

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No.: 1:11-cv-1171-WYD-KMT

LIBERTY MEDIA HOLDINGS, LLC

Plaintiff,

vs.

COLORADO MEMBERS OF SWARM
OF NOVEMBER 16, 2010 TO JANUARY 31, 2011,
SHARING HASH FILE
AE340D0560129AFEE8D78CE07F2394C7B5BC9C05;
AND COMPRISING ALAN LINK, JASON FREDIN,
TAYLOR CHAMBERS, WILLIAM PEARSON, GARY OUTLAW
MICHAEL STANGER, THOMAS GAY, JOHN MOORE
BRADLEY WOOLDRIDGE, AND DOES 15 through 23,

Defendants.

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff Liberty Media Holdings (“Liberty”) and Defendant Taylor Chambers move this Court for the entry of a Final Judgment in this case. The parties have reached an agreement that this action should be resolved consistent with the terms that are reflected in the Consent Judgment filed herewith as Exhibit A.

Memorandum of Law

Settlements are “highly favored” in the law. *Pearson v. Ecological Science Corp.*, 522 F.2d 171, 176 (5 th Cir. 1975), *cert. denied*, 425 U.S. 912 (1976). This is also the case in disputes involving intellectual property. See *Flex-Foot, Inc. v. CRP, Inc.*, 238 F.3d 1362, 1370 (Fed. Cir. 2001) (“Settlement agreements must be enforced if they are to remain effective as a

means for resolving legal disagreements. Upholding the terms of settlement agreements encourages patent owners to agree to settlements and promotes judicial economy”).

The parties have settled this matter on the terms included in the Consent Judgment presented to this Court in Exhibit A. Should the Court approve of the terms, the parties jointly desire that this Court enter a judgment in a form identical, or substantially similar, to that presented. *See Donovan v. Robbins*, 752 F.2d 1170, 1177 (7th Cir. 1985) citing *SEC v. Randolph*, 736 F.2d 525, 529 (9th Cir. 1984) (finding that a consent decree should be approved unless it is “unfair, inadequate or unreasonable”).

There has been a meeting of the minds between the parties. As such, they stipulate that the consent judgment is fair, adequate and reasonable, as required by law. Thus, the parties move the Court to enter judgment as presented in Exhibit A.

Date: March 16, 2012

Respectfully Submitted,

PLAINTIFF’S COUNSEL

By: /s/ Andrew J. Contiguglia
Andrew J. Contiguglia, Esq.
CONTIGUGLIA / FAZZONE, P.C.
44 Cook Street, Suite 100
Denver, CO 80206
(303) 780-7333
(303) 780-7337 Fax

DEFENDANT TAYLOR CHAMBERS

 3/20/2012
s/ Taylor Chambers
Taylor Chambers
1848 South Reed Court
Lakewood CO 80232-6961
taylorchambers19@gmail.com