

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PEARSON EDUCATION, INC., ELSEVIER INC.,
CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP, LLC
d/b/a MACMILLAN LEARNING, and MCGRAW-
HILL GLOBAL EDUCATION HOLDINGS, LLC,

Plaintiffs,

v.

RAHEIM J. MOFIELD a/k/a James Reynolds,
individually and d/b/a
www.worldmediaincorporated.com, and Does 1-3.

Defendants.

Case No. 19-cv-04605-AB

**NOTICE OF SETTLEMENT AND STIPULATION FOR ENTRY OF JUDGMENT
AND PERMANENT INJUNCTION AGAINST DEFENDANT RAHEIM J.
MOFIELD**

On October 3, 2019, Pearson Education, Inc., Elsevier Inc., Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, and McGraw-Hill Global Education Holdings, LLC (“Plaintiffs”) filed a Complaint against, *inter alia*, Defendant Raheim J. Mofield a/k/a James Reynolds, individually and d/b/a www.worldmediaincorporated.com (“Defendant”), asserting claims of copyright infringement in violation of 17 U.S.C. § 106.

Plaintiffs and Defendant have agreed to settle the claims against Defendant in this action and enter into this Stipulation seeking entry of the Judgment and Permanent

Injunction against Defendant in a form substantially similar to Exhibit A.

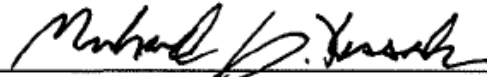
Therefore, Plaintiffs and Defendant respectfully request that the Court enter the Judgment and Permanent Injunction against Defendant submitted herewith as Exhibit A.



Raheim J. Mofield
304 W. Upsal Street, Apt. 1
Philadelphia, PA 19119

Defendant

Date: 3/20/20



Michael O. Kassak
WHITE AND WILLIAMS LLP
LibertyView
457 Haddonfield Road, Suite 400
Cherry Hill, NJ 08002
Tel: 856.317.3600
Fax: 856.317.1342

Counsel for Plaintiffs

Date: 4/29/20

EXHIBIT “A”

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PEARSON EDUCATION, INC., ELSEVIER INC.,
CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP,
LLC d/b/a MACMILLAN LEARNING, and
MCGRAW-HILL GLOBAL EDUCATION
HOLDINGS, LLC,

Plaintiffs,

v.

RAHEIM J. MOFIELD a/k/a James Reynolds,
individually and d/b/a
www.worldmediaincorporated.com, and Does 1-3.

Defendants.

Case No. 19-cv-04605-AB

**CONSENT JUDGMENT AND PERMANENT INJUNCTION
AGAINST DEFENDANT RAHEIM J. MOFIELD**

Upon the Stipulation for Entry of Judgment and Permanent Injunction
Against Defendant Raheim J. Mofield ("Defendant"), it is hereby

ORDERED that final judgment is **ENTERED** for Plaintiffs Pearson
Education, Inc., Elsevier Inc., Cengage Learning, Inc., Bedford, Freeman & Worth
Publishing Group, LLC d/b/a Macmillan Learning, and McGraw-Hill Global
Education Holdings, LLC (hereinafter, "Plaintiffs") for Defendant's willful copyright
infringement.

Pursuant to and in accordance with 17 U.S.C. § 502 and this Court's inherent equitable authority, it is **FURTHER ORDERED** that a permanent injunction is **ENTERED** in this action as to Defendant. Defendant, his agents, servants, and employees, and all those in active concert or participation with any of them, are permanently enjoined from:

- Directly or indirectly infringing any of Plaintiffs' Copyrighted Works;
- Directly or indirectly Manufacturing, importing, distributing, selling, or offering to sell any unauthorized copies of Plaintiffs' Copyrighted Works; and
- Enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to directly or indirectly infringe Plaintiffs' Copyrighted Works and/or manufacture, import, distribute, sell, or offer to sell any unauthorized copies of Plaintiffs' Copyrighted Works.

It is **FURTHER ORDERED** that this Final Judgment and Permanent Injunction shall inure to the benefit of Plaintiffs and any successors, assigns, and acquiring companies. This Final Judgment and Permanent Injunction shall be binding upon Defendant and any successors, assigns, and acquiring companies.

It is **FURTHER ORDERED** that this Final Judgment and Permanent Injunction shall be deemed to have been served upon the Defendant at the time of its execution by this Court.

It is **FURTHER ORDERED** that this Final Judgment and Permanent Injunction pertains only to Plaintiffs' claims in Case Nos. 19-cv-04605-AB.

Nothing herein extends to, limits, or waives any of Plaintiffs' other rights, claims, or remedies, including, without limitation, any events, actions, occurrences, infringements, or violations occurring after the issuance of this Final Judgment and Permanent Injunction.

It is **FURTHER ORDERED** that the Court retains jurisdiction of this matter in law and equity for purposes of enforcing this Order and/or adjudicating claims of violations of this Order.

SO ORDERED this 30TH day of _____ April 2020.

s/ANITA B. BRODY, J.

ANITA B. BRODY

United States District Judge