

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STRIKE 3 HOLDINGS, LLC, )  
 )  
Plaintiff, ) Civil Case No. \_\_\_\_\_  
 )  
v. )  
 )  
JOHN DOE subscriber assigned IP address )  
73.129.22.101, )  
 )  
Defendant. )  
\_\_\_\_\_ )

**COMPLAINT-ACTION FOR DAMAGES FOR  
PROPERTY RIGHTS INFRINGEMENT**

Plaintiff, Strike 3 Holdings, LLC (“Strike 3” or “Plaintiff”), brings this complaint against John Doe subscriber assigned IP address 73.129.22.101, and alleges as follows:

**Introduction**

1. This is a case about the ongoing and wholesale copyright infringement of Plaintiff’s motion pictures by Defendant, currently known only by an IP address.
2. Plaintiff is the owner of award winning, critically acclaimed adult motion pictures.
3. Strike 3’s motion pictures are distributed through the *Blacked*, *Tushy*, *Vixen*, and *Blacked Raw* 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 91 movies over an extended period of time.

5. Although Defendant attempted to hide this theft by infringing Plaintiff's content anonymously, Defendant's Internet Service Provider ("ISP"), Comcast Cable (Comcast Cable), can identify Defendant through his or her IP address 73.129.22.101.

6. In an effort to conserve Federal judicial resources, Strike 3 originally moved to discover Defendant's identity utilizing a state court procedure in Florida where Strike 3's infringement detection servers are located. Defendant objected asserting that the action is more properly litigated in the federal court of his or her domicile. Because Plaintiff is amenable to litigating the matter in either forum, this suit was initiated.

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 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. Plaintiff used IP address geolocation technology by Maxmind Inc. ("Maxmind"), an industry-leading provider of IP address intelligence and online fraud detection tools, to determine that Defendant's IP address traced to a physical address in this District. Over 5,000

companies, along with United States federal and state law enforcement, use Maxmind's GeoIP data to locate Internet visitors, perform analytics, enforce digital rights, and efficiently route Internet traffic.

11. 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**

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

13. Plaintiff currently can only identify Defendant by his or her IP address. Defendant's IP address is 73.129.22.101. Defendant's name and address can be provided by Defendant's Internet Service Provider.

### **Factual Background**

#### ***Plaintiff's Award-Winning Copyrights***

14. 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 the number one selling adult DVDs in the United States.

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

16. 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.

17. 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***

18. 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.

19. 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.

20. 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.

21. 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.

22. 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.

23. 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.

24. 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.”

25. 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.

26. 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.

27. 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.

28. Plaintiff has developed, owns, and operates an infringement detection system, named “VXN Scan.”

29. Using VXN Scan, Plaintiff discovered that Defendant used the BitTorrent file network to illegally download and distribute Plaintiff’s copyrighted motion pictures.

30. To explain, while Defendant was using the BitTorrent file distribution network, VXN Scan established direct TCP/IP connections with Defendant’s IP address.

31. VXN Scan downloaded from Defendant one or more pieces of numerous digital media files.

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

33. To explain, the VXN Scan system first searched for and obtained .torrent files claiming to be infringing copies of Plaintiff's works, and then downloaded complete copies of the digital media files that correlate to those .torrent files.

34. 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.

35. 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.

36. VXN Scan then used the "Info Hash" value, contained within the metadata of the .torrent file 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 the same digital media file from Defendant using the BitTorrent network.

37. At no point did VXN Scan upload content to any BitTorrent user. Indeed, it is incapable of doing so.

38. The VXN Scan captured transactions from Defendant sharing specific pieces of 91 digital media files that have been determined to be identical (or substantially similar) to a copyrighted work(s) that Plaintiff owns.

39. VXN Scan recorded each transaction in a PCAP file.

40. VNX Scan recorded multiple transactions in this matter.

41. For each work infringed a single transaction is listed on Exhibit A.

42. For each transaction listed, Exhibit A sets forth the Universal Time Coordinated (UTC) time and date of each transaction, along with (1) the Info Hash value obtained from the metadata of the corresponding .torrent file that formed the basis of the VNX Scan's request for data, and (2) the File Hash value of the digital media file itself.

43. 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.

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

45. Defendant's infringement was continuous and ongoing.

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

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

## COUNT I

### **Direct Copyright Infringement**

48. The allegations contained in paragraphs 1-47 are hereby re-alleged as if fully set forth herein.

49. Plaintiff is the owner of the Works, which is an original work of authorship.

50. Defendant copied and distributed the constituent elements of Plaintiff's Works using the BitTorrent protocol.

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

52. 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 "publically" 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).

53. 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.

Dated: May 20, 2020

Respectfully submitted,

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Tel.: 202-552-2357  
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*Attorneys for Plaintiff*

## Exhibit A to the Complaint

Location: Columbia, MD  
Total Works Infringed: 91

IP Address: 73.129.22.101  
ISP: Comcast Cable

Work	Hashes	UTC	Site	Published	Registered	Registration
1	Info Hash: D3412112F061AA57DF2F71E07F2B8A42DC2AF3C8 File Hash: 175736359AFD9A3338DB5777DC84A99B9BEEF3511A5CCA55570527B2F8B73E75	03/19/2020 03:26:55	Blacked	01/25/2020	02/20/2020	PA0002229054
2	Info Hash: 3C221FD725BBE043C588928E15ACBC81E23B4E53 File Hash: 6C5359230EBB63CCED70A9217186FCB3B8D1F6D97597EB096CDD94AA7ED8F9C4	03/17/2020 02:50:21	Blacked	05/15/2019	07/05/2019	PA0002206387
3	Info Hash: C69296B873B5A52990A42A663576E11CD1F84D5C File Hash: 4284F1BDA3067D8D5110828F5003238E5EF8A81B805C65D82FE33AA40A80BC66	03/13/2020 02:58:45	Blacked Raw	05/02/2019	05/28/2019	PA0002200769
4	Info Hash: 7D38121EE26BF43B7483C3486BB57D14BA36197A File Hash: 78CB09F6C2242774890DE6B5CA4C05DAFC9853410B097ADB6B71BF3B0DDBCF26	02/25/2020 04:28:45	Blacked	04/30/2019	06/03/2019	PA0002178774
5	Info Hash: C295DB4D1D1DA424FF9474EB33F1154BC171E5E0 File Hash: 12370AA3EBC3E9E3E7E42EF252C18F552A7593335924FF93C103A367935A903B	02/22/2020 06:24:44	Vixen	07/23/2017	08/10/2017	PA0002046877
6	Info Hash: 8380829FBFACEF0EE48B37AF15910E96A5E8329C File Hash: 72B9208BB759C27C1532BE6EBAB0A289A32F80E552A690ABAE2BA4752DA0B354	02/22/2020 01:23:03	Blacked Raw	12/23/2017	01/15/2018	PA0002099706
7	Info Hash: AACF6BA7BAEA95F5EBE6A06B86E4D0DBBC9AA17D File Hash: 837E1490718032F2F3BF70CBA954C1B91292F83F3300EFA39B0FAAFC76E019F3	02/07/2020 10:16:55	Blacked Raw	02/06/2020	02/20/2020	PA0002229053
8	Info Hash: 680EE371B7800325E30411D1F71804CA76112ECB File Hash: 2502A266973A3BDE9DCF00310969C52A9ED145D7457446FE671BE56CD7FA5245	02/03/2020 01:06:45	Blacked Raw	03/13/2019	04/17/2019	PA0002186977

Work	Hashes	UTC	Site	Published	Registered	Registration
9	Info Hash: C928E9AFC20D9764DC3317973F8EF2D22A185F95 File Hash: 4A160C8FDD1A57AD4CE35F7C589DD75C752EC79DCFFBF6B90F319A935F01D16B	02/02/2020 07:35:41	Blacked	01/20/2020	02/04/2020	PA0002225586
10	Info Hash: B1DE72F07D62E4977F757BE86A51D446B2F75B07 File Hash: 46FEC717655D2B9464FF3F06AB9236D57F9CE5B0718AE8F9DC657EC1C2817D12	02/02/2020 07:34:28	Blacked	01/30/2020	02/20/2020	PA0002237624
11	Info Hash: 50759CA5CFAA4ED7A53C06CF8F524D21691C6587 File Hash: 8F413E4EE1C94A5714079DCC8EB092ADF08F21FDAC146FA56A330433344505F7	02/02/2020 00:57:49	Blacked	09/27/2017	10/10/2017	PA0002057451
12	Info Hash: E336DA33BF1D439EAEA80D679CBB3A1C5784C7EF File Hash: 40AE7A53758077750072524F0300E8A9490902C38A4500871483FFD98FC6D590	02/02/2020 00:57:36	Blacked Raw	12/08/2017	01/02/2018	PA0002097423
13	Info Hash: 90A061D4C6A7A5B878744407DD5FED7F9E0A850C File Hash: 314D177D3C56A326C715DE12E936EEA3F4748FC711B4B2A3FAAFA7F4A1F86D6F	02/02/2020 00:57:31	Blacked Raw	01/27/2018	03/02/2018	PA0002104873
14	Info Hash: 8F4DD2420D0F4D0C3D0A8278EAEA72746B0910BD File Hash: 40D90FCC995D7F11D257841B25D6DC722A415F5C8A9441B85F5E368C19D9666B	02/02/2020 00:57:19	Blacked	08/23/2017	10/10/2017	PA0002086163
15	Info Hash: A7448A393F01061BB9CFE11EEF2BAFB37DFF2FFD File Hash: C597FFE1CADD03DA47F09E78C848172277056EEF81A0F9AA8B1422FDBD39C637	02/01/2020 21:54:26	Blacked Raw	01/17/2018	01/24/2018	PA0002101760
16	Info Hash: 2F97A1BAC8350D4387E0BA9B5609D676F0C15EFD File Hash: D7E58FC4BCC0AB9C9400EEFED47DF5B8B2110671BD2E2786FB3FCCC6C8993D82	02/01/2020 02:41:00	Blacked Raw	01/02/2020	02/04/2020	PA0002225581
17	Info Hash: EC9B743231AA25818F093ED5B15E59674CA4F2C0 File Hash: CE413A76BF40C7AFD6A2FDC4D1E3C270F2A436264887410442A171CFA45D906B	01/31/2020 09:26:17	Blacked Raw	06/26/2019	08/27/2019	PA0002213245

Work	Hashes	UTC	Site	Published	Registered	Registration
18	Info Hash: 225581CF42E66DBCCF8CE9ED3B76C263E8F5BEDD File Hash: A51B3BC831EC9CC9AB39EB5F87794DFBA2D5E04F1429BF9F12A329C8E6839159	01/31/2020 09:24:13	Blacked Raw	07/26/2019	09/10/2019	PA0002199417
19	Info Hash: F4E07B15F8DAF0FAADC40068D05AF56B4EE7E19B File Hash: EA90B0315F531F73AA2EF7068350EBFB665030828F7EB51408CFA63FAF1AB877	01/31/2020 06:22:26	Blacked Raw	08/05/2019	08/27/2019	PA0002213302
20	Info Hash: 3A5E7B4F43D8B6C18BED90FCE3B399B2529AEA4E File Hash: 1688FFDC65F24CFFA8F839CF55DEA19B5162AF79B2B182D1EA31F39F3C208CDE	01/28/2020 04:22:54	Blacked	12/06/2019	12/17/2019	PA0002217665
21	Info Hash: 274601AE9C6F83A6BF1BC7ED8DFC78B3E301D3FC File Hash: B570EB29EF3C7D2821621D92AA4456FB409128A5C13959AB8989BD622EE15FBA	01/28/2020 04:22:49	Blacked Raw	07/01/2019	07/17/2019	PA0002188302
22	Info Hash: 6E8645D885A00F28060C247A81D02641E006BED0 File Hash: 884899241E4C42B1B4014F44AC922166805AC496AD23DCBA4FD6B6F09EDAFAFEFD	01/28/2020 04:22:48	Blacked Raw	07/16/2019	08/02/2019	PA0002192306
23	Info Hash: 2E1419C133DCC689F4210764E671C2C301A392C8 File Hash: 4CDAB90C13E349B2B90D24F9411BE3734327D69571C7FE68C32E272BD72C3AFC	01/27/2020 05:15:08	Blacked	09/27/2019	10/07/2019	PA0002205468
24	Info Hash: 2487F6C33E33E67F3FDA803B93E29A42341F3539 File Hash: 5A82DBB63F749AF866C80BE1055B9787C4C227A3E861247BF4FAE9991CCF960B	01/21/2020 09:33:31	Blacked Raw	08/20/2019	09/13/2019	PA0002200701
25	Info Hash: 3C6606CD2AB4EA3AA856FA3CF4DCAA609C2C2789 File Hash: 6D2F0AF16950FAA5B78A689DAD0DC66362AEFB1D9655E752A283DD0AEBaed0EF	01/21/2020 09:33:24	Blacked	08/23/2019	09/11/2019	PA0002199989
26	Info Hash: 65B1946A16DBBE039A23501986574A1A7006F206 File Hash: 45C2649F6F7F08AA46A93D1D5086BDF7702AA909526AE3D7D7984F1654F6F0C6	01/21/2020 06:04:56	Blacked	11/11/2019	11/27/2019	PA0002213994

Work	Hashes	UTC	Site	Published	Registered	Registration
27	Info Hash: F6E559EE9A1F06F61D924CBFF269FC98697C8F26 File Hash: FB263B245C5C335FB3034E4A3FB09FC7FA8E095FF3A204010E9577D025835CBA	01/21/2020 06:04:36	Blacked Raw	11/22/2019	12/17/2019	PA0002217672
28	Info Hash: 3882B5927080554E41942A250FB254BBDD7E4793 File Hash: 6AFD07CFF5EFA5B3443C96A5F79A92B0EDAE17A4CDA5E5B51A40E3FB723E53C9	01/21/2020 06:04:21	Blacked Raw	09/29/2019	10/21/2019	PA0002207777
29	Info Hash: 4026C1E989060191A826989E10CDDA37DB2536B5 File Hash: 2E9FCE8A39DB869A162A5164F8C523E2128D2C57C4501174F8634D934BCCE80A	01/21/2020 06:04:21	Blacked Raw	09/04/2019	09/13/2019	PA0002200700
30	Info Hash: 0D948F5F6BA233EB21E811A0598A0C6E68AA9807 File Hash: 6F731BB25969D12742E9F6D868A9CCB5103E1CB6600EBD02CB4F3490FCD2D00A	01/19/2020 23:19:15	Blacked Raw	11/28/2018	01/22/2019	PA0002149836
31	Info Hash: 690D7CA2FECF5BB56BB42C195FAED9252AEF3331 File Hash: 718DD5A2B3D6169A18351682631597CF19CB1EA8C2184F1FDBED090D1CA76E45	01/18/2020 22:28:24	Blacked Raw	01/17/2020	02/20/2020	PA0002229055
32	Info Hash: E9400ED0BFD7D3498B7A33C7E1907FA0028A8F10 File Hash: 79B4AAAC410E5E0EC7DC7E0A29DD342F0444CD533F82C9970302631932F19AC0	01/16/2020 04:14:03	Blacked	12/26/2019	01/27/2020	PA0002223955
33	Info Hash: 5C04D68E75DBBB78C6F04847CBEF7EBCC6B077BA File Hash: 44F413BAED22D9298F3254BD630E26FC5263D42429DEB597D298E72F6438D61D	01/16/2020 04:13:38	Blacked	12/31/2019	01/27/2020	PA0002223957
34	Info Hash: 8FB9DA5AF95D2263E0AA1D0E8A59E73FDF53EC95 File Hash: 532699269D5BDEA165CC77048507F0256DA013FE36322A4CA4AFA99743D7692A	01/16/2020 04:13:36	Blacked Raw	12/28/2019	01/27/2020	PA0002223954
35	Info Hash: 8BBD8D28B09CB8522128AEA87660225FFF8FBB36 File Hash: 836A7FDD62AE3CEFC9DAB2F6BFF4F8C3591DB8580706C313B52131DEA1537E7C	01/16/2020 04:13:21	Blacked Raw	12/23/2019	01/03/2020	PA0002219636

Work	Hashes	UTC	Site	Published	Registered	Registration
36	Info Hash: 80477CCB62EF861A11C609B9C95AB02F51EBEA78 File Hash: B5F2CC9857650373629E57B213F962494C69BC5EFDFA79C4B36E032E51A5FDA0	12/27/2019 04:25:52	Blacked	12/21/2019	01/03/2020	PA0002219632
37	Info Hash: E17386891F4078C6AF9BBADEF01DEA189F76D095 File Hash: BC995C37180CFBB8B46E101CB25131F3FE19CE58E386974BA3A6F1B5DD381483	12/10/2019 17:55:22	Tushy	09/13/2017	10/10/2017	PA0002086153
38	Info Hash: B219D12248F1CA666493E6415186170418E22D01 File Hash: 3B5FB6A315906FE1B87D64F91BF0396215C2D306AEBE07432BAF3C3931BC0A18	12/10/2019 14:48:05	Vixen	12/05/2017	01/04/2018	PA0002097413
39	Info Hash: DBAA02153CB1ACE3D2D3133FD8A00C6766453DA5 File Hash: 8F50BCF41DEEA9CB475E77E05BFE90341DA3F03214D1506CC7B08009A850E053	12/10/2019 08:30:27	Blacked Raw	01/02/2018	01/26/2018	PA0002101761
40	Info Hash: D9F517D083F2110C3E6B76139EB6EE73B561C9CC File Hash: E9632E2680CC11E58D2313E7D3D8254FD2A1BB12D77F9FB23A68B6302D50483F	12/10/2019 08:29:54	Tushy	02/25/2018	03/01/2018	PA0002079188
41	Info Hash: F438B0A967F6E8F4BC555126E68409AFAF956AA7 File Hash: 3EC91E91B15EB618D1181CA8E4D564146052BA95818B2981D1FEFB23A19FF857	12/10/2019 04:58:17	Tushy	06/25/2019	08/27/2019	PA0002213234
42	Info Hash: 5EB444FE3B29AA0C56A35B327C608B115BA9DB1B File Hash: 6E8E05B0BE611E66575DDA745F409E89CB10B527DA33188E69F188F78C676F8E	12/09/2019 01:29:44	Tushy	12/22/2017	01/23/2018	PA0002101752
43	Info Hash: CA2BD24A9E144AAC283890A9F9FBF3997F62FF7D File Hash: 61A653C728709F98BA0ABA9E2B93802CF671AD12A19AA043CA4957404FD3BB01	12/07/2019 02:07:42	Blacked Raw	03/13/2018	04/17/2018	PA0002116738
44	Info Hash: 61B5147674D3E37FB93E3D973A281ECE1FE5E585 File Hash: 4209ADEB3EB576CD15962FF03ADA8873392802FE7DB5122322D644542D2F06F4	12/07/2019 00:38:12	Blacked Raw	12/03/2019	01/03/2020	PA0002233431

Work	Hashes	UTC	Site	Published	Registered	Registration
45	Info Hash: F42B8996B0AB1CDD26BA12496CA2F0AC1891C34B File Hash: 299362A98572B29D6D84BF5DCCDB43D20FCEE1AC5CC4B272E0FC98A5B5AACCC70	12/06/2019 11:58:36	Blacked Raw	04/27/2018	05/24/2018	PA0002101367
46	Info Hash: 205D060CE634B389714A26E35735BC3806DA7481 File Hash: 584C415632EDAE4F947D902B1FD8026C3D4FD1048CF30E60DC0F5A0323AFE74	12/02/2019 05:18:03	Blacked	02/24/2018	03/01/2018	PA0002079184
47	Info Hash: 597D47FD186A62BB4EB4EA30EEAA11ECBEC96ACB File Hash: 5530BD3DD30CFEA41467B96308EBDF32049A2D9BCEF2EB04C6F83E9DB22482AD	12/02/2019 05:02:33	Blacked	03/31/2018	04/12/2018	PA0002091516
48	Info Hash: 57D55CF2E1C375BBFAB76A1226219452189BF550 File Hash: 77C24A8664F1F1E61C4333D24E05A15885B28F6EF0CFB4B8F73772A06D7A24EA	12/02/2019 04:54:39	Blacked Raw	12/03/2017	01/04/2018	PA0002097460
49	Info Hash: 9A5ACC9C958C00F1B826AC91A7DB3423BCE3F400 File Hash: 3907F5F1B4D7BDF3C32081D6DFECFDA0FFC5A500A4853B1F1B0294CA71241F2B	12/02/2019 04:52:32	Blacked Raw	04/12/2018	06/18/2018	PA0002126637
50	Info Hash: AD487F1E590FF03AC3018CF867108E4FD7F2228F File Hash: DE54F58E5818C41CB82827CC9288D56D371B10A336AAD9D2CEAF51A5BC03677A	11/30/2019 05:11:35	Blacked	11/25/2019	12/09/2019	PA0002216262
51	Info Hash: D306BA77FFF8FB1950408ABBB8A5B60FCC00B122 File Hash: 62F978246DFABCFA5E6D15572F70F8A97ADFD0D485406942557FD8BF6E48BE77	11/29/2019 00:49:40	Blacked Raw	04/12/2019	05/11/2019	PA0002173884
52	Info Hash: FB53F3EECB506F8A44A81683849E6F2D11533EA7 File Hash: BA1342BD50A5BF386A5FE64A6B26D947299FF458E08AAD19D74BCA328B1CCF7C	11/28/2019 22:07:24	Vixen	08/22/2017	09/15/2017	PA0002052852
53	Info Hash: 05D9E9EB431AEF78D0BD2E16B66F558D4839A3BC File Hash: 8077C3FBC1D2DF2C1B18C89D56CA471A09DAB8C87CF5E5C9BA33BE5BD9128134	11/28/2019 20:34:19	Tushy	08/09/2017	08/17/2017	PA0002077673

Work	Hashes	UTC	Site	Published	Registered	Registration
54	Info Hash: 303AA83349BCEE7961EA7089C245D7431040E54A File Hash: 3F8B7417C348F235A5C45698C954C60C53720C773BC939E84E2E8E680EB1D344	11/21/2019 00:48:57	Blacked Raw	08/30/2018	10/16/2018	PA0002127777
55	Info Hash: AE452322D4BF39B173EBF746370CA3A1AFA63F97 File Hash: BC08023EEC6EDB6DC27EF5850DC1144EED11AD95621B1B7412F9CE81F879B539	11/21/2019 00:44:52	Blacked Raw	11/08/2018	12/10/2018	PA0002145833
56	Info Hash: CE6E3AE355BE0831A6BC74277D06A3BB60A09F5A File Hash: C9D25135B90E91BB6451557A25CFF18DF7E804114218FB4E7CB112E333D037EA	11/20/2019 04:43:37	Blacked	11/06/2018	11/25/2018	PA0002136603
57	Info Hash: 554E325A9D7E7E6E67EB4F6AE427E8A6A2D051DC File Hash: A3786D82599BE0B84A40AF5DE0982F53F9BBA050FD3AA5929E3292718C79F801	11/20/2019 04:25:32	Blacked	03/11/2018	04/17/2018	PA0002116091
58	Info Hash: A25F0F8A58F9E53C1BF9249E70F2C692B76AE904 File Hash: 383B652E94E363EBCD7F9E4B25446F83FDFB8CA5AD89BFE66B6765E4192E1C6C	11/20/2019 04:25:04	Blacked Raw	01/12/2019	02/02/2019	PA0002155388
59	Info Hash: BE3C7E08A25F7E1BAB1ADBA3B168C1BF40ABB688 File Hash: 7A4B8C70A6F3D5B0F06DF3D99A020C7E8C143C66AF5E11450359BE856AD50A77	11/20/2019 04:21:32	Blacked Raw	12/28/2017	01/24/2018	PA0002101763
60	Info Hash: A9092A4000B816BDB32CF339ACD7C7F45C2E37A1 File Hash: 4ABDF237877A026354A9BF6A9E0A2ACD0FF398FBF963DFA67AD155DD55CB8AEE	11/18/2019 04:06:48	Blacked Raw	08/15/2018	09/01/2018	PA0002119585
61	Info Hash: 35FC391D7869DA183CB119D3D676978EC11ADDB9 File Hash: BE7FA0E9046E5052989B028E082C94C5A4FB9F7076FEEE4A70FB899BE57B1707	11/16/2019 06:32:33	Blacked Raw	12/13/2017	01/02/2018	PA0002097434
62	Info Hash: 388E7ED27703F4B83AC8FC4EA6512E7B4FBC5AEC File Hash: 262B5FB839942C0084068E0031AADA76ED68D812EC7C6AEF113473B261AE1A29	11/16/2019 06:32:30	Blacked Raw	04/07/2019	05/28/2019	PA0002200775



Work	Hashes	UTC	Site	Published	Registered	Registration
63	Info Hash: AA99615AE6C723CB3050DAC4D48D914E6D5CC02F File Hash: D4777437331085D9F83529F722265DFAD5117630DB84AAE1C0850A6A96FB67CA	11/16/2019 06:32:20	Blacked Raw	05/17/2018	06/19/2018	PA0002126644
64	Info Hash: 623D4B76B7DEFEDOC91EDD5FE108D7E986691273 File Hash: 9AE624B51FE7E991F6BD22B67494B7D5F2FB79F3EBC4716BA7064A888A376388	11/16/2019 06:32:19	Blacked Raw	07/06/2018	07/26/2018	PA0002112158
65	Info Hash: 2ADE8763346FFA11FC1395267FDA45ACC89C677C File Hash: CAC816B88E76CA37F722E7F92736C38A9916269EB659FEA2E78918D83D06D7D8	11/16/2019 06:32:17	Blacked Raw	11/03/2018	12/10/2018	PA0002145823
66	Info Hash: 73F33BDDD94B5889A8E8758E88B3D09B30F3525E File Hash: 8856D5B47B9E13F4AC1D4A19073A027727F8EDB060128D3A34AFE7C5C64E9B7D	11/16/2019 06:32:15	Blacked Raw	05/07/2018	06/19/2018	PA0002126670
67	Info Hash: C2CD33294A80E9042A3D6D2FC6C52861821EFA18 File Hash: D8C1F32807E495498B649867E55C81729FF4F5A3284A8C2BFD14FC74A8412322	11/16/2019 06:32:15	Blacked Raw	07/16/2018	09/01/2018	PA0002119681
68	Info Hash: 3C681622E5111A0DF48D7E1B99D43CB7E089F835 File Hash: 05CB33754E2EBBA16D082FC2453B2A8B347D18FC94361304717A672C103A9EE6	11/16/2019 06:32:15	Blacked Raw	02/21/2019	04/29/2019	PA0002170356
69	Info Hash: B2749CF736B2B9C9F225CE6C55D853EBF21294C4 File Hash: 113DB1C2527EEB0CEE95B4FCE5F96D2CF76EAEA0EACD5A7F6F46C9F3282957F	11/07/2019 02:05:16	Blacked Raw	02/06/2018	02/20/2018	PA0002104186
70	Info Hash: 0616906E5B0D445A8FB469D45908C91D24F6CD2F File Hash: 9AC3BBF9185D5F2498389B013DAD21FC070F127E17E3B94B23F09A5C26518E53	11/07/2019 02:01:16	Blacked	09/27/2018	11/01/2018	PA0002143428
71	Info Hash: 7927D991B118B583CD71828F2F63A12B4635B5E7 File Hash: CAA25AAE87488D48B2B8333738DE97E8D7A15F9D5D305EBF031E8A89416C5E3C	11/06/2019 04:41:07	Tushy	05/21/2018	07/14/2018	PA0002131769

Work	Hashes	UTC	Site	Published	Registered	Registration
72	Info Hash: 3350AD6ED2ECD3F20CA9BFAB853A3CED164589B0 File Hash: C37AF8553805F6A6564CD2DA3705A9DAFD128B2939D7AA101D686499D196A471	11/06/2019 04:38:47	Blacked Raw	08/05/2018	09/01/2018	PA0002119682
73	Info Hash: 99C0003686046E848CDB8C0D2B09F797C1702974 File Hash: C3A3E8AE9285F94208B9F7A8DD06DCEE8259C3E39B3F243FB6A16329FCB983B	11/06/2019 04:37:12	Vixen	09/11/2018	10/16/2018	PA0002127780
74	Info Hash: 0F04127628F4C1B74A90BDCBB03E10B4357654FC File Hash: D76DD3157DAD44C96FA1E38EDB5C557B265BB90E3949287C67DF4DB8BF4BBBA1	11/06/2019 04:34:35	Blacked	12/21/2017	01/15/2018	PA0002070941
75	Info Hash: AAB43732CA29D96F72C32A4D7590FD1111D8A86C File Hash: 336C39AA81CECA1E786A6C6A838549526A34BF8FCC7AA0D634CEE7A718B6DA26	11/05/2019 04:23:30	Vixen	04/04/2019	04/29/2019	PA0002169968
76	Info Hash: 0279F8114C90ECBC2C775793D7CD9105ED963856 File Hash: 3DC45DDEEAF39622E73B28F7587BD6A4688887D83FC0D647EE20E12252B634AB	10/05/2019 04:21:15	Blacked	01/15/2018	01/24/2018	PA0002101768
77	Info Hash: B426DA516B5F87C97B1C1D5732F040BC16B1F5A4 File Hash: 8D6DDB62698A011D6F8AEDECA858410D559FE50CDD8DF33B7527D8CBC1F54D77	09/11/2019 04:49:49	Blacked	07/24/2019	09/10/2019	PA0002199414
78	Info Hash: 0BB45C1043F264656FD238E2E8E117B9E06AD6A0 File Hash: E4B2D26741E5832FCD58CC296E6598F185F73B2F0A5C24B92197FA20F4456F89	09/11/2019 04:48:16	Blacked Raw	07/21/2019	08/27/2019	PA0002213243
79	Info Hash: B0CE169D460B3E10FDC06D60342FA7FD5FBE531B File Hash: E701C43864BC713E4129A4F6CD46A51E0378F2B4D49F69835C388B372747A4C4	07/29/2019 03:10:33	Blacked Raw	11/13/2018	12/10/2018	PA0002145836
80	Info Hash: D57B689422F4E39D8893E3E0BB7A38C930AD4CEF File Hash: 62B7BAB68D9CFA287E5A27C59752ADB87FDB6F932FC27F8022C6E9D279BADD8	07/29/2019 02:52:58	Tushy	02/10/2019	03/24/2019	PA0002184028

Work	Hashes	UTC	Site	Published	Registered	Registration
81	Info Hash: B0BBBDB6F900FBC1DB506642FC2E1521B71AD790 File Hash: D776994BAB03C991B68933B304D7F3C0FB43E67558954B528E39C25D0B1FD927	07/29/2019 02:50:15	Blacked	04/05/2018	04/17/2018	PA0002116752
82	Info Hash: D0016AD9914E4F589A6C0FF9F5D08A652121C7C6 File Hash: 3D61A0215E2CD7D720E4011B203AEA5D3D7C960E9B5FE33107FFEA04CA71B2DB	07/29/2019 02:49:56	Blacked	03/11/2019	03/31/2019	PA0002163979
83	Info Hash: 051A52EFFAA41578BB5F4F7EDE4827997D21BC4C File Hash: 55A1FA72FC61AD5D1ED91299E2C17F3A780F20014A987675F2E69F86B4468AA7	07/14/2019 19:11:23	Vixen	07/23/2018	09/05/2018	PA0002135670
84	Info Hash: 43A5A5371A41AEBDD250328D4BF3FEC056DC13B2 File Hash: E9A54976241BEA2DECB9275B9AEF574AC59E2312E701A903AA834B9B4F07FAF2	07/11/2019 02:23:47	Blacked	10/02/2018	10/16/2018	PA0002127785
85	Info Hash: 15767B4CF1BDB5ADD8DC3544393A9C265AFAA5B5 File Hash: 57A014FBA5622734EA82329D6DDFC1406AE942765033D5A4682F1A3DA92CEED8	07/07/2019 05:26:32	Blacked	12/16/2017	01/24/2018	PA0002101762
86	Info Hash: 83AD512AEE0D9C77324A8AAD63B46AF203D3464D File Hash: 8924A99325F8D4FF65F058BBB9D1256D9D8A2BED409AEE3DC214F906B45FB782	07/03/2019 01:53:50	Blacked Raw	02/11/2018	03/02/2018	PA0002104740
87	Info Hash: 143ED56E751B662F727B52D79C441FBCC16BB177 File Hash: 6E468AF507E2B8CA74CF0E8AB4CC91C10A7F4D5FFA43B66EE393ED88FB48F9FD	06/29/2019 02:21:51	Blacked	12/20/2018	02/02/2019	PA0002154970
88	Info Hash: 35824768BF7B365F1CA830E078527B52C12DC631 File Hash: 0D47CA7EADAD4AD86D9DDB137C67D0B6B7272D733210F25B5986898F75A26F8A	06/29/2019 01:57:16	Tushy	08/19/2018	09/05/2018	PA0002134998
89	Info Hash: 67D95FCED9B00C108A63588568A4B4CC34737EE5 File Hash: 2F08A480A39A433B92CB7BE753ED72122DDC6A8669D61337B266203F90B0E8D4	06/29/2019 01:52:13	Blacked	07/09/2018	08/07/2018	PA0002131818

Work	Hashes	UTC	Site	Published	Registered	Registration
90	Info Hash: CA440BF020303D9EE5CAF3AFC9F6F990F10B7FFE File Hash: D8DA3B246C73F0C13B0C8682F85B951D2217FF7689C445472FC2A69B9D36D0D4	05/14/2019 02:54:38	Vixen	04/24/2019	06/03/2019	PA0002178769
91	Info Hash: 89A4D0EC8E3AD17C8758B15C2D8751637C69FC5E File Hash: 3AD753C4299E587EC34728350B246872BF87F69C5CA1008F8AAA12348373E943	12/22/2018 01:54:19	Blacked	12/01/2018	01/22/2019	PA0002149844

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

STRIKE 3 HOLDINGS, LLC

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Clark Hill PLC, 1001 Pennsylvania Ave NW, Suite 1300 South, Washington, DC 20004, Tel: (202) 552-2357

DEFENDANTS

JOHN DOE subscriber assigned IP address 73.129.22.101

County of Residence of First Listed Defendant Howard (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, 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)

- Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, PTF DEF, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation

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

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Motor Vehicle, Personal Injury, etc.

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, 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. Brief description of cause: Copyright Infringement

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 150000 CHECK YES only if demanded in complaint: JURY DEMAND: X Yes [ ] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE 05/20/2020 SIGNATURE OF ATTORNEY OF RECORD /s/ Elsa M. Ramos Velasquez

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

Case 1:20-cv-01267-SAG Document 1-2 Filed 05/20/20 Page 2 of 2  
**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 the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- 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. When the petition for removal is granted, check this box.  
 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 statute.
- 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.