

- b) an interim, interlocutory and permanent injunction to restrain the Defendant, and its directors, officers, employees, servants, agents, licensees, related or affiliated companies, or any other person under their direct or indirect control, from, directly or indirectly:
- i) producing, reproducing, distributing, downloading, uploading, exposing or offering for sale or rental, exhibiting in public, or authorizing or causing the production, reproduction, distribution, download, upload, exposition, offering for sale or rental or exhibition in public of the CPC Database or any substantial part thereof;
 - ii) producing, reproducing, distributing, downloading, uploading, exposing or offering for sale or rental, exhibiting in public, or authorizing or causing the production, reproduction, distribution, download, upload, exposition, offering for sale or rental or exhibition in public of the Defendant's CPCG Dataset as defined herein and any other dataset reproducing in whole or in substantial part the CPC Database alone or as part of a broader database;
 - iii) otherwise infringing the Plaintiff's rights in the CPC Database, contrary to section 27(1) and 27(2) of the *Copyright Act*;
- c) an Order directing the Defendant to delete permanently under oath all unauthorised copies of the CPCG Dataset, the CPC Database and substantial parts thereof in the possession, power or control of the Defendant and to deliver up to the Plaintiff or destroy under oath, all unauthorized physical copies whether in print or on electronic media of the CPC Database in the possession, power or control of the Defendant and which may offend the injunction sought herein;
- d) damages for injury to the Plaintiff and an accounting of profits or statutory damages as the Plaintiff may elect under the *Copyright Act*.
- e) pre- and post-judgment interest;