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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.

