

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

v.

JOHN DOE subscriber assigned IP address
24.218.87.160,

Defendant.

Civil Action No. _____

**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 24.218.87.160, 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 47 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, can identify Defendant through his or her IP address 24.218.87.160.

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; and, (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 24.218.87.160. 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 47 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.

Respectfully submitted,

By: /s/ Jacqueline M. James
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Attorneys for Plaintiff

Exhibit A to the Complaint

Location: Danbury, CT
 Total Works Infringed: 47

IP Address: 24.218.87.160
 ISP: Comcast Cable

Work	Hashes	UTC	Site	Published	Registered	Registration
1	Info Hash: BB23DC3E3F41E06024BD34016ED05E4D25A7F0AA File Hash: D7B1DFE14A95301D829FD5CBF99D29998ECBD57AB42E09DFFBE9C55F73A582DD	05/04/2020 12:44:54	Tushy	05/03/2020	05/19/2020	PA0002241474
2	Info Hash: 82F0EDE150E947ED87012A1D0AF7A0050F7166CF File Hash: C8B6A9FFD865EC0101EDB0E068E4A92BC477E62BC404553DADC97796D1950491	04/22/2020 01:08:51	Blacked Raw	04/20/2020	05/19/2020	PA0002241477
3	Info Hash: C9909D0CCD845C924F3574A3EE9BA8F4C76F165D File Hash: 5CF0C6FF5870E105611E977DA2BCFA5FCA318453B7AB108AEC638AD4584ABF60	04/22/2020 01:08:38	Blacked Raw	04/13/2020	04/22/2020	PA0002237695
4	Info Hash: 998D889AC133E44A451ADAA9C89CE64C3514FBE5 File Hash: 2F74CC0A9BF6B310FD57C4A213A195D653A4A6DC6AD050D61903295596AD7358	04/03/2020 19:09:49	Blacked	08/03/2019	09/10/2019	PA0002199412
5	Info Hash: BCC18BD6272372F3CFC59A1BE674F61C4788F0CB File Hash: 8A56C37DE8CCCDAA7BBD3EDFA4DC0F49439A4A4CCE0BED2C6768E4FC69BA25C0	02/25/2020 04:26:23	Blacked	02/24/2020	03/18/2020	PA0002241627
6	Info Hash: CB4E9C84E6158E15C0ED1417712F99AF8416D1AF File Hash: 6F33632B841C7B7B86DF8AFF7B499EB7832519BB3BD42950D82721BFF67115A	02/23/2020 05:39:41	Blacked	01/30/2020	02/20/2020	PA0002237624
7	Info Hash: 98A7396F4B2B73301521703E68688BD98063104D File Hash: EC7F3F865D934F1594E5F8E53A103717F39DA69AEDA7FAD4BAD2A032D5AF4520	02/06/2020 00:12:02	Blacked	02/04/2020	02/20/2020	PA0002229052
8	Info Hash: CF38BFE1D0E03012B60F475D878E3C658F3F9277 File Hash: 3932406A76C2B707C5D03A0FBBAA0DDD64B528BC9FB84984D1199D3D315CFD85	01/31/2020 00:52:30	Vixen	01/29/2020	02/20/2020	PA0002229058

Work	Hashes	UTC	Site	Published	Registered	Registration
9	Info Hash: 966AF5D11568D7D5896168F66E882245BA8A5F07 File Hash: 13ABD2A124FF486B57001E7FB865A719FBB18B92F74EF38F6CD5ECA9744EBBE2	01/14/2020 01:38:20	Blacked Raw	01/12/2020	02/04/2020	PA0002225587
10	Info Hash: 875860643F1F06BC7FAD0E66A380D13110313538 File Hash: A3D96824E2BE42665C0496436E594DE0E56DF8DCF27363F7E73FC8EB90BD11C6	12/19/2019 03:10:01	Tushy	12/17/2019	01/22/2020	PA0002234859
11	Info Hash: 628B68825D76E58E7D4FD13905CECE3D6CAFF612 File Hash: F34A9436007F83C5ABEE8FD60D4F3D985F97DCCB0BCAC41BC8244A4180D51B18	12/14/2019 05:52:24	Blacked	08/18/2018	09/05/2018	PA0002135664
12	Info Hash: 7C4CC4B036986716946BD3A9F0672DD4D149E132 File Hash: 9379FEAA36D2E27BDE851891424D3DF3AEBE7BD08EA6EDC8B09548B99E60AD1B	12/11/2019 09:29:50	Blacked Raw	11/25/2019	12/09/2019	PA0002216263
13	Info Hash: 6A77072C0C304C5F128B54AB23E2CFD93A232D05 File Hash: 7D0FDC24CA33E4DCDFC7FC488AC611468F0E1858ABA7BC1DB0C100A248E08AC4	12/11/2019 09:12:25	Blacked Raw	12/08/2019	12/17/2019	PA0002217664
14	Info Hash: 1F5056D2F0CFFD05EA0C69EAE4D19F67E4FC70E9 File Hash: 041D8F8F1C59EE8A62F504D6A791189502DDB7EABF0DB4C67DE8B0A5399E008F	12/07/2019 23:22:50	Blacked	12/06/2019	12/17/2019	PA0002217665
15	Info Hash: 71004D66ED1A8849DC7A6C5EA34C3945EBBA0FF8 File Hash: 57A934B09E984A1CAF074526E245BB78E7A233EDC4A1C4B3D692EFD1783BCA04	12/07/2019 23:20:24	Blacked	12/01/2019	12/17/2019	PA0002217663
16	Info Hash: 6AF2B6BEC2F13EB6C9DD94D47E08B2651FF6D0C0 File Hash: 4209ADEB3EB576CD15962FF03ADA8873392802FE7DB5122322D644542D2F06F4	12/04/2019 23:10:18	Blacked Raw	12/03/2019	01/03/2020	PA0002233431
17	Info Hash: 0C3DE4F2C051D172C64E1806FF1443E927D83769 File Hash: E2C7F4AA2C72DC7A352817F7CE175170EF8AB2A69D96A7CA1F3F3F8768E8A3B4	11/19/2019 20:30:24	Blacked	11/16/2019	12/03/2019	PA0002232049

Work	Hashes	UTC	Site	Published	Registered	Registration
18	Info Hash: 60FBF1984DF7A347419DBC1A4F35C161C39D011C File Hash: 6C015F9CAA2C5C1DC830BB007B1E624275DB2F3666EC6BBF61B46F2A310D9506	11/09/2019 19:55:53	Blacked Raw	11/03/2019	11/27/2019	PA0002213995
19	Info Hash: C3D72FCFAFB0CFE653D94833E141952989C54EFO File Hash: C5E9E52AF063FF4C3D1ACC010C7AFEDD9C2DA2FDDE2AD22AD63E9D5E06EE563F	11/02/2019 21:30:54	Blacked Raw	10/29/2019	11/15/2019	PA0002211918
20	Info Hash: 5BB2AE2D74EDA8D4C0976E8C20C4EC6694B6F88E File Hash: F0D51AC52F91908891963E1F3778781D5C186C7EE0786F7A46A579FFDD9CDA88	11/02/2019 15:50:52	Vixen	10/31/2019	11/15/2019	PA0002211917
21	Info Hash: FC737FCE7A9548867EF99172A2951C431AA74E03 File Hash: B5E86EEBB2CF368BE09B3B094531A43227C492A789F82F0C087CAA730C2C7F61	10/24/2019 02:16:02	Blacked	10/22/2019	11/05/2019	PA0002210294
22	Info Hash: 5C0DEE0CE8B141D07B3755DB6D56508193B98245 File Hash: 95EC2036CC70D63369DA8697C1E368B3C5FB6F4432C39E1391DA61F50036E179	10/17/2019 05:02:56	Blacked Raw	10/09/2019	11/05/2019	PA0002210286
23	Info Hash: 7DC31F64F10A5177DC11A0B36E4E52BDD9D6743E File Hash: 731763BED52FC0E38E82856DB997AEB34FE42070147E94E098EF60145CE647FA	10/17/2019 03:46:31	Blacked Raw	10/14/2019	11/05/2019	PA0002210289
24	Info Hash: 27D3FCCFC1AD4840C1551335EDD1E3406AB4DC0F File Hash: AFFEBE09AECB5375045C33633B636BE6925C6AB9C9888C052B2C6388857BEFE2	10/05/2019 21:36:17	Blacked Raw	09/29/2019	10/21/2019	PA0002207777
25	Info Hash: AB6061895AFDF2D02F4E52CBE8139592CFEFD38 File Hash: 8AC6BEF33EC824383A869041954605EAA507DB219553EA03EE78AEC6DD85A33A	10/05/2019 04:37:43	Blacked	10/02/2019	10/21/2019	PA0002207747
26	Info Hash: 647CFD990FA697C165D54F27CA9CBC3AD9C7C54B File Hash: E2B7478671B64EC94426BE920E869CF327EAB0436CBC5C8D1CE5CC23E5AF793B	09/28/2019 18:16:45	Tushy	08/04/2019	08/22/2019	PA0002195508

Work	Hashes	UTC	Site	Published	Registered	Registration
27	Info Hash: 3917E23A20D11C20256683DBD92B8601ECAA8554 File Hash: 4CDAB90C13E349B2B90D24F9411BE3734327D69571C7FE68C32E272BD72C3AFC	09/28/2019 08:37:11	Blacked	09/27/2019	10/07/2019	PA0002205468
28	Info Hash: 9A3064B3C7D25FC761A9AFCF5099B09AD70501D2 File Hash: 20DC3276F1F4E04D78F119CCF202BF16E6C05C38D7962C7365985924B05D9965	09/28/2019 03:58:33	Blacked Raw	09/24/2019	10/07/2019	PA0002205464
29	Info Hash: 11BE292AF7B6E97B5F5DF01D28694305D92417DA File Hash: 6D2F0AF16950FAA5B78A689DAD0DC66362AEFB1D9655E752A283DD0AEBaed0EF	09/06/2019 22:13:00	Blacked	08/23/2019	09/11/2019	PA0002199989
30	Info Hash: 8B05C6A4D02328A2C9054DAA44B091B0820F2E5C File Hash: A51B3BC831EC9CC9AB39EB5F87794DFBA2D5E04F1429BF9F12A329C8E6839159	09/06/2019 19:29:20	Blacked Raw	07/26/2019	09/10/2019	PA0002199417
31	Info Hash: 93E3EBFDCBDB9F8B24F49167AED42356CB6B5797 File Hash: 5759CF1E96FE88B6319B0B4C5701F96F1C69FDEC2F5412AA7F336D7204658F08	09/06/2019 03:56:55	Blacked Raw	08/30/2019	09/17/2019	PA0002216138
32	Info Hash: 8A52F0878F22B9AC4A7C01099B96A2F81B54B128 File Hash: 8991DF8BDE8772499D9869ADA2008B144375F527D45875F4EE513869384BBE12	03/11/2019 16:11:19	Tushy	03/07/2019	03/31/2019	PA0002163981
33	Info Hash: 799CDEBF9260CD78AAEB31D6AEE6387816A72F0E File Hash: 80318D690A2A6CB65CEA5D15618E021E22D046045DDB06E5914D16D140FD6615	02/24/2019 20:36:39	Blacked Raw	02/21/2019	04/29/2019	PA0002170356
34	Info Hash: 7F94C59C008CA99211BC357AA9829B7372D082F3 File Hash: 18F29D4BFDC7C28F9DDCE5E862D459D4F644732FF6A2BDDC2144DB599D4DD66C	02/20/2019 19:18:53	Blacked	02/19/2019	03/24/2019	PA0002184061
35	Info Hash: 26027D4BBA9366856012B8C062375891C7926188 File Hash: 518F49722D012458CA767399DC4F77F113BD0897F82DBFAE6ECE845BCC7BD399	02/11/2019 17:56:31	Vixen	02/08/2019	03/24/2019	PA0002183193

Work	Hashes	UTC	Site	Published	Registered	Registration
36	Info Hash: 087B25BD20E5A3B694196BBFED11838BF98E49DB File Hash: 25A67263FD48C1B0D59E502A6A879075B620AB71A00A0D0F54BEF4819A098E6C	02/08/2019 02:35:23	Blacked Raw	02/06/2019	03/24/2019	PA0002183207
37	Info Hash: 7BD2BFDA3A80BB7D7CCD177EB3EA4FE086597C61 File Hash: 478D723B4380F92093F78708AA250DE86AC4771120A8106CBD7ACDD219EA36C9	02/01/2019 18:09:51	Blacked	01/30/2019	02/22/2019	PA0002155138
38	Info Hash: 44B182FA7FCBCCFF7DA0E1999AAEBC18BE1E73FA File Hash: 12B14F885B4A3F73C6BE36575AFA81001AEB4DFD8FB67B7E48423E09031792BA	01/31/2019 17:49:43	Blacked Raw	01/27/2019	03/24/2019	PA0002184066
39	Info Hash: D73113BFE9CDDBD27A672E301CB89F271D6996B8 File Hash: 7B520930A0CA51AABFD11EBAE48F436FB40C96E9EEFC950645745DBCAC7412AB	01/29/2019 23:12:28	Blacked Raw	01/22/2019	03/24/2019	PA0002183202
40	Info Hash: 650637F4C368482C7EBB844370A51B7A377FFF4E File Hash: FB58A2DB49CA236939770FD0A452DFCE1EA693EC4AC27864344BC1EAB54371E6	01/22/2019 18:14:53	Blacked Raw	01/17/2019	02/22/2019	PA0002155141
41	Info Hash: D6273EE348C2274701FD6550CE62A3865892BA96 File Hash: 5FBF653EA2E3BAB9C025CE5ED537A444D98B10BD41325911CC94B90029C057FA	01/11/2019 19:00:50	Blacked	01/10/2019	02/02/2019	PA0002155382
42	Info Hash: 8AEA27202C47B378BF48659CC2938DB8691054EF File Hash: 0D3B456AA0D88C15AF796288F66A6A6E23996BA5771C0CD7F6A9A0F347D69959	12/21/2018 20:15:24	Tushy	07/25/2018	09/05/2018	PA0002134601
43	Info Hash: 19A14F5A1BEDEA01536EA9AE0E9566FDA2F94626 File Hash: 728BD3D2613091CA7D99429D28BEC0B27F666BA9B58D601BD9A220283E07BF51	12/21/2018 15:56:31	Blacked	12/20/2018	02/02/2019	PA0002154970
44	Info Hash: 745016888E87C4D1A38D7CA7C6CAB83A553082BF File Hash: F0213DB85B3DD9C781A167BED2A9C0EA3FCF8C8539EA8210F0FA616E7745116A	12/14/2018 06:27:50	Blacked Raw	12/13/2018	02/02/2019	PA0002154971

Work	Hashes	UTC	Site	Published	Registered	Registration
45	Info Hash: A79E1BEA716422681872B46A4AC579C82B92D143 File Hash: 4BFFA4BEDA4DA82D9C1C41DB5B85569501D6F5158228026CBE8B3B956EA24299	12/09/2018 17:13:08	Blacked Raw	12/08/2018	12/18/2018	PA0002141919
46	Info Hash: E7EFEE78BB7AF187945D9250D5CA886E6869E755 File Hash: 399BEE228417F1199983A487545D05F1AF470D5A375DA73ACB32E6D0C4D5ADCB	11/25/2018 17:51:13	Blacked	11/21/2018	01/22/2019	PA0002149833
47	Info Hash: 524F82340C2DB6CDF1DD292204ADAF0F98672DC8 File Hash: 4BD51B7E813609D2E3294849947951F406B363819359BAD47FD9B14DF684D264	11/24/2018 17:20:23	Blacked Raw	11/18/2018	12/10/2018	PA0002146476

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

STRIKE 3 HOLDINGS, LLC

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

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

The James Law Firm, PLLC
445 Hamilton Avenue, Suite 1102, White Plains, New York 10601
T: 914-358-6423

DEFENDANTS

JOHN DOE subscriber assigned IP address 24.218.87.160

County of Residence of First Listed Defendant Fairfield (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)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country).

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

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER 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
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 7/10/2020 SIGNATURE OF ATTORNEY OF RECORD /s/ Jacqueline M. James

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. 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.