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

BY \_\_\_\_\_

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7 Attorneys for Plaintiffs

8  
9  
10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12

13 UNIVERSAL CITY STUDIOS  
PRODUCTIONS LLLP, a Delaware  
14 limited liability limited partnership;  
WARNER BROS. ENTERTAINMENT  
15 INC., a Delaware corporation; and NEW  
LINE PRODUCTIONS, INC., a  
16 California corporation,

17 Plaintiffs,

18 v.

19 MOVIERUMOR.COM, a business  
entity of unknown form; and DOES 1  
20 through 5, inclusive,

21 Defendants.  
22  
23  
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CASE NO. **CV08-04931** **RSWL (SHx)**  
**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT (17 U.S.C. §§ 101,  
ET SEQ.)**

1 Plaintiffs Universal City Studios Productions LLLP, Warner Bros.  
2 Entertainment Inc., and New Line Productions, Inc. (collectively, "Plaintiffs") for  
3 their Complaint against defendants Movierumor.com and Does 1 through 5  
4 (collectively, "Defendants") allege as follows:  
5

6 **NATURE OF THE ACTION**

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

13 2. Defendants own and operate the website [www.movierumor.com](http://www.movierumor.com)  
14 ("Movierumor" or the "Website"), whose purpose is to promote, facilitate, and  
15 profit from the infringement of Plaintiffs' copyrighted works. Movierumor is a  
16 for-profit "one-stop-shop" for infringing copies of Plaintiffs' copyrighted works.  
17 Specifically, Defendants post, organize, search for, identify, collect and index links  
18 to infringing material that is available on third-party websites (including, for  
19 example, the third party website [www.youku.com](http://www.youku.com)). Defendants profit from their  
20 misconduct by displaying advertisements adjacent to the infringing content  
21 (including Plaintiff's copyrighted works) that plays on their site. Defendants'  
22 conduct constitutes copyright infringement.

23 3. As alleged in detail below, by virtue of their conduct, Defendants  
24 violate the Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.*  
25  
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**THE PARTIES**

1  
2           4.     Plaintiff Universal City Studios Productions LLLP (“UCSP”) is a  
3 limited liability limited partnership duly organized under the laws of the State of  
4 Delaware with its principal place of business located in Universal City, California.

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

8           6.     Plaintiff New Line Productions, Inc. (“New Line”) is a corporation  
9 duly incorporated under the laws of the State of California with its principal place  
10 of business located in Los Angeles, California.

11          7.     Defendants own and/or operate a website, [www.movierumor.com](http://www.movierumor.com), at  
12 the Internet Protocol address 208.100.8.140. Plaintiffs are informed and believe,  
13 and based thereon allege, that Defendants engage in and profit from infringing  
14 activity in this judicial district.

15          8.     Defendant Movierumor.com is a business entity of unknown form.

16          9.     Plaintiffs are unaware of the true names or capacities of the  
17 defendants sued herein under the fictitious names DOES 1 through 5, inclusive.  
18 Plaintiffs are informed and believe, and based thereon allege, that DOES 1 through  
19 5, and each of them, either directly performed the acts alleged herein or were  
20 acting as the agent, principal, alter ego, employee, representative, or otherwise  
21 participated in the acts alleged herein with Defendants. Accordingly, defendants  
22 DOES 1 through 5 are each liable for all of the acts alleged herein because they  
23 were the cause in fact and proximate cause of all injuries suffered by Plaintiffs as  
24 alleged herein. Plaintiffs will amend the Complaint to state the true names of  
25 defendants DOES 1 through 5 when their identity is discovered.



1 high definition discs, by selling them directly or indirectly to the home viewing  
2 market or licensing them to others to do so. Plaintiffs also distribute their  
3 copyrighted works, among other ways, through Internet-based streaming and  
4 download services and other media or license others to do so. Plaintiffs also offer  
5 streaming video clips of many of their popular television shows and other  
6 copyrighted works through their own websites (such as www.wb.com) or through  
7 licensees.

8 15. Each Plaintiff or its predecessor-in-interest is the owner or exclusive  
9 licensee of United States copyrights in a substantial number of motion pictures  
10 and/or television programs. Attached hereto as Exhibit A and incorporated herein  
11 by reference is an illustrative schedule of some of the motion pictures in which  
12 Plaintiffs own the copyrights or exclusive reproduction, distribution, public  
13 performance, and public display rights.

14 16. By way of illustration, Plaintiffs are the owners of United States  
15 copyrights or the exclusive reproduction, distribution, public performance, and  
16 public display rights in the following motion pictures: Plaintiff UCSP (*Definitely*  
17 *Maybe*), Plaintiff Warner Bros. (*10,000 B.C.*), and Plaintiff New Line (*Mr.*  
18 *Woodcock*).

19 17. Plaintiffs have registered with the United States Copyright Office  
20 their copyrights in the works identified in Paragraph 16 above and in Exhibit A.

21 18. Plaintiffs and certain of their affiliates have invested (and continue to  
22 invest) substantial sums of money and effort each year to develop, produce, and  
23 distribute motion pictures and/or television programs protected under copyright  
24 and other laws. Defendants' actions, as described below, infringe Plaintiffs'  
25 exclusive rights under the Copyright Act and other laws and diminish the  
26 economic value of such rights.

**Defendants' Unlawful Activities**

1  
2       19. As alleged hereinabove, Defendants operate a website called  
3 Movierumor, located at [www.movierumor.com](http://www.movierumor.com). The primary purpose of  
4 Movierumor is to disseminate to its users content that has been unlawfully  
5 reproduced, distributed, publicly performed, and/or publicly displayed that is  
6 available on third-party Internet websites. Movierumor facilitates the ability of its  
7 users to have access, on demand, to copyrighted movies and other audiovisual  
8 works that have been unlawfully reproduced, distributed, publicly performed,  
9 and/or publicly displayed in violation of Plaintiffs' copyrights.

10       20. Defendants' website is a one-stop shop for infringing material.  
11 Specifically, Defendants' Movierumor website provides links to infringing content  
12 available on third-party websites. Defendants make such infringing content easily  
13 accessible to users by creating and maintaining an index of links to the infringing  
14 content available on third-party sites. Virtually all of the content indexed on and  
15 available via Movierumor's website is infringing, unauthorized copyrighted  
16 content, including Plaintiffs' copyrighted works.

17       21. The homepage of Movierumor at [www.movierumor.com](http://www.movierumor.com) features an  
18 index of links to infringing content organized into categories such as  
19 "Action/Adventure," "Comedy," and "Drama." Under each of these categories,  
20 Movierumor lists the titles of the particular infringing copyrighted works available  
21 for viewing on its website. Among these titles are works that are currently being  
22 exhibited in movie theaters (*e.g., Forgetting Sarah Marshall*).

23       22. To watch an infringing copy of a work using Defendants'  
24 Movierumor site, the user clicks on the title of a particular infringing work (*e.g.,*  
25 *the motion picture I Am Legend*) from Movierumor's index. A page then appears  
26 on the Movierumor site in which the work is performed and displayed on an  
27 embedded video player. The Movierumor page displaying this embedded video  
28 player also contains advertisements.

1           23. In furtherance of creating and posting the index of links to infringing  
2 content, which Movierumor makes available to its users at the click of a mouse, the  
3 Movie website also allows users to submit new links to infringing copyrighted  
4 works and to report broken links.

5           24. Plaintiffs are informed and believe, and based thereon allege, that  
6 Defendants manage their website by identifying, selecting, posting, and organizing  
7 links to third-party websites containing infringing content. Defendants exercise  
8 control over the selection and organization of the links to infringing content  
9 available on their website.

10          25. Virtually all of the content available for streaming through  
11 Movierumor is infringing copyrighted video content, including Plaintiffs'  
12 copyrighted works. Furthermore, Defendants know and intend that virtually all of  
13 the links on their Movierumor website consist of links to unauthorized infringing  
14 copies of copyrighted works, including Plaintiffs' copyrighted works. The  
15 fundamental purpose of Movierumor is to further the illegal dissemination and to  
16 contribute to the illegal dissemination of infringing works.

17          26. By virtue of the conduct alleged hereinabove, Defendants knowingly  
18 promote, participate in, facilitate, assist, enable, materially contribute to,  
19 encourage, and induce copyright infringement, thereby secondarily infringing the  
20 copyrights in Plaintiffs' copyrighted works, including but not limited to those  
21 listed in Exhibit A attached to this Complaint.

22          27. On June 23, 2008, Plaintiffs gave notice to Defendants that their  
23 website infringes Plaintiffs' copyrights, specifically identifying 15 examples of  
24 copyrighted works on Movierumor that are owned or controlled by Plaintiffs and  
25 that are being infringed by the Movierumor website. Plaintiffs demanded that  
26 Defendants immediately cease the infringement and take steps to ensure that the  
27 website does not infringe upon the copyrights of Plaintiffs' copyrighted works in  
28 the future. Defendants, however, ignored Plaintiffs' notice, failing either to

1 remove the links to Plaintiffs' copyrighted works from the Movierumor website or  
2 to take steps to ensure that their website does not infringe upon the copyrights of  
3 Plaintiffs' copyrighted works in the future.

4 28. No Plaintiff has granted any license, permission, authorization, or  
5 consent to Defendants to use or exploit any of Plaintiffs' copyrighted works.  
6 Instead, in violation of Plaintiffs' rights under copyright law, Defendants have  
7 willfully, intentionally, and knowingly facilitated, enabled, induced, and materially  
8 contributed to infringing uses thereof.

9 29. Defendants' conduct causes substantial harm to Plaintiffs and to their  
10 intellectual property. Among other things, Defendants' conduct interferes with the  
11 continued growth and development of numerous emerging legitimate services  
12 offering consumers a means to obtain and view copies of audiovisual works on the  
13 Internet and through other channels of distribution.

14  
15 **FIRST CLAIM FOR RELIEF**

16 **(Contributory Copyright Infringement)**

17 **17 U.S.C. §§ 101, *et seq.***

18 30. Plaintiffs incorporate by reference each and every allegation set forth  
19 in Paragraphs 1 through 29, inclusive, as though fully set forth herein.

20 31. Plaintiffs own the United States copyrights or the pertinent exclusive  
21 rights, including without limitation reproduction, distribution, public performance,  
22 and public display rights, in and to the copyrighted works listed in Paragraph 16  
23 and in Exhibit A, as well as many other motion pictures and other audiovisual  
24 works.

25 32. Plaintiffs (or their predecessors) have obtained copyright registration  
26 and/or preregistration certificates for each work listed in Exhibit A. In doing so,  
27 Plaintiffs have complied in all respects with 17 U.S.C. §§ 101, *et seq.*, the statutory  
28



1 deposit and registration requirements thereof, and all other laws governing federal  
2 copyrights.

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

7 34. Defendants know or have reason to know of the aforesaid  
8 infringement of Plaintiffs' copyrighted works, and Defendants materially  
9 contribute to and further such infringement. The infringement of Plaintiffs'  
10 copyrighted works on Movierumor.com is open and notorious. Furthermore, the  
11 purpose and function of Movierumor is the illegal dissemination of Plaintiffs'  
12 copyrighted works. Plaintiffs' copyrighted works are well-known and  
13 recognizable, and even a cursory review of the Movierumor website reveals that it  
14 provides access to numerous infringing copies of Plaintiffs' motion pictures and  
15 other audiovisual works.

16 35. Moreover, while unnecessary to establish Defendants' knowledge of  
17 the blatant and extensive infringement promoted by their website, Plaintiffs  
18 provided Defendants with written notice of infringement of Plaintiffs' copyrighted  
19 works occurring via the Movierumor website, and Defendants failed to halt their  
20 infringing activities.

21 36. By enabling, causing, facilitating, materially contributing to, and  
22 encouraging the unauthorized reproduction, distribution, public performance, and  
23 public display of Plaintiffs' copyrighted works (including the works listed in  
24 Exhibit A) in the manner described above, with full knowledge of the illegality of  
25 such conduct, Defendants contribute to and induce a vast number of copyright  
26 infringements, including infringements of Plaintiffs' copyrighted works, in  
27 violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

1           37. The unauthorized reproduction, distribution, public performance, and  
2 public display of Plaintiffs' copyrighted works that Defendants enable, cause,  
3 materially contribute to, and encourage through the acts described above are  
4 without Plaintiffs' consent and are not otherwise permissible under the Copyright  
5 Act.

6           38. Plaintiffs are informed and believe, and based thereon allege, that the  
7 foregoing acts of infringement by Defendants have been willful, intentional, and  
8 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive  
9 rights under copyright.

10           39. As a direct and proximate result of Defendants' infringement of  
11 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have  
12 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their  
13 actual damages plus Defendants' profits from infringement of Plaintiffs'  
14 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,  
15 Plaintiffs are entitled to the maximum statutory damages as permitted by federal  
16 copyright law.

17           40. Defendants' acts have caused and continue to cause substantial  
18 irreparable harm to Plaintiffs. Unless Defendants are enjoined from engaging in  
19 their wrongful conduct, Plaintiffs will suffer further irreparable injury and harm,  
20 for which they have no adequate remedy at law.

21           41. Plaintiffs are entitled to their attorneys' fees and full costs pursuant to  
22 17 U.S.C. § 505.



1 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their  
2 actual damages plus Defendants' profits from infringement of Plaintiffs'  
3 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,  
4 Plaintiffs are entitled to the maximum statutory damages as permitted by federal  
5 copyright law.

6 48. Defendants' acts have caused and continue to cause substantial  
7 irreparable harm to Plaintiffs. Unless Defendants are enjoined from engaging in  
8 their wrongful conduct, Plaintiffs will suffer further irreparable injury and harm,  
9 for which they have no adequate remedy at law.

10 49. Plaintiffs are entitled to their attorneys' fees and full costs pursuant to  
11 17 U.S.C. § 505.

12  
13 **PRAYER FOR RELIEF**

14 **WHEREFORE**, Plaintiffs pray that this Court enter judgment in their favor  
15 and against Defendants, as follows:

16 (a) adjudge and declare that Defendants' activities constitute contributory  
17 copyright infringement and inducement of copyright infringement, respectively;

18 (b) preliminary and permanently enjoin, pursuant to 17 U.S.C. § 502,  
19 Defendants and their officers, agents, servants, employees, attorneys, successors,  
20 licensees, partners, and assigns, and all those acting directly or indirectly in concert  
21 or participation with any of them, from contributorily infringing by any means  
22 and/or inducing copyright infringement by any means of the exclusive rights of  
23 Plaintiffs and their affiliates under the Copyright Act, including, but not limited to,  
24 any of Plaintiffs' and Plaintiffs' affiliates' rights in any of the copyrighted works  
25 listed in Exhibit A;

26 (c) award damages that Plaintiffs have sustained or will sustain by reason  
27 of Defendants' copyright infringement and all profits derived by Defendants from  
28 such conduct, or in lieu thereof, should Plaintiffs so elect, such statutory damages

1 as the Court shall deem proper as provided in 17 U.S.C. § 504(c), including  
2 damages for willful infringement for each act of copyright infringement;

3 (d) award Plaintiffs' costs and reasonable attorneys' fees in accordance  
4 with 17 U.S.C. § 505;

5 (e) award Plaintiffs pre-judgment and post-judgment interest according to  
6 law; and

7 (f) award Plaintiffs such further and additional relief as the Court may  
8 deem just and proper.

9 DATED: July 28, 2008

10 ROBERT H. ROTSTEIN  
11 WADE B. GENTZ  
12 ERIC S. BOORSTIN  
13 MITCHELL SILBERBERG & KNUPP LLP

14 By:   
15 \_\_\_\_\_  
16 Wade B. Gentz  
17 Attorneys for Plaintiffs  
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# EXHIBIT A

**Exhibit A**

<b>Title</b>	<b>Owner</b>	<b>Reg. No.</b>
<i>10,000 B.C.</i>	Warner Bros. Entertainment Inc.	PA1-599250
<i>Be Kind Rewind</i>	New Line Productions, Inc.; Junkyard Prods LLC	PAu003050144
<i>Definitely, Maybe</i>	Universal City Studios Productions LLLP	PA1-594-772
<i>Doomsday</i>	Internationale Filmproduktion; Universal City Studios Productions LLLP	PA1-594-317
<i>Forgetting Sarah Marshall</i>	Universal City Studios Productions LLLP	Pre-Registration No. 000001154
<i>Harold &amp; Kumar: Escape From Guantanamo Bay</i>	Going South Productions, LLC	PAu003339764
<i>I Am Legend</i>	WV Films IV LLC	PA1-590-883
<i>Mr. Woodcock</i>	Macron Filmproduktion; New Line Productions, Inc.	PA1-594-313
<i>Sex And The City</i>	IFP Westcoast Erste; Home Box Office; New Line Productions, Inc.	Pre-Registration No. 000001271
<i>Speed Racer</i>	WV Films IV LLC	Pre-Registration No. 000001169
<i>Welcome Home Roscoe Jenkins</i>	Universal City Studios Productions LLLP	PA1-593-188

**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 Ronald S. W. Lew and the assigned discovery Magistrate Judge is Stephen J. Hillman.

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

**CV08- 4931 RSWL (SHx)**

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

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**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.



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Los Angeles, California 90064-1683  
Telephone: (310) 312-2000  
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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

UNIVERSAL CITY STUDIOS PRODUCTIONS  
LLLP, a Delaware limited liability limited partnership;  
WARNER BROS. ENTERTAINMENT INC., a  
Delaware corporation; and NEW LINE  
PRODUCTIONS, INC., a California corporation  
PLAINTIFF(S)

v.

MOVIERUMOR.COM, a business entity of unknown  
form; and DOES 1 through 5, inclusive  
DEFENDANT(S).

CASE NUMBER

CV08-04931 RSWL (SHx)

SUMMONS

TO: DEFENDANT(S): THE ABOVE-NAMED DEFENDANTS

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  \_\_\_\_\_ amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Wade B. Gentz, Mitchell Silberberg & Knupp LLP, whose address is 11377 West Olympic Boulevard Los Angeles, California 90064. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: JUL 28 2008

By: NATALIE LONGORIA



1198

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

CONFORMING COPY

<p>(a) <b>PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/>)                  UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, a Delaware limited liability limited partnership; WARNER BROS. ENTERTAINMENT INC., a Delaware corporation; and NEW LINE PRODUCTIONS, INC., a California corporation</p> <p>b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases):                  Los Angeles</p> <p>c) 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 &amp; KNUPP LLP                  11377 West Olympic Boulevard                  Los Angeles, California 90064-1683</p>	<p><b>DEFENDANTS</b>                  MOVIERUMOR.COM, a business entity of unknown form; and DOES 1 through 5, inclusive</p> <p>County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only):</p> <p>Attorneys (If Known)</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

<p><b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff    <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant    <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b>                  (Place an X in one box for plaintiff and one for defendant.)</p> <table border="0" style="width:100%;"> <tr> <td style="width:30%;"></td> <td style="width:10%;"><b>PTF</b></td> <td style="width:10%;"><b>DEF</b></td> <td style="width:40%;"></td> <td style="width:10%;"><b>PTF</b></td> <td style="width:10%;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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**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.)

<p><b>OTHER STATUTES</b></p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities /Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Act</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Info. Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>	<p><b>CONTRACT</b></p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment &amp; Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p> <p><b>REAL PROPERTY</b></p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease &amp; Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p><b>TORTS</b></p> <p><b>PERSONAL INJURY</b></p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel &amp; Slander</p> <p><input type="checkbox"/> 330 Fed. Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury-Med Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury-Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p>	<p><b>TORTS</b></p> <p><b>PERSONAL PROPERTY</b></p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 444 Welfare</p> <p><input type="checkbox"/> 445 American with Disabilities - Employment</p> <p><input type="checkbox"/> 446 American with Disabilities - Other</p> <p><input type="checkbox"/> 440 Other Civil Rights</p>	<p><b>PRISONER PETITIONS</b></p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus/Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food &amp; Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. &amp; Truck</p> <p><input type="checkbox"/> 650 Airline Regs</p> <p><input type="checkbox"/> 660 Occupational Safety /Health</p> <p><input type="checkbox"/> 690 Other</p>	<p><b>LABOR</b></p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting &amp; Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p><input checked="" type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI(405(g))</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>
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**VIII(a). IDENTICAL CASES:** Has this action been previously filed and dismissed, remanded or closed?     No     Yes

**FOR OFFICE USE ONLY:**    Case Number: CV08-04931

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

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

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

If yes, list case number(s): CV 07-4185; CV 07-6258; CV 07-7837; and CV 08-2530

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.

X. VENUE: List the California County, or State if other than California, in which EACH named plaintiff resides (Use an additional sheet if necessary)

Check here if the U.S. government, its agencies or employees is a named plaintiff.

LOS ANGELES COUNTY

List the California County, or State if other than California, in which EACH named defendant resides. (Use an additional sheet if necessary).

Check here if the U.S. government, its agencies or employees is a named defendant.

UNKNOWN

List the California County, or State if other than California, in which EACH claim arose. (Use an additional sheet if necessary)

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

LOS ANGELES COUNTY

SIGNATURE OF ATTORNEY (OR PRO PER):

Date July 28, 2008

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))