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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10
11 TED ENTERTAINMENT, INC., a
12 California Corporation,

13 Plaintiff,

14 v.

15 MORGAN KAMAL MAJED p/k/a
16 FROGAN, an individual, and DOES
17 1-10

18 Defendants.

Case No.: 2:25-cv-5565-JFW-MAA

[Assigned for all purposes to the Hon.
John F. Walter]

**PLAINTIFF TED
ENTERTAINMENT, INC.'S
NOTICE OF APPLICATION AND
APPLICATION FOR DEFAULT
JUDGMENT AGAINST
DEFENDANT MORGAN KAMAL
MAJED**

Action Filed: June 19, 2025

Date: August 10, 2026

Time: 1:30 p.m.

Courtroom: 7A

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TO ALL PARTIES, THEIR ATTORNEYS OF RECORD, AND THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT, on August 10, 2026 at 1:30 p.m., in Courtroom 7A of the United States District Court for the Central District of California, the Honorable John F. Walter presiding, Plaintiff Ted Entertainment, Inc. (“TEI”) will and hereby does move, pursuant to Federal Rule of Civil Procedure 55, for an order of default judgment against Defendant Morgan Kamal Majed p/k/a Frogan (“Frogan”), including for: (1) statutory damages of \$150,000 for willful infringement or, alternatively, \$39,197 in disgorgement of profits, whichever is greater; (2) \$30,404 in TEI’s reasonable attorneys’ fees; and (3) taxable costs.

This Application is made on the grounds that TEI’s well-pleaded allegations establish Frogan’s liability, TEI properly served Frogan with process and Frogan failed to respond to the Complaint, the *Eitel* factors support entry of default judgment, and TEI is entitled to the relief sought in the Complaint.

This Application will be based on this Notice of Application and Application, the concurrently filed Memorandum of Points and Authorities, Declaration of Rom Bar-Nissim including the exhibits thereto, the Proposed Order, the entire Court file herein, and on such other materials or arguments that may properly come before the Court in connection with the Application.

Dated: June 29, 2026

HEAH BAR-NISSIM LLP

By /s/ Rom Bar-Nissim
ROM BAR-NISSIM
Attorneys for Plaintiff Ted Entertainment, Inc.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I, the undersigned, declare that I am, and was at the time of service of the papers herein referred to, over the age of eighteen years and not a party to the within action or proceeding. My business address is the law firm of Heah Bar-Nissim LLP, 1801 Century Park East, Suite 2400, Los Angeles, CA 90067.

On June 29, 2026, I served the following document(s) **PLAINTIFF TED ENTERTAINMENT, INC.’S NOTICE OF APPLICATION AND APPLICATION FOR DEFAULT JUDGMENT AGAINST DEFENDANT MORGAN KAMAL MAJED**

Bahram Niknia NIKZIA LAW FIRM, INC. 1875 Century Park East Suite 1240 Los Angeles, CA 90067	Attorney for Defendant Morgan Kamal Majed p/k/a Frogan
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[X] BY MAIL: I enclosed the document(s) identified above in a sealed envelope or package addressed to the persons addressed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business’s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully paid. attached the document(s) to an email sent to the email addresses set forth above

I declare under penalty of perjury that the foregoing is true and correct and a member of the bar of this Court.

Executed this June 29, 2026, at Los Angeles, CA.

/s/ Rom Bar-Nissim

Rom Bar-Nissim