

IV. ORDER SOUGHT

110. The Plaintiff respectfully requests that this motion for summary judgment be granted on the following terms, including:
- (a) a declaratory judgment that:
 - (i) copyright subsists in the Plaintiff's Literary Works; and
 - (ii) the Plaintiff is the owner thereof;
 - (b) a declaratory judgment that the Defendants have infringed copyright in the Plaintiff's Literary Works;
 - (c) a permanent injunction restraining the Defendants, whether acting by their directors, officers, servants, agents, workers or representatives, from infringing the Plaintiff's copyright in the Literary Works;
 - (d) an Order requiring the Defendants to deliver up to the Institute of Ismaili Studies in London, U.K., all copies of the Infringing Materials in the Defendants' possession, care or control;
 - (e) an Order for a reference for the determination of damages owing to the Plaintiff by reason of the Defendants' infringing activities, with any such damages to be payable to the AKDN Foundation, or such other charitable organization as may be designated by the Plaintiff;
 - (f) costs to be fixed in the amount of \$30,000.00 CAD, to be payable forthwith to the AKDN Foundation, or such other charitable organization as may be designated by the Plaintiff;
 - (g) pre-judgment and post-judgment interest; and
 - (h) Such further and other relief as counsel may advise and to this Honourable Court may seem just.

ALL OF WHICH IS RESPECTFULLY SUBMITTED this 28th day of June, 2010.

FURTHER REVISED this 26th day of November, 2010

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