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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

QOTD FILM INVESTMENT LTD., a)
U.K. private limited company,)

Case No.: 2:16-cv-928-APG-GWF

Plaintiff,)

vs.)

FIRST AMENDED COMPLAINT

DANIEL STEWART, an individual;)
VIKRAM CHOCHAN, an individual; JOE)
TOWNSEND, an individual; GERALD)
LOPEZ, an individual; NATHAN)
FROST, an individual; RONALD)
ESTES, an individual; REBECCA)
GONZALEZ, an individual; SAMUEL)
WITWER, an individual; SHARON)
KATNER, an individual; BRANDEN)
DEGLER, an individual; ANGEL)
TARANGO, an individual; ROGER)
CLANCY, an individual; LUCIE)
VALENTINE, an individual; JESSICA)
SABINA, an individual; ALICE)
EDWARDS, an individual; SURESH)
LACHHWANI, an individual; GARY)
JOHANNNS, an individual; GONA)
LOPEZ, an individual; DAVID SKRED,)
an individual; ROCKSROY BAILEY, an)
individual; EDWARD MANNIX, an)
individual; MOHAMMED IBRAHAM)
ANSALAMI, an individual; and DOES 1)
- 30,)

Defendants)

Plaintiff QOTD FILM INVESTMENT LTD., a U.K. private limited company
("PLAINTIFF"), by and through its counsel, Charles Rainey, Esq. of Rainey Legal
Group, PLLC, complains and alleges as follows against DANIEL STEWART, an
individual; VIKRAM CHOCHAN, an individual; JOE TOWNSEND, an individual;

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1 GERALD LOPEZ, an individual; NATHAN FROST, an individual; RONALD
2 ESTES, an individual; REBECCA GONZALEZ, an individual; SAMUEL WITWER,
3 an individual; SHARON KATNER, an individual; BRANDEN DEGLER, an
4 individual; ANGEL TARANGO, an individual; ROGER CLANCY, an individual;
5 LUCIE VALENTINE, an individual; JESSICA SABINA, an individual; ALICE
6 EDWARDS, an individual; SURESH LACHHWANI, an individual; GARY
7 JOHANNNS, an individual; GONA LOPEZ, an individual; DAVID SKRED, an
8 individual; ROCKSROY BAILEY, an individual; EDWARD MANNIX, an
9 individual; MOHAMMED IBRAHAM ANSALAMI, an individual (collectively,
10 “DEFENDANTS”):

11 **NATURE OF THE ACTION**

- 12 1. This matter arises under the United States Copyright Act of 1976, as amended,
13 17 U.S.C. §§ 101, et seq. (the Copyright Act”).
- 14 2. The Plaintiff alleges that each Defendant is liable for:
- 15 (a) direct copyright infringement in violation of 17 U.S.C. §§106 and 501; and
16 (b) contributory copyright infringement.

17 **JURISDICTION AND VENUE**

- 18 3. This Court has subject matter jurisdiction over this action pursuant to 28
19 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1338 (patents, copyrights,
20 trademarks, and unfair competition).
- 21 4. As shown on Exhibit “1” attached to this Complaint, and incorporated herein by
22 reference, each of the Defendants’ acts of copyright infringement occurred
23 using an Internet Protocol address (“IP address”) traced to a physical address
24 located within this District. Under Fed.R.Civ.P. 4, every federal district court
25 follows the law on personal jurisdiction that is in force in the state courts
26 where the federal court is located. Under NRS 14.065, the courts may exercise
27 personal jurisdiction to the extent permitted under federal due process. Here,
28 this Court has personal jurisdiction over each Defendant because:

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

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

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

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

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

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

16 **PARTIES**

17 6. The Plaintiff is a U.K. private limited company, having its principal place of
18 business at 2-4 Bucknall Street, London, WC2H 8LA, United Kingdom.

19 7. Each Defendant was originally known to the Plaintiff only by an IP address.

20 8. An IP address is a number that is assigned by an Internet Service Provider (an
21 "ISP") to devices, such as computers, that are connected to the Internet.

22 9. After Plaintiff conducted limited discovery, the ISP to which each Defendant
23 subscribes correlated the Defendant's IP address to the Defendant's true
24 identity, as set forth and detailed in Exhibit "1" attached hereto and
25 incorporated herein by reference, identifying each of the Defendants as follows:

26 (a) DANIEL STEWART, an individual receiving Internet service from Cox
27 Communications at 9514 Michelle Falls Ave., Las Vegas, NV 89149-3727;
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- 1 (b) VIKRAM CHOCHAN, an individual receiving Internet service from Cox
2 Communications at 8136 Greenbush Dr., Las Vegas, NV 89117-3774;
- 3 (c) JOE TOWNSEND, an individual receiving Internet service from Cox
4 Communications at 4470 Vegas Valley Dr., Apt 45, Las Vegas, NV 89121-
5 1914;
- 6 (d) GERALD LOPEZ, an individual receiving Internet service from Cox
7 Communications at 3166 Richford Pl, Las Vegas, NV 89102-7848;
- 8 (e) NATHAN FROST, an individual receiving Internet service from Cox
9 Communications at 8401 Timber Pine Ave, Las Vegas, NV 89143-4614;
- 10 (f) RONALD ESTES, an individual receiving Internet service from Cox
11 Communications at 6942 Lakota Summit Ct., Las Vegas, NV 89166-4633;
- 12 (g) REBECCA GONZALEZ, an individual receiving Internet service from Cox
13 Communications at 636 Oak Island Dr., North Las Vegas, NV 89032-9004;
- 14 (h) SAMUEL WITWER, an individual receiving Internet service from Cox
15 Communications at 8729 Radiant Ruby Ave., Las Vegas, NV 89143-5138;
- 16 (i) SHARON KATNER, an individual receiving Internet service from Cox
17 Communications at 3305 E Rome Blvd, Apt 1114, North Las Vegas, NV
18 89086-1310;
- 19 (j) ANGEL TARANGO, an individual receiving Internet service from Cox
20 Communications at 3805 Alder Creek Ct, North Las Vegas, NV 89032-
21 2946;
- 22 (k) BRANDEN DEGLER, an individual receiving Internet service from Cox
23 Communications at 8070 W Russell Rd, Apt 2058, Las Vegas, NV 89113-
24 1558;
- 25 (l) ROGER CLANCY, an individual receiving Internet service from Cox
26 Communications at 300 Greenfield Ln, Las Vegas, NV 89107-2442;
- 27 (m) LUCIE VALENTINE, an individual receiving Internet service from Cox
28 Communications at 9073 Pine Mission Ave, Las Vegas, NV 89143-1178;

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- 1 (n) JESSICA SABINA, an individual receiving Internet service from Cox
2 Communications at 4265 Rollingstone Dr, Las Vegas, NV 89103-3425;
- 3 (o) ALICE EDWARDS, an individual receiving Internet service from Cox
4 Communications at 3744 Alpine Bypass Ave, North Las Vegas, NV 89081-
5 6616;
- 6 (p) SURESH LACHHWANI, an individual receiving Internet service from Cox
7 Communications at Apt 171, 3555 Stober Blvd, Las Vegas, NV 89103-1460;
- 8 (q) GARY JOHANNNS, an individual receiving Internet service from Cox
9 Communications at 112 Sir George Dr., Las Vegas, NV 89110-4818;
- 10 (r) GONA LOPEZ, an individual receiving Internet service from Cox
11 Communications at 3465 Harem Lane, Apt 1275, Las Vegas, NV 89115-
12 0714;
- 13 (s) DAVID SKRED, an individual receiving Internet service from Cox
14 Communications at 7012 Edwin Aldrin Cir., Las Vegas, NV 89145-6127;
- 15 (t) ROCKSROY BAILEY, an individual receiving Internet service from Cox
16 Communications at 10090 Korbelt Blanc St, Las Vegas, NV 89178-3857;
- 17 (u) EDWARD MANNIX, an individual receiving Internet service from Cox
18 Communications at 544 San Pedro Dr., Las Vegas, NV 89104-2613;
- 19 (v) MOHAMMED IBRAHAM ANSALAMI, an individual receiving Internet
20 service from Cox Communications at 4920 Winterset Dr., Las Vegas, NV
21 89130-3614; and
- 22 (w) The true names, identities or capacities, of DOES 1-30, and their
23 involvement herein are unknown to Plaintiff who therefore sue said
24 Defendants by such fictitious names; specifically, Plaintiff is unaware to
25 what extent the other named defendants in this case may blame or
26 implicate other individuals for the infringing conduct alleged herein; as
27 such, Plaintiff will seek leave of Court to amend this pleading to set forth
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1 the true names and capacities of such fictitiously named Defendants when,
2 and if, the true names become known.

3 **JOINDER**

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

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

8 (b) the infringement complained of herein by each of the Defendants was part
9 of a series of transactions over the course of a relatively short period of
10 time, involving the exact same piece of the Plaintiff's copyrighted Work,
11 and was accomplished by the Defendants acting in concert with each other;
12 and

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

14 (d) the claims against each of the Defendants are identical, and each of the
15 Defendants used the BitTorrent protocol, jointly and in concert, to infringe
16 the Plaintiff's copyrighted Work.

17 **FACTUAL BACKGROUND**

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

19 11. The Plaintiff is the owner of United States Copyright Registration Number
20 PAu 3-766-976 (the "Registration") for the motion picture entitled QUEEN OF
21 THE DESERT (the "Work"), a film that has been shown recently in numerous
22 theaters throughout the United States and throughout the world.

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

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1 **II. The Defendants Used BitTorrent To Infringe the**
2 **Plaintiff's Copyright**

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

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

16 **A. Each Defendant Installed a BitTorrent Client**
17 **onto his or her Computer.**

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

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

23 18. Once installed on a computer, the BitTorrent "Client" serves as the user's
24 interface during the process of uploading and downloading data using the
25 BitTorrent protocol.

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B. The Initial Seed, Torrent, Hash and Tracker

19. A BitTorrent user that wants to upload a new file, known as an “initial seeder,” starts by creating a “torrent” descriptor file using the Client he or she installed onto his or her computer.
20. The Client takes the target computer file, the “initial seed,” here the copyrighted Work, and divides it into identically sized groups of bits known as “pieces.”
21. The Client then gives each one of the computer file’s pieces, in this case, pieces of the copyrighted Work, a random and unique alphanumeric identifier known as a “hash” and records these hash identifiers in the torrent file.
22. When another peer later receives a particular piece, the hash identifier for that piece is compared to the hash identifier recorded in the torrent file for that piece to test that the piece is error-free. In this way, the hash identifier works like an electronic fingerprint to identify the source and origin of the piece and that the piece is authentic and uncorrupted.
23. Torrent files also have an “announce” section, which specifies the URL (Uniform Resource Locator) of a “tracker,” and an “info” section, containing (suggested) names for the files, their lengths, the piece length used, and the hash identifier for each piece, all of which are used by Clients on peer computers to verify the integrity of the data they receive.
24. The “tracker” is a computer or set of computers that a torrent file specifies and to which the torrent file provides peers with the URL address(es).
25. The tracker computer or computers direct a peer user’s computer to other peer user’s computers that have particular pieces of the file, here the copyrighted Work, on them and facilitates the exchange of data among the computers.
26. Depending on the BitTorrent Client, a tracker can either be a dedicated computer (centralized tracking) or each peer can act as a tracker (decentralized tracking).

1 **C. Torrent Sites**

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

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

8 **D. Uploading and Downloading a Work through a**
9 **BitTorrent Swarm**

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

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

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

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

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

25 34. In this way, and by way of example only, one initial seeder can create a torrent
26 that breaks a movie up into hundreds or thousands of pieces saved in the form
27 of a computer file, like the Work here, upload the torrent onto a torrent site,
28 and deliver a different piece of the copyrighted Work to each of the peers. The

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1 recipient peers then automatically begin delivering the piece they just received
2 to the other peers in the same swarm.

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

8 **E. The Plaintiff’s Computer Investigators Identified**
9 **Each of the Defendants’ IP Addresses as**
10 **Participants in a Swarm That Was Distributing the**
11 **Plaintiff’s Copyrighted Work.**

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

17 37. The Investigator used forensic software to enable the scanning of peer-to-peer
18 networks for the presence of infringing trans actions.

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

23 SHA1: 896B438F8D8F7C433F4B88A24322B8763A3E9885

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

25 39. The IP addresses, Unique Hash Number, and hit dates contained on Exhibit
26 “1” accurately reflect what is contained in the evidence logs, and show:

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

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

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

6 41. The Investigator analyzed each BitTorrent "piece" distributed by each IP
7 address listed on Exhibit "1" and verified that re-assembly of the pieces
8 using a BitTorrent Client results in a fully playable digital motion picture of
9 the Work.

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

13 **MISCELLANEOUS**

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

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

17 **FIRST CLAIM FOR RELIEF**

18 (Direct Copyright Infringement)

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

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

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

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

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

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- 1 (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501;
- 2 (B) Redistribute copies of the Work to the public by sale or other transfer of
3 ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3)
4 and 501;
- 5 (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501,
6 by showing the Work's images; and,
- 7 (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and 501,
8 by showing individual images of the Work non-sequentially and
9 transmitting said display of the Work by means of a device or process to
10 members of the public capable of receiving the display (as set forth in 17
11 U.S.C. § 101's definition of "publicly" display.)

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

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

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

24 **SECOND CLAIM FOR RELIEF**

25 (Contributory Copyright Infringement)

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

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

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

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

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

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

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

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

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

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

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

4 **THIRD CLAIM FOR RELIEF**

5 (Vicarious Copyright Infringement)

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

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

9 66. Each of the Defendants are vicariously liable for the infringement upon the
10 Plaintiff's copyright, as such infringement occurred over the Defendants'
11 Internet access points, and each of the Defendants benefited from such
12 infringement.

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

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

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

22 68. The Defendants, and each of them, derived one or more direct benefits from
23 allowing the infringing activity to occur over their respective Internet access
24 points, including, without limitation: the benefit of viewing the Plaintiff's Work
25 without paying for it or otherwise compensating the Plaintiff; the benefit of
26 allowing others within the Defendants' household to view the Work, thereby
27 providing the household with free entertainment, at no cost to the Defendant.
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69. The Plaintiff has suffered actual damages that were proximately caused by each of the Defendants direct and secondary infringing activity, including lost sales, price erosion, and a diminution of the value of its copyright.

PRAYER FOR RELIEF

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

- (A) enjoining permanently each Defendant and all other persons who are inactive concert or participation with each Defendant from continuing to infringe the Plaintiff’s copyrighted Work;
- (B) mandating that each Defendant delete and permanently remove the torrent file relating to the Plaintiff’s copyrighted Work from each of the computers under each such Defendant’s possession, custody, or control;
- (C) mandating that each Defendant delete and permanently remove the copy of the Work that each Defendant has on the computers under that Defendant’s possession, custody or control;
- (D) finding that each Defendant is jointly and severally liable for the direct infringement of each other Defendant;
- (E) awarding the Plaintiff either its actual damages and any additional profits made by each Defendant pursuant to 17 U.S.C. § 504-(a)-(b) or statutory damages in the amount of \$150,000 per Defendant pursuant to 17 U.S.C. § 504-(a) and (c), whichever is greater;
- (F) awarding the Plaintiff its reasonable attorneys’ fees and costs pursuant to 17 U.S.C. § 505; and
- (G) granting the Plaintiff any and all further relief that this Court deems just 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 July 23, 2016.

/s/ Charles C. Rainey
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EXHIBIT “1”
TO THE PLAINTIFF’S FIRST AMENDED COMPLAINT
SUMMARY OF DEFENDANTS’ IP ADDRESS DATA

FILE NAME: London.Has.Fallen.2016.HD-TS.XVID.AC3.HQ.Hive-CM8
FILE HASH: SHA1: 8033280B90E634A9A8F6767C72B10281077A4529
Complaint Filed: April 24, 2016

IP	Name	Address	Hit Date UTC	ISP
68.108.70.253	Daniel Stewart	9514 Michelle Falls Ave., Las Vegas, NV 89149-3727	26-Jan-16	Cox Com
68.229.48.242	Vikram Chohan	8136 Greenbush Dr., Las Vegas, NV 89117-3774	26-Jan-16	Cox Com
68.229.62.87	Joe Townsend	Apt 45, 4470 Vegas Valley Dr., Las Vegas, NV 89121-1914	26-Jan-16	Cox Com
68.224.32.170	Gerald Lopez	3166 Richford Pl Las Vegas, NV 89102-7848	28-Jan-16	Cox Com
68.224.148.98	Nathan Frost	8401 Timber Pine Ave Las Vegas, NV 89143-4614	30-Jan-16	Cox Com
72.193.133.68	Ronald Estes	6942 Lakota Summit Ct., Las Vegas, NV 89166-4633	30-Jan-16	Cox Com
68.108.56.206	Rebecca Gonzalez	636 Oak Island Dr., North Las Vegas, NV 89032-9004	30-Jan-16	Cox Com
68.224.0.73	Samuel Wittwer	8729 Radiant Ruby Ave., Las Vegas, NV 89143-5138	30-Jan-16	Cox Com
68.224.104.161	Sharon Katner	Apt 1114, 3305 E Rome Blvd, North Las Vegas, NV 89086-1310	31-Jan-16	Cox Com
70.170.122.94	Branden Degler	Apt 2058, 8070 W Russell Rd Las Vegas, NV 89113-1558	1-Feb-16	Cox Com
72.193.18.233	Angel Tarango	3805 Alder Creek Ct North Las Vegas, NV 89032-2946	2-Feb-16	Cox Com
24.253.18.85	Roger Clancy	300 Greenfield Ln Las Vegas, NV 89107-2442	3-Feb-16	Cox Com
68.224.119.34	Lucie Valentine	9073 Pine Mission Ave Las Vegas, NV 89143-1178	4-Feb-16	Cox Com
70.180.167.143	Jessica Sabina	4265 Rollingstone Dr Las Vegas, NV 89103-3425	4-Feb-16	Cox Com
70.170.12.46	Alice Edwards	3744 Alpine Bypass Ave North Las Vegas, NV 89081-6616	6-Feb-16	Cox Com
70.180.252.114	Suresh Lachhwani	Apt 171, 3555 Stober Blvd Las Vegas, NV 89103-1460	6-Feb-16	Cox Com
70.189.239.110	Gary Johanns	112 Sir George Dr., Las Vegas, NV 89110-4818	9-Feb-16	Cox Com
68.104.93.248	Gona Lopez	Apt 1275, 3465 Harem Ln Las Vegas, NV 89115-0714	11-Feb-16	Cox Com
98.160.232.58	David Skred	7012 Edwin Aldrin Cir Las Vegas, NV 89145-6127	12-Feb-16	Cox Com
70.173.107.109	Rocksroy Bailey	10090 Korbel Blanc St, Las Vegas, NV 89178-3857	13-Feb-16	Cox Com
70.170.4.104	Edward Mannix	544 San Pedro Dr., Las Vegas, NV 89104-2613	18-Feb-16	Cox Com
70.173.172.140	Mohammed Ibrahim Ansari	4920 Winterset Dr Las Vegas, NV 89130-3614	25-Feb-16	Cox Com

EXHIBIT “2”
TO THE PLAINTIFF’S FIRST AMENDED 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.

Registration Number

PAu 3-766-976

Effective Date of Registration:

March 13, 2015

Maria A. Pallante

Register of Copyrights, United States of America

Title

Title of Work: Queen of the Desert

Completion/Publication

Year of Completion: 2015

Author

- **Author:** QOTD Film Investment Ltd.
- Author Created:** entire motion picture
- Work made for hire:** Yes
- Citizen of:** United Kingdom
- Domiciled in:** United Kingdom

Copyright Claimant

Copyright Claimant: QOTD Film Investment Ltd.
2-4 Bucknall Street, London, WC2H 8LA, United Kingdom

Limitation of copyright claim

Material excluded from this claim: script/screenplay
Previous registration and year: PAu 3-744-537, 2013

New material included in claim: production as a motion picture

Rights and Permissions

Organization Name: Benaroya Pictures
Name: Michael Benaroya
Email: michael@benaroyapics.com
Telephone: (424)278-4224
Address: 8383 Wilshire Boulevard
Suite 310
Beverly Hills, CA 90211 United States

Certification

Name: Joseph Lanius
Date: March 10, 2015

