

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

COMCAST OF MAINE/NEW HAMPSHIRE, INC.; A&E TELEVISION NETWORKS, LLC; C-SPAN; CBS CORP.; DISCOVERY, INC.; DISNEY ENTERPRISES, INC.; FOX CABLE NETWORK SERVICES, LLC; NBCUNIVERSAL MEDIA, LLC; NEW ENGLAND SPORTS NETWORK, LP; and VIACOM INC.,

Plaintiffs,

v.

JANET MILLS, in her official capacity as the Governor of Maine; AARON FREY, in his official capacity as the Attorney General of Maine; the CITY OF BATH, MAINE; the TOWN OF BERWICK, MAINE; the TOWN OF BOWDOIN, MAINE; the TOWN OF BOWDOINHAM, MAINE; the TOWN OF BRUNSWICK, MAINE; the TOWN OF DURHAM, MAINE; the TOWN OF ELIOT, MAINE; the TOWN OF FREEPORT, MAINE; the TOWN OF HARPSWELL, MAINE; the TOWN OF KITTERY, MAINE; the TOWN OF PHIPPSBURG, MAINE; the TOWN OF SOUTH BERWICK, MAINE; the TOWN OF TOPSHAM, MAINE; the TOWN OF WEST BATH, MAINE; and the TOWN OF WOOLWICH, MAINE;

Defendants.

Case No. 1:19-cv-00410-NT

**JOINT MOTION FOR ENTRY OF
STIPULATED FINAL JUDGMENT AND
ORDER FOR DECLARATORY AND
PERMANENT INJUNCTIVE RELIEF**

Plaintiffs Comcast of Maine/New Hampshire, Inc., A&E Television Networks, LLC, C-SPAN, CBS Corp., Discovery, Inc., Disney Enterprises, Inc., Fox Cable Network Services, LLC, NBCUniversal Media, LLC, New England Sports Network, LP, and Viacom Inc. (hereafter “Plaintiffs”), and Defendants Janet Mills, in her official capacity as the Governor of Maine, and Aaron Frey, in his official capacity as the Attorney General of Maine¹ (hereafter “Defendants”), hereby respectfully move this Court to approve and enter the attached proposed Stipulated Final Judgment and Order for Declaratory and Permanent Injunctive Relief, providing for declaratory and permanent injunctive relief in settlement of the Complaint, which alleges that H.P. 606 – L.D. 832, 129th Leg., Pub. Law, ch. 308 (Me. 2019), titled “An Act to Expand Options for Consumers of Cable Television in Purchasing Individual Channels and Programs,” is preempted by federal law and violates the First Amendment to the U.S. Constitution.

IT IS SO MOVED this 23rd day of April, 2021.

/s/ Joshua A. Tardy

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¹ The remaining Defendants were dismissed pursuant to a joint stipulation. Dkt. 84.

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IT IS SO MOVED this 23rd day of April, 2021.

Aaron M. Frey
Attorney General

/s/ Christopher C. Taub
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document entitled Joint Motion for Entry of Stipulated Final Judgment and Order for Declaratory and Permanent Injunctive Relief via the Court's CM/ECF system, which will serve a copy of same upon all counsel of record.

DATED: April 23, 2021

/s/ Christopher C. Taub
Christopher C. Taub