

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE infringer using IP address
108.26.153.180,

Defendant.

Civil Action No. 1:26-cv-11363-WGY

**FIRST AMENDED COMPLAINT – ACTION FOR DAMAGES FOR
PROPERTY RIGHTS INFRINGEMENT**

Plaintiff, Strike 3 Holdings, LLC (“Strike 3” or “Plaintiff”), brings this First Amended Complaint against Defendant, John Doe infringer using IP address 108.26.153.180 a/k/a [REDACTED] (“Defendant”), and alleges as follows:

Introduction

1. This is a case about the ongoing and wholesale copyright infringement of Plaintiff’s motion pictures by Defendant.
2. Plaintiff is the owner of award-winning, critically acclaimed adult motion pictures.
3. Strike 3’s motion pictures are distributed through the *Blacked*, *Blacked Raw*, *MILFY*, *Slayed*, *Tushy*, *Tushy Raw*, *Vixen*, and *Wifey* adult websites and DVDs. With millions of unique visitors to its websites each month, the brands are famous for redefining adult content, creating high-end, artistic, and performer-inspiring motion pictures produced with a Hollywood style budget and quality.
4. Defendant is, in a word, stealing these works on a grand scale. Using the BitTorrent protocol, Defendant is committing rampant and wholesale copyright infringement by downloading

Strike 3's motion pictures as well as distributing them to others. Defendant did not infringe just one or two of Strike 3's motion pictures, but has been recorded infringing 31 movies over an extended period of time.

5. Although Defendant attempted to hide this theft by infringing Plaintiff's content anonymously, this court's order permitted Plaintiff to serve a subpoena on Defendant's Internet Service Provider ("ISP"), Verizon Online LLC, to discover the identity of the subscriber assigned to IP address 108.26.153.180, the IP address the Defendant used to download and share Plaintiff's works.

6. Based on Plaintiff's investigation of the subscriber and publicly available resources, Plaintiff identified Defendant as true infringer.

7. This is a civil action seeking damages under the United States Copyright Act of 1976, *as amended*, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").

Jurisdiction and Venue

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338 (jurisdiction over copyright actions).

9. This Court has personal jurisdiction over Defendant because Defendant used an Internet Protocol address ("IP address") traced to a physical address located within this District to commit copyright infringement. Therefore: (i) Defendant committed the tortious conduct alleged in this First Amended Complaint in this State; (ii) Defendant resides in this State and/or; (iii) Defendant has engaged in substantial – and not isolated – business activity in this State.

10. Pursuant to 28 U.S.C. § 1391(b) and (c), venue is proper in this district because: (i) a substantial part of the events or omissions giving rise to the claims occurred in this District; and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this State.

Additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for copyright cases) because Defendant or Defendant's agent resides or may be found in this District.

Parties

11. Plaintiff, Strike 3 is a Delaware limited liability company located at 2140 S. Dupont Hwy, Camden, DE.

12. Defendant, [REDACTED], is an individual currently residing at [REDACTED].

Factual Background

Plaintiff's Award-Winning Copyrights

13. Strike 3's subscription-based websites proudly boast a paid subscriber base that is one of the highest of any adult-content sites in the world. Strike 3 also licenses its motion pictures to popular broadcasters and Strike 3's motion pictures are some of the highest selling adult DVDs in the United States.

14. Strike 3's motion pictures and websites have won numerous awards, such as "best cinematography," "best new studio," and "adult site of the year."

15. Strike 3's motion pictures have had positive global impact, leading more adult studios to invest in better content, higher pay for performers, and to treat each performer with respect and like an artist.

16. Unfortunately, Strike 3, like a large number of other makers of motion picture and television works, has a major problem with Internet piracy. Often appearing among the most infringed popular entertainment content on torrent websites, Strike 3's motion pictures are among the most pirated content in the world.

***Defendant Used the BitTorrent File Distribution Network
to Infringe Plaintiff's Copyrights***

17. BitTorrent is a system designed to quickly distribute large files over the Internet. Instead of downloading a file, such as a movie, from a single source, BitTorrent users are able to connect to the computers of other BitTorrent users in order to simultaneously download and upload pieces of the file from and to other users.

18. BitTorrent's popularity stems from the ability of users to directly interact with each other to distribute a large file without creating a heavy load on any individual source computer and/or network. It enables Plaintiff's motion pictures, which are often filmed in state of the art 4kHD, to be transferred quickly and efficiently.

19. To share a movie within the BitTorrent network, a user first uses BitTorrent software to create a .torrent file from the original digital media file. This process breaks the original digital media file down into numerous pieces.

20. The entire movie file being shared has a hash value (*i.e.*, the "File Hash"). A hash value is an alpha-numeric value of a fixed length that uniquely identifies data.

21. Hash values are not arbitrarily assigned to data merely for identification purposes, but rather are the product of a cryptographic algorithm applied to the data itself. As such, while two identical sets of data will produce the same cryptographic hash value, any change to the underlying data – no matter how small – will change the cryptographic hash value that correlates to it.

22. To find and re-assemble the pieces of the digital media file, *i.e.*, to download the file using BitTorrent, a user must obtain the .torrent file for the specific file that has been broken down into pieces.

23. Each .torrent file contains important metadata with respect to the pieces of the file. When this data is put into the cryptographic algorithm, it results in a hash value called the “Info Hash.”

24. The “Info Hash” is the data that the BitTorrent protocol uses to identify and locate the other pieces of the desired file (in this case, the desired file is the respective file for the infringing motion pictures that are the subject of this action) across the BitTorrent network.

25. Using the Info Hash in the metadata of a .torrent file, a user may collect all the pieces of the digital media file that correlates with the specific .torrent file.

26. Once a user downloads all of the pieces of that digital media file from other BitTorrent users, the digital media file is automatically reassembled into its original form, ready for playing.

27. Plaintiff has developed, owns, and operates infringement detection systems named “VXN Scan” and the “Cross Reference Tool”. Each infringement detection system identifies infringement in two distinct ways.

28. The Cross Reference Tool first searched for and obtained .torrent files claiming to be infringing copies of Plaintiff’s works, and then VXN Scan downloaded complete copies of the digital media files that correlate to those .torrent files.

29. Plaintiff then compared the completed digital media files to Plaintiff’s copyrighted works to determine whether they are infringing copies of one of Plaintiff’s copyrighted works.

30. The digital media files have been verified to contain a digital copy of a motion picture that is identical (or, alternatively, strikingly similar or substantially similar) to Plaintiff’s corresponding original copyrighted Works.

31. VXN Scan used the “Info Hash” value, contained within the metadata of the .torrent

file which correlated with a digital media file that was determined to be identical (or substantially similar) to a copyrighted work, to download a piece (or pieces) of multiple digital media files from Defendant using the BitTorrent network.

32. VXN Scan only downloads pieces of digital media files from Plaintiff's copyrighted works. At no point did VXN Scan upload content to any BitTorrent user. Indeed, it is incapable of doing so.

33. While Defendant was using the BitTorrent file distribution network, VXN Scan established multiple direct TCP/IP connections with Defendant's IP address.

34. Plaintiff identified these pieces as portions of infringing copies of Strike 3's motion pictures.

35. VXN Scan detected, captured and documented Defendant transmitting pieces of Plaintiff's copyrighted motion pictures and recorded those transactions in a Packet Capture ("PCAP") file.

36. Plaintiff also recorded infringement using its Cross Reference Tool.

37. The Cross Reference Tool is designed on the basis of a distributed hash table ("DHT") and is a class of decentralized distributed systems that provides an identification service similar to a hash table: (key, value) pairs are stored in a DHT, and any participating node can efficiently retrieve the value associated with a given key.

38. BitTorrent clients use a DHT to locate peers who are participating in the distribution of the digital media files related to the Info Hash. Specifically, a BitTorrent client locates and connects to the DHT network. That way it registers its own IP address while requesting IP addresses of other peers, which are distributing the same .torrent file.

39. Using this process BitTorrent users are able to locate and connect to a number of

peers within a particular swarm, and download the data related to each .torrent file.

40. A BitTorrent client registers the IP address of the user into the DHT with the purpose of participating in the distribution of constituent pieces of the relevant digital media file.

41. The Cross Reference Tool uses servers that locate .torrent files and their related Info Hashes. The servers subsequently download the torrent information from popular torrent websites. The Cross Reference Tool is incapable of downloading any digital media file associated with an Info Hash, and it has only the ability to download torrent file metadata.

42. Similar to BitTorrent clients, the Cross Reference Tool uses a DHT to obtain the IP Addresses of peers registered to each .torrent file listed in the DHT.

43. The Cross Reference Tool detected and documented that Defendant used the BitTorrent File Distribution Network with the purpose of distributing digital media files that have been determined to be identical (or substantially similar) to Plaintiff's copyrighted motion pictures. At no point did the Cross Reference Tool upload content to any BitTorrent user. Indeed, it is incapable of doing so.

44. Both VXXN Scan and the Cross Reference Tool independently recorded multiple infringements in the manner described above. Collectively, Plaintiff's proprietary software detected 31 number of infringements.

45. Each work infringed by Defendant is listed on Exhibit A and sets forth the Universal Time Coordinated (UTC) time and date of each infringement, along with the Info Hash value obtained from the metadata of the corresponding .torrent file.

46. Exhibit A also sets forth relevant copyright information for each work at issue: the date of publication, the date of registration, and the work's copyright registration number. In a showing of good faith, Plaintiff has intentionally omitted the title of the work from this public

filing due to the adult nature of its content, but can provide a version of Exhibit A containing the works' titles to the Court or any party upon request.

47. Thus, Defendant downloaded, copied, and distributed Plaintiff's Works without authorization.

48. Defendant's infringement was continuous and ongoing.

49. Plaintiff owns the copyrights to the Works and the Works have been registered with the United States Copyright Office.

50. Plaintiff seeks statutory damages, attorneys' fees, and costs under 17 U.S.C. § 501 of the United States Copyright Act.

Discovery Will Likely Show that Defendant is the Individual Who Infringed Plaintiff's

Copyrighted Works

51. Plaintiff's investigation has determined that Defendant is the person who used IP address 108.26.153.180 to infringe on its copyrighted works.

52. Plaintiff utilized the Maxmind geolocation service to determine the ISP that assigned IP address 108.26.153.180 (to determine the correct ISP to whom a subpoena can be sent) and the geographic location of the subscriber of that IP address (to determine the proper venue in which to file an action).

53. After the Court granted Plaintiff's request to conduct limited expedited discovery, Plaintiff served the court-authorized subpoena on the ISP on or about April 28, 2026.

54. Upon information and belief, the ISP subsequently provided notice of the subpoena (and this lawsuit) to the subscriber, in compliance with the Cable Communications Policy Act of 1984 ("CCPA"), 47 U.S.C. § 551 et seq.

55. The ISP responded to the subpoena and identified Defendant's wife as the

subscriber assigned the relevant IP address during at least one date of infringement and provided Defendant's address identified in paragraph 12.

56. The address identified in paragraph 12 is a single-family home.

57. After receiving the ISP's response to the subpoena, Plaintiff reviewed publicly available information for Defendant and individuals who, upon information and belief, resided in the residence (and therefore had sufficient access to the IP address during the period of infringement).

58. Defendant lived at the residence identified in paragraph 12 above during the period of infringement.

59. Upon information and belief, the only other occupants of the residence identified in paragraph 12 above during the period of infringement were Defendant's wife and their son.

60. Plaintiff also logged BitTorrent network activity emanating from IP address 108.26.153.180 involving works other than Plaintiff's 31 copyrighted works during the period of infringement. Collectively, this evidence is referred to as the "Additional Evidence."

61. Plaintiff's Additional Evidence indicates that IP address 108.26.153.180 was used to download and distribute files relating to other adult movies and mainstream media (i.e., movies, music, books, software, TV shows, and other works) using the BitTorrent protocol during the period of infringement.

62. The consistent and prolonged history of BitTorrent activity indicates that the infringer is unlikely to be a houseguest or infrequent visitor.

63. Publicly available records indicate strong matches between the BitTorrent activity identified in Plaintiff's Additional Evidence and Defendant.

64. [REDACTED]:

- a. [REDACTED];
 - b. [REDACTED];
 - c. [REDACTED];
 - d. [REDACTED];
 - e. [REDACTED];
 - f. [REDACTED];
 - g. [REDACTED];
 - h. [REDACTED];
 - i. [REDACTED];
 - j. [REDACTED];
 - k. [REDACTED];
 - l. [REDACTED];
 - m. [REDACTED];
 - n. [REDACTED];
 - o. [REDACTED];
 - p. [REDACTED]; and
 - q. [REDACTED].
65. [REDACTED]:
- a. [REDACTED];
 - b. [REDACTED];
 - c. [REDACTED];
 - d. [REDACTED];
 - e. [REDACTED];

- f. [REDACTED];
- g. [REDACTED];
- h. [REDACTED];
- i. [REDACTED];
- j. [REDACTED];
- k. [REDACTED];
- l. [REDACTED];
- m. [REDACTED];
- n. [REDACTED];
- o. [REDACTED];
- p. [REDACTED];
- q. [REDACTED];
- r. [REDACTED];
- s. [REDACTED];
- t. [REDACTED];
- u. [REDACTED]; and
- v. [REDACTED].

COUNT I

Direct Copyright Infringement

- 66. The allegations contained in paragraphs 1-65 are hereby re-alleged as if fully set forth herein.
- 67. Plaintiff is the owner of the Works, which is an original work of authorship.
- 68. Defendant copied and distributed the constituent elements of Plaintiff's Works

using the BitTorrent protocol.

69. At no point in time did Plaintiff authorize, permit or consent to Defendant's distribution of its Works, expressly or otherwise.

70. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

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

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

(C) Perform the copyrighted Works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Works' images in any sequence and/or by making the sounds accompanying the Works' audible and transmitting said performance of the work, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publicly" perform); and

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

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

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant from continuing to infringe Plaintiff's copyrighted Works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's Works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the Works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. § 504(a) and (c);

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

(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

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

Respectfully submitted,

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Exhibit A to the First Amended Complaint

Location: Marlborough, MA

IP Address: 108.26.153.180

Total Works Infringed: 31

ISP: Verizon Fios

Work	Info Hash	UTC	Site	Published	Registered	Registration
1	051A52EFFAA41578BB5F4F7EDE4827997D21BC4C	03/02/2026 15:10:00	Vixen	07/23/2018	09/05/2018	PA0002135670
2	BF4DB7D99CD5F1DBC3EA10A70EC1BD1E4A9674B0	03/10/2026 18:18:42	Milfy	02/19/2025	03/28/2025	PA0002522506
3	fbb1e3387b5d032b30b9137e05f516e696dc5cc5	03/09/2026 13:16:31	Vixen	11/10/2018	11/25/2018	PA0002136725
4	2f872cc3383d684714d4ef9df5e064793831153d	03/05/2026 13:14:39	Milfy	11/06/2024	11/18/2024	PA0002500974
5	9DA4398C2EA37BD75DFD276DC58714FCFD46A7E4	03/04/2026 19:31:04	Milfy	01/28/2026	02/04/2026	PA0002565319
6	D953E392C297913CDBDFCE65BCF4DF39F6D492E1	03/04/2026 13:50:10	Vixen	05/24/2019	07/17/2019	PA0002188303
7	0e8fd8baba4a34b2b14a576bf31bffdc4c1b9ddc	02/20/2026 13:45:52	Vixen	02/23/2019	04/29/2019	PA0002169931
8	0e88a9517afeee582849e374d9911fac01c7d4a4	02/20/2026 13:45:52	Wifey	07/12/2025	07/22/2025	PA0002541693
9	0e88588445822bfb014456cee2b3486de3f97a75	02/20/2026 13:45:51	Tushy	07/28/2024	08/14/2024	PA0002484831
10	0eafebac6daa51f461b13c9cafad7ba1d962822a	02/20/2026 13:45:51	TushyRaw	01/03/2024	01/16/2024	PA0002449519
11	0eac407f54401d2989158590bf8d081c3f5fc5eb	02/20/2026 13:45:51	Blacked Raw	12/05/2022	01/10/2023	PA0002389624
12	0eabbed66ed9d88296a81b5d6a63f1f19035e013	02/20/2026 13:45:51	Blacked	05/22/2021	06/09/2021	PA0002295591
13	0e890068fe77c4593cba9ccbe5f458244c6aed8a	02/20/2026 13:45:51	Blacked Raw	06/08/2020	06/25/2020	PA0002255509
14	0e88a66ccab0c708774c78cafebec4eedbeaccf	02/20/2026 13:45:51	Blacked Raw	11/18/2019	12/09/2019	PA0002216261
15	0eaa4082debe285e1a741a998e42d42b0db26b68	02/20/2026 13:45:51	Blacked Raw	09/19/2018	11/01/2018	PA0002143420
16	0ea362e2d434594fa128ec2cca923bfa98b45c06	02/20/2026 13:45:50	Blacked	05/15/2017	06/22/2017	PA0002039283

Work	Info Hash	UTC	Site	Published	Registered	Registration
17	BB108D1DE3659FA8B24F197DCCF3511E5ACA635F	02/12/2026 18:06:20	Milfy	10/15/2025	11/10/2025	PA0002553354
18	DBA02866E5BD0D4D5FCFFB15FEB41DBEC49237EE	02/11/2026 13:50:26	Vixen	05/05/2023	05/15/2023	PA0002411290
19	5DF8FA648DEEAE1D73E962DB195061E646F82B4E	01/28/2026 21:14:12	Tushy	08/04/2019	08/22/2019	PA0002195508
20	23510AB1A7B70C2F16AB31DC5FB45AA30F3F3E75	01/12/2026 20:19:12	Milfy	01/24/2024	03/15/2024	PA0002461445
21	79153C5817365DF2C54E1CA8A115266FE84C1A08	12/08/2025 15:12:53	Vixen	04/18/2025	04/23/2025	PA0002527325
22	2EB05136D65F6D94BC380C4E42D3107DF99EE8F2	10/27/2025 23:13:38	Vixen	10/04/2024	10/16/2024	PA0002494721
23	BBED38C36127A8B2DBED3F2D4D6B32EFA3C568FF	10/27/2025 23:08:05	Vixen	09/19/2025	09/24/2025	PA0002552393
24	F9459A2CD9FCD152ACC9DF1B45FB05D033257A0D	10/27/2025 23:07:58	Vixen	05/16/2025	05/21/2025	PA0002531817
25	E1522D8D5EE66F96296F06AF7B049398889C01D9	10/23/2025 18:18:59	Vixen	01/24/2025	02/18/2025	PA0002515955
26	492EEA537AED41C211298AEC8E1433F363F92CE8	10/09/2025 19:20:07	TushyRaw	06/25/2024	07/15/2024	PA0002480610
27	997D5180CBC67DFE2455C40F2D36DF5AF75255D4	09/23/2025 20:15:59	Milfy	06/25/2025	07/08/2025	PA0002539157
28	D71FA8300D660A26679A2C53720C9F8C05F9CF79	09/09/2025 17:07:00	Tushy	07/15/2019	08/02/2019	PA0002192300
29	1018A676073B24EB9A7384E7BF56686079E27B27	09/04/2025 20:13:30	Tushy	07/20/2018	09/05/2018	PA0002134598
30	1908BDD6CC4531281E1755D49FECD27A6B7B57AF	08/29/2025 16:43:11	Milfy	02/12/2025	02/18/2025	PA0002516144
31	BD9E65417FC6622CAC52AD62302485B933871057	08/27/2025 18:19:08	Milfy	08/06/2025	08/08/2025	PA0002544264