

1 Lincoln D. Bandlow, Esq. (CA #170449)
Lincoln@BandlowLaw.com
2 **Law Offices of Lincoln Bandlow, PC**
1801 Century Park East, Suite 2400
3 Los Angeles, CA 90067
Phone: (310) 556-9680
4 Fax: (310) 861-5550

5 Attorney for Plaintiff
Strike 3 Holdings, LLC
6

7 **UNITED STATES DISTRICT COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN JOSE DIVISION**

10 STRIKE 3 HOLDINGS, LLC,
11 Plaintiff,
12 vs.
13 JOHN DOE subscriber assigned IP address
174.62.124.166,
14 Defendant.
15

Case Number:
**COMPLAINT FOR COPYRIGHT
INFRINGEMENT - DEMAND FOR JURY
TRIAL**

16
17 Plaintiff, Strike 3 Holdings, LLC (“Strike 3” or “Plaintiff”), brings this complaint
18 against John Doe subscriber assigned IP address 174.62.124.166, and alleges as follows:

19 **Introduction**

20 1. This is a case about the ongoing and wholesale copyright infringement of
21 Plaintiff’s motion pictures by Defendant, currently known only by an IP address.

22 2. Plaintiff is the owner of award winning, critically acclaimed adult motion
23 pictures.

24 3. Strike 3’s motion pictures are distributed through the *Blacked*, *Tushy*, *Vixen*, and
25 *Blacked Raw* adult websites and DVDs. With millions of unique visitors to its websites each
26 month, the brands are famous for redefining adult content, creating high-end, artistic, and
27 performer-inspiring motion pictures produced with a Hollywood style budget and quality.

28 4. Defendant is, in a word, stealing these works on a grand scale. Using the

1 BitTorrent protocol, Defendant is committing rampant and wholesale copyright infringement by
2 downloading Strike 3's motion pictures as well as distributing them to others. Defendant did
3 not infringe just one or two of Strike 3's motion pictures, rather, Defendant has been recorded
4 infringing 38 movies over an extended period of time.

5 5. Although Defendant attempted to hide this theft by infringing Plaintiff's content
6 anonymously, Defendant's Internet Service Provider ("ISP"), Comcast Cable (Comcast Cable),
7 can identify Defendant through his or her IP address 174.62.124.166.

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

13 7. This is a civil action seeking damages under the United States Copyright Act of
14 1976, as amended, 17 U.S.C. §§ 101 et seq. (the "Copyright Act").

15 **Jurisdiction and Venue**

16 8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.
17 § 1331 (federal question); and 28 U.S.C. § 1338 (jurisdiction over copyright actions).

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

23 10. Plaintiff used IP address geolocation technology by Maxmind Inc. ("Maxmind"),
24 an industry-leading provider of IP address intelligence and online fraud detection tools, to
25 determine that Defendant's IP address traced to a physical address in this District. Over 5,000
26 companies, along with United States federal and state law enforcement, use Maxmind's GeoIP
27 data to locate Internet visitors, perform analytics, enforce digital rights, and efficiently route
28 Internet traffic.

1 11. To ensure that Defendant’s IP address accurately traced to this District, Plaintiff
2 inputted Defendant’s IP address into Maxmind’s GeoIP database twice: first when it learned of
3 the infringement and again, just prior to filing this lawsuit.

4 12. Pursuant to 28 U.S.C. § 1391(b) and (c), venue is proper in this district because:
5 (i) a substantial part of the events or omissions giving rise to the claims occurred in this District;
6 and, (ii) the Defendant resides (and therefore can be found) in this District and resides in this
7 State. Additionally, venue is proper in this District pursuant 28 U.S.C. § 1400(a) (venue for
8 copyright cases) because Defendant or Defendant’s agent resides or may be found in this
9 District.

10 **Parties**

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

13 14. Plaintiff currently can only identify Defendant by his or her IP address.
14 Defendant’s IP address is 174.62.124.166. Defendant’s name and address can be provided by
15 Defendant’s Internet Service Provider.

16 **Factual Background**

17 ***Plaintiff’s Award-Winning Copyrights***

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

22 16. Strike 3’s motion pictures and websites have won numerous awards, such as
23 “best cinematography,” “best new studio,” and “adult site of the year.”

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

27 18. Unfortunately, Strike 3, like a large number of other makers of motion picture
28 and television works, is plagued by Internet piracy. Often appearing among the most infringed

1 popular entertainment content on torrent websites, Strike 3’s motion pictures are among the
2 most pirated content in the world.

3 ***Defendant Used the BitTorrent File Distribution Network***
4 ***to Infringe Plaintiff’s Copyrights***

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

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

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

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

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

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

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

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

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

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

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

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

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

15 32. VXN Scan downloaded from Defendant one or more pieces of numerous digital
16 media files.

17 33. Plaintiff identified these pieces as portions of infringing copies of Strike 3’s
18 motion pictures.

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

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

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

27 37. VXN Scan then used the “Info Hash” value, contained within the metadata of the
28 .torrent file correlated with a digital media file that was determined to be identical (or substantially

1 similar) to a copyrighted work, to download a piece (or pieces) of the same digital media file from
2 Defendant using the BitTorrent network.

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

5 39. The VXN Scan captured transactions from Defendant sharing specific pieces of
6 38 digital media files that have been determined to be identical (or substantially similar) to a
7 copyrighted work(s) that Plaintiff owns.

8 40. VXN Scan recorded each transaction in a PCAP file.

9 41. VXN Scan recorded multiple transactions in this matter.

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

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

15 44. Exhibit A also sets forth relevant copyright information for each work at issue:
16 the date of publication, the date of registration, and the work's copyright registration number. In
17 a showing of good faith, Plaintiff has intentionally omitted the title of the work from this public
18 filing due to the adult nature of its content, but can provide a version of Exhibit A containing the
19 works' titles to the Court or any party upon request.

20 45. Thus, Defendant downloaded, copied, and distributed Plaintiff's Works without
21 authorization.

22 46. Defendant's infringement was continuous and ongoing.

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

25 48. Plaintiff seeks statutory damages, attorneys' fees, and costs under 17 U.S.C. §
26 501 of the United States Copyright Act.

COUNT I

Direct Copyright Infringement

1
2
3 49. The allegations contained in paragraphs 1-48 are hereby re-alleged as if fully set
4 forth herein.

5 50. Plaintiff is the owner of the Works, which are each an original work of
6 authorship.

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

9 52. At no point in time did Plaintiff authorize, permit or consent to Defendant's
10 copying, distribution, performance and/or display of its Works, expressly or otherwise.

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

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

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

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

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

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

26 WHEREFORE, Plaintiff respectfully requests that the Court:

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

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

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

6 (D) Award Plaintiff statutory damages per infringed work pursuant to 17 U.S.C. §
7 504(a) and (c);

8 (E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. §
9 505; and

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

11 DATED this 21st day of May, 2020.

12 **Law Offices of Lincoln Bandlow, PC**

13 *s/ Lincoln D. Bandlow*
14 Lincoln D. Bandlow

15 Attorneys for Plaintiff
16 Strike 3 Holdings, LLC

17 **DEMAND FOR A JURY TRIAL**

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

19 DATED this 21st day of May, 2020.

20 **Law Offices of Lincoln Bandlow, PC**

21 *s/ Lincoln D. Bandlow*
22 Lincoln D. Bandlow

23 Attorneys for Plaintiff
24 Strike 3 Holdings, LLC

Exhibit A to the Complaint

Location: Los Gatos, CA
 Total Works Infringed: 38

IP Address: 174.62.124.166
 ISP: Comcast Cable

Work	Hashes	UTC	Site	Published	Registered	Registration
1	Info Hash: 0BA8894950218E069E42B23403598B102CE4C6B3 File Hash: 9EF07345C5CB3B960537862FA8897CBCD0A50C4718FF5FF79C6B852E76ABB2D4	01/08/2020 04:17:38	Tushy	12/22/2019	01/22/2020	PA0002234863
2	Info Hash: A96CB64E937D16635099A291DF66872988DB3CE2 File Hash: 3BB01A1A6A59951571A72103BFFA914318BAC4864A958428D15F5B935FB52768	12/25/2019 23:02:32	Vixen	12/15/2019	01/03/2020	PA0002233430
3	Info Hash: 878E686C5F49A5B1CAA5EC7FBECB43C4E85E277A File Hash: E060FDDD1555473C552CAB4D0EA5286DEBDE323BA64668C565F3F6C573F46E9C	11/24/2019 15:26:29	Vixen	11/20/2019	12/09/2019	PA0002216255
4	Info Hash: 5BB2AE2D74EDA8D4C0976E8C20C4EC6694B6F88E File Hash: F0D51AC52F91908891963E1F3778781D5C186C7EE0786F7A46A579FFDD9CDA88	11/01/2019 02:52:41	Vixen	10/31/2019	11/15/2019	PA0002211917
5	Info Hash: 67BBA68AD2F8B337347AB5C68764713754555B43 File Hash: C70398C9D731697DA1771680334F165E6124A962806289F0633A9433A89C447D	10/30/2019 01:43:07	Tushy	10/28/2019	11/05/2019	PA0002227106
6	Info Hash: 219BC0BC67C63963FA0AA9EF310C09EC4BCE055A File Hash: 2E0E176FABD9043446C0F4168909C85A493935DCEB3D9CE7657651CC7664390F	10/29/2019 04:29:24	Vixen	10/26/2019	11/05/2019	PA0002227099
7	Info Hash: B64795AC58268CD9C422E07C69CFE21BF5817B3A File Hash: D635910093E18115308F865230E69E3C9BD78A158FE7F327A8E07D39DC5D7AED	10/23/2019 13:59:29	Blacked	10/22/2019	11/05/2019	PA0002210294
8	Info Hash: 592E00EEFD8E4215D6964480C40D05812DBD90C7 File Hash: FA22CD79576E501FDA01E552ADE1E975DF4576FF63D4D95EF7497F64F508904A	10/22/2019 03:36:31	Vixen	10/21/2019	11/05/2019	PA0002227093

Work	Hashes	UTC	Site	Published	Registered	Registration
9	Info Hash: 9E5DDD510945C8DD46FF3E459522F0292D605EE0 File Hash: 27ACBEAFD3C064094A693AFC0818310C36EDABEFCD4508C74040DFC08488C1D6	10/13/2019 06:41:17	Vixen	10/06/2019	10/21/2019	PA0002207778
10	Info Hash: 313A6D4A94559F25179E088261818808DB04CEB9 File Hash: B0AE7AC7AE37A6CF40D80F135B2B56033E0348B0E97B3B3DE55C1298D69F5CFD	09/25/2019 03:13:31	Tushy	09/23/2019	10/07/2019	PA0002205466
11	Info Hash: F29FB427E07BFCD850C0DF7DB1EDB5BE24C0267F File Hash: A3D700E02B72B0C705B3B957FA90E83F1AFB65BE85F5C435AE5DFF3F2D03250B	09/18/2019 03:31:39	Blacked Raw	11/18/2018	12/10/2018	PA0002146476
12	Info Hash: 52DBCAB7B39058F361707D52D0191BCAB55EB38A File Hash: E12D2277C7893FC16F285BCFC8D659FCD546C0F02E28E864937BC6EAF3E4D90C	09/18/2019 03:23:29	Blacked	09/17/2018	10/16/2018	PA0002127778
13	Info Hash: C9B43CE41BA479C1CD8E51416831AEBEA00AB98D File Hash: 8A9876BAA41D925584588A5F69C68353F867993B742D8614D1FEA2400139C1DF	08/15/2019 03:21:51	Tushy	08/09/2019	09/11/2019	PA0002199987
14	Info Hash: 004DA2C9122F1CFF1346FD0D9BBA7C7BE4D156EC File Hash: 42EEA3996C07F526F42BC5A56307832E4DB84ECE456789187C9194BF3BFC57E4	08/08/2019 16:14:36	Vixen	08/07/2019	08/26/2019	PA0002213240
15	Info Hash: 815D0FCED85C4565288DBAFE53ED6266B0D41447 File Hash: 06A2F223C47718512F0CE11E8F2F4AC477DA3C2E6BA1D12CAB1EF8599AF827CF	07/31/2019 02:20:49	Tushy	07/30/2019	08/22/2019	PA0002195506
16	Info Hash: 95A5870C793057C65F7C4B5740D88208D956ECBD File Hash: 00989731AA4639F95DD0C9F04EB9BCF59B893235B99ADF83FF30C5AB58AF26AE	05/25/2019 03:52:28	Vixen	05/24/2019	07/17/2019	PA0002188303
17	Info Hash: 84FEB874319728389ACFBDD9188FDBF6C57DA75C File Hash: 7A6B52B645BE0D832E6A225667034CB707762BD1CAE234FB660518649DF9ABC0	05/22/2019 05:30:28	Vixen	12/25/2018	01/22/2019	PA0002147901

Work	Hashes	UTC	Site	Published	Registered	Registration
18	Info Hash: AF83F0498433595CA405D5BA503668E39140BE7E File Hash: 1758F9FF705A88510CFB1DF88597276C51A2A6CF8968519E990F20D0A91194FA	05/18/2019 04:13:35	Tushy	05/16/2019	07/05/2019	PA0002206381
19	Info Hash: 0FCCA66E8060DC05A221832147357A295BD5BDC1 File Hash: D41CDE4E667263D193097E42CDCA562A0F38C6D727FB238AF2E6DEBD0CB7402D	05/18/2019 04:08:13	Tushy	05/11/2019	07/05/2019	PA0002206404
20	Info Hash: 97D72EF918207B057716A7250623FD27471D7CDF File Hash: 6C5359230EBB63CCED70A9217186FCB3B8D1F6D97597EB096CDD94AA7ED8F9C4	05/16/2019 03:21:28	Blacked	05/15/2019	07/05/2019	PA0002206387
21	Info Hash: F9B1C1D66AED353AE45C3DB37B2DCEA70E3E7649 File Hash: 55B79140DAC0943B0950CCB4FDA2EEDA6CF3EAE421B990BA2CA97A24DD3E3490	05/11/2019 03:09:37	Vixen	05/09/2019	06/03/2019	PA0002178768
22	Info Hash: C0E85250C4665B97E6430774E95F95EEF1572F2C File Hash: 7B580766221DC503AD8D48F278FD435863C1F65ACFFF34CB8FF1A5C4A55781CF	04/11/2019 01:59:14	Vixen	04/09/2019	04/29/2019	PA0002169963
23	Info Hash: 547F59918808C7DD20DEFBD841F4F140FDB0D2DD File Hash: B5BB34C457E4594F2C2FEEF860DB4EDE3E3C0D710F987129C155729453639A62	04/06/2019 02:52:19	Vixen	04/04/2019	04/29/2019	PA0002169968
24	Info Hash: A647DAC4F1765F4D273A84ACD720FAC66EFF116D File Hash: 89BA4F59F83B6B124281B2F62CB78C126AB440E65F5E332A4B05602AF478052C	04/04/2019 02:54:06	Tushy	04/01/2019	05/11/2019	PA0002173888
25	Info Hash: FB672E815A9FEA2A5E75AB12CF8D0C070F88F203 File Hash: 4533A2D00026774EA08D15C910F8939DF7CFE778FCC019BE146C06FF19256D85	03/31/2019 22:22:20	Vixen	03/30/2019	04/29/2019	PA0002169943
26	Info Hash: 4CFCD4A417821FCFCD79A36FA4B8E445497B61BB File Hash: 321968D700111022299000B4A423C842F1148E917FE15681BEBABE12F54EB66E	03/24/2019 04:24:44	Tushy	03/22/2019	04/08/2019	PA0002164887

Work	Hashes	UTC	Site	Published	Registered	Registration
27	Info Hash: DB799D53C1E2497D219E0E3D8BBF29A8A99DBA6D File Hash: 4696AD49226D1CDFB484990DC892256998D6B5E780AD3B63C8B5D84798D395E1	03/15/2019 02:22:13	Tushy	03/12/2019	04/29/2019	PA0002169947
28	Info Hash: 624A1332AFA93159FAE818A85963F4110145A7C File Hash: C9A51E9A93A9035274A1EE32243ABF6115C43DF3658A5D24C5D519B7810261B9	03/11/2019 01:28:55	Vixen	03/05/2019	03/31/2019	PA0002163982
29	Info Hash: CE371CD4A148579DA33E1EE69A14F0B6A0B5B31A File Hash: CE51EF9B8F482C3E62F3765A7BC8BB80251D08557AFFCD7CA7AB84E6E03D7927	02/27/2019 07:14:17	Vixen	02/08/2019	03/24/2019	PA0002183193
30	Info Hash: 6B065FECB85F94548AAEF8B2737DD9C2A4EE1D6E File Hash: A2549F16C4044CD609BF50156526FBC6406A0DD1C81272B8728E9F7E5A78EA90	02/27/2019 04:05:00	Tushy	02/25/2019	04/17/2019	PA0002187005
31	Info Hash: 001779348C6F84B362C125BB6E6DE3EFEA9FCADD File Hash: A9C15FEA95319BBD26164E4166180BE8FB9A431E810E635FFEB5847A8858A2D3	02/23/2019 02:57:17	Tushy	02/20/2019	04/29/2019	PA0002170363
32	Info Hash: B6ECD1FE798497FACAFEE2BB5A2F4C6DAFFD6272 File Hash: 1D1AA26BDFB985F4F5BB9D70C5153E2653C2C1DFAED02538E04474336865EA89	02/12/2019 04:54:58	Tushy	02/10/2019	03/24/2019	PA0002184028
33	Info Hash: BAD68CA70D6BFA8F2608A138058B5819F96FD177 File Hash: B25AF3DE3F80EB8CBDD72DB3152799B8AE2232B90DAB38987A39E22110E2485A	02/12/2019 04:15:21	Tushy	02/05/2019	02/22/2019	PA0002155146
34	Info Hash: 66E24EFC34B1ACF70F5DADCFA1EDE2B2C034D5B7 File Hash: 3EC8124C644C5EC00511B304FC81BDC0B456DDE16A452DC4C8AFEBD06DDF7A9C	01/28/2019 01:47:42	Tushy	01/26/2019	02/22/2019	PA0002155150
35	Info Hash: D73113BFE9CDDBD27A672E301CB89F271D6996B8 File Hash: 7B520930A0CA51AABFD11EBAE48F436FB40C96E9EEFC950645745DBCAC7412AB	01/24/2019 04:01:02	Blacked Raw	01/22/2019	03/24/2019	PA0002183202

Work	Hashes	UTC	Site	Published	Registered	Registration
36	Info Hash: 230A6D45AD01B4CC67F19BABB58E68B928C42502 File Hash: 0514D07FB08BE468DC58262E31A69232E4D3FF1697271B02E7E5B031B399976B	01/11/2019 07:17:52	Blacked	01/10/2019	02/02/2019	PA0002155382
37	Info Hash: 9F603D8C63DDB71F9A0412A6272081629F2302B8 File Hash: 2C112D6DCF8D71340CEA6FE8DAAB618588311BA0CAD0060E0D830F64E1A4FC89	01/10/2019 03:54:38	Vixen	01/09/2019	02/02/2019	PA0002155377
38	Info Hash: 8AA35B136BAD524ABE532FF7416DCBEDF3D5C782 File Hash: 8F198D597802DA68E34FA5BCF8D9F4B9EAC2F19B1E474F1898480231B0458C0D	12/20/2018 04:27:53	Vixen	12/15/2018	01/22/2019	PA0002147905

CIVIL COVER SHEET

The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate 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
(c) Attorneys (Firm Name, Address, and Telephone Number)
LAW OFFICES OF LINCOLN BANDLOW, PC, 1801 Century Park East, Suite 2400, Los Angeles, CA 90067, Tel: (310) 556-9680

DEFENDANTS
JOHN DOE subscriber assigned IP address 174.62.124.166
County of Residence of First Listed Defendant Santa Clara
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
4 Diversity

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
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)

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, 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
6 Multidistrict Litigation-Transfer
8 Multidistrict Litigation-Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing
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, Fed. R. Civ. P. DEMAND \$ 150000 CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S), IF ANY (See instructions): JUDGE DOCKET NUMBER

IX. DIVISIONAL ASSIGNMENT (Civil Local Rule 3-2) (Place an "X" in One Box Only) SAN FRANCISCO/OAKLAND X SAN JOSE EUREKA-MCKINLEYVILLE

DATE 05/21/2020 SIGNATURE OF ATTORNEY OF RECORD /s/ Lincoln D. Bandlow

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS-CAND 44

Authority For Civil Cover Sheet. The JS-CAND 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 in its original form by the Judicial Conference of the United States in September 1974, is required for the Clerk of Court to initiate 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 Federal Rule of Civil Procedure 8(a), 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.
- (1) United States plaintiff. Jurisdiction based on 28 USC §§ 1345 and 1348. Suits by agencies and officers of the United States are included here.
 - (2) United States defendant. When the plaintiff is suing the United States, its officers or agencies, place an “X” in this box.
 - (3) Federal question. This refers to suits under 28 USC § 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.
 - (4) Diversity of citizenship. This refers to suits under 28 USC § 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-CAND 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 six boxes.
- (1) Original Proceedings. Cases originating in the United States district courts.
 - (2) Removed from State Court. Proceedings initiated in state courts may be removed to the district courts under Title 28 USC § 1441. When the petition for removal is granted, check this box.
 - (3) Remanded from Appellate Court. Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 - (4) Reinstated or Reopened. Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 - (5) Transferred from Another District. For cases transferred under Title 28 USC § 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 - (6) Multidistrict Litigation Transfer. Check this box when a multidistrict case is transferred into the district under authority of Title 28 USC § 1407. When this box is checked, do not check (5) above.
 - (8) Multidistrict Litigation Direct File. Check this box when a multidistrict litigation case is filed in the same district as the Master MDL docket. Please note that there is no 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 Federal Rule of Civil Procedure 23. 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-CAND 44 is used to identify related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.
- IX. Divisional Assignment.** If the Nature of Suit is under Property Rights or Prisoner Petitions or the matter is a Securities Class Action, leave this section blank. For all other cases, identify the divisional venue according to Civil Local Rule 3-2: “the county in which a substantial part of the events or omissions which give rise to the claim occurred or in which a substantial part of the property that is the subject of the action is situated.”
- Date and Attorney Signature.** Date and sign the civil cover sheet.