IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:25-cv-3550

BOY KILLS WORLD RIGHTS, LLC,

Plaintiff,

v.

DOES 1-7,

Defendants.

COMPLAINT AND JURY DEMAND

Boy Kills World Rights, LLC ("Plaintiff") files this Complaint against Defendants DOES 1-7 ("Defendants") and alleges as follows:

I. NATURE OF THE ACTION

1. This matter arises under the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, et seq. (the "Copyright Act").

2. The Plaintiff alleges that Defendants are liable for: (1) direct and contributory copyright infringement in violation of 17 U.S.C. §§ 106 and 501; and (2) violations under the Digital Millennium Copyright Act, 17 U.S.C. § 1202.

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 17 U.S.C. §§ 101, et. seq., (the Copyright Act), 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1338 (patents, copyrights, trademarks, and unfair competition).

4. Defendants either reside in, solicit, transact, or are doing business within this jurisdiction, and have committed unlawful and tortious acts both within and outside this jurisdiction with the full knowledge that their acts would cause injury in this jurisdiction. As such, Defendants have sufficient contacts with this judicial district to permit the Court's exercise of personal jurisdiction over them.

5. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) - (c) because: (a) all or a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (b) the Defendants reside or resided, and therefore can or could be found, in this State. Additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(b (venue for copyright cases), because the Defendants or Defendants' agents resides and can be found in this District.

III. PARTIES

A. The Plaintiff

6. The Plaintiff is a limited liability company registered under the laws of the State of Delaware and is an affiliate of Capstone Studios, Corp., a production company with a notable catalog of major award-winning motion pictures.

7. Plaintiff is the owner of the copyrights in the 2023 action movie *Boy Kills World* ("Work") featuring Bill Skarsgard. The Work is a dystopian fever dream action film that follows Boy, a deaf mute with a vibrant imagination. When his family is murdered, he is trained by a mysterious shaman to repress his childish imagination and become an instrument of death.

B. The Defendants

8. The Defendants are members of a group of BitTorrent users or peers whose computers are collectively interconnected for the sharing of a particular unique file, otherwise known as a "swarm". The particular file a BitTorrent swarm is associated with has a unique "hash" number.

9. Upon information and believe, each of the Defendants received from Plaintiff's agent at least a first notice styled per 17 U.S.C. 512(a) of the Digital Millennium Copyright Act ("DMCA notice") requesting the individual to stop infringement of the Work or other Works via BitTorrent protocol.

10. The Internet Service Provider ("ISP") provides the Internet service for Defendants. Plaintiff intends to subpoena the ISP in order to learn the subscriber identities of Defendants. Further discovery may be necessary in some circumstances in order to be certain of the identity of the proper Defendant. Plaintiff believes that information obtained in discovery will lead to the identification of each Defendants' true names and permit the Plaintiff to amend this Complaint to state the same. Plaintiff further believes that the information obtained in discovery may lead to the identification of additional infringing parties to be added to this Complaint as Defendants. Plaintiff will amend this Complaint to include the proper names and capacities once determined. Plaintiff is informed and believes, and based thereon allege, that each of the fictitiously named Defendants participated in and are responsible for the acts described in this Complaint and damages resulting therefrom.

11. Upon information and belief and as explained more fully below, each of the

Defendants used the same piracy website to obtain a torrent file for infringing the Work.

IV. JOINDER

12. Pursuant to Fed. R. Civ. P. 20(a)(1), each of the Defendants was properly joined because, as set forth in more detail below, the Plaintiff asserts that the infringements of its Work complained of herein by each of the Defendants was accomplished by the Defendants using the same piracy website; and there are common questions of law and fact. Each of Defendants obtained their torrent files from the same initial seeder.

13. Moreover, the infringements of the Work complained of herein by each of the Defendants was part of a series of transactions over the course of a relatively short period of time, involving the same Work, and, upon information and belief, was accomplished by the Defendants acting in concert with each other.

V. FACTUAL BACKGROUND

A. The Plaintiff Owns the Copyrights to the Work

14. The Plaintiff is the owner of the copyright registrations for the screenplay (PAu004119556 and PAu004114774) and motion picture (PAu004119107) in the Work. This action is brought pursuant to 17 U.S.C. § 411.

15. The Work is a motion picture currently offered for sale in commerce.

16. Defendants had notice of Plaintiff's rights through at least the credits indicated in the content of the motion pictures which bore proper copyright notices.

17. Defendants also had notice of Plaintiff's rights through general publication and advertising associated with the motion picture, which bore a proper copyright notice.

B. Defendants Used a piracy website to Download Torrent Files for Copying Plaintiff's Work.

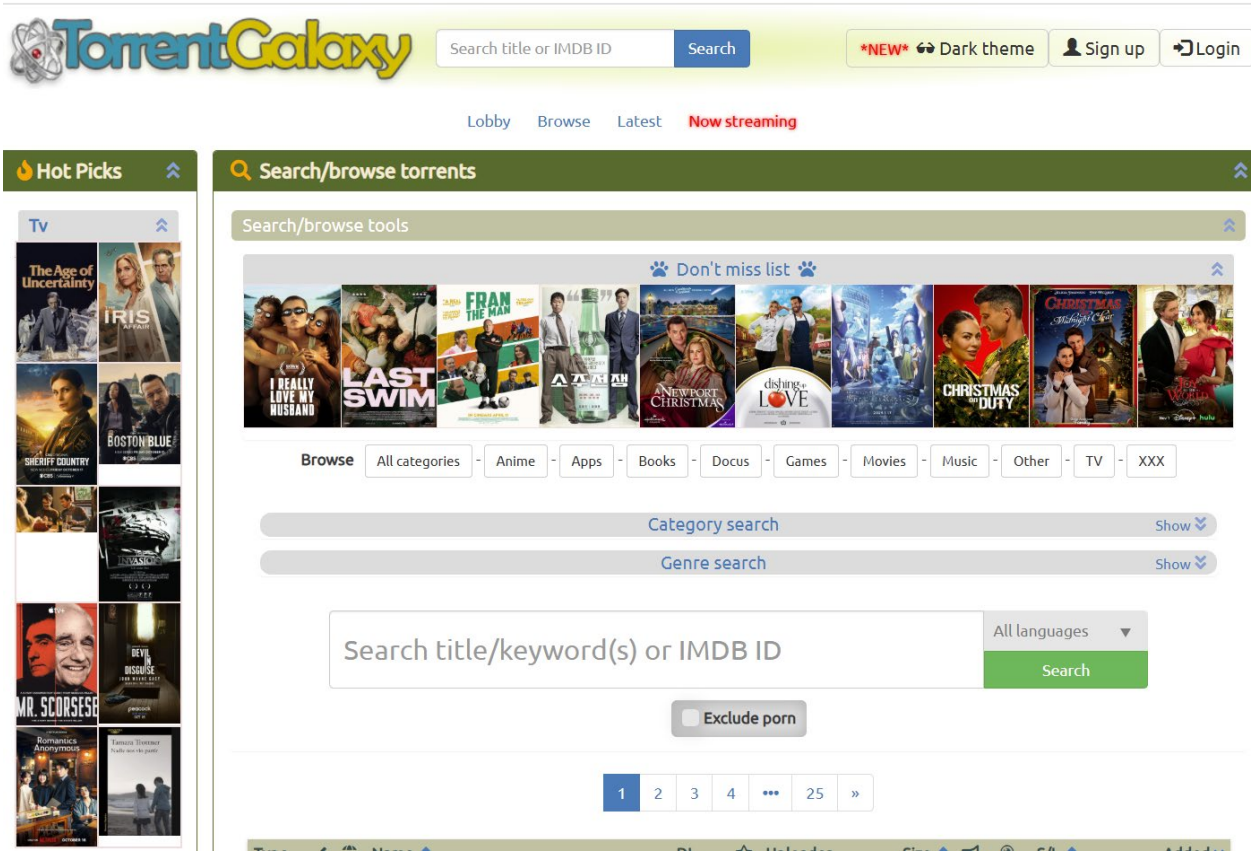
18. Upon information and belief, each of the Defendants registered for an account on a piracy website.

19. Upon information and belief, each of the Defendants registered for an account on the Torrent Galaxy website using an email address or installed a BitTorrent protocol client application on their device that retrieved torrent files from the Torrent Galaxy website.

20. The Torrent Galaxy website provides torrent files, many including the name "TGx" in their file names, that can be used by a BitTorrent protocol client application to download copyright protected content, including Plaintiff's Work.

21. The Torrent Galaxy also provides capability to stream copies of pirated Works.

22. As shown by the screenshots below, the Torrent Galaxy website is known for distributing torrent files of copyright protected motion pictures.



23. Upon information and belief, Defendants used the Torrent Galaxy website to download a torrent file associated with Plaintiff's motion picture or used a BitTorrent protocol client application installed on their device to retrieve the torrent file from the Torrent Galaxy website.

C. Defendants Used BitTorrent To Infringe the Plaintiff's Copyrights.

24. BitTorrent is one of the most common peer-to-peer file sharing protocols (in other words, set of computer rules) used for distributing large amounts of data.

25. The BitTorrent protocol's popularity stems from its ability to distribute a large file without creating a heavy load on the source computer and network. In short, to reduce the load on the source computer, rather than downloading a file from a single

source computer (one computer directly connected to another), the BitTorrent protocol allows users to join a "swarm" of host computers to download and upload from each other simultaneously (one computer connected to numerous computers).

1. Defendants installed a BitTorrent Client onto his or her computer.

26. A BitTorrent Client is a software program that implements the BitTorrent Protocol. There are numerous such software programs which can be directly downloaded from the Internet.

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

28. Each of the Defendants installed a BitTorrent Client onto his or her computer.

2. The Initial Seed, Torrent, Hash and Tracker

29. A BitTorrent user that wants to upload a new file, known as an "initial seeder," starts by creating a "torrent" descriptor file using, for example, the Client he or she installed onto his or her computer.

30. 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."

31. 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.

32. 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.

33. 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.

34. 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).

35. 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.

36. 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.)

3. Torrent Sites

37. “Torrent sites” are websites that index torrent files that are currently being made available for copying and distribution by people using the BitTorrent protocol. There are numerous torrent websites including the Torrent Galaxy website.

38. Defendants went to the Torrent Galaxy website to upload and download Plaintiff's copyrighted Work.

4. The Peer Identification

39. The BitTorrent Client will assign an identification referred to as a Peer ID to the computer so that it can share content (here the copyrighted Work) with other peers.

40. Upon information and belief, each Defendant was assigned a Peer ID by their BitTorrent client.

5. Uploading and Downloading a Work Through a BitTorrent Swarm

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

42. The BitTorrent protocol causes the initial seeder's computer to send different pieces of the computer file, here the copyrighted Work, to the peers seeking to download the computer file.

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

44. In this way, all of the peers and seeders are working together in what is called a "swarm."

45. Here, Defendants participated in a swarm and directly interacted and communicated with other members of that swarm through digital handshakes, the passing along of computer instructions, uploading and downloading, and by other types

of transmissions.

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

47. Once a peer has downloaded the full file, the BitTorrent Client reassembles the pieces and the peer is able to view the movie. Also, once a peer has downloaded the full file, that peer becomes known as "an additional seed," because it continues to distribute the torrent file, here the copyrighted Work.

6. The Plaintiff's Computer Investigator Identified Defendants' IP Addresses as Participants in a Swarm That Was Distributing Plaintiff's Copyrighted Work.

48. Maverickeye UG ("MEU") was retained to identify the IP addresses that are being used by those people that are using the BitTorrent protocol and the Internet to reproduce, distribute, display or perform the Plaintiff's copyrighted Work.

49. MEU used forensic software to enable the scanning of peer-to-peer networks for the presence of infringing transactions.

50. MEU extracted the resulting data emanating from the investigation, reviewed the evidence logs, and isolated the transactions and the IP addresses associated therewith for the files identified by the SHA-1 hash value of the Unique Hash

Number.

51. The IP addresses and hit dates contained in Exhibit 1 accurately reflect what is contained in the evidence logs.

52. The logged information in Exhibit 1 show that Defendants copied pieces of the Plaintiff's copyrighted Work.

53. The Defendants' computers used the identified IP addresses in Exhibit 1 to connect to the investigative server from a computer in this District in order to transmit a full copy, or a portion thereof, of a pirated copy of Plaintiff's Work.

54. MEU's agent analyzed each BitTorrent "piece" distributed by the IP addresses listed on Exhibit 1 and verified that re-assemblage of the pieces using a BitTorrent Client results in a fully playable digital motion picture of the Work.

55. MEU's agent viewed the Work side-by-side with the pirated copy and determined that they were identical, strikingly similar or substantially similar.

56. Other rightsholder detected pirated copies of copyright protected Works being distributed from some of the same IP addresses at or near the same time MEU detected the Work being infringed from the IP addresses. *See*, *e.g.,* STRIKE 3 HOLDINGS, LLC v. JOHN DOE subscriber assigned IP address 73.95.250.156, 1:24cv02693-CMA-MEH, Doc.#1(D.Col. 2024); STRIKE 3 HOLDINGS, LLC v. JOHN DOE subscriber assigned IP address 76.130.128.15, 1:25-cv-00433-CMA-CYC, Doc. #1 (D.Col. 2025); and STRIKE 3 HOLDINGS, LLC v. JOHN DOE subscriber assigned IP address 24.9.236.48, 1:25-cv-00781-CMA-CYC, Doc. #1 (D.Col. 2025).

D. Defendants Knew the Copyright Management Information Included in the Files They Distributed had been Removed or Altered Without the Authority of Plaintiff

57. A legitimate file copy of the Work includes copyright management information ("CMI") indicating the title.

58. The operator of the piracy website Torrent Galaxy was the initial seeder of the infringing file copies.

59. The initial seeder of the infringing file copies of Plaintiff's Work added the word "TGx" to the file titles to "brand" the quality of piracy files he or she released and attract further traffic to the Torrent Galaxy website.

60. The word TGx is not included in the file title of legitimate copies or streams of the Plaintiff's Work. The initial seeder of the Work altered the title to falsely include the word "TGx" as CMI.

61. The file copies Defendants distributed to other peers in the Swarm included this altered CMI in the file title.

62. Defendants knew that the Torrent Galaxy website from which they obtained their torrent files was distributing illegal copies of the Work.

63. For multiple years including through 2024, the United States Trade Representative listed Torrent Galaxy as a notorious piracy website.

Excerpt from 2024 Review of Notorious Markets for Counterfeiting and Piracy

TORRENT GALAXY

Nominated as torrentgalaxy.to. Related sites include torrentglaxy.mx, torrentgalaxy.buzz, tgx.rs, and tgx.sb.

Torrent Galaxy is a popular BitTorrent streaming site that grew after another popular site, ExtraTorrent, shut down in 2018. In addition to torrent downloads, Torrent Galaxy also offers streaming for some content. After the shutdown of RARBG, one of the world's largest torrent sites, in May 2023, many users reportedly moved from RARBG to Torrent Galaxy. RARBG was well-known for having copies of new movies and television programs sourced from illegal "release groups," and Torrent Galaxy has sought to provide access to similar content. Torrent Galaxy has reportedly received over 320 million visits since August 2023.

64. Defendants knew that TGx was not the author of Plaintiff's Work.

65. Defendants knew that TGx was not a licensed distributor of Plaintiff's Works.

66. Defendants knew that the CMI that included TGx in the file names was false.

67. Defendants knew that the file copies of the Work that they distributed to other peers in the Swarm included the altered CMI without the authority of Plaintiff.

68. Defendants knew that the CMI in the title they distributed to other peers in the Swarm included the altered CMI without the authority of Plaintiff.

69. Defendants knew that the false or altered CMI in the titles would induce, enable, facility or conceal infringements of the Work when they distributed the false CMI, altered CMI, or Work including the false or altered CMI.

70. Namely, Defendants knew that other recipients would see the file titles and

use the altered CMI to go to the website such as Torrent Galaxy from where the torrent files originated to obtain unlicensed copies of the Work.

71. By providing the website title TGx in the altered CMI to others, Defendants induced, enabled and facilitated further infringements of the Work.

VI. FIRST CLAIM FOR RELIEF
(Direct Copyright Infringement)

72. Plaintiff re-alleges and incorporates by reference the allegations contained in each of the foregoing paragraphs.

73. Plaintiff is the registered copyright owner of the Work which contains an original work of authorship.

74. Defendants copied the constituent elements of the Works.

75. Defendants also publicly performed and displayed the copyright protected Work.

76. By participating in the BitTorrent swarms with others, Defendants distributed at least a piece of the copyright protected Work to others.

77. Plaintiff did not authorize, permit, or provide consent to Defendants to copy, reproduce, distribute, publicly perform, or display the Work.

78. As a result of the foregoing, Defendants violated the Plaintiff's exclusive rights to reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501.

79. As a result of the foregoing, Defendants violated the Plaintiff's exclusive rights to distribute copies of the Work in copies, in violation of 17 U.S.C. §§ 106(3) and 501.

80. As a result of the foregoing, Defendants violated the Plaintiff's exclusive rights to perform the Work publicly, in violation of 17 U.S.C. §§ 106(4) and 501.

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

82. The Plaintiff has suffered damages that were proximately caused by each of the Defendants' copyright infringements including, but not limited to lost sales, price erosion, and a diminution of the value of its copyrights.

VIII. SECOND CLAIM FOR RELIEF
(Contributory Copyright Infringement based upon participation in the BitTorrent Swarm)

83. Plaintiff re-alleges and incorporates by reference the allegations contained in each of the foregoing paragraphs.

84. By participating in the BitTorrent swarms with others, Defendants induced, caused or materially contributed to the infringing conduct of others.

85. Plaintiff did not authorize, permit, or provide consent to the Defendants inducing, causing, or materially contributing to the infringing conduct of others.

86. Defendants knew or should have known that the other BitTorrent users in a swarm with them were directly infringing the Plaintiff's copyrighted Work by copying constituent elements of the registered Work that are original. Indeed, Defendants directly participated in and therefore materially contributed to others' infringing activities.

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

88. By engaging in the contributory infringement alleged in this Complaint, the

Defendants deprived not only the producers of the Work from income that could have been derived when the respective film was offered for sale or rental, but also all persons involved in the production and marketing of this film, numerous owners of licensed distribution outlets in Colorado and their employees, and, ultimately, the local economy. The Defendants' misconduct therefore offends public policy.

VIII. THIRD CLAIM FOR RELIEF

(Digital Millennium Copyright Act Violations)

89. Plaintiff re-alleges and incorporates by reference the allegations contained in each of the foregoing paragraphs.

90. Defendants knowingly and with the intent to induce, enable, facilitate, or conceal infringement of the copyright protected Work distributed copyright management information ("CMI") that falsely included the wording "TGx" in violation of 17 U.S.C. § 1202(a)(2).

91. Defendants, without the authority of Plaintiff, or the law, distributed, removed or altered CMI knowing that the CMI had been removed or altered to include the wording "TGx" without the authority of Plaintiff and knowing, or having reasonable grounds to know, that it will induce, enable, facilitate, or conceal infringement of copyright protected Work in violation of 17 U.S.C. § 1202(b)(2).

92. Defendants, without the authority of Plaintiff, or the law, distributed Plaintiff's Copyright protected Work knowing that the CMI had been removed or altered to include the wording "TGx", and knowing, or having reasonable grounds to know, that it will induce,

enable, facilitate, or conceal infringement of the copyright protected Work in violation of 17 U.S.C. § 1202(b)(3).

93. Particularly, the Defendants knew that the CMI in the file names of the pieces had been altered to include the wording “TGx”.

94. Particularly, the Defendants distributed the file names that included CMI that had been altered to include the wording “TGx”.

95. Defendants knew that the wording “TGx” originated from the notorious movie piracy website for which each had registered accounts and/or actively used.

96. Defendants’ acts constitute violations under the Digital Millennium Copyright Act, 17 U.S.C. § 1202.

97. Plaintiff is entitled to an injunction to prevent Defendants from engaging in further violations of 17 U.S.C. § 1202.

98. Plaintiff is entitled to recover from Defendants the actual damages suffered by Plaintiff and any profits Defendants have obtained as a result of their wrongful acts that are not taken into account in computing the actual damages. Plaintiff is currently unable to ascertain the full extent of the profits Defendants have realized by their violations of 17 U.S.C. § 1202.

99. Plaintiff is entitled to elect to recover from Defendants statutory damages for their violations of 17 U.S.C. § 1202.

100. Plaintiff is further entitled to costs and reasonable attorneys’ fees.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that this Court:

(A) enter a permanent injunction enjoining Defendants from continuing to directly infringe and contribute to infringement of the Plaintiff's copyrighted Work;

(B) enter an order pursuant to 17 U.S.C. §512(j) and/or 28 U.S.C §1651(a) that any service provider providing service for Defendants which he or she used to infringe Plaintiff's Work immediately cease said service;

(C) award the Plaintiff actual damages and Defendants' profits in such amount as may be found; alternatively, at Plaintiff's election, for maximum statutory damages of $150,000 for infringing the copyright in the screenplay and $150,000 for infringing the copyright in the motion picture pursuant to 17 U.S.C. § 504(a) and § 504(c);

(D) award the Plaintiff its actual damages from the DMCA violations and Defendants' profits in such amount as may be found; or, in the alternative, at Plaintiff's election, for maximum statutory damages of $25,000 pursuant to 17 U.S.C. § 1203(c) for violations of 17 U.S.C. § 1202;

(E) award the Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) grant the Plaintiff any and all other and further relief that this Court deems just and proper.

The Plaintiff hereby demands a trial by jury on all issues properly triable by jury.

DATED: Kailua-Kona, Hawaii, November 6, 2025.

/s/ Kerry S. Culpepper
Kerry S. Culpepper
CULPEPPER IP, LLLC
75-170 Hualalai Road, Suite B204

Kailua-Kona, Hawaii 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
E-Mail: kculpepper@culpepperip.com
Attorney for Plaintiff Boy Kills World Rights, LLC

EXHIBIT 1

No	IP	Port	Hit Date UTC	Title	ISP	region
1	73.95.250.156	28088	2024-06-20 20:37:27	Boy Kills World	Comcast Cable	Colorado
2	73.14.53.246	53986	2025-05-28 15:46:04	Boy Kills World	Comcast Cable	Colorado
3	76.130.128.15	60856	2024-05-22 00:36:08	Boy Kills World	Comcast Cable	Colorado
4	71.237.57.173	19995	2025-02-12 02:43:54	Boy Kills World	Comcast Cable	Colorado
5	67.165.251.102	65285	2025-05-25 04:47:39	Boy Kills World	Comcast Cable	Colorado
6	73.14.53.246	53811	2025-05-28 15:44:30	Boy Kills World	Comcast Cable	Colorado
7	24.9.236.48	54968	2024-05-03 05:00:04	Boy Kills World	Comcast Cable	Colorado

city
Denver
Aurora
Brighton
Colorado Springs
Denver
Aurora
Colorado Springs

JS 44 (Rev. 09/19) District of Colorado

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
Boy Kills World Rights, LLC

(b) County of Residence of First Listed Plaintiff Kent County, Delaware
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Culpepper IP, LLLC
75-170 Hualalai Road, Suite B204
Kailua Kona, HI 96740 / 808-464-4047

DEFENDANTS
DOES 1-7

County of Residence of First Listed Defendant Denver County
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ❒ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ❒ 2 U.S. Government Defendant
- ❒ 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)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	❒ 1	❒ 1	Incorporated *or* Principal Place of Business In This State	❒ 4	❒ 4
Citizen of Another State	❒ 2	❒ 2	Incorporated *and* Principal Place of Business In Another State	❒ 5	❒ 5
Citizen or Subject of a Foreign Country	❒ 3	❒ 3	Foreign Nation	❒ 6	❒ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

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

REAL PROPERTY
- ❒ 210 Land Condemnation
- ❒ 220 Foreclosure
- ❒ 230 Rent Lease & Ejectment
- ❒ 240 Torts to Land
- ❒ 245 Tort Product Liability
- ❒ 290 All Other Real Property

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

PERSONAL PROPERTY
- ❒ 370 Other Fraud
- ❒ 371 Truth in Lending
- ❒ 380 Other Personal Property Damage
- ❒ 385 Property Damage Product Liability

CIVIL RIGHTS
- ❒ 440 Other Civil Rights
- ❒ 441 Voting
- ❒ 442 Employment
- ❒ 443 Housing/ Accommodations
- ❒ 445 Amer. w/Disabilities - Employment
- ❒ 446 Amer. w/Disabilities - Other
- ❒ 448 Education

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
- ❒ 835 Patent - Abbreviated New Drug Application
- ❒ 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
- ❒ 376 Qui Tam (31 USC 3729(a))
- ❒ 400 State Reapportionment
- ❒ 410 Antitrust
- ❒ 430 Banks and Banking
- ❒ 450 Commerce
- ❒ 460 Deportation
- ❒ 470 Racketeer Influenced and Corrupt Organizations
- ❒ 480 Consumer Credit (15 USC 1681 or 1692)
- ❒ 485 Telephone Consumer Protection Act
- ❒ 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 - Transfer ❒ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing ***(Do not cite jurisdictional statutes unless diversity)***:
17 U.S.C. §§ 101, et seq. (the "Copyright Act")

Brief description of cause:
Direct and Contributory Copyright Infringement, DMCA Violations

❒ **AP Docket**

VII. REQUESTED IN COMPLAINT:

❒ CHECK IF THIS IS A **CLASS ACTION** UNDER RULE 23, F.R.Cv.P.

DEMAND $ 325,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ❒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 11/06/2025

SIGNATURE OF ATTORNEY OF RECORD /s/ Kerry S. Culpepper

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I.(a) **Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) **County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) **Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. **Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below**; NOTE: federal question actions take precedence over diversity cases.**)

III. **Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. **Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: Nature of Suit Code Descriptions.

V. **Origin.** Place an "X" in one of the seven boxes.
Original Proceedings. (1) Cases which originate in the United States district courts.
Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statue.

VI. **Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service

VII. **Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

VIII. **Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.