEF to be served via overnight delivery upon counsel for the defendants as follows:

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Attorney for Defendant RockYou, Inc.

s/Alan J. Phelps

ALAN J. PHELPS