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9  
 10 **UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

11  
 12 RAW FILMS, LTD.,  
 a California corporation,

Case No. '12CV0368 WQH-NLS

13  
 14 Plaintiff,

15 vs.

**COMPLAINT**

16 JOHN DOES 1-11,

17  
 18 Defendants.

19 Plaintiff, Raw Films, Ltd., sues John Does 1-11, and alleges:

20  
 21 **Introduction**

22 1. This matter arises under the United States Copyright Act of 1976, as  
 23 amended, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").

24 2. Through this suit, Plaintiff alleges each Defendant is liable for:

- 25 • Direct copyright infringement in violation of 17 U.S.C. §§ 106 and
- 26 501; and
- 27
- 28

- Contributory copyright infringement.

**Jurisdiction and Venue**

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (patents, copyrights, trademarks and unfair competition).

4. As set forth on Exhibit A, each of the Defendants' acts of copyright infringement occurred using an Internet Protocol address ("IP address") traced to a physical address located within this District, and therefore pursuant to Cal. Civ. Proc. Code § 410.10, this Court has personal jurisdiction over each Defendant because each Defendant committed the tortious conduct alleged in this Complaint in the State of California, and (a) each Defendant resides in the State of California, and/or (b) each Defendant has engaged in continuous and systematic business activity in the State of California.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) a Defendant resides (and therefore can be found) in this District and all of the Defendants reside in this State; additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because each Defendant or each Defendant's agent resides or may be found in this District.

**Parties**

1  
2 6. Plaintiff is a corporation organized and existing under the laws of the  
3 United Kingdom, with its principal place of business located at 37 Warren Street,  
4 London, W1t 6ad, United Kingdom.  
5

6 7. Each Defendant is known to Plaintiff only by an IP address.

7  
8 8. An IP address is a number that is assigned by an Internet Service  
9 Provider (an "ISP") to devices, such as computers, that are connected to the Internet.

10 9. The ISP to which each Defendant subscribes can correlate the  
11 Defendant's IP address to the Defendant's true identity.  
12

**Joinder**

13  
14 10. Pursuant to Fed. R. Civ. P. 20(a)(2), each of the Defendants was  
15 properly joined because, as set forth in more detail below, Plaintiff asserts that: (a)  
16 each of the Defendants is jointly and severally liable for the infringing activities of  
17 each of the other Defendants, and (b) the infringement complained of herein by each  
18 of the Defendants was part of the same series of transaction, involving the exact  
19 same piece of Plaintiff's copyrighted Work, and was accomplished by the  
20 Defendants acting in concert with each other, and (c) there are common questions of  
21 law and fact; indeed, the claims against each of the Defendants are identical and each  
22 of the Defendants used the BitTorrent protocol to infringe Plaintiff's copyrighted  
23 Work.  
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**Factual Background**

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I. Plaintiff Owns the Copyright to a Motion Picture

11. Plaintiff's work is subject to copyright protection for the motion picture entitled "Bareback Street Gang" (the "Work"), pursuant to 17 U.S.C. §§ 104(b)(1)-(3) because one or more of the authors is a national or domiciliary of a treaty party; the Work was first published in a foreign nation that is a treaty party; and the Work qualifies as a sound recording that was first fixed in the territory of a treaty party.

12. Registering the copyright is not a condition precedent to bringing this action under 17 U.S.C. § 411 (a) because the subject copyright is not a "United States Work" within the meaning of that statute. Instead, the work underlying the copyright was created and/or published within the territory of a treaty party.

II. Defendants Used BitTorrent To Infringe Plaintiff's Copyright

13. BitTorrent is one of the most common peer-to-peer file sharing protocols (in other words, set of computer rules) used for distributing large amounts of data; indeed, it has been estimated that users using the BitTorrent protocol on the internet account for over a quarter of all internet traffic. The creators and users of BitTorrent developed their own lexicon for use when talking about BitTorrent; a copy of the BitTorrent vocabulary list posted on [www.Wikipedia.org](http://www.Wikipedia.org) is attached as Exhibit B.

14. The BitTorrent protocol's popularity stems from its ability to distribute a large file without creating a heavy load on the source computer and network. In

1 short, to reduce the load on the source computer, rather than downloading a file from  
2 a single source computer (one computer directly connected to another), the  
3 BitTorrent protocol allows users to join a "swarm" of host computers to download  
4 and upload from each other simultaneously (one computer connected to numerous  
5 computers).

7 *A. Each Defendant Installed a BitTorrent Client onto his or her Computer*

8  
9 15. Each Defendant installed a BitTorrent Client onto his or her computer.

10 16. A BitTorrent "Client" is a software program that implements the  
11 BitTorrent protocol. There are numerous such software programs including  $\mu$ Torrent  
12 and Vuze, both of which can be directly downloaded from the internet. See  
13 www.utorrent.com and http://new.vuze-downloads.com/.

14  
15 17. Once installed on a computer, the BitTorrent "Client" serves as the  
16 user's interface during the process of uploading and downloading data using the  
17 BitTorrent protocol.

18  
19 *B. The Initial Seed, Torrent, Hash and Tracker*

20  
21 18. A BitTorrent user that wants to upload a new file, known as an "initial  
22 seeder," starts by creating a "torrent" descriptor file using the Client he or she  
23 installed onto his or her computer.

24  
25 19. The Client takes the target computer file, the "initial seed," here the  
26 copyrighted Work, and divides it into identically sized groups of bits known as  
27 "pieces."  
28



1 tracking).

2 C. Torrent Sites

3 26. "Torrent sites" are websites that index torrent files that are currently  
4 being made available for copying and distribution by people using the BitTorrent  
5 protocol. There are numerous torrent websites, including www.TorrentZap.com,  
6 www.Btscene.com, and www.ExtraTorrent.com.  
7

8  
9 27. Upon information and belief, each Defendant went to a torrent site to  
10 upload and download Plaintiff's copyrighted Work.

11 D. Uploading and Downloading a Work Through a BitTorrent Swarm

12  
13 28. Once the initial seeder has created a torrent and uploaded it onto one or  
14 more torrent sites then other peers begin to download and upload the computer file  
15 to which the torrent is linked (here the copyrighted Work) using the BitTorrent  
16 protocol and BitTorrent Client that the peers installed on their computers.  
17

18 29. The BitTorrent protocol causes the initial seed's computer to send  
19 different pieces of the computer file, here the copyrighted Work, to the peers seeking  
20 to download the computer file.  
21

22 30. Once a peer receives a piece of the computer file, here a piece of the  
23 Copyrighted Work, it starts transmitting that piece to the other peers.  
24

25 31. In this way, all of the peers and seeders are working together in what is  
26 called a "swarm."  
27

1           32. Here, each Defendant peer member participated in the same swarm and  
2 directly interacted and communicated with other members of that swarm through  
3 digital handshakes, the passing along of computer instructions, uploading and  
4 downloading, and by other types of transmissions. A print out of a computer screen  
5 illustrating the type of interactions between and among peers and seeders in a typical  
6 swarm is attached as Exhibit C.  
7

8  
9           33. In this way, and by way of example only, one initial seeder can create a  
10 torrent that breaks a movie up into hundreds or thousands of pieces saved in the form  
11 of a computer file, like the Work here, upload the torrent onto a torrent site, and  
12 deliver a different piece of the copyrighted Work to each of the peers. The recipient  
13 peers then automatically begin delivering the piece they just received to the other  
14 peers in the same swarm.  
15

16  
17           34. Once a peer, here a Defendant, has downloaded the full file, the  
18 BitTorrent Client reassembles the pieces and the peer is able to view the movie.  
19 Also, once a peer has downloaded the full file, that peer becomes known as “an  
20 additional seed” because it continues to distribute the torrent file, here the  
21 copyrighted Work.  
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1           E.     *Plaintiff's Computer Investigators Identified Each of the Defendants' IP*  
2                 *Addresses as Participants in a Swarm That Was Distributing Plaintiff's*  
3                 *Copyrighted Work*

4           35.    Plaintiff retained IPP, Limited ("IPP") to identify the IP addresses that  
5           are being used by those people that are using the BitTorrent protocol and the internet  
6           to reproduce, distribute, display or perform Plaintiffs' copyrighted works.

7           36.    IPP used forensic software named INTERNATIONAL IPTRACKER  
8           v1.2.1 and related technology enabling the scanning of peer-to-peer networks for the  
9           presence of infringing transactions.  
10

11           37.    IPP extracted the resulting data emanating from the investigation,  
12           reviewed the evidence logs, and isolated the transactions and the IP addresses  
13           associated therewith for the file identified by the SHA-1 hash value of  
14           D0DE9062102977D136A7D055953D5D57A088C1E4, (the "Unique Hash  
15           Number").  
16  
17

18           38.    The IP addresses, Unique Hash Number and hit dates contained on  
19           Exhibit A accurately reflect what is contained in the evidence logs, and show:  
20

21           (A)    Each Defendant had copied a piece of Plaintiff's copyrighted Work  
22           identified by the Unique Hash Number; and

23           (B)    Therefore, each Defendant was part of the same series of transactions.  
24

25           39.    Through each of the transactions, each of the Defendant's computers  
26           used their identified IP addresses to connect to the investigative server from a  
27           computer in this District in order to transmit a full copy, or a portion thereof, of a  
28

1 digital media file identified by the Unique Hash Number.

2 40. IPP's agent analyzed each BitTorrent "piece" distributed by each IP  
3 address listed on Exhibit A and verified that re-assembly of the pieces using a  
4 BitTorrent Client results in a fully playable digital motion picture of the Work.  
5

6 41. IPP's agent viewed the Work side-by-side with the digital media file  
7 that correlates to the Unique Hash Number and determined that they were identical,  
8 strikingly similar or substantially similar.  
9

10 **Miscellaneous**

11 42. All conditions precedent to bringing this action have occurred or been  
12 waived.  
13

14 43. Plaintiff retained counsel to represent it in this matter and is obligated to  
15 pay said counsel a reasonable fee for its services.  
16

17 **COUNT I**  
18 **Direct Infringement Against Does 1-11**

19 44. The allegations contained in paragraphs 1-43 are hereby re-alleged as if  
20 fully set forth herein.

21 45. Plaintiff is the owner of the copyrighted Work which contains an  
22 original work of authorship.  
23

24 46. By using the BitTorrent protocol and a BitTorrent Client and the  
25 processes described above, each Defendant copied the constituent elements of the  
26 Work that are original.  
27

1 47. Plaintiff did not authorize, permit or consent to Defendants' copying of  
2 its Work.

3 48. As a result of the foregoing, each Defendant violated Plaintiff's  
4 exclusive right to:  
5

6 (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and  
7 501;  
8

9 (B) Redistribute copies of the Work to the public by sale or other transfer of  
10 ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and  
11 501;  
12

13 (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and  
14 501, by showing the Work's images in any sequence and/or by making the sounds  
15 accompanying the Work audible and transmitting said performance of the Work, by  
16 means of a device or process, to members of the public capable of receiving the  
17 display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically"  
18 perform); and  
19

20 (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and  
21 501, by showing individual images of the Work nonsequentially and transmitting  
22 said display of the Work by means of a device or process to members of the public  
23 capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of  
24 "publically" display).  
25  
26

27 49. Each of the Defendants' infringements was committed "willfully"  
28

1 within the meaning of 17 U.S.C. § 504(c)(2).

2 50. Plaintiff has suffered actual damages that were proximately caused by  
3 each of the Defendants including lost sales, price erosion and a diminution of the  
4 value of its copyright.  
5

6 WHEREFORE, Plaintiff respectfully requests that the Court:

7 (A) Permanently enjoin each Defendant and all other persons who are in  
8 active concert or participation with each Defendant from continuing to infringe  
9 Plaintiff's copyrighted Work;  
10

11 (B) Order that each Defendant delete and permanently remove the torrent  
12 file relating to Plaintiff's copyrighted Work from each of the computers under each  
13 such Defendant's possession, custody or control;  
14

15 (C) Order that each Defendant delete and permanently remove the copy of  
16 the Work each Defendant has on the computers under Defendant's possession,  
17 custody or control; and  
18

19 (D) Grant Plaintiff any other and further relief this Court deems just and  
20 proper.  
21

22 **COUNT II**

23 **Contributory Infringement Against Does 1-11**

24 51. The allegations contained in paragraphs 1-43 are hereby re-alleged as if  
25 fully set forth herein.  
26

27 52. Plaintiff is the owner of the copyrighted Work which contains an  
28

1 original work of authorship.

2 53. By using the BitTorrent protocol and a BitTorrent Client and the  
3 processes described above, each Defendant copied the constituent elements of the  
4 Work that are original.  
5

6 54. By participating in the BitTorrent swarm with the other Defendants,  
7 each Defendant induced, caused or materially contributed to the infringing conduct  
8 of each other Defendant.  
9

10 55. Plaintiff did not authorize, permit or consent to Defendants' inducing,  
11 causing or materially contributing to the infringing conduct of each other Defendant.  
12

13 56. Each Defendant knew or should have known that other BitTorrent users,  
14 here the other Defendants, would become members of a swarm with Defendant.  
15

16 57. Each Defendant knew or should have known that other BitTorrent users  
17 in a swarm with it, here the other Defendants, were directly infringing Plaintiff's  
18 copyrighted Work by copying constituent elements of the Work that are original.  
19

20 58. Indeed, each Defendant directly participated in and therefore materially  
21 contributed to each other Defendant's infringing activities.  
22

23 59. Each of the Defendants' contributory infringements were committed  
24 "willfully" within the meaning of 17 U.S.C. § 504(c)(2).  
25

26 60. Plaintiff has suffered actual damages that were proximately caused by  
27 each of the Defendants including lost sales, price erosion, and a diminution of the  
28 value of its copyright.

1 WHEREFORE, Plaintiff respectfully requests that the Court:

2 (A) Permanently enjoin each Defendant and all other persons who are in  
3 active concert or participation with each Defendant from continuing to infringe  
4 Plaintiff's copyrighted Work;  
5

6 (B) Order that each Defendant delete and permanently remove the torrent  
7 file relating to Plaintiff's copyrighted Work from each of the computers under each  
8 such Defendant's possession, custody or control;  
9

10 (C) Order that each Defendant delete and permanently remove the copy of  
11 the Work each Defendant has on the computers under Defendant's possession,  
12 custody or control;  
13

14 (D) Find that each Defendant is jointly and severally liable for the direct  
15 infringement of each other Defendant; and  
16

17 (E) Grant Plaintiff any other and further relief this Court deems just and  
18 proper.  
19

20 **COUNT III**

21 **Direct Trademark Infringement Against Does 1-11**

22 61. The allegations contained in paragraphs 1-43 are hereby re-alleged as if  
23 fully set forth herein.

24 62. Plaintiff is the owner of the trademark EUROCREME and its  
25 corresponding federal registrations.  
26

27 63. Each of the Defendant's unauthorized uses and reproductions in  
28

1 commerce of the mark EUROCREME, and/or variations thereof, is likely to cause  
2 confusion, mistake or deception of consumers as to the source or origin of Plaintiff's  
3 goods, services or commercial activities, or lead consumers to mistakenly believe  
4 that Plaintiff sponsors, approves of or is affiliated with any of the Defendants or their  
5 goods, services or commercial activities.  
6

7         64. As a result of each of the Defendant's infringements, consumers are  
8 likely to purchase Defendants' goods or services, or patronize Defendants'  
9 commercial activities, mistakenly believing them to be those of the Plaintiff.  
10

11         65. Plaintiff cannot control the nature and quality of the goods, services or  
12 commercial activities offered by each of the Defendants, and any failure, neglect or  
13 default by each of the Defendants in providing same will and does reflect adversely  
14 on Plaintiff as their believed source or origin, thus hampering efforts by Plaintiff to  
15 protect its reputation, and resulting in loss of sales, a diminution in Plaintiff's  
16 reputation, and/or the need for considerable expenditures to promote its goods,  
17 services or commercial activities under its marks, all to the irreparable harm of  
18 Plaintiff.  
19  
20  
21

22         66. Plaintiff's damages are continuing, and additional injury and damage to  
23 Plaintiff will continue to occur so long as each of the Defendant's above alleged  
24 unauthorized and infringing uses persist.  
25

26         67. Each of the Defendants' infringements is willful and deliberate, has  
27 resulted in gains, profits and advantages to each of the Defendants, and is designed  
28

1 specifically to trade upon the enormous goodwill associated with the EUROCREME  
2 mark.

3 68. Each of the Defendants' infringements constitutes a violation of 15  
4 U.S.C. § 1114(1), and will continue unless enjoined by this Court.

5  
6 69. Plaintiff does not have an adequate remedy at law.

7 WHEREFORE, Plaintiff respectfully requests that the Court:

8  
9 (A) Permanently enjoin each Defendant and all other persons who are in  
10 active concert or participation with each Defendant from continuing their  
11 unauthorized and misleading use of Plaintiff's trademark;

12  
13 (B) Order that each Defendant delete and permanently remove the torrent  
14 file relating to Plaintiff's trademark from each of the computers under each such  
15 Defendant's possession, custody or control;

16  
17 (C) Order that each Defendant delete and permanently remove the copy of  
18 the Work each Defendant has on the computers under Defendant's possession,  
19 custody or control;

20  
21 (D) Ordering Defendants to prepare and file with the Court and serve on  
22 Plaintiffs a report in writing under oath setting forth in detail the manner and form in  
23 which Defendants have complied with the Court's judgment;

24  
25 (E) Ordering that an accounting be made of the profits Defendants have  
26 wrongfully obtained from his or her use of the EUROCREME mark, or any variation  
27 thereof;



1 (F) Awarding Plaintiff three times such profits or Plaintiff's damages,  
2 whichever amount is greater;

3 (G) Awarding Plaintiff compensatory damages under 15 U.S.C. § 1117;

4 (H) Awarding Plaintiff statutory damages under 15 U.S.C. § 1117;

5 (I) Awarding Plaintiff their attorneys' fees and costs incurred in this action  
6 under 15 U.S.C. § 1117;  
7

8 (J) Granting Plaintiff such other and further relief as the Court deems just  
9 and proper.  
10

11 **COUNT IV**

12 **Contributory Trademark Infringement Against Does 1-11**

13 70. The allegations contained in paragraphs 1-43 are hereby re-alleged as if  
14 fully set forth herein.  
15

16 71. The actions of each of the Defendants above, and specifically, their  
17 participation and inducement in the distribution of torrent files containing the  
18 EUROCREME trademark to those whom each Defendant knows or has reason to  
19 know is engaging in trademark infringement, constitute contributory trademark  
20 infringement in violation of federal law.  
21

22 72. Each act of contributory trademark infringement has resulted in loss of  
23 sales, a diminution in Plaintiff's reputation, and/or the need for considerable  
24 expenditures to promote its goods, services or commercial activities under its mark,  
25 all to the irreparable harm of Plaintiff.  
26  
27

1 73. Plaintiff's damages are continuing, and additional injury and damage to  
2 Plaintiff will continue to occur so long as each of the Defendant's above alleged  
3 unauthorized and infringing uses persists.  
4

5 74. Each of the Defendant's contributory infringements is willful and  
6 deliberate, has resulted in gains, profits and advantages to each of the Defendants,  
7 and is designed specifically to trade upon the goodwill associated with the  
8 EUROCREME marks.  
9

10 75. Plaintiff does not have an adequate remedy at law.

11 WHEREFORE, Plaintiff respectfully requests that the Court:

12  
13 (A) Permanently enjoin each Defendant and all other persons who are in  
14 active concert or participation with each Defendant from continuing their  
15 unauthorized and misleading use of Plaintiff's trademark;  
16

17 (B) Order that each Defendant delete and permanently remove the torrent  
18 file relating to Plaintiff's trademark from each of the computers under each such  
19 Defendant's possession, custody or control;  
20

21 (C) Order that each Defendant delete and permanently remove the copy of  
22 the Work each Defendant has on the computers under Defendant's possession,  
23 custody or control;  
24

25 (D) Find that each Defendant is jointly and severally liable for the  
26 unauthorized and misleading use of each other Defendant;  
27

28 (E) Award Plaintiff damages, and its attorneys' fees and costs incurred in

1 this action; and

2 (F) Grant Plaintiff any other and further relief this Court deems just and  
3 proper.  
4

5 **DEMAND FOR A JURY TRIAL**

6 Plaintiff hereby demands a trial by jury on all issues so triable.

7 Respectfully submitted,

8  
9 By: /s/ Adam M. Silverstein  
10 Adam M. Silverstein (197638)  
11 CAVALLUZZI & CAVALLUZZI  
12 9200 Sunset Boulevard, Suite 807  
13 Los Angeles, California 90069  
14 Telephone: (310) 246-2601  
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16 Email: adam@cavalluzzi.com  
17 *Attorneys for Plaintiff*  
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
RAW FILMS, LTD.
(b) County of Residence of First Listed Plaintiff
(c) Attorney's (Firm Name, Address, and Telephone Number)
Cavalluzzi & Cavalluzzi, 9200 Sunset Boulevard, Suite 807, Los Angeles, CA, (310)246-2601

DEFENDANTS
JOHN DOES 1-11
County of Residence of First Listed Defendant San Diego County
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.
Attorneys (If Known) '12CV0368 WQHNS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1
2 2
3 3
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT
TORTS
PERSONAL INJURY
PERSONAL INJURY
PERSONAL PROPERTY
PRISONER PETITIONS
FORFEITURE/PENALTY
LABOR
IMMIGRATION
BANKRUPTCY
PROPERTY RIGHTS
SOCIAL SECURITY
FEDERAL TAX SUITS
OTHER STATUTES

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation
7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 U.S.C. Section 106
Brief description of cause:
Copyright Infringement

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23
DEMAND \$ 150,000.00
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY
(See instructions): JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE