

1 STEVEN A. GIBSON, ESQ.  
Nevada Bar No. 6656  
[sgibson@righthaven.com](mailto:sgibson@righthaven.com)

2 J. CHARLES COONS, ESQ.  
Nevada Bar No. 10553  
[ccoons@righthaven.com](mailto:ccoons@righthaven.com)

3 JOSEPH C. CHU, ESQ.  
4 Nevada Bar No. 11082  
[jchu@righthaven.com](mailto:jchu@righthaven.com)  
5 Righthaven LLC  
9960 West Cheyenne Avenue, Suite 210  
6 Las Vegas, Nevada 89129-7701  
(702) 527-5900  
7 Attorneys for Plaintiff

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 RIGHTHAVEN LLC, a Nevada limited-  
12 liability company,

13  
14 Plaintiff,

15 v.

16 CENTER FOR INTERCULTURAL  
17 ORGANIZING, a not-for-profit Oregon entity;  
and KAYSE JAMA, an individual,

18 Defendants.  
19

Case No.: 2:10-cv-01322

**COMPLAINT AND DEMAND  
FOR JURY TRIAL**

20 Righthaven LLC (“Righthaven”) complains as follows against Center for Intercultural  
21 Organizing (“CIO”) and Kayse Jama (“Mr. Jama”); collectively with CIO known herein as the  
22 “Defendants”), on information and belief:  
23

24 **NATURE OF ACTION**

25 1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.  
26  
27  
28





1 “Registration”) and attached hereto as Exhibit 3 is evidence of the Registration in the form of a  
2 printout of the official USCO database record depicting the occurrence of the Registration.

3 24. On or about July 8, 2010, the Defendants displayed, and continue to display, the  
4 Infringement on the Website.

5 25. The Defendants did not seek permission, in any manner, to reproduce, display, or  
6 otherwise exploit the Work.

7 26. The Defendants were not granted permission, in any manner, to reproduce,  
8 display, or otherwise exploit the Work.

9  
10 **CLAIM FOR RELIEF: COPYRIGHT INFRINGEMENT**

11 27. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
12 26 above.

13 28. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17  
14 U.S.C. § 106(1).

15 29. Righthaven holds the exclusive right to prepare derivative works based upon the  
16 Work, pursuant to 17 U.S.C. § 106(2).

17 30. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to  
18 17 U.S.C. § 106(3).

19 31. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17  
20 U.S.C. § 106(5).

21 32. The Defendants reproduced the Work in derogation of Righthaven’s exclusive  
22 rights under 17 U.S.C. § 106(1).

23 33. The Defendants created an unauthorized derivative of the Work in derogation of  
24 Righthaven’s exclusive rights under 17 U.S.C. § 106(2).

25 34. The Defendants distributed, and continue to distribute, an unauthorized  
26 reproduction of the Work on the Website, in derogation of Righthaven’s exclusive rights under  
27 17 U.S.C. § 106(3).



