

08 CV 8034

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
JUDGE BATTIS

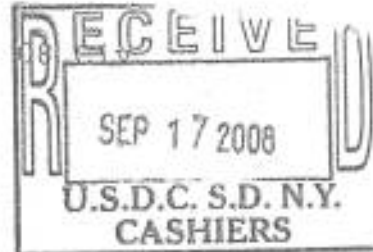
PEARSON EDUCATION, INC.,  
JOHN WILEY & SONS, INC.,  
CENGAGE LEARNING INC. AND  
THE MCGRAW-HILL COMPANIES, INC.,

Plaintiffs,

-against-

HENRY NUGROHO D/B/A SBOOKS4SALE  
D/B/A MR. SBOOKS 4SALE D/B/A  
SURYANET AND JOHN DOE NOS. 1-5,

Defendants.



COMPLAINT

Plaintiffs Pearson Education, Inc. ("Pearson"), John Wiley & Sons, Inc. ("Wiley"), Cengage Learning Inc. ("Cengage") and The McGraw-Hill Companies, Inc. ("McGraw-Hill"), by their undersigned attorneys, for their complaint against defendants Henry Nugroho d/b/a sbooks4sale d/b/a Mr. Sbooks 4Sale d/b/a Suryanet and John Doe Nos. 1-5, aver:

Nature of the Action

1. Plaintiffs are bringing this action to obtain legal and equitable relief to remedy defendants' infringement of plaintiffs' copyrights and trademarks through their sales of electronic copies of instructors' solutions manuals.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over the first three claims in this action pursuant to 28 U.S.C. §§ 1331 and 1338 because they arise under the Copyright Act, 17 U.S.C. § 101 et seq. or the Lanham Act, 15 U.S.C. § 1051 et seq. This Court has subject matter jurisdiction over the fourth claim in this action pursuant to 28 U.S.C. § 1367 because it is so related to the claims within the original jurisdiction of this Court that they form part of the same case or controversy within the meaning of Article III of the United States Constitution.

3. Upon information and belief, venue is proper in this District pursuant to 28 U.S.C. § 1391.

Parties

4. Pearson is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at One Lake Street, Upper Saddle River, New Jersey 07458.

5. Wiley is a corporation organized and existing under the laws of the State of New York with its principal place of business at 111 River Street, Hoboken, New Jersey 07030.

6. Cengage is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 200 First Stamford Place, 4th Floor, Stamford, Connecticut 06902.

7. McGraw-Hill is a corporation organized and existing under the laws of the State of New York with its principal place of business at 1221 Avenue of the Americas, New York, New York 10020.

8. Upon information and belief, defendant Henry Nugroho is a natural person presently residing either at 9308 Cherry Hill Road #101, College Park, Maryland 20740 or at an address presently unknown to plaintiffs in Japan.

9. Upon information and belief, defendants John Doe Nos. 1-5 are natural persons whose identities are presently unknown to plaintiffs.

The Businesses of Plaintiffs

10. Each plaintiff publishes a variety of works, including educational books.

11. As a standard practice, each plaintiff requires its authors to assign the copyrights to them or grant them the exclusive rights of reproduction and distribution in the United States. This practice enables each plaintiff to maximize the dissemination of each work.

12. Plaintiffs invest significant monies to publish their copyrighted works. Plaintiffs, for example, make substantial investments in royalties, content creation, licensing, copyediting, proofreading, typesetting, layout, printing, binding, distribution, and promotion.

13. Plaintiffs earn a substantial portion of their revenue from the publication of their copyrighted works and would suffer serious financial injury if their copyrights were not enforced. A substantial decline in their income could cause plaintiffs to cease publishing one or more deserving books or journals. This would adversely impact the creation of new works, scholarly endeavor, and scientific progress.

14. An important part of plaintiffs' business is derived from publishing college textbooks. College professors select textbooks from competing publishers based on the pedagogical value and the quality of supplementary materials.

15. Instructors' solutions manuals are important supplementary materials. Professors use instructors' solutions manuals to aid in grading homework. Students, however, use instructors' solutions manuals to cheat. Professors are less likely to select a textbook if the instructors' solutions manuals are freely and/or widely available. Accordingly, plaintiffs do not sell their instructors' solutions manuals, and tightly control their distribution to known faculty.

#### Plaintiffs' Copyrights and Trademarks

16. Plaintiffs routinely register their copyrights. Pearson has generally registered its copyrights in its works, including those identified on Schedule A (the "Pearson Copyrights"). Wiley has generally registered its copyrights in



its works, including those identified on Schedule B (the "Wiley Copyrights"). Cengage has generally registered its copyrights in its works, including those identified on Schedule C (the "Cengage Copyrights"). McGraw-Hill has generally registered its copyrights in its works, including those identified on Schedule D (the "McGraw-Hill Copyrights").

17. Plaintiffs also own, themselves or through their parent or affiliate companies, trademarks that they use to differentiate their products from those of their competitors.

18. Pearson PLC, Pearson's ultimate parent company, is the owner of and Pearson is an exclusive licensee of, with the accompanying right and duty to protect and enforce Pearson's rights therein, the well-known trademarks "Pearson," "Pearson Education" and "Prentice Hall." Pearson is the direct holder of the well-known trademark "Benjamin Cummings." Pearson's affiliate corporation Addison Wesley Longman, Inc., is the owner of, and Pearson is the exclusive licensee of, with the accompanying right and duty to protect and enforce its and its affiliate company's rights therein, the well known trademarks "Addison Wesley" or "Addison-Wesley" (the "Pearson Trademarks"). The United States Registrations for the Pearson Trademarks are identified on Schedule E.

19. Among Wiley's well-known trademarks are "John Wiley & Sons," "Wiley," and the "John Wiley Colophon" (the "Wiley

Trademarks"). The United States Registrations for the Wiley Trademarks are identified on Schedule F.

20. Among McGraw-Hill's well-known trademarks are "McGraw-Hill," "The McGraw-Hill Companies" and "Irwin" (the "McGraw-Hill Trademarks"). The United States Registrations for the McGraw-Hill Trademarks are identified on Schedule G.

The Infringing Acts of Defendants

21. Defendants have without permission reproduced and sold copies of plaintiffs' works, including, upon information and belief, works containing the Pearson, Wiley or McGraw-Hill Trademarks. Specifically, defendants have reproduced and sold electronic copies of plaintiffs' instructors' solutions manuals through the Internet at sites such as "eBay.com," "Half.com," "Google Groups," "Craigslist.com," "Alibaba.com," "Mathkb.com," "Studentdump.com," "Sci.tech-archive.net" and "Blogspot.com" using the usernames sbooks4sale, Mr. Sbooks 4Sale and Suryanet and the e-mail addresses suryanet@hotmail.com, hnugrohl@jhu.edu, sbooks4sale@hotmail.com and qbooks4sale@hotmail.com.

FIRST CLAIM FOR RELIEF

(Copyright Infringement - 17 U.S.C. § 501)

22. Plaintiffs repeat the averments contained in paragraphs 1 through 21 as if set forth in full.

23. Pearson has received United States Certificates of Copyright Registration for the Pearson Copyrights.

24. Wiley has received United States Certificates of Copyright Registration for the Wiley Copyrights.

25. Cengage has received United States Certificates of Copyright Registration for the Cengage Copyrights.

26. McGraw-Hill has received United States Certificates of Copyright Registration for the McGraw-Hill Copyrights.

27. The Pearson, Wiley, Cengage and McGraw-Hill Copyrights are valid and enforceable.

28. Defendants have infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C. § 501.

29. Defendants' acts have irreparably damaged and, unless enjoined, will continue to irreparably damage plaintiffs. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants and their agents, servants, employees, and attorneys and all persons acting in concert with them, from infringing the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

30. Defendants have willfully infringed the Pearson, Wiley, Cengage and McGraw-Hill Copyrights.

31. Plaintiffs are entitled to recover all damages

sustained as a result of defendants' unlawful conduct including (1) defendants' profits, or (2) plaintiffs' damages, or alternatively (3) statutory damages.

SECOND CLAIM FOR RELIEF

(Trademark Infringement - 15 U.S.C. § 1114(a))

32. Plaintiffs repeat the averments contained in paragraphs 1 through 31 above as if set forth in full.

33. Pearson is the exclusive licensee of the Pearson Trademarks, with the accompanying right and duty to protect and enforce Pearson's rights therein. Pearson's licensor parent and affiliate companies have obtained numerous United States Trademark Registrations for the Pearson Trademarks.

34. Wiley owns the Wiley Trademarks, for which it has obtained numerous United States Trademark Registrations.

35. McGraw-Hill owns the McGraw-Hill Trademarks, for which it has obtained United States Trademark Registrations.

36. The Pearson, Wiley and McGraw-Hill Trademarks are valid and enforceable.

37. Defendants have infringed the Pearson, Wiley and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a) by using them, upon information and belief, on and/or in connection with the works that they have sold.

38. Defendants' acts complained of herein have irreparably damaged plaintiffs and may continue to do so. The



damage to plaintiffs includes harm to their good-will and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley and McGraw-Hill Trademarks or any colorable imitation of them.

39. Defendants have willfully infringed the Pearson, Wiley and McGraw-Hill Trademarks.

40. Plaintiffs are entitled to recover (1) defendants' profits from the infringing works, (2) plaintiffs' damages, (3) the costs of the suit, and (4) reasonable attorneys' fees.

THIRD CLAIM FOR RELIEF  
(Trademark Counterfeiting - 15 U.S.C. § 1117)

41. Plaintiffs repeat the averments contained in paragraphs 1 through 40 above as if set forth in full.

42. In connection with the sale of their unlawfully reproduced instructors' solutions manuals, defendants have used, upon information and belief, counterfeits of the Pearson, Wiley and McGraw-Hill Trademarks.

43. Based upon defendants' use of the counterfeit marks in connection with the sale of the unlawfully reproduced

works, plaintiffs are entitled to treble damages, and/or statutory damages pursuant to 15 U.S.C. § 1117(b) and (c).

FOURTH CLAIM FOR RELIEF  
(Common Law Unfair Competition)

44. Plaintiffs repeat the averments contained in paragraphs 1 through 43 above as if set forth in full.

45. Defendants' acts complained of herein have damaged and may continue to damage plaintiffs irreparably. The damage to plaintiffs includes harm to their goodwill and reputation in the marketplace for which money cannot compensate. Plaintiffs have no adequate remedy at law for these wrongs and injuries. Plaintiffs are, therefore, entitled to a preliminary and permanent injunction restraining and enjoining defendants, their agents, servants, employees, and attorneys and all persons acting in concert with them from using the Pearson, Wiley and McGraw-Hill Trademarks or any colorable imitation of them, to restitution of defendants' ill-gotten gains, and to punitive damages in an amount to be determined by the trier of fact in this action.

WHEREFORE, plaintiffs demand judgment:

A. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the

Pearson, Wiley, Cengage and McGraw-Hill Copyrights in violation of 17 U.S.C. § 501;

B. Awarding plaintiffs their damages or defendants' profits, or alternatively, at plaintiffs' election, statutory damages, as a result of defendants' willfull infringement of the Pearson, Wiley, Cengage and McGraw-Hill Copyrights;

C. Preliminarily and permanently enjoining defendants, their agents, servants, employees, and attorneys and all those acting in concert with them from infringing the Pearson, Wiley and McGraw-Hill Trademarks in violation of 15 U.S.C. § 1114(a);

D. Awarding plaintiffs their damages and/or defendants' profits from their willful infringement and/or counterfeiting of the Pearson, Wiley and McGraw-Hill Trademarks pursuant to 15 U.S.C. § 1117(a);

E. Awarding plaintiffs treble damages, treble profits and/or statutory damages pursuant to 15 U.S.C. § 1117(b) and (c);

F. Directing that defendants engage in such additional activities, including, but not limited to, recalls of products and corrective advertising, as may be necessary and appropriate to mitigate the damage defendants have caused;


G. Awarding plaintiffs their costs in this action, including their reasonable attorneys' fees pursuant 17 U.S.C. § 505 and 15 U.S.C. § 1117;

H. Awarding plaintiffs punitive damages in an amount to be determined by the trier of fact in this action; and

I. Granting such other and further relief as to this Court seems just and proper.

Dated: New York, New York  
September 16, 2008

DUNNEGAN LLC

By   
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Schedule A  
"Pearson Copyrights"

	<u>Title</u>
	<u>Date of Registration</u>
	<u>Registration #</u>
1.	A Gift of Fire: Social, Legal And Ethical Issues for Computers And the Internet July 1, 2002 TX0005562365
2.	Absolute C++ March 7, 2006 TX0006311993
3.	Absolute Java March 7, 2006 TX0006309806
4.	Accounting February 27, 2004 TX0005917362
5.	Accounting Information Systems July 12, 2005 TX0006201168
6.	Administrative Law: Bureaucracy in a Democracy September 1, 2005 TX0006228641
7.	Advanced Accounting April 10, 2006 TX0006346581
8.	Advanced Accounting September 27, 2002 TX0005625211
9.	Advanced Calculus January 29, 2002 TX0005476264

10. Advanced Engineering Mathematics  
January 22, 1998  
TX0004699356
11. Advertising Principles & Practice  
November 26, 2002  
TX0005645219
12. Algebra for College Students  
May 4, 2007  
TX0006560443
13. Algebra for College Students  
November 8, 1995  
TX0004129825
14. Anatomy and Physiology  
March 14, 2007  
TX0006576746
15. Applied Algebra  
August 29, 2002  
TX0005604498
16. Applied Linear Algebra  
March 9, 2005  
TX0006120903
17. Applied Multivariate  
Statistical Analysis  
September 28, 1999  
TX0005090312
18. Applied Partial Differential Equations  
April 29, 2003  
TX0005736755
19. Applied Physics  
July 22, 2004  
TX0006004074
20. The Art and Science of Leadership  
September 18, 2002  
TX0005617868

21. Automation, Production Systems,  
and Computer Integrated Manufacturing  
March 2, 1987  
TX0002029549
22. Basic Business Statistics:  
Concepts and Application  
May 6, 2005  
TX0006158528
23. Basic Mathematics through Applications  
March 10, 2004  
TX0005956423
24. Beginning Algebra with Applications & Visualization  
February 22, 2005  
TX0006108898
25. Beginning and Intermediate Algebra  
June 6, 2006  
TX0005741117
26. Bond Markets, Analysis and Strategies  
August 22, 2006  
TX0006436905
27. Building Construction: Principles,  
Materials, and Systems  
July 24, 2007  
TX0006834773
28. Building Java Programs  
March 28, 2007  
TX0006547195
29. Business English: Writing in the Workplace  
February 22, 2007  
TX0006521485
30. Business Forecasting  
September 4, 1997  
TX0004623815
31. Calculus  
May 23, 2006  
TX0006342740

32. Calculus and its Applications  
September 15, 2000  
TX0005275641
33. Calculus, Early Transcendentals  
August 29, 2002  
TX0005600256
34. Calculus with Applications  
August 30, 2004  
TX0006019137
35. Chemistry  
August 18, 2003  
TX0005784209
36. Communication Systems Engineering  
September 26, 2001  
TX0005441572
37. Complex Variables with Applications  
September 15, 1993  
TX0003611510
38. Computer Algorithms: Introduction  
to Design and Analysis  
February 15, 2000  
TX0005134407
39. Computer Networking: A Top-Down Approach  
June 23, 2004  
TX0005982429
40. Computer organization and Architecture  
September 2, 2005  
TX0006226053
41. Concepts of Calculus with Applications  
July 27, 2007  
TX0006813040
42. Conceptual Physics Fundamentals  
July 27, 2007  
TX0006608713



43. Concepts of Programming Languages  
March 7, 2006  
TX0006312105
44. Concrete Structures  
December 15, 2006  
TX0006492477
45. Construction Accounting and Financial Management  
June 1, 2004  
TX0005970238
46. Construction Methods and Management  
July 2, 2003  
TX0005742991
47. Construction Project Management  
July 15, 2002  
TX0005568365
48. Contemporary Engineering Economics  
August 29, 2006  
TX0006426757
49. Corporate Financial Management  
March 24, 2003  
TX0005728102
50. Cost Accounting: A Managerial Emphasis  
January 13, 2006  
TX0006311827
51. A Course in Probability  
March 4, 2005  
TX0006140222
52. Cryptography and Network Security  
January 17, 2006  
TX0006304469
53. Data Abstraction and Problem Solving with C++  
May 7, 2004  
TX0005956261
54. Data and Computer Communications  
August 2, 2006  
TX0006450758

55. Data Structures and Algorithm Analysis in C++  
December 3, 1993  
TX0003678100
56. Data Structures & Algorithm Analysis in Java  
January 19, 1999  
TX0004921417
57. Derivatives Markets  
January 3, 2006  
TX0006274497
58. Developmental Mathematics  
September 5, 2003  
TX0005815668
59. Differential Equations with Boundary Value Problems  
September 1, 2005  
TX0006228642
60. Differential Equations and Linear Algebra  
October 4, 1999  
TX0005064768
61. Differential Equations: Computing and Modeling  
July 29, 2003  
TX0005758361
62. Digital and Analog Communication Systems  
October 13, 2000  
TX0005176740
63. Digital Design  
December 11, 2001  
TX0005451074
64. Digital Electronics: A Practical Approach  
July 11, 2001  
TX0005355805
65. Digital Signal Processing  
May 23, 2006  
TX0006347802

- 66. Digital Systems: Principles and Applications  
October 20, 2003  
TX0005813295
- 67. Discrete and Combinatorial Mathematics  
September 5, 2003  
TX0005814577
- 68. Discrete Mathematics  
December 22, 20053  
TX0006262135
- 69. Drugs and the Human Body with Implications for Society  
November 10, 2003  
TX0005824553
- 70. Economic Growth  
June 7, 2004  
TX0005968728
- 71. Economics  
April 20, 2000  
TX0005176721
- 72. Economics Today  
February 3, 2005  
TX0006105464
- 73. Effective Small Business Management  
June 14, 1996  
TX0004250272
- 74. Effective Writing  
April 10, 2006  
TX0006329685
- 75. Electric Circuits  
November 30, 2006  
TX0006480516
- 76. Electrical Engineering: Principles and Applications  
June 1, 2004  
TX0005968393
- 77. Electronic Communications for Technicians  
May 6, 2005  
TX0006172710

78. Electronics and Computer Math  
September 1, 2005  
TX0006226065
79. Elementary and Intermediate Algebra  
February 16, 2006  
TX0006298190
80. Elementary Differential Equations (Edwards)  
November 10, 2003  
TX0005982969
81. Elementary Differential Equations (Kohler)  
January 17, 2003  
TX0005669578
82. Elementary Statistics (Weiss)  
June 22, 2004  
TX0005972668
83. Elementary Statistics (Triola)  
May 29, 2003  
TX0005740881
84. Engineering Economy  
October 13, 2005  
TX0006234784
85. Engineering Materials: Properties and Selection  
August 30, 2004  
TX0006018818
86. Engineering Mechanics Dynamics  
October 13, 2004  
TX0006054474
87. Engineering Mechanics Statistics  
October 3, 2001  
TX0005450699
88. Engineering Vibration  
December 8, 2000  
TX0005316354
89. Entrepreneurial Finance: Finance for Small Business  
August 12, 2003  
TX0005783157



90. Environmental and Natural Resource Economics  
September 22, 2005  
TX0006250441
91. Environmental Law  
November 26, 2001  
TX0005717386
92. Environmental Science Toward A Sustainable Future  
August 30, 2004  
TX0005973222
93. Error Control Coding: Fundamentals and Applications  
January 13, 1983  
TX0001050075
94. Essentials of Entrepreneurship and  
Small Business Management  
April 16, 2004  
TX0005961571
95. Essentials of Logic  
October 6, 2006  
TX0006447645
96. Essentials of Management Information Systems  
July 1, 2002  
TX0005563570
97. Essentials of Organizational Behavior  
August 27, 2004  
TX0006023590
98. Essentials of Statistics  
April 26, 2004  
TX0005926274
99. Ethics for the Information Age  
June 7, 2004  
TX0005982896
100. Feedback Control of Dynamic Systems  
January 15, 2002  
TX0005475773

101. Financial Accounting  
April 7, 2005  
TX0006148637
102. Financial Accounting: A Business Process Approach  
March 26, 2002  
TX0005500542
103. Financial Reporting and Analysis  
July 22, 2004  
TX0006004370
104. Finite Element Analysis: Theory and Application  
February 6, 2003  
TX0005671923
105. Finite Mathematics & its Applications  
April 29, 2003  
TX0005738264
106. Finite Mathematics  
June 23, 2004  
TX0005982435
107. Finite Mathematics and Calculus with Applications  
January 27, 1998  
TX0004709841
108. A First Course in Abstract Algebra (Rotman)  
May 4, 2000  
TX0005208285
109. A first Course in Abstract Algebra (Fraleigh)  
February 12, 2003  
TX0005668461
110. A First Course in Probability  
October 3, 2001  
TX0005446395
111. A first Course in Statistics  
July 1, 2002  
TX0005572210
112. Foundations of Economics  
February 9, 2006  
TX0006298170

- 113. Foundations of Finance: The logic  
and practice of financial management  
September 11, 2003  
TX0005811899
- 114. The Foundations of Geometry  
March 21, 2005  
TX0006154658
- 115. Foundations of Microeconomics  
August 9, 2001  
TX0005434127
- 116. A Framework for Human Resource Management  
January 9, 2004  
TX0005886945
- 117. A Framework for Marketing Management  
November 29, 2002  
TX0005624436
- 118. A Friendly Introduction to Analysis  
February 27, 2004  
TX0005912038
- 119. Fundamentals of Applied Electromagnetics  
December 22, 2003  
TX0005854471
- 120. Fundamentals of Communication Systems  
February 2, 2005  
TX0006126564
- 121. Fundamentals of Differential  
Equations and Boundary Value Problems  
September 11, 2003  
TX0005800226
- 122. Fundamentals of Differential Equations  
March 20, 1996  
TX0004242396
- 123. Fundamentals of Engineering Economics  
January 9, 2004  
TX0005888575

- 124. High Speed Networks and Internets:  
Performance and Quality of Service  
December 11, 2001  
TX0005465240
- 125. Human Resource Management  
September 26, 2001  
TX0005446188
- 126. Integrated Arithmetic and Basic Algebra  
August 30, 2004  
TX0006019074
- 127. Interactive Computer Graphics  
November 13, 2002  
TX0005622534
- 128. Intermediate Algebra (Lial)  
June 25, 2003  
TX0005770699
- 129. Intermediate Algebra (Martin-Gay)  
September 27, 2002  
TX0005598366
- 130. Intermediate Algebra (Bittinger)  
February 4, 2003  
TX0005668211
- 131. International Accounting  
February 2, 2005  
TX0006116836
- 132. International Business:  
Environments and Operations  
April 10, 2006  
TX0006346572
- 133. International Business Law:  
Text Cases and Readings  
March 24, 2003  
TX0005727369
- 134. International Economics  
March 21, 2005  
TX0006150550

- 135. International Money & Finance  
September 8, 2003  
TX0005815610
- 136. An Introduction to Analysis  
January 9, 2004  
TX0005887037
- 137. Introduction to Chemical Principles  
May 12, 2004  
TX0005963688 dyslexic
- 138. Introduction to Econometrics  
December 20, 2002  
TX0005659183
- 139. Introduction to Linear Algebra  
September 4, 2001  
TX0005390442
- 140. Introduction to Linear Programming  
January 7, 2003  
TX0005659588
- 141. Introduction to Management Accounting  
October 25, 2001  
TX0005446277
- 142. Introduction to Materials Management  
July 20, 2000  
TX0005138465
- 143. An Introduction to Mathematical  
Statistics and its Applications  
September 13, 2000  
TX0005280680
- 144. Introduction to Operations and Supply Chain Management  
April 7, 2005  
TX0006148566
- 145. Introduction to Quantum Mechanics  
May 4, 2004  
TX0005959250



- 146. Introduction to Risk Management and Insurance  
June 1, 2004  
TX0005968400
- 147. Introduction to Technical Mathematics  
March 24, 1988  
TX0002278427
- 148. Introduction to Telecommunications  
September 26, 2001  
TX0005446173
- 149. Introduction to Vacuum Technology  
April 30, 2007  
TX0006560211
- 150. Introductory Algebra  
August 15, 2002  
TX0005591214
- 151. Introductory Algebra through Applications  
August 26, 2004  
TX0006019309
- 152. Introductory Chemistry  
February 4, 2003  
TX0005656069
- 153. Introductory Circuit Analysis  
April 22, 2002  
TX0005522977
- 154. Introductory Linear Algebra: An Applied First Course  
October 1, 2004  
TX0006049329
- 155. Introductory Mathematical  
Analysis for Business, Economics  
and the Life and Social Sciences  
May 12, 2004  
TX0005959454
- 156. Java Software Solutions  
June 7, 2004  
TX0005978491

157. Kleppner's Advertising Procedure  
October 14, 2004  
TX0006057820
158. Labor Relations  
August 20, 2003  
TX0005807752
159. Law and Economics  
October 6, 2003  
TX0005832415
160. Legal Terminology  
August 19, 2003  
TX0005807528
161. Linear Algebra and its Applications  
December 20, 2002  
TX005659182
162. Linear Algebra for Engineers and Scientists  
October 1, 2004  
TX0006029043
163. Linear Algebra with Applications (Bretscher)  
July 22, 2004  
TX0006005808
164. Linear Algebra with Applications (Leon)  
October 3, 2001  
TX0005447210
165. Logic and Computer Design Fundamentals  
February 27, 2004  
TX0005922254
166. Machine Design: An Integrated approach  
March 14, 2000  
TX0005094117
167. Macroeconomics (Abel)  
February 18, 2004  
TX0005908214
168. Macroeconomics (Gordon)  
August 29, 2002  
TX0005604012

- 169. Macroeconomics: Theories and Policies  
October 1, 2004  
TX0006062789
- 170. Management  
December 8, 2004  
TX0006082707
- 171. Managing Human Resources  
July 29, 2003  
TX0005771533
- 172. Manufacturing Processes for Engineering Materials  
September 6, 2002  
TX0005608352
- 173. Manufacturing Engineering and Technology  
April 5, 2001  
TX0005309032
- 174. Market-Based Management  
February 1, 2005  
TX0006095787
- 175. Marketing Management  
April 7, 2005  
TX0006150569
- 176. Mathematical Ideas  
February 12, 2001  
TX0005244803
- 177. Mathematical Methods for Economics  
November 13, 1997  
TX0004670848
- 178. Mathematical Proofs: A  
Transition to Advanced Mathematics  
June 21, 2002
- 179. Mathematical Reasoning for Elementary Teachers  
April 12, 2005  
TX0006214434
- 180. Mathematics for Business  
November 1, 2000  
TX0005301130

181. Mathematics for Elementary School Teachers  
June 22, 2004  
TX0005991863
182. Mathematics of Interest Rates and Finance  
February 4, 2004  
TX0005904931
183. Mechanical Behavior of Materials  
June 28, 2006  
TX0006203586
184. Microbiology: An Introduction  
August 18, 1997  
TX0004582379
185. Microeconomics (Perloff)  
February 17, 2006  
TX0006326449
186. Microeconomics (Parkin)  
March 28, 2003  
TX0005877321
187. Microeconomics (Pindyck)  
March 21, 2005  
TX0006156330
188. Microeconomics: Principles and Tools  
February 1, 2005  
TX0006103629
189. Modern Control Systems  
October 25, 2000  
TX0005183216
190. Modern Electronic Communication  
July 21, 2004  
TX0006099326
191. Modern Labor Economics:  
Theory and Public Policy  
August 14, 2002  
TX0005589428

192. Modern Management  
October 22, 2007  
TX0006828811
193. Modern Wireless Communications  
April 5, 2004  
TX0005952018
194. Money, the Financial System, and the Economy  
April 26, 2004  
TX0005959738
195. Multinational Business Finance  
September 22, 2003  
TX0005856343
196. Numerical Analysis  
January 3, 2006  
TX0006274472
197. Numerical Methods for Engineers  
November 8, 1995  
TX0004143488
198. Numerical Methods Using MATLAB  
February 27, 2004  
TX0005917228
199. Operating Systems Principles  
January 7, 2003  
TX0005640870
200. Operating Systems: Internals  
and Design Principles  
January 14, 1998  
TX0004693854
201. Operations Management  
May 5, 2003  
TX0005748096
202. Operations Management: Process and Value Chains  
May 5, 2004  
TX0005926751



- 203.     Operations Research: An Introduction  
          July 30, 2002  
          TX0005580198
  
- 204.     Oracle 10g Programming: A Primer  
          July 27, 2007  
          TX000645 8029
  
- 205.     Organic Chemistry  
          June 27, 2006  
          TX0006400788
  
- 206.     Organizational Behavior  
          February 1, 2005  
          TX0006103180
  
- 207.     Organizational Behavior--An Experiential Approach  
          January 19, 2007  
          TX0006505825
  
- 208.     Organizational Theory, Design, and Change  
          June 12, 2003  
          TX0005738545
  
- 209.     Orthopaedic Biomechanics  
          August 29, 2006  
          TX0006426754
  
- 210.     Parallel and Distributed  
          Computation: Numerical Methods  
          December 22, 1988  
          TX0002471998
  
- 211.     Parallel Programming  
          July 20, 2000  
          TX0005246705
  
- 212.     Partial Differential Equations  
          and Boundary Value Problems  
          October 4, 1999  
          TX0005065773
  
- 213.     Performance Management  
          April 7, 2006  
          TX0006338633

214. Personal Finance  
March 7, 2006  
TX0006309808
215. Pharmacology for Nurses  
June 23, 2004  
TX0005972696
216. Physics for Scientists and Engineers  
February 18, 2000  
TX0005136541
217. Physics: Principles with Applications  
September 3, 1997  
TX0004627153
218. Prealgebra (Martin-Gay)  
February 27, 2004  
TX0005804927
219. Prealgebra (Bittinger)  
September 11, 2003  
TX0005790954
220. Prealgebra & Introductory Algebra (Martin-Gay)  
October 14, 2004  
TX0006052324
221. Prealgebra and Introductory Algebra (Bittinger)  
January 29, 2007  
TX0006506135
222. Precalculus (Beecher)  
April 26, 2004  
TX0005955904
223. Precalculus (Sullivan)  
April 5, 2004  
TX0005946366
224. Precalculus: Enhanced with Graphing Utilities  
June 3, 2002  
TX0005510683
225. Precalculus: Functions and Graphs  
May 7, 2004  
TX0005956262

- 226. Prehospital Emergency Care  
May 5, 2003  
TX0005724705
- 227. Principles of Accounting  
February 16, 2007  
TX0006541434
- 228. Principles of Economics  
October 6, 2006  
TX0006443658
- 229. Principles of Electric Circuits  
July 1, 2002  
TX0005544524
- 230. Principles of Law and Economics  
October 14, 2004  
TX0006049399
- 231. Principles of Marketing  
April 8, 2003  
TX0005733315
- 232. Principles of Microeconomics  
January 11, 1995  
TX0003978873
- 233. Principles of Operations Management  
May 25, 2006  
TX0006357719
- 234. Probabilistic Systems and Random Signals  
November 7, 2005  
TX0006268001
- 235. Probability and Statistics for Engineers and Scientists  
January 15, 1998  
TX0004697382
- 236. Probability and Statistical Inference  
September 13, 2000  
TX0005258643
- 237. Probability and Statistics  
November 2, 2001  
TX0005475012

- 238. Miller and Freund's Probability and  
Statistics for Engineers  
August 11, 2000  
TX0005149093
- 239. Problem Solving and Program Design in C  
September 11, 2003  
TX0005814628
- 240. Problem Solving with C++  
April 7, 2006  
TX0006324365
- 241. Problem solving, Abstraction and Design using C++  
September 11, 2003  
TX0005814629
- 242. Process Control Instrumentation Technology  
April 22, 2002  
TX0005505761
- 243. Professional Office Procedures  
May 6, 2005  
TX0006174788
- 244. Programming the World Wide Web  
November 21, 2002  
TX0005612588
- 245. Public Relations Practices  
June 3, 2002  
TX0005542770
- 246. Quality Control  
January 22, 1986  
TX0001739588
- 247. Quantitative Analysis for Management  
July 15, 2002  
TX0005568077
- 248. Quantum Chemistry and Spectroscopy  
March 7, 2005  
TX0006124902

- 249. Risk Takers: Uses and Abuses of Financial Derivatives  
February 18, 2004  
TX0005914514
- 250. Signals, Systems, and Transforms  
October 15, 2002  
TX0005622947
- 251. Soils and Foundations  
September 11, 2003  
TX0005793718
- 252. Solid State Electronic Devices  
September 1, 2005  
TX0006221401
- 253. Spectral Analysis of Signals  
June 13, 2005  
TX0006185245
- 254. Statistical Methods for the Social Sciences  
April 17, 1997  
TX0004503464
- 255. Statistical Reasoning for Everyday Life  
August 14, 2002  
TX0005591728
- 256. Statistics  
June 3, 2002  
TX0005546862
- 257. Statistics for Business and Economics  
July 30, 2002  
TX0005554842
- 258. Statistics for Science and Engineering  
January 8, 2002  
TX0005476269
- 259. Statistics for the Behavioral and Social Sciences  
August 27, 2004  
TX0006018161
- 260. Statistics for the Life Sciences  
October 4, 1999  
TX0005090270



- 261. Stats: Data and Models  
April 26, 2004  
TX0005957575
- 262. Strategic Brand Management  
September 27, 2002  
TX0005624621
- 263. Strategic Management and Business Policy  
August 20, 2003  
TX0005807563
- 264. Strategic Management in Action  
February 7, 2005  
TX0006106145
- 265. Strategic Management: Concepts and Cases  
August 27, 2004  
TX0006017663
- 266. Structure and Interpretation of Signals and Systems  
August 29, 2002  
TX0005600258
- 267. A Survey of Mathematics with Applications  
March 10, 2004  
TX0005957678
- 268. Surveying with Construction Applications  
August 12, 2003  
TX0005807404
- 269. Systems Analysis and Design  
April 5, 2004  
TX0005941476
- 270. Tax Research  
April 10, 2006  
TX0006344310
- 271. Technical Calculus with Analytic Geometry  
June 14, 2001  
Tx0005378885
- 272. The Economics of Macro Issues  
February 22, 2005  
TX0006109318

- 273. The Economics of Poverty and Discrimination  
June 6, 2003  
TX0005741923
- 274. The Economics of Public Issues  
March 4, 2005  
TX0006140130
- 275. The Economics of Sports  
May 7, 2004  
TX0005956083
- 276. The Paralegal Professional  
February 6, 2003  
TX0005671922
- 277. Thinking Mathematically  
March 9, 2004  
TX0005912352
- 278. Training in Interpersonal Skills  
October 15, 2002  
TX0005609623
- 279. Understanding and Managing Diversity  
March 15, 2006  
TX0006326758
- 280. Understanding Financial Statements  
June 12, 2003  
TX0005738540
- 281. Understanding Modern Economics  
April 26, 2004  
TX0005926238
- 282. University Calculus  
October 31, 2006  
TX0006459892
- 283. Using and Understanding Mathematics  
April 26, 2004  
TX0005959737
- 284. Vector Calculus  
April 7, 2005  
TX0006148565

- 285. Web 101: Making the Net Work for You  
November 21, 2002  
TX0005638783
- 286. Wireless Communications and Networks  
December 15, 2006  
TX0006495035
- 287. Your Attitude is Showing  
September 21, 2001  
TX0005448392

Schedule B  
"Wiley Copyrights"

1. Materials Science & Engineering:  
An Introduction, Sixth Edition  
October 7, 2003  
TX0005804687
2. Microwave Engineering, Third Edition  
March 12, 2004  
TX0005939958

Schedule C  
"Cengage Copyrights"

	<u>Title</u>
	<u>Date of Registration</u>
	<u>Registration #</u>
1.	Accounting April 2, 2001 TX0005349208
2.	Accounting: Concepts and Applications May 9, 2007 TX0006577433
3.	Accounting Information Systems March 19, 2007 TX0006547786
4.	Accounting Information Systems October 25, 2006 TX0006453185
5.	Advanced Accounting January 3, 2006 TX0006274172
6.	Advanced Engineering Mathematics August 22, 2002 TX0005625435
7.	Analytical Mechanics April 6, 2004 TX0005948682
8.	Auditing: Assurance and Risk December 8, 2006 TX0006485237
9.	Biochemistry November 25, 2002 TX0005700280
10.	Business Analysis and Valuation August 27, 2007 TX0006814141



11. Business & Society:  
Ethics and Stakeholder  
Management  
January 3, 2006  
TX0006358865
12. Business Law and the Regulation of Business  
May 14, 2007  
TX0006589362
13. Business Law: Principles for  
Today's Commercial Environment  
March 19, 2007
14. Business Law Today--The Essentials  
March 16, 1994  
TX0003782040
15. Classical Dynamics of Particles and Systems  
July 30, 2003  
TX0005827168
16. College Accounting  
April 2, 2001  
TX0005280139
17. Cost Accounting: Traditions and Innovations  
June 6, 2002  
TX0005811620
18. Cost Management: Accounting and Control  
June 6, 2002  
TX0005811577
19. Economics: A Contemporary Introduction  
February 28, 1994  
TX0003750628
20. Economics: Principles and Policy  
January 9, 2006  
TX0006303377
21. Elements of Forecasting  
January 22, 2007  
TX0006500475

22. Engineering Fundamentals: An Introduction to Engineering  
June 9, 2006  
TX0006377386
23. Financial Accounting  
April 2, 2001  
TX0005349137
24. Financial Accounting: A Bridge to Decision Making  
October 2, 2006  
TX0006438621
25. Financial Accounting: An Integrated Statements Approach  
September 29, 2006  
TX0006438597
26. Financial Management: Theory and Practice  
July 31, 2001  
TX0005388574
27. Financial Markets and Institutions  
December 5, 2006  
TX0006485236
28. Financial Reporting, Financial Statement Analysis and Valuation  
November 3, 2006  
TX0006493714
29. Fraud Examination  
January 3, 2006  
TX0006358871
30. Fundamentals of Financial Management  
March 15, 2006  
TX0006328846
31. Fundamentals of Organic Chemistry  
October 21, 197  
TX0004753632
32. Intermediate Accounting (Nikolai)  
July 18, 1991  
TX0003128717

33. Intermediate Accounting (Stice)  
April 24, 2003  
TX0005715299
34. International Economics  
October 1, 1991  
TX0003157050
35. International Financial Management  
February 10, 1995  
TX0003994559
36. Introduction to Business Law  
January 3, 2005  
TX0006303122
37. Introduction to Business Statistics  
May 7, 2004  
TX0005926785
38. Introduction to Corporate Finance  
March 15, 2006  
TX0006338708
39. An Introduction to Derivatives & Risk Management  
January 3, 2006  
TX0006305776
40. An Introduction to Signals and Systems  
May 29, 2007  
TX0006592610
41. Law for Business  
August 3, 2001  
TX0005423310
42. Macroeconomics  
January 9, 2006  
TX0006306933
43. Managerial Accounting  
March 14, 2006  
TX0006340609
44. Managing in a Global Economy  
March 19, 2007  
TX0006552225

45. Mathematics for Physicists  
May 1, 2003  
TX0005751767
46. Modern Physics  
May 7, 2004  
TX0005959547
47. Money, Banking and Financial Markets  
October 25, 2006  
TX0006455627
48. Multinational Management  
March 26, 2007  
TX0006551864
49. Payroll Accounting  
November 26, 2007  
TX0006818722
50. Personal Financial Planning  
January 3, 2006  
TX0006302077
51. Practical Financial Management  
March 19, 2007  
TX0006547441
52. Price Theory and Applications  
August 6, 2007  
TX00068128147
53. Principles of Cost Accounting  
November 6, 1991  
TX0003180504
54. Principles of Customer Relationship Management  
April 20, 2007  
TX0006571320
55. Principles of Economics  
September 29, 2006  
TX0006434553
56. Principles of Finance  
January 9, 2006  
TX0006306936

57. Principles of Foundations Engineering  
February 28, 2003  
TX0005700477
58. Principles of Heat Transfer  
October 19, 2000  
TX0005292081
59. Principles of Macroeconomics  
September 29, 2006  
TX0006437004
60. Principles of Microeconomics  
September 29, 2006  
TX0006437003
61. Probability and Statistics for Engineers and Scientists  
May 2, 2006  
TX0006333416
62. Professional Selling: A Trust-Based Approach  
January 9, 2006  
TX0006318711
63. Real Estate Law  
March 2, 1992  
TX0003268149
64. Short-Term Financial Management  
September 27, 2001  
TX0005443741
65. Statistics for Business and Economics  
January 3, 2006  
TX0006352862
66. Statistics for Management and Economics  
January 12, 2005  
TX0006110369
67. Steel Design  
November 25, 2002  
TX0005700325

68. Survey of Accounting  
November 17, 2006  
TX0006455593
69. System Dynamics and Response  
May 31, 2007  
TX0006583772
70. Using Peachtree Complete 2007 for Accounting  
April 7, 2007  
TX0006547181
71. West Federal Taxation  
Corporations 2008  
November 17, 2006  
TX0006466907
72. West Federal Taxation  
Individual 2008  
November 17, 2006  
TX0006466904
73. West Federal Taxation: Taxation  
of Business Entities 2008  
November 6, 2006  
TX0006454540
74. West's Business Law  
December 9, 1991  
TX0003206048



Schedule D  
"McGraw-Hill Copyrights"

Title  
Date of Registration  
Registration #

1. Digital Communications  
September 5, 2000  
TX0005266506
2. Probability, Random Variables, and Stochastic Process  
February 14, 1991  
TX0003010182
3. Thermodynamics: An Engineering Approach  
October 17, 2001  
TX0005473166
4. Intermediate Accounting  
February 28, 2003  
TX0005686304
5. Introduction to Computing Systems  
August 15, 2003  
TX0005823922

Schedule E  
"Pearson Trademarks"

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "Pearson"	2,599,724	009, 016, 035, 042
2. "Pearson"	2,600,081	041
3. "Pearson"	2,652,792	009, 016
4. "Pearson"	2,679,355	016
5. "Pearson"	2,691,830	041
6. "Pearson"	2,694,359	009
7. "Prentice-Hall"	1,332,044	016
8. "Prentice-Hall"	1,332,639	042
9. "Prentice-Hall"	1,375,654	009
10. "Addison Wesley"	2,188,798	016
11. "Addison-Wesley"	2,400,130	016
12. "Benjamin Cummings"	2,674,589	016
13. "Benjamin Cummings"	2,671,773	041
14. "Benjamin Cummings"	2,671,772	041
15. "Benjamin Cummings"	2,621,299	016
16. "Benjamin Cummings"	1,189,279	016

Schedule F  
"Wiley Trademarks"

	<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1.	"JW" Colophon	2,168,941	009, 042
2.	"Wiley"	1,003,988	009, 016, 036, 038
3.	"Wiley"	2,159,987	009, 042

Schedule G  
"McGraw-Hill Trademarks"

<u>U.S. Trademark</u>	<u>Registration Number</u>	<u>Class</u>
1. "McGraw-Hill"	1,350,345	16
2. "McGraw-Hill"	2,899,528	16, 41
3. "The McGraw-Hill Companies"	3,103,212	9,16,35,36,37, 38,39,40,41,42
4. "Irwin"	1,718,118	16