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5 *Attorney for Plaintiff*

6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 ME2 PRODUCTIONS, INC., a Nevada )  
corporation, ) Case No.: 2:16-cv-02662  
11 )  
12 ) **COMPLAINT**  
Plaintiff, )  
13 vs. )  
14 JOHN AND JANE DOES, 1-14 )  
Defendants )  
15 )  
16 )

17 Plaintiff ME2 PRODUCTIONS, INC., a Nevada corporation (“PLAINTIFF”),  
18 by and through its counsel, Charles Rainey, Esq. of Hamrick & Evans LLP,  
19 complains and alleges as follows against Defendants JOHN AND JANE DOES 1 –  
20 14 (collectively, “DEFENDANTS”):

21 **NATURE OF THE ACTION**

- 22 1. This matter arises under the United States Copyright Act of 1976, as amended,  
23 17 U.S.C. §§ 101, et seq. (the Copyright Act”).  
24 2. The Plaintiff alleges that each Defendant is liable for:  
25 (a) direct copyright infringement in violation of 17 U.S.C. §§106 and 501; and  
26 (b) contributory copyright infringement.

27 / / /  
28 / / /

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**JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1338 (patents, copyrights, trademarks, and unfair competition).

4. As shown on Exhibit “1” attached to this Complaint, and incorporated herein by reference, each of the Defendants’ acts of copyright infringement occurred using an Internet Protocol address (“IP address”) traced to a physical address located within this District. Under Fed.R.Civ.P. 4, every federal district court follows the law on personal jurisdiction that is in force in the state courts where the federal court is located. Under NRS 14.065, the courts may exercise personal jurisdiction to the extent permitted under federal due process. Here, this Court has personal jurisdiction over each Defendant because:

(a) each Defendant committed the tortious conduct alleged in this Complaint in the State of Nevada, and/or

(b) has engaged in business transactions in the State of Nevada, such as, without limitation, the ongoing purchase and maintenance of Internet service within the State.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c), because:

(a) a substantial part of the events giving rise to the claims occurred in this District; and

(b) the Defendants reside, or at the very least maintain residences or ongoing business operations within the State, and therefore can be found in this State.

Additionally, venue is proper in this District pursuant 28 U.S.C. §1400(a) (venue for copyright cases), because the majority of the Defendants or Defendants’ agents reside or may be found in this District.

**PARTIES**

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1 6. The Plaintiff is a Nevada corporation, having its principal place of business at  
2 318 N. Carson Street, No. 208, Carson City, NV 89701.

3 7. Each Defendant is known to the Plaintiff only by an IP address.

4 8. An IP address is a number that is assigned by an Internet Service Provider (an  
5 “ISP”) to devices, such as computers, that are connected to the Internet.

6 9. The ISP to which a Defendant subscribes can correlate a Defendant’s IP  
7 address to a Defendant’s true identity.

8 **JOINDER**

9 10. Pursuant to Fed.R.Civ.P. 20(a)(2), each of the Defendants was properly joined  
10 because, as set forth in more detail below, the Plaintiff asserts that:

11 (a) each of the Defendants is jointly and severally liable for the infringing  
12 activities of each of the other Defendants;

13 (b) the infringement complained of herein by each of the Defendants was part  
14 of a series of transactions over the course of a relatively short period of  
15 time, involving the exact same piece of the Plaintiff’s copyrighted Work,  
16 and was accomplished by the Defendants acting in concert with each other;  
17 and

18 (c) there are common questions of law and fact.

19 Indeed, the claims against each of the Defendants are identical, and each of the  
20 Defendants used the BitTorrent protocol, jointly and in concert, to infringe the  
21 Plaintiff’s copyrighted Work.

22 **FACTUAL BACKGROUND**

23 **I. The Plaintiff Owns the Copyright to the Motion Picture**

24 11. The Plaintiff is the owner of United States Copyright Registration Number PA  
25 1-998-057, 2016-08-02 (the “Registration”) for the motion picture entitled  
26 MECHANIC: RESURRECTION (the “Work”), a film that has been shown  
27 recently in numerous theaters throughout the United States and throughout  
28 the world.

1 13. A copy of the Plaintiff's Copyright Registration Record, evidencing, among  
2 other things, the Plaintiff's ownership of the Registration and the Registration  
3 date, is attached to this Complaint as Exhibit "2" and incorporated herein by  
4 reference.

5 **II. The Defendants Used BitTorrent To Infringe the**  
6 **Plaintiff's Copyright**

7 14. BitTorrent is one of the most common peer-to-peer file sharing protocols (in  
8 other words, set of computer rules) used for distributing large amounts of data;  
9 indeed, it has been estimated that users of the BitTorrent protocol on the  
10 Internet account for over a quarter of all internet traffic. The creators and  
11 users of BitTorrent developed their own lexicon for use when talking about  
12 BitTorrent.

13 15. The BitTorrent protocol's popularity stems from its ability to distribute a large  
14 file without creating a heavy load on the source computer and network. In  
15 short, to reduce the load on the source computer, rather than downloading a  
16 file from a single source computer (one computer directly connected to  
17 another), the BitTorrent protocol allows users to join a "swarm" of host  
18 computers to download and upload from each other simultaneously (one  
19 computer connected to numerous computers).

20 **A. Each Defendant Installed a BitTorrent Client**  
21 **onto his or her Computer.**

22 16. Each Defendant installed a BitTorrent Client onto his or her computer.

23 17. A BitTorrent "Client" is a software program that implements the BitTorrent  
24 Protocol. There are numerous such software programs including *µTorrent* and  
25 *Vuze*, both of which can be directly downloaded from the Internet. See  
26 *www.utorrent.com*, and *http://new.vuze-downloads.com/*.

27 / / /

28 / / /

1 18. Once installed on a computer, the BitTorrent “Client” serves as the user’s  
2 interface during the process of uploading and downloading data using the  
3 BitTorrent protocol.

4 ***B. The Initial Seed, Torrent, Hash and Tracker***

5 19. A BitTorrent user that wants to upload a new file, known as an “initial seeder,”  
6 starts by creating a “torrent” descriptor file using the Client he or she installed  
7 onto his or her computer.

8 20. The Client takes the target computer file, the “initial seed,” here the  
9 copyrighted Work, and divides it into identically sized groups of bits known as  
10 “pieces.”

11 21. The Client then gives each one of the computer file’s pieces, in this case, pieces  
12 of the copyrighted Work, a random and unique alphanumeric identifier known  
13 as a “hash” and records these hash identifiers in the torrent file.

14 22. When another peer later receives a particular piece, the hash identifier for that  
15 piece is compared to the hash identifier recorded in the torrent file for that  
16 piece to test that the piece is error-free. In this way, the hash identifier works  
17 like an electronic fingerprint to identify the source and origin of the piece and  
18 that the piece is authentic and uncorrupted.

19 23. Torrent files also have an “announce” section, which specifies the URL  
20 (Uniform Resource Locator) of a “tracker,” and an “info” section, containing  
21 (suggested) names for the files, their lengths, the piece length used, and the  
22 hash identifier for each piece, all of which are used by Clients on peer  
23 computers to verify the integrity of the data they receive.

24 24. The “tracker” is a computer or set of computers that a torrent file specifies and  
25 to which the torrent file provides peers with the URL address(es).

26 25. The tracker computer or computers direct a peer user’s computer to other peer  
27 user’s computers that have particular pieces of the file, here the copyrighted  
28 Work, on them and facilitates the exchange of data among the computers.

1 26. Depending on the BitTorrent Client, a tracker can either be a dedicated  
2 computer (centralized tracking) or each peer can act as a tracker (decentralized  
3 tracking).

4 **C. Torrent Sites**

5 27. “Torrent sites” are websites that index torrent files that are currently being  
6 made available for copying and distribution by people using the BitTorrent  
7 protocol. There are numerous torrent websites, including  
8 *www.TorrentZap.com*, *www.Btscene.com*, and *www.ExtraTorrent.com*.

9 28. Upon information and belief, each Defendant went to a torrent site to upload  
10 and download Plaintiff’s copyrighted Work.

11 **D. Uploading and Downloading a Work through a**  
12 **BitTorrent Swarm**

13 29. Once the initial seeder has created a torrent and uploaded it onto one or more  
14 torrent sites, then other peers begin to download and upload the computer file  
15 to which the torrent is linked (here the copyrighted Work) using the BitTorrent  
16 protocol and BitTorrent Client that the peers installed on their computers.

17 30. The BitTorrent protocol causes the initial seed’s computer to send different  
18 pieces of the computer file, here the copyrighted Work, to the peers seeking to  
19 download the computer file.

20 31. Once a peer receives a piece of the computer file, here a piece of the copyrighted  
21 Work, it starts transmitting that piece to the other peers.

22 32. In this way, all of the peers and seeders are working together in what is called  
23 a “swarm.”

24 33. Here, each Defendant peer member participated in the same swarm and  
25 directly interacted and communicated with other members of that swarm  
26 through digital handshakes, the passing along of computer instructions,  
27 uploading and downloading, and by other types of transmissions.

28

1 34. In this way, and by way of example only, one initial seeder can create a torrent  
2 that breaks a movie up into hundreds or thousands of pieces saved in the form  
3 of a computer file, like the Work here, upload the torrent onto a torrent site,  
4 and deliver a different piece of the copyrighted Work to each of the peers. The  
5 recipient peers then automatically begin delivering the piece they just received  
6 to the other peers in the same swarm.

7 35. Once a peer, here a Defendant, has downloaded the full file, the BitTorrent  
8 Client reassembles the pieces and the peer is able to view the movie. Also, once  
9 a peer has downloaded the full file, that peer becomes known as “an additional  
10 seed,” because it continues to distribute the torrent file, here the copyrighted  
11 Work.

12 **E. The Plaintiff’s Computer Investigators Identified**  
13 **Each of the Defendants’ IP Addresses as**  
14 **Participants in a Swarm That Was Distributing the**  
15 **Plaintiff’s Copyrighted Work.**

16 36. The Plaintiff retained the services of a digital forensic investigation service,  
17 MAVERICKEYE UG (the “Investigator”), to identify the IP addresses that are  
18 being used by those people that are using the BitTorrent protocol and the  
19 internet to reproduce, distribute, display or perform the Plaintiff’s copyrighted  
20 Work.

21 37. The Investigator used forensic software to enable the scanning of peer-to-peer  
22 networks for the presence of infringing transactions.

23 38. The Investigator extracted the resulting data emanating from the  
24 investigation, reviewed the evidence logs, and isolated the transactions and the  
25 IP addresses associated therewith for the files identified by the SHA-1 hash  
26 value of:

27 SHA1: 41E5C8F5DAE85A7230C884E3AB57E10A48BA04CE

28 (hereafter, referred to as the “Unique Hash Number”).

1 39. The IP addresses, Unique Hash Number, and hit dates contained on Exhibit  
2 “1” accurately reflect what is contained in the evidence logs, and show:

3 (A) Each Defendant had copied a piece of the Plaintiff’s copyrighted Work  
4 identified by the Unique Hash Number; and

5 (B) Therefore, each Defendant was part of the same series of transactions.

6 40. Through each of the transactions, each of the Defendant’s computers used their  
7 identified IP addresses to connect to the investigative server from a computer  
8 in this District in order to transmit a full copy, or a portion thereof, of a digital  
9 media file identified by the Unique Hash Number.

10 41. The Investigator analyzed each BitTorrent “piece” distributed by each IP  
11 address listed on Exhibit “1” and verified that re-assemblage of the pieces  
12 using a BitTorrent Client results in a fully playable digital motion picture of  
13 the Work.

14 42. The Investigator viewed the Work side-by-side with the digital media file that  
15 correlates to the Unique Hash Number and determined that they were  
16 identical, strikingly similar or substantially similar.

17 **MISCELLANEOUS**

18 43. All conditions precedent to bringing this action have occurred or been waived.

19 44. Plaintiff retained counsel to represent it in this matter and is obligated to pay  
20 said counsel a reasonable fee for its services.

21 **FIRST CLAIM FOR RELIEF**

22 (Direct Copyright Infringement)

23 45. The Plaintiff incorporates the allegations in the foregoing paragraphs.

24 46. Plaintiff is the owner of the Registration for the Work, which contains an  
25 original work of authorship.

26 47. By using the BitTorrent protocol and a BitTorrent Client and the processes  
27 described above, each Defendant copied the constituent elements of the  
28 registered work that are original.



1 48. The Plaintiff did not authorize, permit, or provide consent to the Defendants to  
2 copy, reproduce, redistribute, perform, or display its Work.

3 49. As a result of the foregoing, each Defendant violated the Plaintiff's exclusive  
4 right to:

5 (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501;

6 (B) Redistribute copies of the Work to the public by sale or other transfer of  
7 ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3)  
8 and 501;

9 (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501,  
10 by showing the Work's images; and,

11 (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and 501,  
12 by showing individual images of the Work non-sequentially and  
13 transmitting said display of the Work by means of a device or process to  
14 members of the public capable of receiving the display (as set forth in 17  
15 U.S.C. § 101's definition of "publicly" display.)

16 50. Each of the Defendants' infringements was committed "willfully" within the  
17 meaning of 17 U.S.C. § 504(c)(2).

18 51. By engaging in the infringement misconduct alleged in this Complaint, the  
19 Defendants thereby deprived not only the producer of the Work from income  
20 that could have been derived when this film was shown in public theaters, but  
21 also all persons involved in the production and marketing of this film, and also  
22 numerous owners of local theaters in Nevada, their employees, and, ultimately,  
23 the local Nevada economy. The Defendants' misconduct therefore offends  
24 public policy.

25 52. The Plaintiff has suffered actual damages that were proximately caused by  
26 each of the Defendants direct and secondary infringing activity, including,  
27 without limitation, lost sales, price erosion, and a diminution of the value of its  
28 copyright.

**SECOND CLAIM FOR RELIEF**

(Contributory Copyright Infringement)

53. The Plaintiff incorporates the allegations in the foregoing paragraphs.

54. The Plaintiff is the owner of the Registration for the Work, which contains an original work of authorship.

55. By using the BitTorrent protocol and a BitTorrent Client and the processes described above, each Defendant copied the constituent elements of the registered Work that are original.

56. By participating in the BitTorrent swarm with the other Defendants, each Defendant induced, caused or materially contributed to the infringing conduct of each other Defendant.

57. The Plaintiff did not authorize, permit or consent to the Defendants' inducing, causing or materially contributing to the infringing conduct of each other Defendant.

58. Each Defendant knew or should have known that other BitTorrent users, here the other Defendants, would become members of a swarm with the Defendant.

59. Each Defendant knew or should have known that other BitTorrent users in a swarm with it, here the other Defendants, were directly infringing the Plaintiff's copyrighted Work by copying constituent elements of the registered Work that are original.

60. Indeed, each Defendant directly participated in and therefore materially contributed to each other Defendant's infringing activities.

61. Each of the Defendants' contributory infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

62. By engaging in the infringement misconduct alleged in this Complaint, the Defendants thereby deprived not only the producer of the Work from income that could have been derived when this film was shown in public theaters, but also all persons involved in the production and marketing of this film, and also

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1 numerous owners of local theaters in Nevada, their employees, and, ultimately,  
2 the local Nevada economy. The Defendants' misconduct therefore offends  
3 public policy.

4 63. The Plaintiff has suffered actual damages that were proximately caused by  
5 each of the Defendants direct and secondary infringing activity, including,  
6 without limitation, lost sales, price erosion, and a diminution of the value of its  
7 copyright.

8 **THIRD CLAIM FOR RELIEF**

9 (Vicarious Copyright Infringement)

10 64. The Plaintiff incorporates the allegations in the foregoing paragraphs.

11 65. The Plaintiff is the owner of the Registration for the Work that contains an  
12 original work of authorship.

13 66. Each of the Defendants are vicariously liable for the infringement upon the  
14 Plaintiff's copyright, as such infringement occurred over the Defendants'  
15 Internet access points, and each of the Defendants benefited from such  
16 infringement.

17 67. The Defendants each maintain Internet service at their respective addresses,  
18 purchasing such service from an Internet Service Provider.

19 67. As the accountholders for the Internet service provided to their respective  
20 addresses, each Defendant possesses the right and ability to supervise any  
21 infringing activity occurring over each Defendants' Internet access point.

22 68. Each of the Defendants failed to reasonably supervise the use of their  
23 respective Internet access points, thereby allowing those Internet access points  
24 to be utilized for the purposes of unlawfully downloading and sharing the  
25 Plaintiff's Work.

26 68. The Defendants, and each of them, derived one or more direct benefits from  
27 allowing the infringing activity to occur over their respective Internet access  
28 points, including, without limitation: the benefit of viewing the Plaintiff's Work

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1 without paying for it or otherwise compensating the Plaintiff; the benefit of  
2 allowing others within the Defendants' household to view the Work, thereby  
3 providing the household with free entertainment, at no cost to the Defendant.

4 69. The Plaintiff has suffered actual damages that were proximately caused by  
5 each of the Defendants direct and secondary infringing activity, including lost  
6 sales, price erosion, and a diminution of the value of its copyright.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, the Plaintiff requests that this Court enter a judgment in  
9 its favor against the Defendants jointly and severally and enter an order:

- 10 (A) enjoining permanently each Defendant and all other persons who are  
11 inactive concert or participation with each Defendant from continuing to  
12 infringe the Plaintiff's copyrighted Work;
- 13 (B) mandating that each Defendant delete and permanently remove the  
14 torrent file relating to the Plaintiff's copyrighted Work from each of the  
15 computers under each such Defendant's possession, custody, or control;
- 16 (C) mandating that each Defendant delete and permanently remove the copy  
17 of the Work that each Defendant has on the computers under that  
18 Defendant's possession, custody or control;
- 19 (D) finding that each Defendant is jointly and severally liable for the direct  
20 infringement of each other Defendant;
- 21 (E) awarding the Plaintiff either its actual damages and any additional  
22 profits made by each Defendant pursuant to 17 U.S.C. § 504-(a)-(b) or  
23 statutory damages in the amount of \$150,000 per Defendant pursuant to  
24 17 U.S.C. § 504-(a) and (c), whichever is greater;
- 25 (F) awarding the Plaintiff its reasonable attorneys' fees and costs pursuant to  
26 17 U.S.C. § 505; and
- 27 (G) granting the Plaintiff any and all further relief that this Court deems just  
28 and proper.

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**DEMAND FOR A JURY TRIAL**

The Plaintiff hereby demands a trial by jury on all issues related to or arising out of this matter.

Respectfully submitted this November 18, 2016.

/s/ Charles C. Rainey  
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*Attorney for Plaintiff*

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**EXHIBIT “1”  
TO THE PLAINTIFF’S COMPLAINT**

**SUMMARY OF DEFENDANTS’ IP ADDRESS DATA**

File Name: Mechanic.Resurrection.2016.HC.720p.HDRiP.900MB.ShAaNiG.mkv

File Hash: SHA1: 41E5C8F5DAE85A7230C884E3AB57E10A48BA04CE

Film Name: Mechanic: Resurrection

Plaintiff Name: ME2 Productions, Inc.

No	IP	Hit Date UTC	ISP	State	County
1	24.234.39.34	2016-10-16 17:19:12	Cox Com	Nevada	County
2	68.108.61.187	2016-10-16 20:13:30	Cox Com	Nevada	County
3	72.193.20.134	2016-10-17 23:09:23	Cox Com	Nevada	County
4	68.104.99.86	2016-10-18 03:00:10	Cox Com	Nevada	County
5	68.108.76.65	2016-10-18 10:14:59	Cox Com	Nevada	County
6	98.160.207.22	2016-10-18 23:05:15	Cox Com	Nevada	County
7	24.234.61.202	2016-10-19 07:35:20	Cox Com	Nevada	County
8	70.173.85.54	2016-10-20 22:02:44	Cox Com	Nevada	County
9	68.229.60.154	2016-10-22 09:12:09	Cox Com	Nevada	County
10	72.193.55.16	2016-10-23 07:16:15	Cox Com	Nevada	County
11	70.173.151.242	2016-10-25 08:22:21	Cox Com	Nevada	County
12	24.120.251.146	2016-10-30 19:18:02	Cox Com	Nevada	County
13	68.96.175.77	2016-11-04 15:16:22	Cox Com	Nevada	County
14	98.160.196.72	2016-11-08 04:07:21	Cox Com	Nevada	County

EXHIBIT “2”  
TO THE PLAINTIFF’S COMPLAINT  
PLAINTIFF’S COPYRIGHT REGISTRATION



# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

United States Register of Copyrights and Director

**Registration Number**

**PA 1-998-057**

**Effective Date of Registration:**

August 02, 2016

## Title

**Title of Work:** Mechanic: Resurrection

**Previous or Alternate Title:** The Mechanic 2 aka The Mechanic II

**Nature of Claim:** Original Motion Picture

## Completion/Publication

**Year of Completion:** 2016

**Date of 1st Publication:** August 25, 2016

**Nation of 1st Publication:** United States

**Preregistration:** PRE000008863

## Author

- **Author:** ME2 Productions, Inc.
- Author Created:** Entire Motion Picture
- Work made for hire:** Yes
- Domiciled in:** United States
- Anonymous:** No
- Pseudonymous:** No

## Copyright Claimant

**Copyright Claimant:** ME2 Productions, Inc.  
318 N. Carson Street, #208, Carson City, NV 89701

## Limitation of copyright claim

**Material excluded from this claim:** Motion Picture Screenplay - PAu 3-773-822 - Registered August 6, 2014  
**Previously registered:** Yes

**New material included in claim:** Cinematographic material including performance, production as a motion picture, editing and all audio and visual elements including photography, dialogue, music and special effects

## Certification

**Name:** Michael A. Hierl  
**Date:** August 01, 2016

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Correspondence: Yes



\*0000PA00019980570202\*

CIVIL COVER SHEET

The 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, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
ME2 PRODUCTIONS, INC.
(b) County of Residence of First Listed Plaintiff Carson City, NV
(c) Attorneys (Firm Name, Address, and Telephone Number)
HAMRICK & EVANS
2600 W. Olive Ave., Ste. 1020, Burbank, CA 91505
818-763-5292

DEFENDANTS
John and Jane Does
County of Residence of First Listed Defendant Clark County, NV
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)
Not yet known

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State 1 1
Citizen of Another State 2 2
Citizen or Subject of a Foreign Country 3 3
Incorporated or Principal Place of Business In This State 4 4
Incorporated and Principal Place of Business In Another State 5 5
Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)
CONTRACT
110 Insurance
120 Marine
130 Miller Act
140 Negotiable Instrument
150 Recovery of Overpayment & Enforcement of Judgment
151 Medicare Act
152 Recovery of Defaulted Student Loans (Excludes Veterans)
153 Recovery of Overpayment of Veteran's Benefits
160 Stockholders' Suits
190 Other Contract
195 Contract Product Liability
196 Franchise
TORTS
PERSONAL INJURY
310 Airplane
315 Airplane Product Liability
320 Assault, Libel & Slander
330 Federal Employers' Liability
340 Marine
345 Marine Product Liability
350 Motor Vehicle
355 Motor Vehicle Product Liability
360 Other Personal Injury
362 Personal Injury - Medical Malpractice
PERSONAL INJURY
365 Personal Injury - Product Liability
367 Health Care/Pharmaceutical Personal Injury Product Liability
368 Asbestos Personal Injury Product Liability
PRISONER PETITIONS
Habeas Corpus:
463 Alien Detainee
510 Motions to Vacate Sentence
530 General
535 Death Penalty
Other:
540 Mandamus & Other
550 Civil Rights
555 Prison Condition
560 Civil Detainee - Conditions of Confinement
FORFEITURE/PENALTY
625 Drug Related Seizure of Property 21 USC 881
690 Other
LABOR
710 Fair Labor Standards Act
720 Labor/Management Relations
740 Railway Labor Act
751 Family and Medical Leave Act
790 Other Labor Litigation
791 Employee Retirement Income Security Act
IMMIGRATION
462 Naturalization Application
465 Other Immigration Actions
BANKRUPTCY
422 Appeal 28 USC 158
423 Withdrawal 28 USC 157
PROPERTY RIGHTS
820 Copyrights
830 Patent
840 Trademark
SOCIAL SECURITY
861 HIA (1395ff)
862 Black Lung (923)
863 DIWC/DIWW (405(g))
864 SSID Title XVI
865 RSI (405(g))
FEDERAL TAX SUITS
870 Taxes (U.S. Plaintiff or Defendant)
871 IRS—Third Party 26 USC 7609
OTHER STATUTES
375 False Claims Act
400 State Reapportionment
410 Antitrust
430 Banks and Banking
450 Commerce
460 Deportation
470 Racketeer Influenced and Corrupt Organizations
480 Consumer Credit
490 Cable/Sat TV
850 Securities/Commodities/Exchange
890 Other Statutory Actions
891 Agricultural Acts
893 Environmental Matters
895 Freedom of Information Act
896 Arbitration
899 Administrative Procedure Act/Review or Appeal of Agency Decision
950 Constitutionality of State Statutes

V. 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 Multidistrict Litigation

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 USC 101 et seq.
Brief description of cause:
Copyright Infringement - Internet Piracy of Motion Picture

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.
DEMAND \$
\$2,100,000
CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY
(See instructions):
JUDGE
DOCKET NUMBER

DATE
November 18, 2016
SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY
RECEIPT #
AMOUNT
APPLYING IFP
JUDGE
MAG. JUDGE