

FEDERAL COURT**BETWEEN:**

**ROGERS MEDIA INC.
 ROGERS COMMUNICATIONS INC.
 GROUPE TVA INC.
 COLUMBIA PICTURES INDUSTRIES, INC.
 DISNEY ENTERPRISES, INC.
 NETFLIX STUDIOS, LLC
 NETFLIX WORLDWIDE ENTERTAINMENT, LLC
 PARAMOUNT PICTURES CORPORATION
 UNIVERSAL CITY STUDIOS LLC
 UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP
 WARNER BROS. ENTERTAINMENT INC.**

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I S S U E D	FEDERAL COURT COUR FÉDÉRALE February 27, 2026 27 février 2026 Liviu-Razvan Movila	É M I S
MTL		1

Applicants

and

**JOHN DOE 1 dba APOLLO GROUP TV
 JOHN DOE 2 dba DIABLO IPTV
 JOHN DOE 3 dba GLO TV
 JOHN DOE 4 dba IPGUYS
 JOHN DOE 5 dba JIO TV
 JOHN DOE 6 dba SMART4K/PLATINUM
 JOHN DOE 7 dba 123MOVIES
 JOHN DOE 8 dba CINEBY
 JOHN DOE 9 dba FMOVIES
 JOHN DOE 10 dba HYDRAHD
 JOHN DOE 11 dba PUTLOCKER
 JOHN DOE 12 dba THETVAPP
 JOHN DOE 13 dba WATCHSERIES
 AND OTHER UNIDENTIFIED PERSONS WHO OPERATE
 UNAUTHORIZED ONLINE TELEVISION AND MOTION PICTURE
 PIRACY PLATFORMS**

Respondents

and

**BELL CANADA
 BRAGG COMMUNICATIONS INC. dba EASTLINK
 COGECO CONNEXION INC.
 ROGERS COMMUNICATIONS CANADA INC.**

**SASKATCHEWAN TELECOMMUNICATIONS
TEKSAVVY SOLUTIONS INC.
TELUS COMMUNICATIONS INC.
VIDEOTRON LTD.**

Third Party Respondents

NOTICE OF APPLICATION

TO THE RESPONDENTS:

A PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Applicants. The relief claimed by the Applicants appears below.

THIS APPLICATION will be heard by the Court at a time and place to be fixed by the Judicial Administrator. Unless the Court orders otherwise, the place of hearing will be as requested by the Applicants. The Applicants request that this Application be heard by videoconference, pursuant to paragraphs 73 and 74 of the Federal Court's Amended Consolidated General Practice Guidelines (June 20, 2025), or in-person at the Federal Court in Montreal.

IF YOU WISH TO OPPOSE THIS APPLICATION, to receive notice of any step in the application or to be served with any documents in the Application, you or a solicitor acting for you must file a notice of appearance in Form 305 prescribed by the Federal Courts Rules and serve it on the Applicants' solicitor WITHIN 10 DAYS after being served with this Notice of Application.

Copies of the Federal Courts Rules, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO OPPOSE THIS APPLICATION, JUDGMENT MAY BE GIVEN IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU.

February 27, 2026

Issued by:

(Registry Officer)

Issued on: March 06, 2026

Issued by: Liviu-Razvan Movila (Registry Officer)

Address of Local Office: Bureau local de Montréal/Montréal Local Office 30,
rue McGill/McGill Street Montréal, Quebec H2Y 3Z7

Address of local office:

30 McGill Street
Montreal (Quebec) H2Y 3Z7

Telephone: (514) 283-4820
Facsimile: (514) 283-6004

TO: The Administrator
FEDERAL COURT

TO: **JOHN DOE 1 dba APOLLO GROUP TV**
Unknown Address
Served by email at: support@cdn77.com, abuse@datacamp.co.uk

TO: **JOHN DOE 2 dba DIABLO IPTV**
Unknown address
Served by email at: support@cdn77.com, abuse@datacamp.co.uk

TO: **JOHN DOE 3 dba GLO TV**
Unknown address
Served by e-mail at: ripe@vestitel.bg, abuse@solytro.com, abuse@vestitel.bg

TO: **JOHN DOE 4 dba IPGUYS**
Unknown address
Served by e-mail at: abuse@melbicom.net, info@melbicom.net

TO: **JOHN DOE 5 dba JIO TV**
Unknown address
Served by e-mail at: ripe@bvestitel.bg, abuse@vestitel.bg,
sales@colobix.com, voxlan@voxlan.com

TO: **JOHN DOE 6 dba SMART4K/PLATINUM**
Unknown address
Served by e-mail at: support@cdn77.com, abuse@datacamp.co.uk

TO: **JOHN DOE 7 dba 123MOVIES**
Unknown address
Served by e-mail at: dmca@0123movie.net, dmca@123moviesfree.net

TO: **JOHN DOE 8 dba CINEBY**
Unknown address
Served by e-mail at: contact@ceneby.gd

TO: **JOHN DOE 9 dba FMOVIES**
Unknown address
Served by e-mail at: compliance@tucows.com, abuse@namecheap.com,
abuse@netim.net, support@netim.com

TO: **JOHN DOE 10 dba HYDRAHD**
Unknown address
Served by e-mail at: hydrahd@proton.met

TO: **JOHN DOE 11 dba PUTLOCKER**
Unknown address
Served by e-mail at: support@putlocker.digital, contact@immateriali.sm,
info@epag.de
Served by contact form at: <https://putlocker.gy/contact>,
<https://putlocker.pe/contact>

TO: **JOHN DOE 12 dba THETVAPP**
Unknown address
Served by e-mail at: abuse@tonic.to, info@tonicregistry.to

TO: **JOHN DOE 13 dba WATCHSERIES**
Unknown address
Served by e-mail at: whois@njal.la, info@epag.de
Served by contact form at: <https://swatchseries.is/contact>,
<https://watchseries.bar/contact>, <https://watchseries.pe/contact>

TO: **BELL CANADA**
1 Carrefour Alexander-Graham-Bell, A-7
Verdun, Québec
H3E 3B3

TO: **BRAGG COMMUNICATIONS INC. dba EASTLINK**
4881 Main Street
Oxford, Nova Scotia
B0M 1P0

TO: **COGECO CONNEXION INC.**
1 Place Ville-Marie
Suite 3301
Montréal, Québec
H3B 3N2

TO: **ROGERS COMMUNICATIONS CANADA INC.**
333 Bloor Street East, 10th Floor
Toronto, Ontario
M4W 1G9

TO: **SASKATCHEWAN TELECOMMUNICATIONS**
2121 Saskatchewan Drive
Regina, Saskatchewan
S4P 3Y2

TO: **TEKSAVVY SOLUTIONS INC.**
800 Richmond Street
Chatham, Ontario
N7M 5J5

TO: **TELUS COMMUNICATIONS INC.**
7th Floor
510 West Georgia Street
Vancouver, British Columbia
V6B 0M3

TO: **VIDEOTRON LTD.**
612 Saint-Jacques Street, 18th Floor
Montreal, Quebec
H3C 4M8

APPLICATION

THE APPLICANTS MAKE APPLICATION FOR:

1. **A DECLARATION** that copyright subsists in the Applicants' Works (as defined at paragraph 35 below) listed in the tables set out in Appendix 1 hereto and that the Applicant specified in each of these tables owns or is the exclusive licensee of the Canadian copyright therein;
2. **A DECLARATION** that the Respondents:
 - a. have engaged in the unauthorized communication of the Applicants' Works to the public by telecommunication without the consent of the Applicants, in contravention of subsections 3(1)(f) and 27(1) of the *Copyright Act*; and
 - b. have made available to the public by telecommunication the Applicants' Works without the consent of the Applicants, contrary to subsections 2.4(1.1), 3(1)(f) and 27(1) of the *Copyright Act*,

by directly or indirectly developing, operating, maintaining and/or promoting the Target Platforms (as defined at paragraph 51 below).
3. **AN ORDER** in the form of the Draft Order attached hereto as **Schedule "A"**:
 - a. for a permanent injunction, pursuant to section 34(1) of the *Copyright Act* and section 44 of the *Federal Courts Act*, ordering the Respondents, by themselves or by their employees, representatives and agents, or by any company, partnership, trust, entity or person under their authority or control, or with which they are associated or affiliated, to immediately cease providing unauthorized access to streams of the Applicants' Works, including by directly or indirectly operating, maintaining, and/or promoting Piracy Streaming Platforms (defined at paragraph 26 below) that provide or facilitate access to the Applicants'

Works for streaming in Canada, including the Target Platforms, and refrain from otherwise, directly or indirectly:

1. communicating the Applicants' Works to the public by telecommunication in Canada, including transmitting or otherwise making available the Applicants' Works to the public by telecommunication in a way that allows members to the public to have access to them from a place individually chosen by them; or
 2. inducing and/or authorizing anyone to infringe the Applicants' right to communicate the Applicants' Works to the public by telecommunication in Canada.
- b. validating service of this Notice of Application and of the Applicants' motion requesting case management and the appointment of a case management judge, upon the John Doe Respondents pursuant to Rule 147, by e-mail and contact form at the addresses and links set out in Schedule A.
4. **AN ORDER** pursuant to section 34(1) of the *Copyright Act* and section 44 of the *Federal Courts Act* in the form of the draft Order attached hereto as **Schedule "B"**, for an injunction ordering the Third Party Respondents to, *inter alia*, block or attempt to block access by at least their residential wireline Internet service customers to the Target Platforms by blocking or attempting to block access to all of the domains, subdomains and IP addresses identified in Schedule 1 of the draft Order, as Schedule 1 may be amended from time to time following the procedure in the Order, in Canada for a period of two (2) years;
 5. **AN ORDER** pursuant to Rule 151(1) of the *Rules*, allowing the Applicants to file under seal their confidential materials in support of the Application and that this information be treated as confidential by the Registry, the Applicants, and

the Third Party Respondents on the same terms set out in the draft Order attached hereto as Schedule B;

6. **AN ORDER** pursuant to Rules 55, 70 and 309 of the *Rules*, dispensing the Applicants from complying with the requirement of filing a Memorandum of Fact and Law of a maximum of 30 pages, and granting them leave to file a Memorandum of Fact and Law in excess of 30 pages in support of this Application;
7. **AN ORDER** pursuant to Rule 8 abridging the deadlines of the application process to dates to be discussed in the context of a case management conference that will be requested in the context of a motion to be filed by the Applicants;
8. **WITHOUT COSTS**, unless contested, in which case the Applicants seek costs against the contesting Respondents or Third Party Respondent(s) in the form of a lump sum payment in an amount to be determined by the Court depending on the complexity and merits of the contestation, payable forthwith; and
9. **SUCH FURTHER AND OTHER ORDER** as to this Court may seem just.

THE GROUNDS FOR THE APPLICATION ARE:

I. The Parties

1. The Applicant Rogers Media Inc. ("**Rogers Media**") is a corporation incorporated and subsisting under the laws of Canada, having a registered office at 333 Bloor Street East, 10th Floor, Toronto, Ontario.
2. The Applicant Rogers Communications Inc. ("**Rogers Communications**") is a corporation incorporated and subsisting under the laws of British Columbia, having a registered office at 2900-550 Burrard Street, Vancouver, British

Columbia, and is the parent of Rogers Media (collectively referred to as “**Rogers**”).

3. The Applicant Groupe TVA Inc. (“**Groupe TVA**”) is a corporation incorporated and subsisting under the laws of Quebec, having a registered office at 612 Saint-Jacques Street, 18th Floor South, Montreal, Quebec.
4. The Applicant Columbia Pictures Industries, Inc. is a corporation incorporated and subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 10202 West Washington Boulevard, Culver City, California 90232, U.S.A.
5. The Applicant Disney Enterprises, Inc. is a corporation incorporated and subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 500 South Buena Vista Street, Burbank, California, 91521, U.S.A.
6. The Applicant Netflix Studios, LLC is a limited liability company subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 5808 W. Sunset Blvd., Los Angeles, California, 90028, U.S.A.
7. The Applicant Netflix Worldwide Entertainment, LLC is a limited liability company subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 5808 W. Sunset Blvd., Los Angeles, California, 90028, U.S.A.
8. The Applicant Paramount Pictures Corporation is a corporation incorporated and subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 5555 Melrose Avenue, Los Angeles, California, 90038, U.S.A.
9. The Applicant Universal City Studios LLC is a limited liability company subsisting under the laws of the state of Delaware, U.S.A., having a principal

place of business at 100 Universal City Plaza, Universal City, California, 91608, U.S.A.

10. The Applicant Universal City Studios Productions LLLP is a limited liability limited partnership subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 100 Universal City Plaza, Universal City, California, 91608, U.S.A.
11. The Applicant Warner Bros. Entertainment Inc. is a corporation incorporated and subsisting under the laws of the state of Delaware, U.S.A., having a principal place of business at 4000 Warner Blvd, Burbank, California, 91522, U.S.A.
12. As described at paragraphs 27 to 35 below, together, the Applicants own or are the exclusive licensees of the Canadian rights to the motion pictures, television content, and live programming (collectively, the “**Applicants’ Works**”) listed in the tables set out in Appendix 1 hereto and therefore have the exclusive right to reproduce the Applicants’ Works.
13. The Respondent John Doe 1 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Apollo Group TV**”, an Unauthorized Subscription Service (defined at paragraph 39 below) available at least at the portal domains con.me, confbucket.me, tvnow.best and starlite.best, which provides unauthorized access in Canada to the Applicants’ Works.
14. The Respondent John Doe 2 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Diablo IPTV**”, an Unauthorized Subscription Service available at least at the portal domain dp.dp-elite.net, which provides unauthorized access in Canada to the Applicants’ Works.
15. The Respondent John Doe 3 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to

the Applicants, who operates “**Glo TV**”, an Unauthorized Subscription Service available at least at the portal domains glotv.me, play.suntv.biz and play.zee5.live, which provides unauthorized access in Canada to the Applicants’ Works.

16. The Respondent John Doe 4 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates, along with identified individual Mr. Tomasz Kaczmarek, “**IPGuys**”, an Unauthorized Subscription Service available at least at the portal domains 4k.spicetv.cc and cod41.biz:88, which provides unauthorized access in Canada to the Applicants’ Works. Mr. Kaczmarek is currently subject to litigation in the Ontario Superior Court of Justice, but the IPGuys Unauthorized Subscription Service remains online and is operated by unidentified conspirators of Mr. Kaczmarek (i.e., John Doe 4).
17. The Respondent John Doe 5 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**JioTV**”, an Unauthorized Subscription Service available at least at the portal domain new.jiotv.be, which provides unauthorized access in Canada to the Applicants’ Works.
18. The Respondent John Doe 6 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Smart4K/Platinum**”, an Unauthorized Subscription Service available at least at the portal domain smart4k.me, which provides unauthorized access in Canada to the Applicants’ Works.
19. The Respondent John Doe 7 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**123Movies**”, an Open Web Piracy Platform (defined at paragraph 39 below) available at least at the domains 0123movie.net and 123moviesfree.net, which provides unauthorized access in Canada to the Applicants’ Works.

20. The Respondent John Doe 8 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Cineby**”, an Open Web Piracy Platform available at least at the domain cineby.gd, which provides unauthorized access in Canada to the Applicants’ Works.
21. The Respondent John Doe 9 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Fmovies**”, an Open Web Piracy Platform available at least at the domains Fmovies.com, Fmovies.ro, and BMovies.vip, which provides unauthorized access in Canada to the Applicants’ Works.
22. The Respondent John Doe 10 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**HydraHD**”, an Open Web Piracy Platform available at least at the domain hydrahd.ru, which provides unauthorized access in Canada to the Applicants’ Works.
23. The Respondent John Doe 11 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**Putlocker**”, an Open Web Piracy Platform available at least at the domains putlocker.digital, putlocker.gy, and putlocker.pe, which provides unauthorized access in Canada to the Applicants’ Works.
24. The Respondent John Doe 12 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to the Applicants, who operates “**TheTVApp**”, an Open Web Piracy Platform available at least at the domain TheTVApp.to, which provides unauthorized access in Canada to the Applicants’ Works.
25. The Respondent John Doe 13 is an unidentified individual, group of individuals or other incorporated or unincorporated person, whose address is unknown to

the Applicants, who operates “**Watchseries**”, an Open Web Piracy Platform available at least at the domains watchseries.pe, watchseries.bar, and swatchseries.is, which provides unauthorized access in Canada to the Applicants’ Works.

26. The other John Doe Respondents are other unidentified persons unknown to the Applicants who operate Unauthorized Subscription Services and/or Open Web Piracy Platforms (collectively, “**Piracy Streaming Platforms**”) providing unauthorized access in Canada to the Applicants’ Works, and that are located at a large number of domains that change continuously, as explained below.

II. The Business and Rights of the Applicants

A. *The Broadcasting Applicants*

27. The Applicants Rogers Media and Groupe TVA (collectively, the “**Broadcasting Applicants**”) are well-known entities that own and operate a number of television stations (the “**Broadcasting Applicants’ Stations**”) and online subscription services in Canada, on which they broadcast a wide variety of television programs, including news and information, shopping, current affairs, lifestyle programming, sports programs and live sports events for which they own or exclusively licence the Canadian rights to communicate to the public by telecommunication (the “**Broadcasting Applicants’ Programs**”).
28. The Broadcasting Applicants’ Stations are distributed in Canada through broadcasting distribution undertakings (“**BDUs**”), to which Canadian consumers subscribe for a fee. The Broadcasting Applicants also distribute some of their content in Canada through websites and applications they own and operate, such as the Citytv website (citytvplus.ca), the citytv+, SN+ and TVA Sports Direct services, and third party services such as Amazon Prime.

Some of the Broadcasting Applicants' Stations are also broadcast over the air for free.

29. The Broadcasting Applicants' Programs draw consistent and substantial annual viewership and are primarily relevant and best experienced live, including specifically with regard to live sports content.
30. The Broadcasting Applicants have invested significantly to produce and/or acquire the rights in their television programming. In 2024, according to public filings made to the Canadian Radio-Television and Telecommunications Commission ("CRTC") Rogers Media invested over \$939 million in its television programming, while Groupe TVA invested over \$339 million.
31. These investments generate substantial return for the Broadcasting Applicants. For instance, in 2024:
 - a. Rogers' Sportsnet-branded stations generated more than \$892 million in revenue; and
 - b. TVA's TVA Sports stations generated revenues exceeding \$88 million.

B. The Studio Applicants

32. The Applicants Columbia Pictures Industries, Inc.; Disney Enterprises, Inc.; Netflix Studios, LLC and Netflix Worldwide Entertainment, LLC; Paramount Pictures Corporation; Universal City Studios LLC and Universal City Studios Productions LLLP; and Warner Bros. Entertainment Inc. (collectively, the "**Studio Applicants**"), either directly or indirectly through a parent, affiliate or subsidiary, are engaged in, *inter alia*, the production and distribution of motion

pictures and television content, and own or control the copyright in Canada in these cinematographic works (the “**Studio Applicants’ Works**”).

33. The Studio Applicants distribute the Studio Applicants’ Works through a worldwide distribution network and various platforms (i.e., theatrical releases, online platforms, television broadcasts, physical media, etc.).
34. The Studio Applicants also own and operate various well-known subscription-based online distribution platforms, such as Disney+, Netflix, HAYU, Paramount+, Pluto, Crunchyroll and Pure Flix.
35. As explained below, the Applicants seek an Order to prevent the unauthorized streaming of the Broadcasting Applicants’ Programs and the Studio Applicants’ Works (collectively, the “**Applicants’ Works**”)

C. The Applicants’ Rights

36. Pursuant to subsections 53(2) and 53(2.2) of the *Copyright Act*, the Applicants’ certificates of registration of copyright and of their exclusive copyright licenses are respectively proof that they are the owner of the copyrights in the Applicants’ Works and of the copyright interests granted by the licenses in the Applicants’ Works, as the case may be.
37. Pursuant to Section 3 of the *Copyright Act*, the Applicants notably hold the exclusive right to, *inter alia*:
 - a. communicate the Applicants’ Works to the public by telecommunication;
 - b. make available to the public the Applicants’ Works by telecommunication in a way that allows the public to have access to it; and
 - c. authorize such acts.

III. The Respondents' Unlawful Activities

A. *The Unauthorized Broadcast of Content, Including the Applicants' Works, by Piracy Streaming Platforms*

38. While there are popular legitimate services that rely on streaming, such as the various online subscription services owned by the Applicants, a significant number of Canadian consumers are turning to illegitimate “pirate” services that provide user-friendly access to infringing video content and allow Internet subscribers to stream that content without authorization from rightsholders (**“Piracy Streaming Platforms”**)
39. Some Piracy Streaming Platforms can only be accessed through a paid subscription (**“Unauthorized Subscription Services”**, also sometimes referred to colloquially as “unauthorized IPTV services”), while others are freely and publicly available to all users as they are monetized through advertising and donations (**“Open Web Piracy Platforms”**).
40. Unauthorized Subscription Services are typically advertised as providing access to local and international live television broadcasts and unlimited, on-demand access to popular motion pictures and television content.

41. The user experience for Unauthorized Subscription Services is akin to that of a standard legitimate television subscription service, providing an electronic program guide and searchable menus for browsing channels, genres and programs:



42. Once the user finds and selects the desired content, a video player then loads and streams the content:



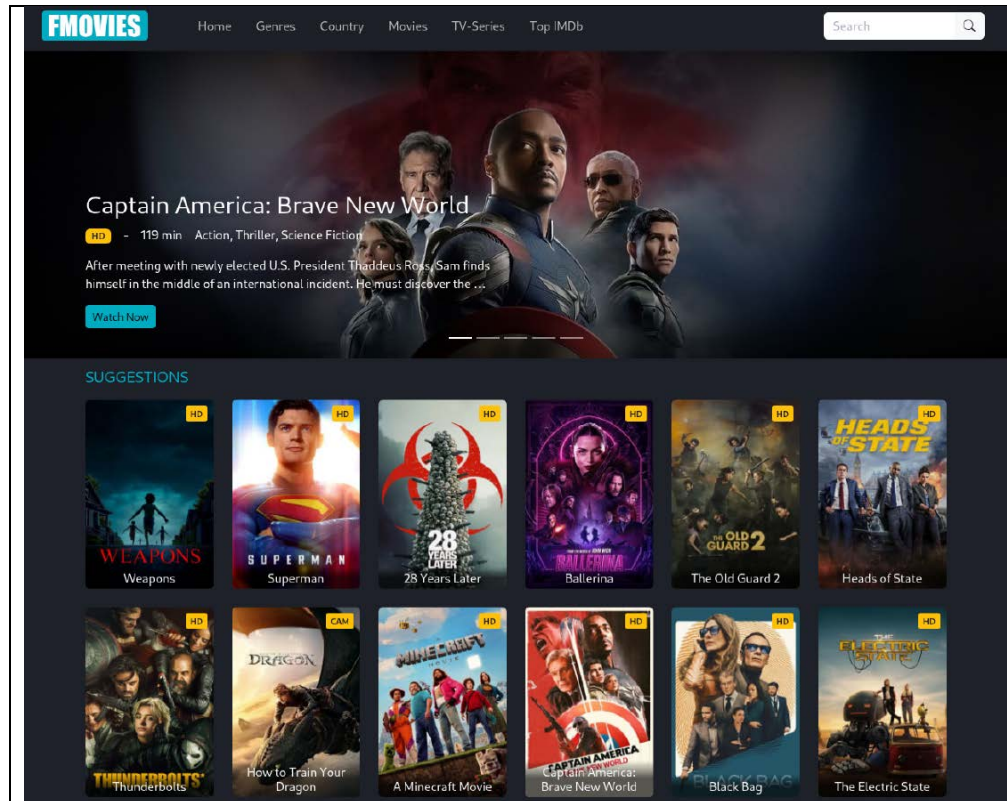
Sportsnet Central, a live sports news and analysis program that airs on the Sportsnet-branded television stations owned and operated by the Broadcasting Applicant Rogers Media.



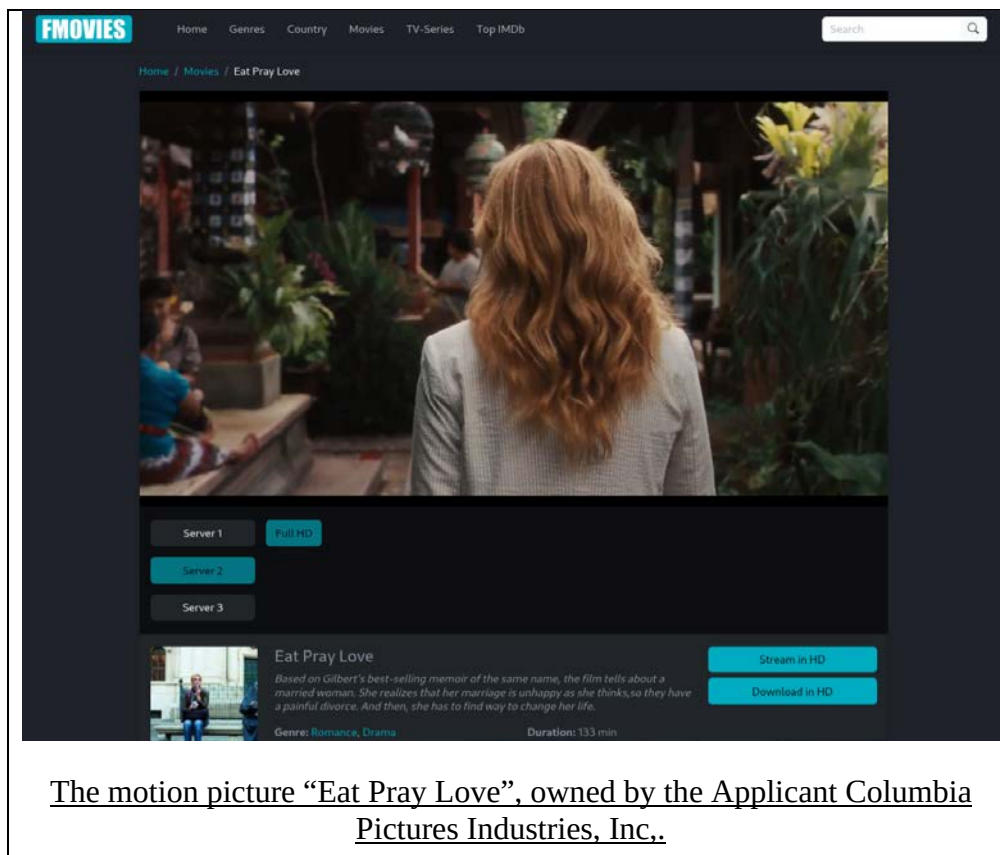
The motion picture Hercules, owned by the Studio Applicant Disney Enterprises, Inc.

43. The above example illustrates the process when using the platform operated by the Respondent John Doe 4. The process is essentially the same for all Unauthorized Streaming Platforms, including those operated by the Respondents John Does 1 to 6.

44. Open Web Piracy Platforms are generally self-described as offering free online streaming services to watch a vast library of content, including the Applicants' Works. Users who visit these platforms, which can be located using a standard Internet search engine, are presented with a home page that introduces them to the platform's vast library and search functionality:



45. The user can then search for a specific title or select one from the home page. Once a title is selected, a new page loads with a video player that streams that title:



46. The above example illustrates the process when using the platform operated by the Respondent John Doe 9. The process is essentially the same for all Open Web Piracy Platforms, including those operated by the Respondents John Does 7 to 13.
47. Unlike authorized licensees, BDUs, distributors, and retailers, Piracy Streaming Platforms do not have authorization from, or make payments to, the Applicants who are the copyright owners or exclusive licensees in Canada of the Applicants' Works.
48. A multiplicity of domains and subdomains attached to Piracy Streaming Platforms may also not even belong to the same operator. When a Piracy Streaming Platform is taken down, either because its operator abandons it,

because of a Court order, or because of an agreement between the legitimate rightsholders and the platform's operator(s), various other copycat platforms race to fill the void left by the initial platform, taking advantage of the goodwill associated with the initial platform's name, branding and reputation.

49. Based on the above and some of the Applicants' recent experiences with these Piracy Streaming Platforms in other jurisdictions, the widespread piracy of the Applicants' Works in Canada will continue indefinitely unless restrained by this Court.

B. The Respondents Infringe the Applicants' Right to Communicate the Applicants' Works to the Public by Telecommunication

50. Anyone who engages in the following acts with regard to the Applicants' Works without the consent of the Applicants infringes the Applicants' copyright:
- a. communicating the Applicants' Works to the public by telecommunication;
 - b. making the Applicants' Works available to the public by telecommunication in a way that allows a member of the public to have access to them from a place and at a time individually chosen by that member of the public; and
 - c. authorizing such acts.
51. By streaming the Applicants' Works to Internet users, the Unauthorized Subscription Services and Open Web Piracy Platforms operated by the Respondents (collectively, the "**Target Platforms**") engage in copyright infringement by communicating the Applicants' Works to the public by telecommunication, contrary to subsections 3(1)(f) and 27(1) of the *Copyright Act*.

C. The Respondents Infringe the Applicants' Right to Make the Applicants' Works Available to the Public by Telecommunication

52. Anyone who allows members of the public to access the Applicants' Works from a place and time of their choosing, i.e., on an on-demand basis, without the consent of the Applicants, infringes the Applicants' copyright.
53. The Target Platforms provide immediate and unauthorized on-demand streaming access to the Applicants' Works through a user-friendly interface specifically designed to provide such unauthorized access.
54. Through their operation of the Target Platforms, the Respondents therefore infringe the Applicants' copyright by both communicating and making available the Applicants' Works to the public by telecommunication.

IV. The Damages Caused by the Respondents' Piracy

55. The Target Platforms provide easy and uninhibited access to the Applicants' Works, leading to permanent and irreversible changes in consumer behaviour, resulting in significant financial consequences for the Applicants and other content creators, owners, and distributors. The impact of this unauthorized access on rightsholders and other stakeholders is, however, virtually impossible to quantify.
56. For instance, as of 2024, Canadians made approximately 5.8 billion visits to piracy websites, resulting in a global rank of fifth place with respect to television piracy.
57. This has significant financial consequences on Canadian distributors. In a 2019 report, Scotiabank calculated that piracy resulted in a lost opportunity of \$1.497 billion for Canadian BDUs and \$179 million for Canadian broadcasters.
58. The Applicants depend on the ability to earn a return on their investments by receiving remuneration for their rights to reproduce and stream their works. This piracy significantly damages the Applicants' business, threatens their

carefully designed strategies to build demand across various distribution platforms and impedes their ability to continue investing.

59. The Applicants take this piracy problem very seriously and have invested significant resources to enforce their rights against the unauthorized distribution of motion picture and television content. However, technology is evolving rapidly and pirates are becoming more sophisticated. They constantly change their piracy methods in order to circumvent the Applicants' enforcement efforts. The Applicants must constantly adapt their enforcement strategies.

V. The Applicants' Request that the John Doe Respondents Cease their Infringing Activities

60. The Applicants have already served John Does 1 through 13 with a Notice of Infringement on January 19 and 20, 2026, through the following means:
- a. John Doe 1 dba APOLLO GROUP TV: by email to all email addresses provided in the WHOIS record associated with the IP address 169.150.236.22 from which the APOLLO GROUP TV Platform is available, at support@cdn77.com and abuse@datacamp.co.uk;
 - b. John Doe 2 dba DIABLO IPTV: by email to all email addresses provided in the WHOIS record associated with the IP address 212.102.58.246 from which the DIABLO IPTV Platform is available, at support@cdn77.com and abuse@datacamp.co.uk;
 - c. John Doe 3 dba GLO TV: by email to all email addresses provided in the WHOIS record associated with the IP address 93.93.11.207 from which the GLO TV Platform is available, at ripe@vestitel.bg, abuse@solytro.com and abuse@vestitel.bg;
 - d. John Doe 4 dba IPGUYS: by email to Melbicom, who is affiliated with the server associated with the IP address 95.174.71.13 from which the

IPGUYS Platform is available, at abuse@melbicom.net and info@melbicom.net;

- e. John Doe 5 dba JIO TV: by email to all email addresses provided in the WHOIS record associated with the IP address 178.249.169.53 from which the JIO TV Platform is available, at ripe@bvestitel.bg, abuse@vestitel.bg, sales@colobix.com and voxlan@voxlan.com;
- f. John Doe 6 dba SMART4K/PLATINUM: by email to all email addresses provided in the WHOIS record associated with the IP address 84.17.45.168 from which the SMART4K/PLATINUM Platform is available, at support@cdn77.com and abuse@datacamp.co.uk;
- g. John Doe 7 dba 123MOVIES
 - i. by email at dmca@0123movie.net, for the domain 0123movie.net,
 - ii. by email at dmca@123moviesfree.net, for the domain 123moviesfree.net;
- h. John Doe 8 dba CINEBY: by email at contact@cineby.gd, for the domain cineby.gd;
- i. John Doe 9 dba FMOVIES
 - i. by email to Netim, the domain name registrar for the domain Fmovies.ro, at abuse@netim.net and support@netim.com,
 - ii. by email to NameCheap, Inc, the domain name registrar for the domain Bmovies.vip, at abuse@namecheap.com,
 - iii. by email to TuCows Domain Inc., the domain name registrar for the domain Fmovies.co, at compliance@tucows.com;

- j. John Doe 10 dba HYDRAHD: by email at hydrhd@proton.me, for the domain hydrhd.ru;
- k. John Doe 11 dba PUTLOCKER
 - i. by email at support@putlocker.digital, for the domain putlocker.digital,
 - ii. by email to Immaterialism Limited, the domain name registrar for the domain putlocker.gy, at contact@immateriali.sm,
 - iii. by email to EPAG Domainservices GmbH, the domain name registrar for the domain putlocker.pe, at info@epag.de;
- l. John Doe 12 dba THETVAPP: by email to the Government of Kingdom of Tonga, the domain name registrar for the domain TheTVApp.to, at abuse@tonic.to and info@tonicregistry.to;
- m. John Doe 13 dba WATCHSERIES
 - i. by sending a message and providing the credentials to access the web portal set up by counsel for the Applicants through the contact form located at <https://watchseries.bar/contact>,
 - ii. by email to Njalla Guokte S.R.L., the domain name registrar for the domain swatchseries.is, at whois@njal.la

VI. The Need for an Injunction Against the Respondents

- 61. The Respondents are not, and have never been, authorized by the Applicants, or any of their respective affiliates, to communicate the Applicants' Works to the public, in any territory or by any means whatsoever.
- 62. Unless restrained by this Honourable Court, the Respondents will continue their infringing activities and the Applicants will continue to suffer damages. The

Applicants therefore submit they are entitled to a permanent injunction against the Respondents in the form of the draft Order attached hereto as Schedule A.

63. In the present application, the only remedy sought by the Applicants against the Respondents is a permanent injunction and costs. The Applicants reserve the right to seek additional remedies, including statutory damages and punitive damages, should they be in a position to identify and prosecute the Respondents in the future.

VII. The Need for a Site Blocking Order Binding the Third Party Respondents

64. The Third Party Respondents, listed below, are Internet Service Providers (“ISPs”) that provide their residential customers with access to the Internet by providing the necessary infrastructure to connect their customer’s devices to the rest of the Internet (and thus ultimately to the Unauthorized Stream-ripping Platforms). They collectively represent over 97% of the market for residential Internet subscribers in Canada.

- a. Bell Canada, a corporation incorporated and subsisting under the laws of Canada, having a registered office address at 1 Carrefour Alexander Graham-Bell, A-7, Verdun, Quebec.
- b. Bragg Communications Incorporated, doing business as Eastlink, a corporation incorporated and subsisting under the laws of Nova Scotia, having a registered office at 4881 Main Street, Oxford, Nova Scotia.
- c. Cogeco Connexion Inc., a corporation incorporated and subsisting under the laws of Canada, having a registered office at 1 Place Ville-Marie, Suite 3301, Montreal, Quebec.
- d. Rogers Communications Canada Inc., a corporation incorporated and subsisting under the laws of Canada, having a registered office at 333 Bloor Street East, 10th Floor, Toronto, Ontario.

- e. Saskatchewan Telecommunications, a corporation incorporated and subsisting under the laws of Saskatchewan, having a registered office at 2121 Saskatchewan Drive, Regina, Saskatchewan.
 - f. TekSavvy Solutions Inc., a corporation incorporated and subsisting under the laws of Ontario, having a registered office at 800 Richmond Street, Chatham, Ontario.
 - g. Telus Communications Inc., a corporation incorporated and subsisting under the laws of British Columbia, having a registered office at 510 West Georgia Street, 7th floor, Vancouver, British Columbia.
 - h. Videotron Ltd., a corporation incorporated and subsisting under the law of Quebec, having a registered office at 612 Saint-Jacques Street, 18th Floor South, Montreal, Quebec.
65. The Third Party Respondents are not wrongdoers. However, due to the nature of their operations as ISPs and the fact that they provide an essential link for the Respondents' acts of copyright infringement in Canada, they are in the best position to stop the Target Platforms from communicating the Applicants' Works to the public by telecommunication, or making the Applicants' Works available to the public by telecommunication in Canada.
66. Given the Applicants' inability to identify and pursue all the operators of the Target Platforms, and given the Respondents' refusal to deactivate the Target Platforms following receipt of the Applicants' notices of infringement, it is unlikely that all of the Target Platforms will be deactivated despite the issuance of the injunction directed at the Respondents set out in Schedule A hereto.
67. In such a situation, where rightsholders cannot effectively stop an online piracy platform engaging in copyright infringement, the alternative is to disable access to the platform for users located in Canada (referred to as "site blocking"). This form of relief, which requires the assistance of the Third Party Respondents in their capacity as ISPs, has the same practical effect: impeding access to these

piracy platforms so that Internet subscribers in Canada cannot receive or access the infringing content.

68. All Third Party Respondents are able to put in place a site blocking order that may be amended from time to time based on the proposed mechanism, and already have the required infrastructure to do so.
69. In fact, the Third Party Respondents have already implemented site-blocking orders as a result of numerous prior orders issued by this Court:
 - a. Platform-specific site-blocking orders: these orders, for example the ones issued in *Bell Media Inc. v. GoldTV.Biz*, 2019 FC 1432 and 2022 FC 1695, target a specific online infringement platform and enjoin ISPs to block domains, subdomains or IP addresses associated with that platform on an ongoing basis for a set duration (historically in Canada, a two-year period). The Order sought in this case is similar to this category, subject to the additional mechanism described below that aims to increase its efficiency.
 - b. Live and dynamic event-specific site-blocking orders: these orders, for example those issued in *Rogers Media Inc. v. John Doe 1*, 2022 FC 775; *Bell Media Inc. v. John Doe 1*, 2022 FC 1432; *Rogers Media Inc. v. John Doe 1*, Federal Court File T-955-21; and *Rogers Media Inc. v. John Doe 1*, Federal Court File T-1253-23, target specific events (e.g., National Hockey League games) and enjoin ISPs to block IP addresses illegally broadcasting these events on multiple platforms, but only for the duration of the event.
 - c. Multi-event dynamic site-blocking order: these orders, such as the one issued in *Rogers Media Inc v John Doe 1*, 2024 FC 1082, are similar to the previous category, but also allow applicants or plaintiffs to apply the order to additional events not targeted by the initial order (e.g., initially blocking National Hockey League games during the winter, followed

by blocking Major League Baseball games during the summer, and so on).

- d. Copycat site site-blocking order, also known as “pirate-brand” site-blocking order: this category of order, for example the one issued in *Bell Media Inc. v. Soap2Day*, 2025 FC 133, is similar to a platform-specific site-blocking order, but also allows the applicants or plaintiffs to apply the order to near-identical platforms with the same branding not targeted by the initial order.

70. As with the *Soap2Day* case, the Order sought in this case would provide that it can be updated to:

- a. target additional domains, subdomains, or IP addresses if they are using any of the brands and having the characteristics shared by the Target Platforms; and
- b. remove domains, subdomains, or IP addresses, if necessary, for example if some of them are no longer active on the Internet (i.e., site-blocking is no longer necessary) or become associated with predominantly non-infringing purposes (i.e., site-blocking is no longer appropriate).

71. Changing the domain or subdomain from which a platform operates is a common method employed by copyright infringers to hide their operations, evade court orders, and avoid unwanted attention from authorities, rights holders, and content protection organizations.

72. As the Target Platforms have a certain brand-awareness, if only the current domains are blocked, it would be relatively easy for the Respondents to circumvent the order by moving their platforms to a different online location or for other copyright infringers to create new platforms that copy the brand, features and user interface of the blocked site.

73. As this Court held in the *Soap2day* case, copycat site site-blocking orders, such as the Order sought in this Application, are “necessary and the most, if not the only, effective remedy to put an end to the copyright infringing activities of the Defendants [or Respondents] and of those who imitate their platforms.” This type of order is, therefore, an “extremely modest but important extension” of the general site-blocking relief that was granted in the prior *GoldTV* case.
74. The main differences between the *Soap2day* site-blocking order issued by this Court and the proposed Order, are the following:
- a. The procedural vehicle. The Applicants seek an Order in the context of an application, instead of an injunction in the context of an action. This approach was endorsed by this Court in the Multi-Event Site Blocking application (2024 FC 1082) mentioned at paragraph 69 above. The Applicants, therefore, propose to proceed by way of application instead of by action, as it is a more streamlined process.
 - b. The Order sought would target additional Piracy Streaming Platforms. Unlike the *Soap2day* Order, which concerned one brand of Piracy Streaming Platform, this Application defines Piracy Streaming Platforms as not only the platforms operated by the Respondents but also additional platforms that satisfy the six conditions listed at subparagraphs 1.b.i to 1.b.vi of the Draft Order. Paragraph 3 of the Draft Order then provides for a mechanism to include additional Target Platforms to be blocked pursuant to the Order, requiring the Applicants to serve and file a proposed amended Schedule 1 of the Order along with affidavit evidence satisfying the conditions listed at subparagraphs 3.a.i to 3.a.iv. This mechanism also provides the Third Party Respondents with the opportunity to object to the proposed amended Schedule 1 within five (5) business days of service.

- c. Pursuant to paragraph 3(c) of the Draft Order, if no Third Party Respondent files a notice of motion to object within five (5) business days, and a motion record within five (5) business days of the filing of the notice of motion, in accordance with paragraph 3(b) of the Draft Order, the supplemented Schedule 1 proposed by the Applicants shall be considered the new Schedule 1 without the need for the Court to grant additional Orders.
 - d. Pursuant to paragraph 7 of the Draft Order, the mechanism through which Internet service customers of the Third Party Respondents will be notified of the Order is through a “Notification Website” where this Court’s Judgment will be posted by the Applicants and will optionally include information on authorized and legitimate platforms that distribute motion pictures and/or television programming in Canada.
75. The Order sought is proportional and reflects a careful weighing of the rights of those involved, including the Applicants, the Respondents, the Third Party Respondents, and members of the general public.
76. The Order sought is limited in reach and will therefore not impact the rights of third parties to distribute legitimate content on the Internet, or of the public to access that content. The Order is only aimed at blocking access to infringing content for a limited period of time and implements strong safeguards to avoid the risk of “over-blocking.”
77. The Order sought will also not prejudice the Third Party Respondents, as its implementation leverages tools that are already at their disposal and the reasonable marginal cost of its implementation (if any) would be borne by the Applicants.
78. Lastly, the Order sought favours judicial economy by avoiding the need for the Applicants to file and the Court to consider multiple applications for each platform targeted by the Order sought, which would be based on the same legal

grounds and the same type of evidence, and which operate in essentially the same way and cause the same harm to the Applicants.

79. As a result of the above, the Applicants respectfully request that this Honourable Court exercise its powers and discretion to issue the Order sought.

VIII. Ancillary Relief

A. *Confidentiality*

80. Some of the materials filed in support of this Application will contain confidential information. Unless the identified confidential conditions remain confidential, pirates will likely be able to rely on that information to elaborate techniques allowing them to circumvent any resulting blocking order and thereby continue offering infringing content. This would undermine the value and impact of any order to be issued by this Court.

B. *Substituted Service of Materials Upon the Respondents*

81. As explained above, the Applicants intend to serve the John Doe Respondents by email and/or contact form submission, which are the only contact information available on or associated with their Piracy Streaming Platforms.
82. The Applicants respectfully request that this Court issue an order validating service of this Notice of Application and of the Applicants' motion for case management and the appointment of a case management judge upon the John Doe Respondents by these means.

C. *Memorandum of Fact and Law in Excess of Thirty Pages*

83. Due to the complex and highly technical nature of the issues addressed in this proceeding and the substantial evidentiary record, the Applicants respectfully request that this Court grant them leave to file a Memorandum of Fact and Law in excess of thirty (30) pages.

THIS APPLICATION WILL BE SUPPORTED BY THE FOLLOWING MATERIAL:

1. The pleadings and proceedings herein;
2. The Affidavit of Colette Watson;
3. The Affidavit of Constance Chan;
4. The Affidavit of Damian Poltz;
5. The Affidavit of Jason Vallée Buchanan;
6. The Affidavit of Juan Manuel Ramos Guerrion;
7. The Affidavit of Larissa Knapp;
8. The Affidavit of Louis-Philippe Neveu;
9. The Affidavit of Michael Sharp;
10. The Affidavit of Rodrigo Arrigoni; and
11. Such further and other documents as counsel may advise and as this Court may permit.

Montréal (Québec), February 27, 2026



SMART & BIGGAR LLP

3300-1000 de la Gauchetière Street West
Montréal (Québec) H3B 4W5

X Mr. Guillaume Lavoie Ste-Marie

Mr. Christopher A. Guaiani

Ms. Audrey Berteau

Mr. Irshaad Hashim

Tel. 514-954-1500

Fax. 514-954-1396

(Reference: 96566338)

Solicitors for the Applicants

Appendix 1

Representative List of Columbia Works

Title	Registration No.	Registration Date	Copyright Owner
Eat Pray Love	1079524	2010-08-12	Columbia Pictures Industries, Inc.
Escape Room aka the Maze	1156176	2019-01-15	Columbia Pictures Industries, Inc.
Finding Forrester	490152	2001-02-26	Columbia Pictures Industries, Inc.
Groundhog Day	423047	1993-04-14	Columbia Pictures Industries, Inc.
Here Comes the Boom	1099357	2012-10-11	Columbia Pictures Industries, Inc.
Hitch	1027757	2005-03-07	Columbia Pictures Industries, Inc.
Identity	1012119	2003-05-29	Columbia Pictures Industries, Inc.
Jumanji: The Next Level	1164955	2019-12-16	Columbia Pictures Industries, Inc.
Miss Bala	1156764	2019-02-06	Columbia Pictures Industries, Inc.
Premium Rush aka Bike Messenger	1098033	2012-10-23	Columbia Pictures Industries, Inc.
Reign Over Me	1046741	2007-03-23	Columbia Pictures Industries, Inc.; GH Three LLC
Saving Silverman	494074	2001-10-09	Columbia Pictures Industries, Inc.
Sense and Sensibility	449962	1996-02-16	Columbia Pictures Industries, Inc.
Spider-Man: Far from Home	1160728	2019-07-04	Columbia Pictures Industries, Inc.
Stealth	1031785	2005-10-03	Columbia Pictures Industries, Inc.

The Amazing Spider-Man	1096466	2012-06-26	Columbia Pictures Industries, Inc.
The Amazing Spider-Man 2 aka Spider-Man 5	1026352	2005-01-18	Columbia Pictures Industries, Inc.
The Legend of Zorro	1033869	2005-10-31	Columbia Pictures Industries, Inc.
Total Recall	1097620	2012-10-02	Columbia Pictures Industries, Inc.

Representative List of Disney Works

Title	Registration No.	Registration Date	Copyright Owner
101 Dalmatians	458850	1997-01-02	Disney Enterprises, Inc.
Alice in Wonderland	1075362	2010-03-08	Disney Enterprises, Inc.
Atlantis: The Lost Empire	492682	2001-22-08	Disney Enterprises, Inc.
Bedtime Stories	1067798	2009-05-19	Disney Enterprises, Inc.
Brother Bear	1016429	2003-11-21	Disney Enterprises, Inc.
Christopher Robin	1151899	2018-08-13	Disney Enterprises, Inc.
Dinosaur	486581	2000-08-10	Disney Enterprises, Inc.
Dumbo (Live Action)	1158243	2019-03-27	Disney Enterprises, Inc.
Enchanted	1054497	2007-12-14	Disney Enterprises, Inc.
Hercules	463240	1997-07-23	Disney Enterprises, Inc.
Homeward Bound II: Lost in San Francisco	453280	1996-06-04	Disney Enterprises, Inc.
John Carter	1094188	2012-03-16	Disney Enterprises, Inc.
Meet the Robinsons	1048798	2007-03-30	Disney Enterprises, Inc.
Muppets Most Wanted	1112078	2014-03-28	Disney Enterprises, Inc.
Old Dogs	1075637	2010-03-15	Disney Enterprises, Inc.
Tangled	1082893	2010-12-15	Disney Enterprises, Inc.

The Game Plan	1052276	2007-10-02	Disney Enterprises, Inc.
The Good Dinosaur	1126282	2015-12-01	Disney Enterprises, Inc.; Pixar
The Princess and the Frog	1096774	2012-07-03	Disney Enterprises, Inc.

Representative List of Netflix Works

Title	Registration No.	Registration Date	Copyright Owner
Stranger Things Season 1 – Episode 1: Chapter One: The Vanishing of Will Byers	1156644	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 2: Chapter Two: The Weirdo on Maple Street	1156642	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 3: Chapter Three: Holly, Jolly	1156646	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 4: Chapter Four: The Body	1156645	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 5: Chapter Five: The Flea and the Acrobat	1156647	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 6: Chapter Six: The Monster	1156643	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 7: Chapter Seven: The Bathtub	1156641	2019-02-04	Netflix Studios, LLC
Stranger Things Season 1 – Episode 8: Chapter Eight: The Upside Down	1156640	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 1: Chapter One: Madmax	1156655	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 2: Chapter Two: Trick or Treat, Freak	1156649	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 3: Chapter Three: The Pollywog	1156654	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 4: Chapter Four: Will the Wise	1156651	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 5: Chapter Five: Dig Dug	1156652	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 6: Chapter Six: The Spy	1156648	2019-02-04	Netflix Studios, LLC

Stranger Things - Season 2 - Episode 7: Chapter Seven: The Lost Sister	1156650	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 8: Chapter Eight: The Mind Flayer	1156653	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 2 - Episode 9: Chapter Nine: The Gate	1156656	2019-02-04	Netflix Studios, LLC
Stranger Things - Season 3 - Episode 1 - Chapter One: Suzie, Do You Copy?	1161095	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 2 - Chapter Two: The Mall Rats	1161098	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 3 - Chapter 3: The Case of the Missing Lifeguard	1161100	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 4 - Chapter Four: The Sauna Test	1161097	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 5 - Chapter Five: The Flayed	1161099	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 6 - Chapter Six: The Birthday	1161096	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 7 - Chapter Seven: The Bite	1161093	2019-07-16	Netflix Worldwide Entertainment, LLC
Stranger Things - Season 3 - Episode 8 - Chapter Eight: The Battle of Starcourt	1161094	2019-07-16	Netflix Worldwide Entertainment, LLC
Glow - Season 1 - Episode 1: Pilot	1156688	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 2: Slouch. Submit	1156691	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 3: The Wrath of Kuntar	1156684	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 4: The Dusty Spur	1156690	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 5: Debbie Does Something	1156687	2019-02-04	Netflix Studios, LLC

Glow - Season 1 - Episode 6: This Is One of Those Moments	1156689	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 7: Live Studio Audience	1156692	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 8: Maybe It's All the Disco	1156686	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 9: The Liberal Chokehold	1156693	2019-02-04	Netflix Studios, LLC
Glow - Season 1 - Episode 10: Money's in the Chase	1156685	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 1: Viking Funeral	1156700	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 2: Candy of the Year	1156702	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 3: Concealed Women of America	1156694	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 4: Mother of All Matches	1156696	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 5: Perverts Are People, Too	1156695	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 6: Work the Leg	1156697	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 7: Nothing Shattered	1156698	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 8: The Good Twin	1156703	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 9: Rosalie	1156701	2019-02-04	Netflix Studios, LLC
Glow – Season 2 – Episode 10: Every Potato Has A Receipt	1156699	2019-02-04	Netflix Studios, LLC

Representative List of Paramount Works

Title	Registration No.	Registration Date	Copyright Owner
Dickie Roberts: Former Child Star	1022665	2004-08-05	Paramount Pictures Corporation
Flight of the Intruder	409855	1991-10-21	Paramount Pictures Corporation
Forrest Gump	440205	1995-01-20	Paramount Pictures Corporation
Orange County	1006357	2002-10-01	Paramount Pictures Corporation
Patriot Games	422502	1993-03-24	Paramount Pictures Corporation
The Fighting Temptations	1022666	2004-08-05	Paramount Pictures Corporation
The Stepford Wives	1028374	2005-04-04	Paramount Pictures Corporation / Dreamworks Productions LLC
The Talented Mr. Ripley	1006353	2002-09-30	Paramount Pictures Corporation / Miramax Films
Tommy Boy	444838	1995-07-20	Paramount Pictures Corporation
True Grit	1083068	2010-12-23	Paramount Pictures Corporation
Without a Paddle	1028379	2005-04-04	Paramount Pictures Corporation
xXx: Return of Xander Cage	1138366	2017-03-08	Paramount Pictures Corporation / ROX Productions, LLC

Representative List of Universal Works

Title	Registration No.	Registration Date	Copyright Owner
Along Came Polly	1024006	2004-10-06	Universal City Studios LLC as successor of Universal City Studios LLLP
American Dreamz	1043980	2006-12-15	Universal City Studios LLC as successor of Universal City Studios LLLP
American Pie	479488	1999-09-07	Universal City Studios LLC as successor of Universal City Studios, Inc.
American Pie 2	1002225	2002-04-16	Universal City Studios LLC as successor of Universal City Studios, Inc.
Assault on Precinct 13	1031776	2005-08-02	Universal City Studios LLC as successor of Universal City Studios LLLP
Being John Malkovich	1016784	2003-10-29	Universal City Studios Productions LLLP as successor of Universal City Studios Productions, Inc.
Billy Elliot	1064361	2009-01-15	Universal City Studios Productions LLLP
Billy Madison	451136	1996-03-27	Universal City Studios LLC as successor of Universal City Studios, Inc.
Bowfinger	1064362	2009-01-15	Universal City Studios LLC as successor of Universal City Studios LLLP
Contraband	1098345	2012-09-06	Universal City Studios Productions LLLP
Dante's Peak	468489	1998-04-06	Universal City Studios LLC as successor of Universal City Studios, Inc.
Dawn of the Dead (Cinematograph)	1024005	2004-10-06	Universal City Studios LLC as successor of Universal City Studios LLLP
edTV	479487	1999-09-07	Universal City Studios LLC as successor of Universal City Studios, Inc.
Evan Almighty	1049689	2007-06-28	Universal City Studios Productions LLLP

Fear	459213	1997-01-20	Universal City Studios LLC as successor of Universal City Studios, Inc.
Fear and Loathing in Las Vegas	473221	1998-10-28	Universal City Studios LLC as successor of Universal City Studios, Inc.
Friday Night Lights	1037544	2006-03-31	MDBG Filmgesellschaft mbH & Co. KG/ Universal City Studios LLC as successor of Universal City Studios LLLP
Furious 7	1124344	2015-09-10	Universal City Studios Productions LLLP
Hot Fuzz	1046369	2007-03-12	Universal City Studios LLC as successor of Universal City Studios LLLP
Idlewild	1043983	2006-12-15	Home Box Office, Inc./ Universal City Studios Productions LLLP
In Good Company	1037535	2006-03-31	Universal City Studios LLC as successor of Universal City Studios LLLP
Inside Man	1043986	2006-12-15	GH Two LLC/ Universal City Studios LLC as successor of Universal City Studios LLLP
Jason Bourne	1149804	2018-05-15	Universal City Studios Productions LLLP
Leatherheads	1057760	2008-04-18	Internationale Scarena Filmproduktionsgesellschaft mbH & Co KG/ Universal City Studios Productions LLLP
Little Fockers	1093058	2012-02-01	DW Studios L.L.C/ Universal City Studios Productions LLLP
Meet the Fockers	1031775	2005-08-02	DreamWorks LLC/ Universal City Studios LLC as successor of Universal City Studios LLLP
Meet the Parents	491761	2001-05-24	Dreamworks, L.L.C./ Universal City Studios LLC as successor of Universal City Studios, Inc.

Munich	1037513	2006-03-31	DreamWorks LLC/ Universal City Studios LLC as successor of Universal City Studios LLLP
Neighbors	1124347	2015-09-10	Universal City Studios Productions LLLP
Patch Adams	479483	1999-09-07	Universal City Studios LLC as successor of Universal City Studios, Inc.
Public Enemies	1075776	2010-03-18	Universal City Studios Productions LLLP
The Bourne Supremacy	1037515	2006-04-03	Motion Picture THETA Produktionsgesellschaft mbH & Co. KG/ Universal City Studios LLC as successor of Universal City Studios LLLP
The Bourne Ultimatum	1050879	2007-08-06	Universal City Studios Productions LLLP
The Chronicles of Riddick	1037536	2006-03-31	Universal City Studios LLC as successor of Universal City Studios LLLP
The Express	1064286	2009-01-13	IDEA Filmproduktionsgesellschaft mbH Co. KG/ Universal City Studios Productions LLLP
The Frighteners	459212	1997-01-20	Universal City Studios LLC as successor of Universal City Studios, Inc.
The Kingdom	1064364	2009-01-15	MDBF Zweite Filmgesellschaft mbH & Co. KG/ Universal City Studios Productions LLLP
The Mummy	479482	1999-09-07	Universal City Studios LLC as successor of Universal City Studios, Inc.
The Mummy Returns	491760	2001-05-24	Universal City Studios LLC as successor of Universal City Studios, Inc.
The Mummy Tomb of the Dragon Emperor	1064304	2009-01-14	Internationale Filmproduktion Blackbird Vierte GmbH & Co. KG/ Universal City Studios Productions LLLP
The Nutty Professor	468484	1998-04-06	Universal City Studios LLC as successor of Universal City Studios, Inc.

Tower Heist	1107372	2013-08-29	Universal City Studios Productions LLLP
Unbroken	1119588	2015-03-02	Universal City Studios Productions LLLP
Van Helsing	1037533	2006-03-31	Universal City Studios LLC as successor of Universal City Studios LLLP

Representative List of Warner Bros. Works

Title	Registration No.	Registration Date	Copyright Owner
300	1051635	2007-09-06	Warner Bros. Entertainment Inc.
Argo	1100842	2012-12-13	Warner Bros. Entertainment Inc.
Batman Returns	417826	1992-09-08	Warner Bros. Entertainment Inc., successor-in-interest to Warner Bros. Inc.
Collateral Beauty	1136141	2016-12-19	Warner Bros. Entertainment Inc.; Village Roadshow Films North America Inc.; Ratpac-Dune Entertainment LLC
Doctor Sleep	1164141	2019-11-12	Warner Bros. Entertainment Inc.
Everything is Illuminated	1057305	2008-04-03	Warner Bros. Entertainment Inc.
Final Destination 5	1096510	2012-06-27	Warner Bros. Entertainment Inc.
Flag of our Fathers	1042985	2006-11-20	DreamWorks LLC; Warner Bros. Entertainment Inc.
Godzilla	1113277	2014-05-20	Warner Bros. Entertainment Inc.; Legendary Pictures Productions, LLC; Ratpac-Dune Entertainment, LLC
Grudge Match	1110047	2014-01-03	Warner Bros. Entertainment Inc.
Harry Potter and the Half- Blood Prince	1072787	2009-11-23	Warner Bros. Entertainment Inc.
Harry Potter and the Deathly Hallows: Part 1	1085366	2011-03-18	Warner Bros. Entertainment Inc.
Harry Potter and the Deathly Hallows: Part 2	1088777	2011-07-29	Warner Bros. Entertainment Inc.
Horrible Bosses	1097338	2012-07-20	Warner Bros. Entertainment Inc.

Just Mercy	1166134	2020-02-06	Warner Bros. Entertainment Inc.
Lady in the Water	1042240	2006-10-23	Warner Bros. Entertainment Inc.
New Year's Eve	1097905	2012-08-15	Warner Bros. Entertainment Inc.
Outbreak	444120	1995-06-19	Warner Bros. Entertainment Inc., successor-in-interest to Warner Bros., a division of Time Warner Entertainment Company, L.P.
Project X	1102783	2013-03-13	Warner Bros. Entertainment Inc.
Rock of Ages	1103012	2013-03-21	Warner Bros. Entertainment Inc.
Tag	1152860	2018-09-07	Warner Bros. Entertainment Inc.
The Conjuring	1108096	2013-10-04	Warner Bros. Entertainment Inc.
The Hangover Part II	1088829	2011-08-02	Warner Bros. Entertainment Inc.; Legendary Pictures Funding, LLC
The Nun	1153011	2018-09-13	Warner Bros. Entertainment Inc.
The Polar Express	1027976	2005-03-16	Warner Bros. Entertainment Inc.
Shazam!	1158800	2019-04-16	Warner Bros. Entertainment Inc.
Showdown in Little Tokyo	416558	1992-07-15	Warner Bros. Entertainment Inc., successor-in-interest to Warner Bros. Inc.

Rogers Stations and Programs

Station	Program
CityTV	Breakfast Television
	CityNews Toronto
Omni	Focus Portuguese
	Omni News Italian Edition
	Omni News Punjabi Edition
TSC	The Vault
	Style Matters
Sportsnet	Hockey Central
	Blue Jays Central
	Sportsnet Central
	Raptors Central
	2025-2026 NHL Season
	2025-2026 NBA season: Only games streamed on Sportsnet
	2026 MLB season: Only Toronto Blue Jays and Jewel Events
	UFC: Only bouts streamed on Sportsnet

Groupe TVA Stations and Programs

Station	Program
TVA	Salut Bonjour
	Salut Bonjour Weekend
	Le TVA nouvelles (noon)
	Le TVA nouvelles (5 p.m.)
	Le TVA nouvelles (6 p.m.)
	Le TVA nouvelles (10 p.m.)
	J.E.
	Mario Dumont
	La Poule aux Oeufs d'Or
	Le tricheur
LCN	Le TVA nouvelles (noon)
	Le TVA nouvelles (5 p.m.)
	Le TVA nouvelles (6 p.m.)
	Le TVA nouvelles (10 p.m.)
	J.E
	Mario Dumont
TVA Sports	L'avant-match des Canadiens
	L'avant-match de la LNH
	2025-2026 NHL Season (select National Games, in the French language)
	L'après-match LNH
	L'avant-match football universitaire du RSEQ
	Le décompte UFC
	UFC en direct – Fight night (in the French language)
	UFC en direct – Combats préliminaires (“Numbered” events, in the French language)
	JiC
TVA Sports 2	L'avant-match de la LNH
	2025-2026 NHL Season (select National Games, in the French language)
	UFC en direct – Fight night (in the French language)
	UFC en direct – Combats préliminaires (“Numbered” events, in the French language)

Schedule A

Date:

Docket: T- -26

FEDERAL COURT

, ,

PRESENT:

BETWEEN:

**ROGERS MEDIA INC.
ROGERS COMMUNICATIONS INC.
GROUPE TVA INC.
COLUMBIA PICTURES INDUSTRIES, INC.
DISNEY ENTERPRISES, INC.
NETFLIX STUDIOS, LLC
NETFLIX WORLDWIDE ENTERTAINMENT, LLC
PARAMOUNT PICTURES CORPORATION
UNIVERSAL CITY STUDIOS LLC
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP
WARNER BROS. ENTERTAINMENT INC.**

Applicants

and

**JOHN DOE 1 dba APOLLO GROUP TV
JOHN DOE 2 dba DIABLO IPTV
JOHN DOE 3 dba GLO TV
JOHN DOE 4 dba IPGUYS
JOHN DOE 5 dba JIO TV
JOHN DOE 6 dba SMART4K/PLATINUM
JOHN DOE 7 dba 123MOVIES
JOHN DOE 8 dba CINEBY
JOHN DOE 9 dba FMOVIES
JOHN DOE 10 dba HYDRAHD
JOHN DOE 11 dba PUTLOCKER
JOHN DOE 12 dba THETVAPP
JOHN DOE 13 dba WATCHSERIES
AND OTHER UNIDENTIFIED PERSONS WHO OPERATE
UNAUTHORIZED ONLINE TELEVISION AND MOTION PICTURE
PIRACY PLATFORMS**

Respondents

and

**BELL CANADA
BRAGG COMMUNICATIONS INC. dba EASTLINK
COGECO CONNEXION INC.
ROGERS COMMUNICATIONS CANADA INC.
SASKATCHEWAN TELECOMMUNICATIONS
TEKSAVVY SOLUTIONS INC.
TELUS COMMUNICATIONS INC.
VIDEOTRON LTD.**

Third Party Respondents

ORDER

UPON application by the Applicants for an Order against the John Doe Respondents pursuant to Rule 300(b) of the *Federal Courts Rules*, SOR/98-106, Section 44 of the *Federal Courts Act*, RSC 1985, c F-7, and Section 34(1) of the *Copyright Act*, RSC 1985, c. C-42;

UPON considering the Applicants' application record and oral submissions at the hearing of the application;

UPON considering subsections 2.4(1.1), 3(1)(f), 27(1) and 34(1) of the *Copyright Act*, RSC 1985, c C-42;

UPON being satisfied that the Notice of Application has come to the notice of the Respondents John Doe 1 to 13, as contemplated by Rule 147 of the *Federal Courts Rules*, and that service can be validated against all Respondents;

AND UPON being satisfied that the Order sought should issue, based on the evidence and argument presented to the Court;

THIS COURT ORDERS that:

1. Service of the Notice of Application upon the Respondents John Doe 1 to 13 on [date], and of the Applicants' motion for case management and for the appointment of a case management judge on [date], is validated through the following means:
 - a. John Doe 1: by email at the addresses support@cdn77.com and abuse@datacamp.co.uk;
 - b. John Doe 2: by email at the addresses support@cdn77.com and abuse@datacamp.co.uk;
 - c. John Doe 3: by email at the addresses ripe@vestitel.bg, abuse@solytro.com and abuse@vestitel.bg;
 - d. John Doe 4: by email at the addresses abuse@melbicom.net and info@melbicom.net
 - e. John Doe 5: by email at the addresses ripe@bvestitel.bg, abuse@vestitel.bg, sales@colobix.com and voxlan@voxlan.com;
 - f. John Doe 6: by email at the addresses support@cdn77.com and abuse@datacamp.co.uk;
 - g. John Doe 7:
 - i. by email at the address dmca@0123movie.net for the domain 0123movie.net;
 - ii. by email at the address dmca@123moviesfree.net for the domain 123moviesfree.net;
 - h. John Doe 8: by email at the address contact@ceneby.gd for the domain cineby.gd;
 - i. John Doe 9:
 - i. by email at the addresses abuse@netim.net and support@netim.com for the domain Fmovies.ro;
 - ii. by email at the address abuse@namecheap.com for the domain Bmovies.vip;
 - iii. by email at the address compliance@tucows.com for the domain Fmovies.co;

- j. John Doe 10: by email at the address hydrahd@proton.me for the domain hydrahd.ru;
 - k. John Doe 11:
 - i. by email at the address support@putlocker.digital for the domain Putlocker.digital;
 - ii. by email at the address contact@immateriali.sm for the domain putlocker.gy;
 - iii. by email at the address info@epag.de for the domain putlocker.pe;
 - l. John Doe 12: by email at the addresses abuse@tonic.to and info@tonicregistry.to for the domain TheTVApp.to;
 - m. John Doe 13:
 - i. by contact form located at <https://watchseries.bar/contact> for the domain watchseries.bar;
 - ii. by email at the address info@epag.de for the domain watchseries.pe; and
 - iii. by e-mail at the address whois@njal.la for the domain swatchseries.is.
2. Copyright is declared to subsist in the cinematographic works and the television programs that are listed in the tables set out in Schedule 1 of this Order (collectively the “**Applicants’ Works**”) and said copyright is owned by or exclusively licensed to the Applicants specified for each table.
3. The Respondent John Does 1 to 13 are declared to have:
- a. Engaged in the unauthorized communication of the Applicants’ Works to the public by telecommunication without the consent of the Applicants, in contravention of subsections 3(1)(f) and 27(1) of the *Copyright Act*; and

- b. Made available to the public by telecommunication the Applicants' Works without the consent of the Applicants, contrary to subsections 2.4(1.1), 3(1)(f) and 27(1) of the *Copyright Act*.
- 4. A permanent injunction is issued ordering the John Doe Respondents, by themselves or by their employees, representatives and agents, or by any company, partnership, trust, entity or person under their authority or control, or with which they are associated or affiliated, to immediately deactivate the unauthorized online television and motion picture piracy platforms listed below, and any other unauthorized online television or motion picture piracy platform under their authority or control, that provide or facilitate access to the Applicants' Works in Canada
 - a. For the Respondent John Doe 1, the "Apollo Group TV" Unauthorized Subscription Service available at least at the portal domains con.me, confbucket.me, tvnow.best and starlite.best;
 - b. For the Respondent John Doe 2, the "Diablo IPTV" Unauthorized Subscription Service available at least at the portal domain dp.dp-elite.net;
 - c. For the Respondent John Doe 3, the "Glo TV" Unauthorized Subscription Service available at least at the portal domains glotv.me, play.suntv.biz and play.zee5.live;
 - d. For the Respondent John Doe 4, the "IPGuys" Unauthorized Subscription Service available at least at the portal domains 4k.spicetv.cc and cod41.biz:88;
 - e. For the Respondent John Doe 5, the "JioTV" Unauthorized Subscription Service available at least at the portal domain new.jiotv.be;
 - f. For the Respondent John Doe 6, the "Smart4K/Platinum" Unauthorized Subscription Service available at least at the portal domain smart4k.me;
 - g. For the Respondent John Doe 7, the "123Movies" Open Web Piracy Platform available at least at the domains 0123movie.net and 123moviesfree.net;

- h. For the Respondent John Doe 8, the “Cineby” Open Web Piracy Platform available at least at the domain cineby.gd;
- i. For the Respondent John Doe 9, the “Fmovies” Open Web Piracy Platform available at least at the domains Fmovies.com, Fmovies.ro, and BMovies.vip;
- j. For the Respondent John Doe 10, the “HydraHD” Open Web Piracy Platform available at least at the domain hydrahd.ru;
- k. For the Respondent John Doe 11, the “Putlocker” Open Web Piracy Platform available at least at the domains putlocker.digital, putlocker.gy, and putlocker.pe;
- l. For the Respondent John Doe 12, the “TheTVApp” Open Web Piracy Platform available at least at the domain TheTVApp.to;
- m. For the Respondent John Doe 13, the “Watchseries” Open Web Piracy Platform available at least at the domains watchseries.pe, watchseries.bar, and swatchseries.is;
- n. and to refrain from otherwise, directly or indirectly:
 - i. transferring access, control or custody over the assets and infrastructures of the unauthorized online television and motion picture piracy platforms, including their hosting servers and domains names, to any third party;
 - ii. developing, operating, maintaining, promoting, or providing support to any unauthorized online television and motion picture piracy platforms;
 - iii. operating, maintaining, updating, hosting, or promoting the Internet domains and subdomains from which the unauthorized online television and motion picture piracy platforms are directly or indirectly made available;
 - iv. communicating the Applicants’ Works to the public by telecommunication in Canada, including transmitting or otherwise making available the Applicants’ Works to the public by telecommunication in a way that allows members of the

public to have access to it from a place individually chosen by them; or

- v. inducing and/or authorizing anyone to infringe the Applicants' right to communicate the Applicants' Works to the public by telecommunication in Canada.

5. [the issue of costs being dependent on whether or not the Application is opposed].

Schedule B

Date:

Docket: T- -

FEDERAL COURT

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PRESENT:

BETWEEN:

**ROGERS MEDIA INC.
ROGERS COMMUNICATIONS INC.
GROUPE TVA INC.
COLUMBIA PICTURES INDUSTRIES, INC.
DISNEY ENTERPRISES, INC.
NETFLIX STUDIOS, LLC
NETFLIX WORLDWIDE ENTERTAINMENT, LLC
PARAMOUNT PICTURES CORPORATION
UNIVERSAL CITY STUDIOS LLC
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP
WARNER BROS. ENTERTAINMENT INC.**

Applicants

- and -

**JOHN DOE 1 dba APOLLO GROUP TV
JOHN DOE 2 dba DIABLO IPTV
JOHN DOE 3 dba GLO TV
JOHN DOE 4 dba IPGUYS
JOHN DOE 5 dba JIO TV
JOHN DOE 6 dba SMAR4K/PLATINUM
JOHN DOE 7 dba 123MOVIES
JOHN DOE 8 dba CINEBY
JOHN DOE 9 dba FMOVIES
JOHN DOE 10 dba HYDRAHD
JOHN DOE 11 dba PUTLOCKER
JOHN DOE 12 dba THETVAPP
JOHN DOE 13 dba WATCHSERIES
AND OTHER UNIDENTIFIED PERSONS WHO OPERATE
UNAUTHORIZED ONLINE TELEVISION AND MOTION PICTURE
PIRACY PLATFORMS**

Respondents

- and -

**BELL CANADA
BRAGG COMMUNICATIONS INC. dba EASTLINK
COGECO CONNEXION INC.
ROGERS COMMUNICATIONS CANADA INC.
SASKATCHEWAN TELECOMMUNICATIONS
TEKSAVVY SOLUTIONS INC.
TELUS COMMUNICATIONS INC.
VIDEOTRON LTD.**

Third Party Respondents

JUDGMENT

UPON application by the Applicants for a Judgment against the Third Party Respondents pursuant to section 44 of the *Federal Courts Act*, R.S.C., 1985, c. F-7;

UPON considering the Applicants' record and oral submissions at the hearing of this application;

UPON considering the consent of the Third Party Respondents Rogers Communications Canada Inc. and Videotron Ltd.;

UPON considering that the Third Party Respondents [to be confirmed] take no position on the issuance of this Order as it concerns them;

UPON considering subsections 2.4(1.1), 3(1)(f), 27(1) and 34(1) of the *Copyright Act*, R.S.C., 1985, c. C-42; section 36 of the *Telecommunications Act*, S.C. 1993, c. 38; section 44 of the *Federal Courts Act*, R.S.C., 1985, c. F-7; and this Court's decisions in *Bell Media Inc. v. GoldTV.Biz*, 2019 FC 1432 (Justice Gleeson), aff'd 2021 FCA 181 (Justice Locke), leave to appeal to the Supreme Court of Canada refused 2022-03-24; *Bell Media Inc. v. GoldTV.Biz*, 2022 FC 1695 (Justice Gleeson); *Rogers Media Inc. v. John Doe 1*, 2022 FC 775 (Justice Pentney); *Rogers Media Inc. v. John Doe 1*, (unreported decision of Associate Chief Justice Gagné dated November 21, 2022 in T-955-21); *Bell Media Inc. et al. v. John Doe 1 et al.*, 2022 FC 1432 (Justice Mosley); *Rogers Media Inc. et al. v. John Doe 1 et al.* (unreported decision of Justice Lafrenière dated July 18, 2023, in T-1253-23); *Rogers Media Inc. v. John Doe 1*, 2024

FC 1082 (Justice Little); and *Bell Media Inc. v. John Doe 1 (Soap2day)*, 2025 FC 133 (Justice Fothergill);

AND without prejudice to the ability of any Third Party Respondents to subsequently seek to stay, vary, or set aside this Judgment or to oppose on any basis any other related or similar Order or Judgment sought by any Applicants or any other party;

AND UPON being satisfied that the Judgment sought should issue, based on the evidence and argument presented to the Court;

THE COURT ORDERS AS FOLLOWS:

1. In this Judgment the “Target Platforms” shall mean:
 - a. The online piracy platforms operated by the Respondents from the domains, subdomains and IP addresses listed at Schedule 1 of this Judgment at the time of its issuance; and
 - b. Piracy Streaming Platforms that satisfy the following conditions:
 - i. They have the sole or predominant purpose of making available and/or communicating to the public by telecommunication motion pictures or television programming without the authorization of the owner of the copyright therein, and which also includes works for which the Applicants own the copyright;
 - ii. They have substantially the same mode of operation as either category of Piracy Streaming Platform mentioned at paragraph 1.a. of the Judgment, namely Unauthorized Subscription Services and Open Web Piracy Platforms;

- iii. Representatives from the Applicants have confirmed that, as far as they are aware, no consent or license has been granted by the Applicants to the operator of the platform;
 - iv. The platform can be accessed by users in Canada;
 - v. Where the platform has disclosed a means of contact, the Applicants or their agents have sent a notice of infringement to the operator of the platform, which notice explains the infringements of copyright alleged by the Applicants and their intention to take enforcement action should those activities not cease; and
 - vi. The platform continues to operate and the operator has taken no steps, within 7 days of the date of notice, to address the matters identified in the notice of infringement.
2. Within ten (10) business days of the issuance of this Judgment, the Third Party Respondents shall block or attempt to block access by at least their residential wireline Internet service customers to the Target Platforms by blocking or attempting to block access to all of the domains, subdomains and IP addresses identified in Schedule 1 to this Judgment.
3. If the Applicants are made aware of any other domain, subdomain or IP address that has as its sole or predominant purpose to enable or facilitate access to a Target Platform:
- a. The Applicants may serve and file a proposed amended Schedule 1 together with one or more affidavits that may be limited to:
 - i. stating that the Target Platform(s) subject to the amended Schedule 1 meet the conditions set out at paragraph 1 above;

- ii. identifying the additional domain(s), subdomain(s) or IP address(es) associated with the Target Platform(s) subject to the amended Schedule 1;
 - iii. stating that such additional domain, subdomain and/or IP address have as their sole or predominant purpose to enable or facilitate access to a Target Platform(s) and that any additional IP address is not associated with any other active domain or subdomain that provides access to a service or website other than a Target Platform;
 - iv. proposing to supplement Schedule 1 to this Judgment to include such additional domain, subdomain, and/or IP address.
- b. Any Third Party Respondent may bring a motion to object to the additional proposed domain, subdomain and IP address by serving and filing a notice of motion within five (5) business days of service of the Applicants' affidavit and proposed amended Schedule 1, and a motion record within five (5) business days of the filing of the notice of motion. In the event that such a motion record is filed, the Third Party Respondents shall not be ordered to block or attempt to block the domains, subdomains or IP addresses that are the subject of the motion until the motion is decided or the Court orders otherwise.
- c. If no Third Party Respondent files a notice of motion to object within five (5) business days, and a motion record within five (5) business days of the filing of the notice of motion, in accordance with paragraph 3(b) of this Judgment, the supplemented Schedule 1 proposed by the Applicants shall be considered Schedule 1 under this Judgment, and become subject to paragraph 2 above.
- d. The Applicants' affidavit and proposed amended Schedule 1 shall be accepted for filing as confidential, and be treated as confidential by the

Third Party Respondents until ten (10) business days following the application of an updated Schedule 1 pursuant to paragraph 3(c) above.

4. The Third Party Respondents have no obligation to verify whether the Applicants' updates to Schedule 1 to this Judgment are correct, and are wholly reliant on the Applicants accurately identifying the domains, subdomains or IP addresses associated with the Target Platform(s).
5. If and once they become or are made aware of the following situations, the Applicants must notify the Third Party Respondents as soon as reasonably practicable:
 - a. any domain, subdomain or IP address contained in Schedule 1 to this Judgment (as updated) no longer has the sole or predominant purpose of enabling or facilitating access to a Target Platform, in which case the Applicants shall provide to the Third Party Respondents and file with the Court an updated Schedule 1 removing said domain, subdomain or IP address and the Third Party Respondents shall no longer be ordered to block or attempt to block access to said domain, subdomain or IP address; and
 - b. any IP address contained in Schedule 1 to this Judgment (as updated) hosts one or more active website(s) other than a Target Platform, in which case the Third Party Respondents shall no longer be ordered to block or attempt to block access to said IP address.
6. Notices and service of documents under this Judgment may be made by the Applicants, the Third Party Respondents and their agents to one another by electronic means at the addresses determined and agreed upon by them. Service and filing of documents pursuant to paragraph 3 of this Judgment may be made no more frequently than every ten (10) business days.

7. The Internet Service customers of the Third Party Respondent will be notified through the following mechanism:
- a. the Applicants shall post this Judgment, as well as an explanation of the purpose of the Judgment, on a separate website domain [the “Notification Website”] that will also make the following information immediately available:
 - i. that access has been blocked by this Judgment;
 - ii. the identity of the Applicants and the Federal Court File for this matter and contact information of the Applicants or its counsel;
 - iii. a statement to the effect that the operators of the Target Platforms (i.e., the John Doe Defendants), any third party who claims to be affected by this Judgment, and any internet service customer affected by the Judgment, may apply to the Court to discharge or vary the Judgment pursuant to paragraph 12 below;
 - iv. optionally, information on authorized and legitimate platforms that distribute motion pictures and/or television programming in Canada.
 - b. where an Internet Service customer has access to a domain blocked by a Third Party Respondent pursuant to this Judgment, to the extent practicable, the Third Party Respondent shall setup the DNS blocking, DNS re-routing or an alternative or equivalent technical means, to redirect the internet service customer to the Notification Website; and
 - c. the Applicants shall notify the Third Party Respondents of any changes to the domain or website address of the Notification Website as soon as reasonably practicable.

- d. as an alternative to the mechanism ordered at subparagraph b. above, to the extent practicable, a Third Party Respondent may use different technical means to give notice of the information listed at subparagraph a. above to its internet service customer whose access to a domain, subdomain or IP address is blocked by the Third Party Respondent pursuant to this Judgment.
- 8. A Third Party Respondent will be deemed to have complied with paragraph 2 of this Judgment (including following updates to Schedule 1) if it uses the technical means set out in Schedule 2 to this Judgment, or alternative or equivalent technical means, provided that the Third Party Respondent notifies to the Applicants of the change.
- 9. If a Third Party Respondent, in complying with this Judgment, is unable to implement one of the steps referred to in Schedule 2 of this Judgment, that Third Party Respondent must, within ten (10) business days of the issuance of this Judgment or of an update to Schedule 1, or of being first made aware that it is unable to implement blocking, as applicable, notify the Applicants of the step or steps it has taken and why it could not comply with the Judgment. The Applicants shall treat any information received pursuant to this paragraph confidentially and shall use it solely for the purpose of monitoring compliance with this Judgment.
- 10. A Third Party Respondent shall not be in breach of this Judgment if it temporarily suspends, for no longer than is reasonably necessary, its compliance with paragraph 2 of this Judgment (including following updates to Schedule 1), in whole or in part, when such suspension is reasonably necessary to:
 - a. correct or investigate potential over-blocking that is caused or suspected to be caused by the steps taken pursuant to paragraph 2 of this Judgment;

- b. maintain the integrity or quality of its Internet services or the functioning of its blocking system(s);
- c. upgrade, troubleshoot or maintain its Internet services or blocking system(s), including as a result of technical or capacity limitations of its blocking system(s);
- d. prevent or respond to an actual or potential security threat to its network or systems

provided that the Third Party Respondent (i) gives notice to the Applicants during or following such suspension and provides the reason for such suspension and an estimate of its duration or (ii) if the suspension does not last longer than 48 hours, uses commercially reasonable efforts to maintain a record of the suspension and provides that record to the Applicants upon request. The Applicants shall treat any information received pursuant to this paragraph confidentially and shall use it solely for the purposes of monitoring and ensuring compliance with this Judgment.

11. For greater certainty a Third Party Respondent may hold a reasonable portion of its capacity to implement DNS blocking in reserve, if it deems it necessary to do so, in order to be able to respond to threats to its subscribers and to maintain the integrity of its network and services. Any such measure must be justified with reference to the network capacity used for similar purposes within the 12 months preceding this Judgment.
12. The operator(s) of any Target Platform, the operators of any other website who claim to be affected by this Judgment, and any Internet service customer of the Third Party Respondents affected by the Judgment, may bring a motion to seek a variation of this Judgment insofar as this Judgment affects their ability to access or distribute non-infringing content by serving and filing a motion record

within thirty (30) days of the first occurrence of the event that allegedly effects them and that results from this Judgment.

13. The Applicants shall indemnify and save harmless the Third Party Respondents for:

- a. the reasonable marginal cost of implementing paragraphs 2 and 7 of this Judgment and updating the implementation of this Judgment pursuant to paragraphs 3 and 5 of this Judgment;
- b. any reasonably incurred loss, liability, obligation, claim, damages, costs (including defence costs), or expenses resulting from a third party complaint, demand, action, claim, application or similar proceeding whether administrative, judicial, or quasi-judicial in nature, in respect of the Third Party Respondents as a result of their compliance with the Judgment; and
- c. for certainty, the scope of the Applicants' indemnification obligations set out in this paragraph is limited to the circumstances of this proceeding, and this paragraph of the Judgment is specifically without prejudice to the ability of the Third Party Respondents, Applicants or any other party to seek indemnification obligations of a different scope in other cases or proceedings.

14. With respect to the costs referenced in paragraph 13.a:

- a. The Third Party Respondents shall provide the Applicants with an invoice setting out the claimed cost elements and the total costs claimed after having complied with one or more terms of this Judgment;

- b. The Applicants shall pay the invoice within thirty (30) days of receipt unless a disagreement as to its reasonableness must be resolved under paragraph 14.c; and
 - c. In the event that the Applicants and Third Party Respondent disagree as to the reasonableness of the invoice, the parties are encouraged to attempt to amicably resolve their disagreement. If required, the parties may bring a motion to settle this issue.
15. This Judgment shall terminate two (2) years from the date of issuance, unless the Court orders otherwise.
16. All without prejudice to the ability of any Third Party Respondents to subsequently seek to stay, vary, or set aside this Judgment or to oppose on any basis any other related or similar Judgment sought by any Applicant or any other party.
17. There shall be no costs, unless contested by any of the Third Party Respondents, in which case costs are awarded against the contesting Third Party Respondent(s) in favour of the Applicants in the form of a lump sum payment in an amount to be determined by the Court, payable forthwith.
-

Schedule 1 – Target Platforms

Domains to be blocked, including all associated subdomains	Subdomains to be blocked	IP addresses to be blocked
Unauthorized Streaming Services		
con.me confbucket.me tvnow.best starlite.best		
dp.dp-elite.net		
glotv.me play.suntv.biz play.zee5.live		
new.jiotv.be		
4k.spicetv.cc cod41.biz		
smart4k.me		
Open Web Piracy Platforms		
0123movie.net 123moviesfree.net		
cineby.gd		
Fmovies.com Fmovies.ro BMovies.vip		
hydrahd.ru		
putlocker.digital putlocker.gy putlocker.pe		
TheTVApp.to		

Domains to be blocked, including all associated subdomains	Subdomains to be blocked	IP addresses to be blocked
watchseries.pe watchseries.bar swatchseries.is		

Schedule 2 – Technical Means

1. For domains identified in Schedule 1 (as updated): DNS blocking, or alternatively DNS rerouting to comply with paragraph 7 of the Judgment.
2. For domains, subdomains or specific paths identified in Schedule 1 (as updated): DNS blocking or DNS re-routing, or at the Third Party Respondent's election URL path blocking, to the extent that the Third Party Respondent's existing technical infrastructure allows this blocking method. For certainty:
 - a. for domains and subdomains identified in Schedule 1 (as updated), the Third Party Respondents do not need to implement URL path blocking if they implement DNS blocking or DNS re-routing in accordance with paragraph 1 of this Schedule 2.
 - b. no Third Party Respondent shall be required to acquire the hardware and software necessary to put in place or upgrade URL path blocking.
3. For the IP addresses identified in Schedule 1 (as updated): IP address blocking, or alternatively IP address re-routing. For certainty, IP address blocking, or IP address rerouting shall only be required to block IP addresses in respect of which the Applicants or their agents notify the Third Party Respondents that, to the best of their knowledge, the server associated with the notified IP address does not also host an active website other than the Target Platforms.