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

BY: _____

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

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WARNER BROS. ENTERTAINMENT
INC., a Delaware corporation; DISNEY
ENTERPRISES, INC., a Delaware
corporation,

Plaintiffs,

v.

TRITON MEDIA, LLC, an Arizona
limited liability company,

Defendant.

CASE NO. **CV10 6318**
GW (JEM)
**COMPLAINT FOR COPYRIGHT
INFRINGEMENT (17 U.S.C. §§ 101,
ET SEQ.)**

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1 Plaintiffs Warner Bros. Entertainment Inc. and Disney Enterprises, Inc.
2 (collectively, "Plaintiffs") for their Complaint against Defendant Triton Media,
3 LLC allege as follows:
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5 **NATURE OF THE ACTION**

6 1. This is a civil action for damages and for injunctive and related relief
7 against Defendant for violations of the United States Copyright Act of 1976, 17
8 U.S.C. §§ 101, *et seq.* This action arises out of Defendant's infringement of
9 copyrights in numerous motion pictures and other audiovisual works to which
10 Plaintiffs own or control copyright and/or exclusive distribution rights ("Plaintiffs'
11 copyrighted works").

12 2. Defendant has owned, operated, provided advertising consulting and
13 referrals for, and/or provided other material assistance to the websites [www.free-](http://www.free-tv-video-online.info)
14 [tv-video-online.info](http://www.free-tv-video-online.info), supernovatube.com, donogo.com, watch-movies.net, [movies-online.tv](http://watch-
15 <a href=), watch-movies-links.net, thepiratecity.org, and havenvideo.com
16 (collectively the "Websites"), whose purpose is to promote, facilitate, and profit
17 from the infringement of Plaintiffs' copyrighted works. The Websites are for-
18 profit "one-stop-shops" for infringing copies of Plaintiffs' copyrighted works.
19 Specifically, the Websites, have posted, organized, searched for, identified,
20 collected and indexed links to infringing material that is available on third-party
21 websites, otherwise provided access to infringing material, and/or hosted infringing
22 material. Plaintiffs are informed and believe, and based thereon allege, that
23 Defendant profits from its misconduct by way of the advertisements displayed on
24 the Websites or other websites accessed through the Websites. Defendant's
25 conduct constitutes copyright infringement.

26 3. As alleged in detail below, by virtue of its conduct, Defendant violates
27 the Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.*
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THE PARTIES

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2 4. Plaintiff Warner Bros. Entertainment Inc. (“Warner Bros.”) is a
3 corporation duly incorporated under the laws of the State of Delaware with its
4 principal place of business located in Burbank, California.

5 5. Plaintiff Disney Enterprises, Inc. (“Disney”) is a corporation duly
6 incorporated under the laws of the State of Delaware with its principal place of
7 business located in Burbank, California.

8 6. Defendant Triton Media, LLC is a limited liability company with its
9 principal place of business located in Scottsdale, Arizona.

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11 **JURISDICTION AND VENUE**

12 7. The Court has subject matter jurisdiction over this action under 28
13 U.S.C. §§ 1331 (federal question) and 1338(a) (any act of Congress relating to
14 copyright) and under the Copyright Act, 17 U.S.C. §§ 101, *et seq.*

15 8. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b)
16 and (c) and 1400(a), and because Defendant, by its infringing activities,
17 intentionally and knowingly caused the damages and other harmful effects
18 complained of herein, which are suffered in the United States and in California,
19 where Plaintiffs have their principle places of business and which is the heart of
20 the television and motion picture industry.

21 9. This Court has personal jurisdiction over Defendant because
22 Defendant has purposefully directed its activities at the United States and at
23 California. Specifically, Plaintiffs allege that (a) Defendant or its agents are doing
24 or have been doing business continuously in the State of California and this
25 district, (b) a substantial part of the wrongful acts committed by Defendant, have
26 occurred in interstate commerce, in the State of California, and in the Central
27 District of California, and (c) Defendant knows that the damages and other harmful
28 effects of Defendant’s infringing activities occur in the United States and primarily

1 in California, where Plaintiffs have their principle places of business and which is
2 the heart of the television and motion picture industry.

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4 **BACKGROUND FACTS**

5 **Plaintiffs' Copyrighted Works**

6 10. Plaintiffs and certain of their affiliates are producers, distributors,
7 and/or exclusive licensees of motion pictures and television programs in the United
8 States. Plaintiffs are, among other things, engaged in the business of developing,
9 producing, distributing, and/or licensing to others, the right to copy, distribute,
10 transmit, and exhibit copyrighted motion pictures, television programs and/or other
11 audiovisual works.

12 11. Plaintiffs, either directly or through their affiliates or licensees,
13 distribute their copyrighted works in various forms including, without limitation,
14 for exhibition in theaters, through television broadcasts, over the Internet, and
15 through cable and direct-to-home satellite services (including basic, premium,
16 "pay-per-view," and "video on demand" ("VOD") television services). In
17 addition, Plaintiffs distribute their motion pictures and television programs on
18 digital versatile discs ("DVDs") and other formats, including next generation and
19 high definition discs, by selling them directly or indirectly to the home viewing
20 market or licensing them to others to do so. Plaintiffs also distribute their
21 copyrighted works, among other ways, through Internet-based streaming and
22 download services and other media or license others to do so. Plaintiffs also offer
23 streaming video clips of many of their popular television shows and other
24 copyrighted works through their own websites (such as disney.go.com) or through
25 licensees.

26 12. Each Plaintiff or its predecessor-in-interest is the owner or exclusive
27 licensee of United States copyrights in a substantial number of motion pictures
28 and/or television programs. Attached hereto as Exhibit A and incorporated herein

1 by reference is an illustrative schedule of some of the motion pictures in which
2 Plaintiffs own the copyright or exclusive distribution and public performance and
3 display right.

4 13. By way of illustration, Plaintiffs are the owners of United States
5 copyrights or the exclusive distribution and public performance rights in the
6 following motion pictures: Plaintiff Warner Bros. (*No Reservations*) and Plaintiff
7 Disney (*Ratatouille*).

8 14. Plaintiffs have registered with the United States Copyright Office
9 their copyrights in the works identified in Paragraph 13 above and in Exhibit A.

10 15. Plaintiffs and certain of their affiliates have invested (and continue to
11 invest) substantial sums of money and effort each year to develop, produce, and
12 distribute motion pictures and/or television programs protected under copyright
13 and other laws. Defendant's actions, as described below, infringe Plaintiffs'
14 exclusive rights under the Copyright Act and other laws and diminish the
15 economic value of such rights.

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Defendant's Unlawful Activities

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16. As alleged hereinabove, Defendant has owned, operated, provided
advertising consulting and referrals for, and/or provided other material assistance
to the websites located at www.free-tv-video-online.info, supernovatube.com,
donogo.com, watch-movies.net, watch-movies-online.tv, watch-movies-links.net,
havenvideo.com and thepiratecity.org (collectively "the Websites"). The primary
purpose of the Websites is to provide to their users access to content that has been
unlawfully reproduced, distributed, publicly performed, and/or publicly displayed.
The Websites facilitate the ability of their users to have access, on demand, to
copyrighted movies and other audiovisual works that have been unlawfully
reproduced, distributed, publicly performed, and/or publicly displayed in violation
of Plaintiffs' copyrights.

1 17. The Websites are one-stop shops for infringing material. Specifically,
2 the Websites provide or have provided links to infringing content available on
3 third-party websites, provide or have provided access to infringing material, and/or
4 host or have hosted infringing material. Most, if not all, of the content indexed on
5 and/or available via the Websites is infringing, unauthorized copyrighted content,
6 including Plaintiffs' copyrighted works.

7 18. The Free-tv-video-online homepage has a list of "popular online
8 movie links" and "popular online tv-show links." The Website also contains a
9 search engine which enables users to find the infringing motion picture of their
10 choice. The "Movies" webpage features an index of links to hundreds of
11 infringing motion pictures organized alphabetically. Among these titles are works
12 that are currently being exhibited in movie theaters.

13 19. To watch an infringing copy of a work using the Free-tv-video-online
14 website, the user clicks on the title of a particular infringing work from Free-tv-
15 video-online's index. The user is automatically taken to a third party user-
16 generated content webpage on which the work is automatically displayed and
17 performed *via* a video player.

18 20. Plaintiffs are informed and believe, and based thereon allege, that the
19 Free-tv-video-online website identifies, selects, posts, and organizes links to third-
20 party websites containing infringing content. Plaintiffs are informed and believe,
21 and based thereon allege, that Defendant materially contributed to the Free-tv-
22 video-online website, including but not limited to, by advising on how the website
23 could increase its advertising revenue and by providing advertising referrals.

24 21. Most, if not all, of the content available for streaming through Free-tv-
25 video-online is infringing copyrighted video content, including Plaintiffs'
26 copyrighted works. Furthermore, Defendant knows and intends that the Free-tv-
27 video-online website consist of links to unauthorized infringing copies of
28 copyrighted works, including Plaintiffs' copyrighted works. The fundamental

1 purpose of Free-tv-video-online is to further the illegal dissemination and to
2 contribute to the illegal dissemination of infringing works. Plaintiffs are informed
3 and believed, and based thereon allege that Defendant provided consulting and
4 referral services regarding advertising for Free-tv-video-online.

5 22. Supernovatube.com is a video-hosting website. Plaintiffs are
6 informed, believe, and based thereon allege, that Defendant materially contributes
7 to and/or induces the reproduction, distribution, public performance and/or public
8 display of a large number of videos, including unauthorized infringing copies of
9 copyrighted works, on or via Supernovatube. Supernovatube is widely used by
10 FreeTV and other infringing link sites because the infringing copies of Plaintiffs'
11 copyrighted works cannot be browsed or searched on the site and can only be
12 viewed or accessed through a linking site. Plaintiffs are informed and believe that
13 Supernovatube has a close partnership with FreeTV. Plaintiffs are informed and
14 believed, and based thereon allege that Defendant provided consulting and referral
15 services regarding advertising for Supernovatube.

16 23. Donogo was a high-definition video hosting website created and
17 operated by Defendant. Plaintiffs are informed, believe, and based thereon allege
18 that Defendant materially contributed to and/or induced the reproduction,
19 distribution, public performance and/or public display of unauthorized infringing
20 copies of copyrighted works on or via Donogo, including but not limited to, divx
21 videos previously hosted by Supernovatube.

22 24. Watch-movies.net featured an index of links to infringing motion
23 pictures and various categories of infringing motion pictures, including "New
24 releases" and "Genres." Additionally, Watch-movies.net had a search engine
25 which allowed users to quickly find the motion picture they would like to watch.
26 The Watch-movies.net website contained links to thousands of motion pictures,
27 including hundreds of recently released motion pictures. The website, Watch-
28 movies-links.net and the later created website Watch-movies-online.tv featured

1 substantially the same organization, graphics, layout, functionality, and content as
2 the website Watch-movies.net, with additional links to copyrighted motion pictures
3 and other audiovisual works. Plaintiffs are informed, believed, and based thereon
4 allege that Defendant performed consulting and referral services regarding
5 advertising for Watch-movies.net, Watch-movies-links.net, and Watch-movies-
6 online.tv.

7 25. Havenvideo.com is an online video website which identifies, selects,
8 posts, and organizes links to third-party websites containing infringing content
9 and/or providing access to infringing content and prominently features links to
10 various blatantly infringing “video host sites” and “video link sites.” Plaintiffs are
11 informed, believe, and based thereon allege that Defendant materially contributed
12 to and/or induced the reproduction, distribution, public performance and/or public
13 display of unauthorized infringing copies of copyrighted works via
14 Havenvideo.com, including but not limited to by way of posting links to infringing
15 third party websites and exchanging files or other information with individual users
16 known to be involved in the infringement of copyrighted material.

17 26. Plaintiffs are informed, believe, and based thereon allege, that the
18 website Thepiratecity.org, identifies, selects, posts, and organizes links to third-
19 party websites containing infringing content. The homepage of ThePiratecity.org
20 features reduced-size images of movie posters for twenty (20) new release films.
21 Upon clicking one of these icons, the user is redirected to a series of links to his
22 selected motion picture. Each link also lists the percentage of users who reported it
23 to be working. Additionally, Thepiratecity.org allows users to search for particular
24 movies and provides listings by genre and alphabetically. Plaintiffs are informed,
25 believe, and based thereon, allege that Defendant performed consulting and referral
26 services regarding advertising for Thepiratecity.org.

27 27. By virtue of the conduct alleged hereinabove, Defendant knowingly
28 promotes, participates in, facilitates, assists, enables, materially contributes to,

1 encourages, and induces copyright infringement, and thereby has secondarily
2 infringed the copyrights in Plaintiffs' copyrighted works, including but not limited
3 to those listed in Exhibit A attached to this Complaint.

4 28. On December 17, 2008, Plaintiffs gave notice to Defendant that the
5 Free-tv-video-online website infringes Plaintiffs' copyrights, specifically
6 identifying numerous examples of copyrighted works on Free-tv-video-online that
7 are owned or controlled by Plaintiffs and that are being infringed by the Free-tv-
8 video-online website. Plaintiffs demanded Defendant immediately cease the
9 infringement and take steps to ensure that the website does not infringe upon the
10 copyrights of Plaintiffs' copyrighted works in the future. Defendant, however,
11 ignored Plaintiffs' notice, failing either to remove the links to Plaintiffs'
12 copyrighted works from the Free-tv-video-online website or to take steps to ensure
13 that the website does not infringe upon the copyrights of Plaintiffs' copyrighted
14 works in the future.

15 29. No Plaintiff has granted any license, permission, authorization, or
16 consent to Defendant to use or exploit any of Plaintiffs' copyrighted works.
17 Instead, in violation of Plaintiffs' rights under copyright law, Defendant has
18 willfully, intentionally, and knowingly facilitated, enabled, induced, and materially
19 contributed to infringing uses thereof.

20 30. Defendant's conduct causes substantial harm to Plaintiffs and to their
21 intellectual property. Among other things, Defendant's conduct interferes with the
22 continued growth and development of numerous emerging legitimate services
23 offering consumers a means to obtain and view copies of audiovisual works on the
24 Internet and through other channels of distribution.

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FIRST CLAIM FOR RELIEF
(Contributory Copyright Infringement)

17 U.S.C. §§ 101, *et seq.*

31. Plaintiffs incorporate by reference each and every allegation set forth in Paragraphs 1 through 30, inclusive, as though fully set forth herein.

32. Plaintiffs own the United States copyrights or the pertinent exclusive rights, including without limitation the reproduction, distribution, public performance, and public display rights, in and to the copyrighted works listed in Paragraph 13 and in Exhibit A, as well as many other motion pictures and other audiovisual works.

33. Plaintiffs (or their predecessors) have obtained copyright registration and/or preregistration certificates for each work listed in Exhibit A. In doing so, Plaintiffs have complied in all respects with 17 U.S.C. §§ 101, *et seq.*, the statutory deposit and registration requirements thereof, and all other laws governing federal copyrights.

34. By virtue of the availability of infringing copies of Plaintiffs' copyrighted works on third-party websites, Plaintiffs' exclusive rights of reproduction, distribution, public performance, and public display have been infringed in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

35. Plaintiffs are informed and believe, and based thereon allege, that Defendant knows or have reason to know of the aforesaid infringement of Plaintiffs' copyrighted works, and Defendant materially contributes to and furthers such infringement. The infringement of Plaintiffs' copyrighted works on the Websites is open and notorious. Furthermore, the purpose and function of the Websites is the illegal dissemination of Plaintiffs' copyrighted works. Plaintiffs' copyrighted works are well-known and recognizable, and even a cursory review of the Websites reveals that they provide access to numerous infringing copies of Plaintiffs' copyrighted motions pictures.

1 36. Moreover, while unnecessary to establish Defendant's knowledge of
2 the blatant and extensive infringement promoted by their website, Plaintiffs
3 provided Defendant with written notice of the infringement of Plaintiffs'
4 copyrighted works occurring via the Free-tv-video-online website. Defendant
5 failed to halt its infringing activities.

6 37. By enabling, causing, facilitating, materially contributing to, and
7 encouraging the unauthorized reproduction, distribution, public performance, and
8 public display, of unauthorized copying of Plaintiffs' copyrighted works (including
9 the works listed in Exhibit A) in the manner described above, with full knowledge
10 of the illegality of such conduct, Defendant has contributed to and induced a vast
11 number of copyright infringements, including infringements of Plaintiffs'
12 copyrighted works, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

13 38. The unauthorized reproduction, distribution, public performance, and
14 public display of Plaintiffs' copyrighted works that Defendant enables, causes,
15 materially contributes to, and encourages through the acts described above are
16 without Plaintiffs' consent and are not otherwise permissible under the Copyright
17 Act.

18 39. Plaintiffs are informed and believe, and based thereon allege, that the
19 foregoing acts of infringement by Defendant have been willful, intentional, and
20 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive
21 rights under copyright.

22 40. As a direct and proximate result of Defendant's infringement of
23 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have
24 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their
25 actual damages plus Defendant's profits from infringement of Plaintiffs'
26 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,
27 Plaintiffs are entitled to the maximum statutory damages as permitted by federal
28 copyright law.

1 47. Plaintiffs are informed and believe, and based thereon allege, that the
2 foregoing acts of infringement by Defendant have been willful, intentional, and
3 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive
4 rights under copyright.

5 48. As a direct and proximate result of Defendant's infringement of
6 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have
7 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their
8 actual damages plus Defendant's profits from infringement of Plaintiffs'
9 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,
10 Plaintiffs are entitled to the maximum statutory damages as permitted by federal
11 copyright law.

12 49. Defendant's acts have caused and continue to cause substantial
13 irreparable harm to Plaintiffs. Unless Defendant is enjoined from engaging in its
14 wrongful conduct, Plaintiffs will suffer further irreparable injury and harm, for
15 which they have no adequate remedy at law.

16 50. Plaintiffs are entitled to their attorneys' fees and full costs pursuant to
17 17 U.S.C. § 505.

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PRAYER FOR RELIEF

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WHEREFORE, Plaintiffs pray that this Court enter judgment in their favor
and against Defendant, as follows:

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(a) adjudge and declare that Defendant's activities constitute contributory
copyright infringement and inducement of copyright infringement, respectively;

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(b) preliminary and permanently enjoin, pursuant to 17 U.S.C. § 502,
Defendant and its officers, agents, servants, employees, attorneys, successors,
licensees, partners, and assigns, and all those acting directly or indirectly in concert
or participation with any of them, from contributorily infringing by any means
and/or inducing copyright infringement by any means of the exclusive rights of

1 Plaintiffs and their affiliates under the Copyright Act, including, but not limited to,
2 any of Plaintiffs' and Plaintiffs' affiliates' rights in any of the copyrighted works
3 listed in Exhibit A;

4 (c) award damages that Plaintiffs have sustained or will sustain by reason
5 of Defendant's copyright infringement and all profits derived by Defendant from
6 such conduct, or in lieu thereof, should Plaintiffs so elect, such statutory damages
7 as the Court shall deem proper as provided in 17 U.S.C. § 504(c), including
8 damages for willful infringement for each act of copyright infringement;

9 (d) preliminary and permanently enjoin Defendant and its officers, agents,
10 servants, employees, successors, licensees, partners, and assigns, and all those
11 acting directly or indirectly in concert or participation with any of them, from
12 doing the following, whether through the Websites, or any related website
13 (whether or not the website or the said acts occur in the United States or
14 elsewhere):

15 i) posting, organizing, selecting, searching for, identifying, collecting
16 and indexing links to unauthorized copies of the works listed in
17 Exhibit A and other works of which the Plaintiffs are the owners of
18 the copyrights or to whom an interest in the copyright has been
19 granted by exclusive license, and providing or enabling use or
20 access to such works to persons located in the United States;

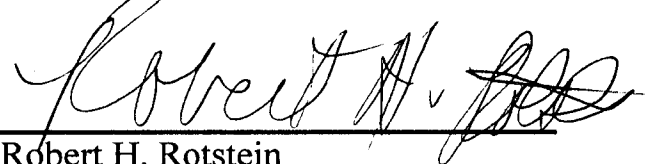
21 ii) authorizing, inducing, encouraging, aiding or abetting, or materially
22 contributing to the unauthorized streaming, copying, and
23 transmission of streams and copies in or to the public, in the United
24 States, of the works listed in Exhibit A and other works of which
25 the Plaintiffs are the owners of the copyrights or to whom an
26 interest in the copyrights has been granted by license including by
27 exclusive license;

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- 1 iii) authorizing, inducing, encouraging, aiding or abetting, or materially
- 2 contributing to the unauthorized reproduction, distribution,
- 3 publication, performance in public, communication to the public,
- 4 and public display, in the United States, of copies of the works
- 5 listed in Exhibit A and other works of which the Plaintiffs are the
- 6 owners of the copyrights or to whom an interest in the copyrights
- 7 has been granted by license including by exclusive license;
- 8 (e) award Plaintiffs' costs and reasonable attorneys' fees in accordance
- 9 with 17 U.S.C. § 505;
- 10 (f) award Plaintiffs pre-judgment and post-judgment interest according to
- 11 law; and
- 12 (g) award Plaintiffs such further and additional relief as the Court may
- 13 deem just and proper.

14 DATED: August 23, 2010

15 ROBERT H. ROTSTEIN
 16 WADE B. GENTZ
 17 EMILY F. EVITT
 18 MITCHELL SILBERBERG & KNUPP LLP

19 By: 
 20 Robert H. Rotstein
 21 Attorneys for Plaintiffs

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EXHIBIT A

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Exhibit A

Title	Owner	Reg. No.
<i>Bucket List, The</i>	Warner Bros. Entertainment Inc.	PA1-594-788
<i>Fool's Gold</i>	Warner Bros. Entertainment Inc.	PA1-569-069
<i>Fred Claus</i>	Warner Bros. Entertainment Inc.	PA1-592-290
<i>License To Wed</i>	WV Films III LLC	PA1-355-566
<i>No Reservations</i>	WV Films III LLC	PA1-589-443
<i>Smallville - Season 1, Episode 15</i>	Warner Bros. Television, a div. of Time Warner Ent. Co. L.P.	PA1-110-425
<i>College Road Trip</i>	Disney Enterprises, Inc.	PA1-597-791
<i>Pirates Of The Caribbean: At World's End</i>	Disney Enterprises, Inc.	PA1-334-112
<i>Ratatouille</i>	Disney Enterprises, Inc. & Pixar	PA1-354-935

Ex. A, Pg 16

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge George H. Wu and the assigned discovery Magistrate Judge is John E. McDermott.

The case number on all documents filed with the Court should read as follows:

CV10- 6318 GW (JEMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) WARNER BROS. ENTERTAINMENT INC., a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation	DEFENDANTS TRITON MEDIA, LLC, an Arizona limited liability company
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) ROBERT H. ROTSTEIN (SBN 72452) WADE B. GENTZ (SBN 249793) MITCHELL SILBERBERG & KNUPP LLP 11377 West Olympic Boulevard Los Angeles, California 90064-1683	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width: 100%;"> <tr> <td style="width: 30%;">Citizen of This State</td> <td style="width: 10%;">PTF <input type="checkbox"/> 1</td> <td style="width: 10%;">DEF <input type="checkbox"/> 1</td> <td style="width: 40%;">Incorporated or Principal Place of Business in this State</td> <td style="width: 10%;">PTF <input type="checkbox"/> 4</td> <td style="width: 10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

IV. 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 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT: \$** 0.00

VI. CAUSE OF ACTION (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 COPYRIGHT INFRINGEMENT (17 U.S.C. SECTIONS 101, ET SEQ.)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 22 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 61 HIA(1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW 405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes

If yes, list case number(s): CV 08-8484

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

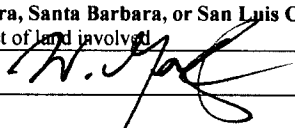
County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Arizona

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date August 24, 2010

Notice to Counsel/Parties: The CV-71 (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. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3 -1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))