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5 Attorneys for Plaintiff
Ted Entertainment, Inc.

6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

9 TED ENTERTAINMENT, INC., a
10 California Corporation,

11 Plaintiff,

12 vs.

13 ALEXANDRA MARWA SABER f/k/a
MARWA TALATT ABDELMONEM
14 p/k/a DENIMS, an individual, and
DOES 1-10,

15 Defendants.

Case No. 2:25-cv-05564-WLH-PD

Hon. Wesley L. Hsu

**JOINT STIPULATION RE: (1)
DISMISSAL OF THE
“COUNTDOWN EPISODE” CLAIM
WITHOUT PREJUDICE; AND (2)
DEFERRING DEADLINE FOR
MOTION FOR ATTORNEYS’ FEES
UNTIL AFTER APPEAL**

Action filed: June 19, 2025

1 **WHEREAS**, plaintiff Ted Entertainment, Inc. (“TEI”) commenced this action
2 by filing its complaint (“Complaint”) on June 19, 2025 alleging: (1) direct copyright
3 infringement against defendant Alexandra Marwa Saber p/k/a Denims (“Denims”);
4 and (2) contributory copyright infringement against Does 1-10 (the “H3Snark Mods”)
5 (Dkt. No. 1);

6 **WHEREAS**, the Complaint alleged two of TEI’s works were infringed: (1)
7 *Content Nuke: Hasan Piker* (“The Nuke”); and (2) *The H3 Show #104 – Countdown*
8 *to Doomsday* (“Countdown Episode”);

9 **WHEREAS**, on April 17, 2026, Denims filed a motion for judgment on the
10 pleadings as to The Nuke only (Dkt. No. 35) (the “Motion”);

11 **WHEREAS**, on June 29, 2026, this Court granted the Motion and gave Denims
12 seven days to file a proposed judgment (Dkt. No. 45) (the “Order”);

13 **WHEREAS**, there still exists in the Complaint a claim for direct copyright
14 infringement against Denims as to the Countdown Episode;

15 **WHEREAS**, TEI and Denims (collectively, the “Parties”) have agreed to
16 stipulate to dismissal of the claim of direct copyright infringement as to the
17 Countdown Episode against Denims without prejudice pursuant to FRCP
18 41(a)(1)(A)(ii);

19 **WHEREAS**, pursuant to FRCP 54(d)(1), Denims has fourteen days after entry
20 of judgment to file a motion for attorneys’ fees and costs;

21 **WHEREAS**, TEI intends to file a notice of appeal of the Order; and

22 **WHEREAS**, to avoid duplicative or potentially unnecessary motion practice
23 and for purposes of judicial economy, TEI and Denims have reached a stipulation to
24 defer the deadline for the filing of Denims’ motion for attorneys’ fees and costs in this
25 action to until 30 days after all appeals of the order have been exhausted, with Denims
26 reserving all rights with respect to such attorneys’ fees and costs.

27 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
28 and between the Parties, that: (1) TEI’s claim of direct copyright infringement as to

1 the Countdown Episode against Denims is hereby dismissed without prejudice
2 pursuant to FRCP 41(a)(1)(A)(ii); and (2) the deadline for Denims to file her motion
3 for attorneys’ fees and costs in this action shall be 30 days following the conclusion
4 of appellate proceedings.

5 **SO STIPULATED AND AGREED.**

6 Dated: July 6, 2026

HEAH BAR-NISSIM LLP

8 Bv /s/ Rom Bar-Nissim
9 ROM BAR-NISSIM
10 Attorneys for Plaintiff Ted
Entertainment. Inc.

11 Dated: July 6, 2026

FROST LLP

13 Bv /s/ Benjamin Kassis
14 BENJAMIN KASSIS
15 BENJAMIN GRUSH
16 Attorneys for Defendant
Alexandra Marwa Saber p/k/a
Denims

17 **L.R. 5-4.3.4 Attestation**

18 Pursuant to Civil L.R. 5-4.3.4(a)(2)(i), the filer attest that all other signatories
19 listed, and on whose behalf this filing is submitted, concur in the filing’s content and
20 have authorized the filing.
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