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PRAVOSLAVNOGO TELEVIDENIYA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

GOOGLE LLC,

Plaintiff,

v.

NAO TSARGRAD MEDIA, ANO TV-
NOVOSTI, AND NO FOND
PRAVOSLAVNOGO TELEVIDENIYA,

Defendants.

Case No. 5:24-cv-05423-EJD

Referred to: Magistrate Judge Susan van
Keulen

**STIPULATED RELIEF AGAINST ANO
TV-NOVOSTI AND NO FOND
PRAVOSLAVNOGO TELEVIDENIYA
AND ~~PROPOSED~~ ORDER**

Pursuant to Federal Rule of Civil Procedure 65 and Civil Local Rule 7-12, Plaintiff Google LLC (“Google”) and Defendants ANO TV-Novosti (“TV-Novosti”) and NO Fond Pravoslavnogo Televideniya (“NFPT”) (Google, TV-Novosti, and NFPT are each a “Party” and collectively the “Parties” to this stipulation), by and through their undersigned counsel of record, hereby stipulate as follows in the above-referenced consolidated action:

WHEREAS After suing Google and its affiliates in the Russian Federation, TV-Novosti and NFPT obtained the following Russian judgments: Judgment of the Arbitrazh Court of the City of Moscow dated October 11, 2022 in Case No. A40-99830/22-110-726, Judgment of the Ninth Arbitrazh Court of Appeal dated February 21, 2023 in Case No. A40-99830/22, and all other related appellate and other related court decisions (the “TV-Novosti Russian Judgments”); and Judgment of the Arbitrazh Court of the City of Moscow dated March 14, 2023 in Case No. A40-211341/22-110-1622, Judgment of the Ninth Arbitrazh Court of Appeal dated June 22, 2023 in Case No. A40-211341/22, and all other related appellate and other related court decisions (the “NFPT Russian Judgments,” and collectively with the TV-Novosti Russian Judgments, the “TV-Novosti/ NFPT Russian Judgments”).

WHEREAS TV-Novosti and NFPT have initiated proceedings in jurisdictions outside the Russian Federation to recognize and/or enforce the TV-Novosti/NFPT Russian Judgments (collectively with any further or future such proceedings, the “Foreign Enforcement Proceedings”).

WHEREAS On August 19, 2024, Google filed Complaints (*TV-Novosti* Dkt. 1, *NFPT* Dkt. 1) and *Ex Parte* Applications for Temporary Restraining Orders and Orders to Show Cause Why Preliminary Injunction Should Not Issue against TV-Novosti and NFPT (*TV-Novosti* Dkt. 4, *NFPT* Dkt. 4) (the “Preliminary Injunction Motions”).

WHEREAS On September 3, 2024, the Parties entered into a Stipulation (*TV-Novosti* Dkt. 39, *NFPT* Dkt. 38) (the “September 3, 2024 Stipulated Relief”), which was so-ordered by this Court.

WHEREAS On March 5, 2025, the Court conducted a hearing on Google’s preliminary injunction Motions, during which the Court noted Google’s willingness to potentially withdraw its preliminary injunction motions against those two Defendants if they could agree to stipulated relief.

1 The Court ordered the Parties to report back to the Court by March 26, 2025.

2 **WHEREAS** After meeting and conferring, the Parties were not able to reach agreement on
3 a stipulation and instead filed a status report memorializing their respective positions on March 26,
4 2025. Dkt. 134.

5 **WHEREAS** On March 31, 2025, the Court issued an Order (Dkt. 136), noting that “Google
6 had indicated that it might be willing to withdraw its preliminary injunction motions against
7 Novosti and Pravoslav if the two were willing to stipulate that the Google Terms of Service were
8 not at issue in their underlying Russian proceedings and that they would not seek to enforce their
9 Russian judgments based on the Google Terms of Service.” The Court also noted that “Because the
10 status report indicates that the parties are close to resolving the preliminary injunction motions at
11 issue, the Court **DEFERS** ruling on those motions for **twenty-one (21) days** and **DIRECTS** the
12 parties to further meet and confer” and issued guidance for these further meetings.

13 **WHEREAS** On April 21, 2025, Google, TV-Novosti and NFPT submitted a Joint Status
14 Report regarding their further meet-and-confer efforts.

15 **WHEREAS** On May 6, 2025, the Court referred Google, TV-Novosti and NFPT to
16 mediation with the Honorable Susan van Keulen and deferred ruling on pending motions until after
17 the mediation.

18 **WHEREAS** Google, TV-Novosti, and NFPT met and conferred, and have agreed as
19 follows:

20 **IT IS HEREBY STIPULATED AND AGREED** by and between Google and TV-
21 Novosti and NFPT, subject to the approval of the Court:

22 1. TV-Novosti and NFPT obtained the TV-Novosti/NFPT Russian Judgments against
23 Google based solely on alleged violations of the YouTube Terms of Service.

24 2. The TV-Novosti/NFPT Russian Judgments arise under and order relief as to Google
25 based solely on alleged violations of the YouTube Terms of Service.

26 3. TV-Novosti and NFPT’s enforcement of the TV-Novosti/NFPT Russian Judgments
27 against Google is based solely on alleged violations of YouTube Terms of Service and not based
28 on violations of the Google Terms of Service.

1 4. TV-Novosti and NFPT do not and will not seek to enforce the TV-Novosti/NFPT
2 Russian Judgments based on the Google Terms of Service and will not attach, impair or execute on
3 any assets of Google or any affiliate of Google based on the Google Terms of Service.

4 5. The Parties agree that effective immediately they will not take any position in any
5 proceeding, including any Foreign Enforcement Proceeding, contrary to the positions set forth
6 above, including that the TV-Novosti/NFPT Russian Judgments are based on violation of the
7 Google Terms of Service.¹

8 6. Neither TV-Novosti nor NFPT shall commence or pursue suit in the Russian
9 Arbitrazh Court or any other Russian court to enjoin Google from continuing and/or pursuing
10 further proceedings in this action, subject to the terms of this Stipulation.

11 7. Defendant NFPT is not currently subject to sanctions and, accordingly, within 10
12 business days of entry of this stipulation by the Court, Google shall dismiss with prejudice its claims
13 against NFPT in the Northern District of California, Case No. 5:24-cv-05428, except that, if NFPT
14 or Google, either of them through their officers, agents, servants, employees, attorneys, and all
15 those in active concert or participation with them, breach any of the terms of this Stipulation, then
16 Google or NFPT may move this Court for relief related to this breach.

17 8. Defendant TV-Novosti is currently subject to sanctions and, accordingly:

- 18 a. Google shall file an application for an Office of Foreign Assets Control
19 ("OFAC") License within 60 days of execution of this Stipulation seeking
20 permission to dismiss its claims against TV-Novosti under the terms of this
21 Stipulation, unless it determines that no such license is required by that time;
- 22 b. Google and TV-Novosti agree to seek a stay of further proceedings relating to
23 TV-Novosti, Case No. 5:24-cv-05426, subject to either party's ability to enforce
24

25 ¹ This term does not apply to any litigation before the Northern District of California or any related
26 appeal (1) for the purpose of asserting personal jurisdiction over TV-Novosti or NFPT in order to
27 enforce violations of this Stipulation, or (2) against TV-Novosti if the Stay is lifted pursuant to
28 paragraphs 8 and 9 because OFAC denies Google's application for an OFAC license.

the terms of this Stipulation. The stay will be lifted upon the earlier of (a) any of the conditions set forth in paragraph 9(i)-(iii) below or (b) a final denial by OFAC of Google's application for the OFAC License.

9. Google shall within 10 business days dismiss with prejudice its claims against TV-Novosti in the Northern District of California, Case No. 5:24-cv-05426, upon the earlier of any one of the following: (i) Google obtains an OFAC License as to TV-Novosti; (ii) OFAC states that such a license is not required; or (iii) Google determines that such license is not required as to TV-Novosti, in which case Google shall notify TV-Novosti in writing.

10. If any Party, including through their officers, agents, servants, employees, attorneys, and all those in active concert or participation with them, breach any of the terms of this Stipulation, then any other Party may move this Court for relief related to this breach.

11. The Parties agree that the Court shall have jurisdiction to resolve any breach of this Stipulation, except that this provision and this Stipulation as a whole are without prejudice to TV-Novosti's and NFPT's positions that the Court lacks personal jurisdiction over them.

12. The September 3, 2024 Stipulated Relief is vacated as between the Parties.

Dated: September 25, 2025

KING & SPALDING LLP

By: /s/ Olivia A. Radin

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Attorneys for Plaintiff GOOGLE LLC

Dated: September 25, 2025

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1 Dated: September 25, 2025

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3 By: /s/ Adrian Sawyer

4 ADRIAN SAWYER

5 Dated: September 25, 2025

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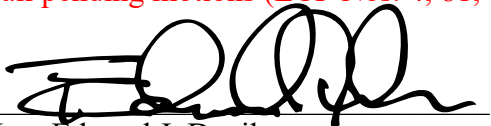
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

In light of this Stipulation, the Court **TERMINATES** all pending motions (ECF Nos. 4, 81, 140) to be re-noticed if necessary.

Dated: September 26, 2025


Hon. Edward J. Davila
United States District Judge