

Exhibit "K-15"

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12 SEP 27 AM 9:24

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com
7 *Attorney for Plaintiff*

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 CENTRAL DISTRICT OF CALIFORNIA

CV12-08322

DMG (PJW)

10 INGENUITY13 LLC,
11 Plaintiff,
12 v.
13 JOHN DOE
14 Defendant.

No.

Judge:

COMPLAINT

DEMAND FOR JURY TRIAL

15
16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
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19. The Video is currently registered in the United States Copyright Office (Copyright No. PA0001802629). (See Exhibit A to Complaint.)

20. The torrent file used to access the copyrighted material was named in a manner that would have provided an ordinary individual with notice that the Video was protected by the copyright laws of the United States.

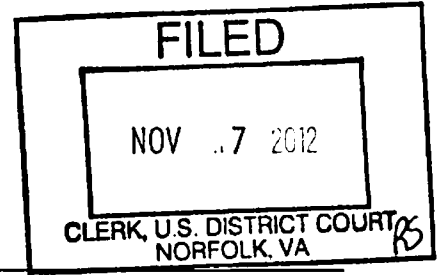
21. Plaintiff employs proprietary peer-to-peer network forensic software to perform exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video. This software is effective in capturing data about the activity of peers in a swarm and their infringing conduct.

22. Defendant, using IP address 71.83.94.169, without Plaintiff’s authorization or license, intentionally downloaded a torrent file particular to Plaintiff’s Video, purposefully loaded that torrent file into his BitTorrent client—in this case, Azureus 4.7.1.2—entered a BitTorrent swarm particular to Plaintiff’s Video, and reproduced and distributed the Video to numerous third parties.

23. Plaintiff’s investigators detected Defendant’s illegal download on 2012-08-21 at 00:09:42 (UTC). However, this is a simply a snapshot observation of when the IP address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this date and time.

24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a process generally described above—whose computers were collectively interconnected for the sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a unique file “hash”—i.e. a unique file identifier generated by an algorithm. The unique hash value in this case is identified as 7571E2F7C1972FC5A383A4D87DA00CC3333FB32E (hereinafter “Hash Tag.”), and common to all of the participants in the swarm.

UNITED STATES DISTRICT COURT
Eastern District of Virginia
Norfolk Division



Ingenuity13 LLC,
Plaintiff,

Case No. 2:12 cv 597

v.

JOHN DOE,
IP Address: 72.84.95.167
Defendant.

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Ingenuity13 LLC("Plaintiff"), through its undersigned counsel, hereby files this Complaint requesting damages and injunctive relief, and alleges as follows:

NATURE OF THE CASE

1. Plaintiff files this action for copyright infringement under the United States Copyright Act and related contributory infringement and negligence claims under the common law to combat the willful and intentional infringement of its creative works. Unidentified Defendant John Doe ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the BitTorrent file sharing protocol, or, in the alternative, allowed another to do so over his Internet connection. Upon information and belief, Defendant continues to do the same. In using BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent injunction, statutory or actual damages, award of costs and attorney's fees, and other relief to curb this behavior.

ALLEGATIONS COMMON TO ALL COUNTS

18. Plaintiff is the exclusive rights holder with respect to BitTorrent-based reproduction and distribution of the Video.

19. The Video is currently registered in the United States Copyright Office (Copyright No. PA0001802629). The torrent file used to access the copyrighted material was named in a manner that would have provided an ordinary individual with notice that the Video was protected by the copyright laws of the United States.

20. Plaintiff employs proprietary peer-to-peer network forensic software to perform exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video. This software is effective in capturing data about the activity of peers in a swarm and their infringing conduct.

21. Defendant, using IP address 72.84.95.167, without Plaintiff's authorization or license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded that torrent file into his BitTorrent client—in this case, Transmission 1.93—entered a BitTorrent swarm particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

22. Plaintiff's investigators detected Defendant's illegal download on 8/21/2012 12:42:12 AM UTC. However, this is a simply a snapshot observation of when the IP address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this date and time.

23. Defendant was part of a group of BitTorrent users or peers in a single swarm—a process generally described above—whose computers were collectively interconnected for the sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a unique file “hash”—i.e. a unique file identifier generated by an algorithm. The unique hash value

in this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter “Hash Tag.”), and common to all of the participants in the swarm.

COUNT I – COPYRIGHT INFRINGEMENT

24. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth fully herein.

25. Defendant’s conduct infringes upon Plaintiff’s exclusive rights of reproduction and distribution that are protected under the Copyright Act.

26. Defendant knew or had constructive knowledge that his acts constituted copyright infringement of Plaintiff’s Video.

27. Defendant’s conduct was willful within the meaning of the Copyright Act: intentional, and with indifference to the Plaintiff’s rights.

28. Plaintiff has been damaged by Defendant’s conduct, including but not limited to economic and reputation losses. Plaintiff continues to be damaged by such conduct, and has no adequate remedy at law to compensate the Plaintiff for all of the possible damages stemming from the Defendant’s conduct.

29. Plaintiff hereby reserves the right, pursuant to 17 U.S.C. § 504(c), to elect to recover statutory damages for each infringement, in lieu of seeking recovery of actual damages.

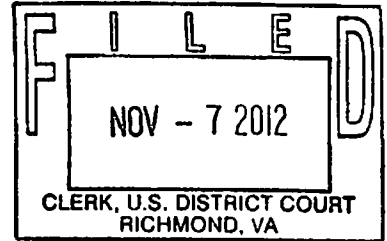
30. As Defendant’s infringement was intentional and willful, Plaintiff is entitled to an award of statutory damages, exemplary damages, attorneys’ fees, and the costs of the suit.

COUNT II – CONTRIBUTORY INFRINGEMENT

31. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

32. Users in the unique swarm containing Plaintiff’s copyrighted Video all possess the same infringing work with the same exact hash value, and each infringer possesses an exact

UNITED STATES DISTRICT COURT
Eastern District of Virginia
Richmond Division



Ingenuity13 LLC,
Plaintiff,

Case No. 3:12cv805

v.

JOHN DOE,
IP Address: 173.53.87.92
Defendant.

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Ingenuity13 LLC("Plaintiff"), through its undersigned counsel, hereby files this Complaint requesting damages and injunctive relief, and alleges as follows:

NATURE OF THE CASE

1. Plaintiff files this action for copyright infringement under the United States Copyright Act and related contributory infringement and negligence claims under the common law to combat the willful and intentional infringement of its creative works. Unidentified Defendant John Doe ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the BitTorrent file sharing protocol, or, in the alternative, allowed another to do so over his Internet connection. Upon information and belief, Defendant continues to do the same. In using BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent injunction, statutory or actual damages, award of costs and attorney's fees, and other relief to curb this behavior.

ALLEGATIONS COMMON TO ALL COUNTS

18. Plaintiff is the exclusive rights holder with respect to BitTorrent-based reproduction and distribution of the Video.
19. The Video is currently registered in the United States Copyright Office (Copyright No. PA0001802629). The torrent file used to access the copyrighted material was named in a manner that would have provided an ordinary individual with notice that the Video was protected by the copyright laws of the United States.
20. Plaintiff employs proprietary peer-to-peer network forensic software to perform exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video. This software is effective in capturing data about the activity of peers in a swarm and their infringing conduct.
21. Defendant, using IP address 173.53.87.92, without Plaintiff's authorization or license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded that torrent file into his BitTorrent client—in this case, Azureus 4.5.0.4—entered a BitTorrent swarm particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.
22. Plaintiff's investigators detected Defendant's illegal download on 8/21/2012 2:14:56 AM UTC. However, this is a simply a snapshot observation of when the IP address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this date and time.
23. Defendant was part of a group of BitTorrent users or peers in a single swarm—a process generally described above—whose computers were collectively interconnected for the sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a unique file “hash”—i.e. a unique file identifier generated by an algorithm. The unique hash value

in this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter “Hash Tag.”), and common to all of the participants in the swarm.

COUNT I – COPYRIGHT INFRINGEMENT

24. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth fully herein.

25. Defendant’s conduct infringes upon Plaintiff’s exclusive rights of reproduction and distribution that are protected under the Copyright Act.

26. Defendant knew or had constructive knowledge that his acts constituted copyright infringement of Plaintiff’s Video.

27. Defendant’s conduct was willful within the meaning of the Copyright Act: intentional, and with indifference to the Plaintiff’s rights.

28. Plaintiff has been damaged by Defendant’s conduct, including but not limited to economic and reputation losses. Plaintiff continues to be damaged by such conduct, and has no adequate remedy at law to compensate the Plaintiff for all of the possible damages stemming from the Defendant’s conduct.

29. Plaintiff hereby reserves the right, pursuant to 17 U.S.C. § 504(c), to elect to recover statutory damages for each infringement, in lieu of seeking recovery of actual damages.

30. As Defendant’s infringement was intentional and willful, Plaintiff is entitled to an award of statutory damages, exemplary damages, attorneys’ fees, and the costs of the suit.

COUNT II – CONTRIBUTORY INFRINGEMENT

31. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if set forth fully herein.

32. Users in the unique swarm containing Plaintiff’s copyrighted Video all possess the same infringing work with the same exact hash value, and each infringer possesses an exact

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

INGENUITY13 LLC,

Plaintiff,

v.

JOHN DOE,

Defendant.

CASE NO. 1:12-cv-8031

Judge:

Magistrate Judge:

COMPLAINT

JURY TRIAL DEMANDED

Plaintiff Ingenuity13 LLC (“Plaintiff”), through its undersigned counsel, hereby files this Complaint requesting damages and injunctive relief, and alleges as follows:

NATURE OF THE CASE

1. Plaintiff files this action for copyright infringement under the United States Copyright Act and related contributory infringement and negligence claims under the common law to combat the willful and intentional infringement of its creative works. Unidentified Defendant John Doe (“Defendant”), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally reproduced and distributed Plaintiff’s copyrighted Video by acting in concert with others via the BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using BitTorrent, Defendant’s infringement actions furthered the efforts of numerous others in infringing on Plaintiff’s copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent injunction, statutory or actual damages, award of costs and attorney’s fees, and other relief to curb this behavior.

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anti-piracy measures. This lawsuit is Plaintiff's only practical means of combating BitTorrent-based infringement of the Video.

ALLEGATIONS COMMON TO ALL COUNTS

18. Plaintiff is the exclusive rights holder with respect to BitTorrent-based reproduction and distribution of the Video.

19. The Video is currently registered in the United States Copyright Office (Copyright No. PA0001802629). (*See* Exhibit A to Complaint.)

20. The torrent file used to access the copyrighted material was named in a manner that would have provided an ordinary individual with notice that the Video was protected by the copyright laws of the United States.

21. Plaintiff employs proprietary peer-to-peer network forensic software to perform exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video. This software is effective in capturing data about the activity of peers in a swarm and their infringing conduct.

22. Defendant, using IP address 24.14.197.217, without Plaintiff's authorization or license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded that torrent file into his BitTorrent client—in this case, Azureus 4.7.1.2—entered a BitTorrent swarm particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

23. Plaintiff's investigators detected Defendant's illegal download on **2012-08-21 at 02:19:20 (UTC)**. However, this is a simply a snapshot observation of when the IP address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this date and time.

24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a process generally described above—whose computers were collectively interconnected for the sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a unique file “hash”—i.e. a unique file identifier generated by an algorithm. The unique hash value in this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter “Hash Tag.”), and common to all of the participants in the swarm.

COUNT I – COPYRIGHT INFRINGEMENT

25. Plaintiff hereby incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth fully herein.

26. Defendant’s conduct infringes upon Plaintiff’s exclusive rights of reproduction and distribution that are protected under the Copyright Act.

27. Defendant knew or had constructive knowledge that his acts constituted copyright infringement of Plaintiff’s Video.

28. Defendant’s conduct was willful within the meaning of the Copyright Act: intentional, and with indifference to the Plaintiff’s rights.

29. Plaintiff has been damaged by Defendant’s conduct, including but not limited to economic and reputation losses. Plaintiff continues to be damaged by such conduct, and has no adequate remedy at law to compensate the Plaintiff for all of the possible damages stemming from the Defendant’s conduct.

30. Plaintiff hereby reserves the right, pursuant to 17 U.S.C. § 504(c), to elect to recover statutory damages for each infringement, in lieu of seeking recovery of actual damages.

31. As Defendant’s infringement was intentional and willful, Plaintiff is entitled to an award of statutory damages, exemplary damages, attorneys’ fees, and the costs of the suit.

///

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com

7 *Attorney for Plaintiff*

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12 SEP 27 AM 10:51
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 CENTRAL DISTRICT OF CALIFORNIA

10 **CV12-08330** BAF (JEM)

11 INGENUITY13 LLC,

No.

12 Plaintiff,

Judge:

13 v.

COMPLAINT

14 JOHN DOE

15 Defendant.

DEMAND FOR JURY TRIAL

16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
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1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 76.170.133.8, without Plaintiff's authorization or license,
11 intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded that
12 torrent file into his BitTorrent client—in this case, Transmission 2.60—entered a BitTorrent swarm
13 particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

14 23. Plaintiff's investigators detected Defendant's illegal download on
15 **2012-08-21 at 02:48:42 (UTC)**. However, this is a simply a snapshot observation of when the IP
16 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
17 date and time.

18 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
19 process generally described above—whose computers were collectively interconnected for the
20 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
21 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
22 this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter "Hash
23 Tag."), and common to all of the participants in the swarm.

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com

7 *Attorney for Plaintiff*

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12 SEP 27 AM 10:40
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 CENTRAL DISTRICT OF CALIFORNIA

10 INGENUITY13 LLC,
11 Plaintiff,
12 v.
13 JOHN DOE
14 Defendant.

CV 12-08328 SJD (PZx)

Judge:

COMPLAINT

DEMAND FOR JURY TRIAL

15
16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
27
28

1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 76.175.251.189, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, µTorrent 3.1.3—entered a BitTorrent swarm
13 particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

14 23. Plaintiff's investigators detected Defendant's illegal download on
15 **2012-08-21 at 04:44:27 (UTC)**. However, this is a simply a snapshot observation of when the IP
16 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
17 date and time.

18 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
19 process generally described above—whose computers were collectively interconnected for the
20 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
21 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
22 this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter "Hash
23 Tag."), and common to all of the participants in the swarm.
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SEP 24 2012

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com

7 *Attorney for Plaintiff*

E-filing

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 NORTHERN DISTRICT OF CALIFORNIA

MEJ

10 INGENUITY13 LLC,
11 Plaintiff,

12 v.

13 JOHN DOE

14 Defendant.

15 No. **C 12 - 4979**
16 Judge:

17 **COMPLAINT**

18 **DEMAND FOR JURY TRIAL**

19 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
20 Complaint requesting damages and injunctive relief, and alleges as follows:

21 **NATURE OF THE CASE**

22 1. Plaintiff files this action for copyright infringement under the United States Copyright
23 Act and related contributory infringement and negligence claims under the common law to combat
24 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
25 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
26 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
27 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
28 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent

1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 76.126.238.116, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, BitTorrent 7.3.4—entered a BitTorrent
13 swarm particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third
14 parties.

15 23. Plaintiff's investigators detected Defendant's illegal download on
16 2012-08-21 at 04:44:46 (UTC). However, this is a simply a snapshot observation of when the IP
17 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
18 date and time.

19 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
20 process generally described above—whose computers were collectively interconnected for the
21 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
22 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
23 this case is identified as 7571E2F7C1972FC5A383A4D87DA00CC3333FB32E (hereinafter "Hash
24 Tag."), and common to all of the participants in the swarm.

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12 SEP 27 AM 11:08

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: _____

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com

7 *Attorney for Plaintiff*

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 CENTRAL DISTRICT OF CALIFORNIA

10 INGENUITY13 LLC,
11 Plaintiff,
12 v.
13 JOHN DOE
14 Defendant.

CV12-08332 MMM(PJW x)
No. ..

Judge:

COMPLAINT

DEMAND FOR JURY TRIAL

15
16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
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1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 96.40.162.169, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, µTorrent 3.2—entered a BitTorrent swarm
13 particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

14 23. Plaintiff's investigators detected Defendant's illegal download on
15 **2012-08-21 at 06:48:02 (UTC)**. However, this is a simply a snapshot observation of when the IP
16 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
17 date and time.

18 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
19 process generally described above—whose computers were collectively interconnected for the
20 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
21 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
22 this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter "Hash
23 Tag."), and common to all of the participants in the swarm.
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3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
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6 blgibbs@wefightpiracy.com

2012 SEP 27 AM 11:18

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

Attorney for Plaintiff

7 IN THE UNITED STATES DISTRICT COURT FOR THE
8 CENTRAL DISTRICT OF CALIFORNIA

9
10 INGENUITY13 LLC,
11 Plaintiff,
12 v.
13 JOHN DOE
14 Defendant.

No. **CV12-8334**

Judge: **GW JEMA**

COMPLAINT

DEMAND FOR JURY TRIAL

15
16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
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1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 173.60.105.180, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, BitComet 1.31—entered a BitTorrent swarm
13 particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.

14 23. Plaintiff's investigators detected Defendant's illegal download on
15 **2012-08-21 at 16:51:17 (UTC)**. However, this is a simply a snapshot observation of when the IP
16 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
17 date and time.

18 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
19 process generally described above—whose computers were collectively interconnected for the
20 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
21 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
22 this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter "Hash
23 Tag."), and common to all of the participants in the swarm.
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FILED

1 Brett L. Gibbs, Esq. (SBN 251000)
2 Of Counsel to Prenda Law Inc.
3 38 Miller Avenue, #263
4 Mill Valley, CA 94941
5 415-325-5900
6 blgibbs@wefightpiracy.com
7 *Attorney for Plaintiff*

2012 SEP 27 AM 11:09

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

8 IN THE UNITED STATES DISTRICT COURT FOR THE
9 CENTRAL DISTRICT OF CALIFORNIA

10 INGENUITY13 LLC,
11 Plaintiff,
12 v.
13 JOHN DOE
14 Defendant.

No. **CV12-8333**

Judge: *SVW (PJWx)*

COMPLAINT

DEMAND FOR JURY TRIAL

15
16 Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this
17 Complaint requesting damages and injunctive relief, and alleges as follows:

18 **NATURE OF THE CASE**

19 1. Plaintiff files this action for copyright infringement under the United States Copyright
20 Act and related contributory infringement and negligence claims under the common law to combat
21 the willful and intentional infringement of its creative works. Unidentified Defendant John Doe
22 ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally
23 reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the
24 BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using
25 BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on
26 Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent
27
28

1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 108.13.119.253, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, libtorrent/0.15.10.0—entered a BitTorrent
13 swarm particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third
14 parties.

15 23. Plaintiff's investigators detected Defendant's illegal download on
16 **2012-08-21 at 19:49:43 (UTC)**. However, this is a simply a snapshot observation of when the IP
17 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
18 date and time.

19 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
20 process generally described above—whose computers were collectively interconnected for the
21 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
22 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
23 this case is identified as **7571E2F7C1972FC5A383A4D87DA00CC3333FB32E** (hereinafter "Hash
24 Tag."), and common to all of the participants in the swarm.

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Brett L. Gibbs, Esq. (SBN 251000)
Of Counsel to Prenda Law Inc.
38 Miller Avenue, #263
Mill Valley, CA 94941
415-325-5900
blgibbs@wefightpiracy.com

Attorney for Plaintiff

BY _____

IN THE UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

INGENUITY13 LLC,
Plaintiff,
v.
JOHN DOE
Defendant.

No. **C.V.12-8336**
Judge: *OPW (mrx)*
COMPLAINT
DEMAND FOR JURY TRIAL

Plaintiff Ingenuity13 LLC ("Plaintiff"), through its undersigned counsel, hereby files this Complaint requesting damages and injunctive relief, and alleges as follows:

NATURE OF THE CASE

1. Plaintiff files this action for copyright infringement under the United States Copyright Act and related contributory infringement and negligence claims under the common law to combat the willful and intentional infringement of its creative works. Unidentified Defendant John Doe ("Defendant"), whose name Plaintiff expects to ascertain during discovery, knowingly and illegally reproduced and distributed Plaintiff's copyrighted Video by acting in concert with others via the BitTorrent file sharing protocol and, upon information and belief, continues to do the same. In using BitTorrent, Defendant's infringement actions furthered the efforts of numerous others in infringing on Plaintiff's copyrighted works. The result: exponential viral infringement. Plaintiff seeks a permanent

1 19. The Video is currently registered in the United States Copyright Office (Copyright
2 No. PA0001802629). (See Exhibit A to Complaint.)

3 20. The torrent file used to access the copyrighted material was named in a manner that
4 would have provided an ordinary individual with notice that the Video was protected by the
5 copyright laws of the United States.

6 21. Plaintiff employs proprietary peer-to-peer network forensic software to perform
7 exhaustive real time monitoring of the BitTorrent-based swarm involved in distributing the Video.
8 This software is effective in capturing data about the activity of peers in a swarm and their infringing
9 conduct.

10 22. Defendant, using IP address 71.104.70.247, without Plaintiff's authorization or
11 license, intentionally downloaded a torrent file particular to Plaintiff's Video, purposefully loaded
12 that torrent file into his BitTorrent client—in this case, µTorrent 3.0.1—entered a BitTorrent swarm
13 particular to Plaintiff's Video, and reproduced and distributed the Video to numerous third parties.
14

15 23. Plaintiff's investigators detected Defendant's illegal download on
16 2012-08-21 at 23:50:33 (UTC). However, this is a simply a snapshot observation of when the IP
17 address was *observed* in the BitTorrent swarm; the conduct took itself place before and after this
18 date and time.
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20 24. Defendant was part of a group of BitTorrent users or peers in a single swarm—a
21 process generally described above—whose computers were collectively interconnected for the
22 sharing of a particular unique file. The particular file a BitTorrent swarm is associated with has a
23 unique file "hash"—i.e. a unique file identifier generated by an algorithm. The unique hash value in
24 this case is identified as 7571E2F7C1972FC5A383A4D87DA00CC3333FB32E (hereinafter "Hash
25 Tag."), and common to all of the participants in the swarm.
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