

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"), Spectrum, can identify Defendant through his or her IP address 172.101.201.71.

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.

Jurisdiction and Venue

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").

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 172.101.201.71. 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 75 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. VXN 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 VXN 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 "publicly" perform); and

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

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,

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Exhibit A to the Complaint

Location: Livonia, NY
Total Works Infringed: 75

IP Address: 172.101.201.71
ISP: Spectrum

Work	Hashes	UTC	Site	Published	Registered	Registration
1	Info Hash: 7840E899EC57DDF846E589EA8BA4C5FDC7465FC3 File Hash: 53769DE0CAB8EED27CBCECFD04DFC51122F7B461817906F4E8FEA8300B155A48	05/25/2020 16:39:44	Vixen	05/22/2020	06/22/2020	PA0002245640
2	Info Hash: 4F0D3D0FD3F88791F4933080453A052BE6924F22 File Hash: 90F0EDD56A0E25855AB1FFD9C94D59B4607F15898B502F5276EC1F80113D2FD3	05/18/2020 20:00:35	Tushy	10/08/2017	10/19/2017	PA0002058298
3	Info Hash: A2F12D22A1ED9F23F0499A8DAA8C8F65CAE2A0F7 File Hash: 0FD973AB75E0C0D9652AFB834F9A3CB1FC4734F6F7736DD8C88C7DC5E8A372CE	05/18/2020 20:00:10	Vixen	04/09/2018	06/19/2018	PA0002126676
4	Info Hash: 2D8F105CB57AD0FD1250254D4910D00E4CBBCDCC File Hash: E02D528851367835DE17CC4D35D0BA309A12CBBFE4576886A79AEB1B91F66DCC	05/16/2020 17:29:17	Vixen	05/15/2020	06/08/2020	PA0002243648
5	Info Hash: 9B227B2F714A2C1D72BA4AABE2E2DDBCE8A08FFA File Hash: 61BE640426AC828DD3E5609FA3BA27950D70BB84715E8B6304A7369C2C970B25	05/05/2020 21:51:47	Vixen	05/01/2020	05/19/2020	PA0002241473
6	Info Hash: 6224B03F4F05E4E513435061AB1BBAB52CE93B5B File Hash: 86A0D3AF33018880E63E10DCB1E95079B9951A8B2B0350554F6F1D45FAF35B73	04/25/2020 22:06:55	Vixen	06/03/2019	07/17/2019	PA0002188305
7	Info Hash: F88E72ADEE9C6A3840795AED040E192D6464657D File Hash: 90D167D8F06430F8809C82EF01715C3A71D39FDCA9F9EBCBCC2EC06301A30FF1	04/04/2020 01:02:01	Vixen	04/03/2020	04/17/2020	PA0002237302
8	Info Hash: 5954CA36DA9BD29C667D78C6FA6EE9CFB6C65806 File Hash: 9BB4B80B2874773C608A5E46747FAC0F93629D1C9636ED6CF313EA61221E810D	04/02/2020 12:02:39	Vixen	07/18/2018	09/01/2018	PA0002119684

Work	Hashes	UTC	Site	Published	Registered	Registration
9	Info Hash: 84A2DA2B5B8B40832873EAF3064B0224D3AA0A4D File Hash: 24CF9A748B31970324ABC18B103B89AB6C07A2814A6C10ED174FE47A658CA9BF	04/02/2020 11:51:22	Vixen	05/09/2019	06/03/2019	PA0002178768
10	Info Hash: 1809D57D2D5C8A110DB432826F6EF13CB753892E File Hash: DDBCC9A12A2BE891DA7F686DE3C3A52E09DB3528C1371FA89709F36254538027	04/02/2020 11:33:11	Vixen	11/20/2018	12/18/2018	PA0002141925
11	Info Hash: A13372D383B6487823771167C3024FF64D0BAF6F File Hash: 966A72033B80F407CEC791BCFC86062A5AE505676C5DD0017BDB610154691AE2	04/02/2020 09:23:48	Vixen	12/15/2018	01/22/2019	PA0002147905
12	Info Hash: AD5C18C1994C5C7C76E738EE43E039563A9A8BD2 File Hash: 6C8BFD68D9A18180B8BCAC1B5CAF5ED59CA39E57F01E76638702D71B369E3134	04/02/2020 09:02:45	Vixen	11/15/2019	12/03/2019	PA0002232048
13	Info Hash: 7D7C8F9388BB672616AE4776724BD944771BFC3B File Hash: D8A29BDFAAA4AA9A9B54FE96761793BC0C8E85458C49BB044CBC17A6D7A832E0	04/02/2020 08:22:32	Vixen	02/18/2020	03/18/2020	PA0002241449
14	Info Hash: 4F66CB8B23BA0087866331E186EA7328DB385A98 File Hash: BE714DD8AC36D4709A15AB6D27BBB8C4AC9EC993D42FD57760692FCABCA6842A	04/02/2020 08:09:28	Vixen	03/25/2018	04/17/2018	PA0002116726
15	Info Hash: FD44EDB24CBD0DBFDF7E9F7D0E6A3B4451EDE702 File Hash: 46461D7C5D41223438B18575B0658755E3B31C1289B232747285799B6D08B50D	04/02/2020 08:07:55	Vixen	09/21/2017	10/10/2017	PA0002086168
16	Info Hash: 258961E123E520633A96CDF11E8E6F60E233C816 File Hash: A116D3BED05F6DD226D58A71AFCD167970C507F1B10DCD4306EA08F55BFE4621	04/02/2020 08:01:10	Vixen	07/23/2017	08/10/2017	PA0002046877
17	Info Hash: 26027D4BBA9366856012B8C062375891C7926188 File Hash: 518F49722D012458CA767399DC4F77F113BD0897F82DBFAE6ECE845BCC7BD399	04/02/2020 07:36:48	Vixen	02/08/2019	03/24/2019	PA0002183193

Work	Hashes	UTC	Site	Published	Registered	Registration
18	Info Hash: 005ECADE217D83653BCBCA490DC3249975B7A05A File Hash: 837EE8CBBFF0CFC826753CE6EDE6C57EC5515141DC4248D373454900CD2EE70C	04/02/2020 07:34:10	Vixen	06/08/2019	07/17/2019	PA0002188311
19	Info Hash: AF73D5191F68715AB060187FE76CDB4AF4CEAA27 File Hash: 32BA54E69E90D183533984A1B0F916A005710AEB23895180B19D45260418C58D	04/02/2020 07:30:36	Vixen	12/15/2019	01/03/2020	PA0002233430
20	Info Hash: 0055B788E96EAA3B5D4A4142C2DF5337045FFD4D File Hash: 593873BAAF5820606B36CE0BFD93DD950C1A301C479A9C0FD3772D87360368F8	04/02/2020 07:30:02	Vixen	07/13/2018	08/07/2018	PA0002131906
21	Info Hash: 9C643ACA38FD9D470613CE49A612A20A07950A43 File Hash: 64E50EA88C00946AADFD30510FF5F092E9ABBF74D00329AC26A1D2C1D3FBED82	04/02/2020 07:25:25	Vixen	04/29/2018	06/19/2018	PA0002126677
22	Info Hash: 5540C89E5B872A3EB29D38D7D6C59134B3342F74 File Hash: 82122CF99D24467F82ADC0C7F5A830B00FD0166A2DACD7D573A461C90D4BA438	04/02/2020 07:22:35	Vixen	11/30/2019	12/17/2019	PA0002217669
23	Info Hash: FB7E3EA3B9E083499E761482A6C6D7DFDB749555 File Hash: EE1EFABAC2DA07AF56C3C5710E9DE7C7EA142C3087F61B0A758DFD202F29E66D	04/02/2020 07:22:11	Vixen	10/06/2018	11/01/2018	PA0002141493
24	Info Hash: 3F270D99BA6AD25ECA5DA3F1A19E9EE0BD1A3B75 File Hash: BC3B31B3647AE5C82A35A0142199F2969DE0DAF9966BA26F68E8D6E2E2FB9748	04/02/2020 04:18:34	Vixen	02/13/2019	03/11/2019	PA0002158413
25	Info Hash: 6E87B814706368545A7A63DE5F99272C4CD302DF File Hash: F33593A2104E6A752BCA10AE83E95E022C915B2ADE112D98536FCC3C571DCE5C	04/02/2020 02:56:47	Vixen	02/08/2020	03/18/2020	PA0002241445
26	Info Hash: FF16D5C558E22B9BA334778EF92DDCAC4B9C219F File Hash: 0A6AC3A4977BD540B7DF072701AB010EE0AFC960275C3F4BBE458E3B8FAEF669	04/02/2020 02:55:37	Vixen	01/29/2020	02/20/2020	PA0002229058

Work	Hashes	UTC	Site	Published	Registered	Registration
27	Info Hash: 8964815B3EE407A3EBFECD69C9A66DF0EFAA05A3 File Hash: A404C4B8F66F1C6C6DA9E343BD7284ACCF468243D2AE64E4053DD9675ADF39B3	04/02/2020 02:54:21	Vixen	10/31/2019	11/15/2019	PA0002211917
28	Info Hash: 2DB957887A10E8246EF3A3DA094E8DFC20643F2F File Hash: F9D00CAEEB69E94196F0F3E1FFF6496D42369A28FFDCAF8572F3B1B9162FD22D	04/01/2020 23:47:17	Tushy	03/11/2020	04/15/2020	PA0002244960
29	Info Hash: E65C8A7AD4B9405CB2994396CF1146FE84014368 File Hash: 35C3C8A4D5131463919CC7CC04F2327481AC5436DF6CE91E4E91B0F84B24CEAE	03/25/2020 21:50:53	Vixen	12/10/2019	01/03/2020	PA0002233429
30	Info Hash: 0ED1618079E29D4BB708465328D67B227B1AA795 File Hash: 74BFE94A22A1AE503CFC1932F5AD24D246D29B424A39F00629A536CC93B83BAF	03/25/2020 18:57:55	Vixen	03/10/2018	04/17/2018	PA0002116743
31	Info Hash: 156E9CD40E90496BDB0EAEC3D0B34567DBD603DE File Hash: 4A49CB21213268044A33070B1FB50D99C1025F2043E66C5F8040E27ABBEA4AFA	03/23/2020 21:34:06	Vixen	07/13/2019	08/02/2019	PA0002192302
32	Info Hash: 01FFE2069B4726F71FBECB4D7DB2047ED047459E File Hash: DE2431F8B774A7DC332E16466DBCF7B8F8B22B79FCE81BB615C78B82C619256D	03/17/2020 15:31:15	Tushy	03/16/2020	04/15/2020	PA0002244959
33	Info Hash: 95220588ABB32914554E532F1B67D75712F16673 File Hash: E5FB2E79748EC94A3A34831C911CC19B852F8F3AF0627A5DC416A1763E6EC47F	03/13/2020 16:54:37	Vixen	03/09/2020	04/17/2020	PA0002246165
34	Info Hash: B63010990EB37E86B9F26FBD4B7BA9FB6B2C89DF File Hash: 834EBFD05DF0DF4ABOCA0F7CCE0052FF451176C4B542FD741399F1F7A692CEBD	03/06/2020 05:46:35	Vixen	03/04/2020	04/17/2020	PA0002246168
35	Info Hash: 5638E0A31CCC0D3571368B985ADF69CB8FE52F4A File Hash: 2C56BAD530ED86B12302AF559F9FC6B7C9FCCACD73456188E567A76E6857E7AD	02/14/2020 02:34:26	Vixen	02/13/2020	03/15/2020	PA0002240552

Work	Hashes	UTC	Site	Published	Registered	Registration
36	Info Hash: EF5E0EA2F75D24F225AAF66630629A160B8070D3 File Hash: 7E3D58FBB38F6191A32209C8C12D19BDAB13FDDDB157807004816D6251C722D57	02/06/2020 05:47:49	Vixen	02/03/2020	03/15/2020	PA0002240554
37	Info Hash: AC7139A92B97FFA7EC184D05EC879DAB12CB55A1 File Hash: DF16A6E0531247C1C792FE0A8B2BC370CBED83E1BEAAFAA86681CA41D732746E	01/17/2020 19:54:28	Vixen	04/04/2019	04/29/2019	PA0002169968
38	Info Hash: 2A03B74B0623C4DC5C2A345CA6942396B4E80DBA File Hash: 28D715B697DDB1C089DA2343D01306F2C2B9365A8A89E422E1E0232F462B7235	12/28/2019 03:31:17	Tushy	12/27/2019	01/22/2020	PA0002234861
39	Info Hash: 16BE9C2A0836D8C3DA7C84CD3ED4B4E614605590 File Hash: 8DC9BE53AC63119E0FCB977C5E88577399C51320275A44A1900D5FDA9D24637A	12/07/2019 16:54:23	Tushy	09/08/2019	10/01/2019	PA0002217338
40	Info Hash: 39AD5B58AA96023EF698F66ACF5820C5B35250DA File Hash: 68C5080FB9859758C14D04261D392973105FAE5B28135335C38D65C2EDD848D4	12/07/2019 16:49:55	Vixen	02/03/2018	02/20/2018	PA0002104152
41	Info Hash: 087F01D9F7138A20FF7157EE29B7138FE6BDF4AE File Hash: 308CF0EB1202B28C6439EC9B9B5C125FBBAAEB4B2813F5BDC9608542582987E6	12/07/2019 15:23:14	Vixen	12/05/2019	12/17/2019	PA0002217671
42	Info Hash: A18108410BFF1A76109865CDFC14DECD21C0C458 File Hash: 2F2287C739EAD9C85BD65235BB5F03A7BB4F156C000C4CBAA27D833D9DEA0989	11/22/2019 02:32:37	Vixen	11/20/2019	12/09/2019	PA0002216255
43	Info Hash: ED5D228423F6688187B1663319514A65E2F5DE14 File Hash: 2EEBF3BF6B38D0CCC7D8D23D6C0C586557B0D5E179EBCCE0AA3691A4329D2BC9	10/27/2019 17:34:31	Vixen	10/26/2019	11/05/2019	PA0002227099
44	Info Hash: 71CDE1D6A34644CAD4EFCCC1581D55107B84CE0F File Hash: E6A03BC0D9B055B2E441EE1649F1560B70105621DC0458E1B33BB513E3159338	10/22/2019 02:15:52	Vixen	10/21/2019	11/05/2019	PA0002227093

Work	Hashes	UTC	Site	Published	Registered	Registration
45	Info Hash: D180CCB76299423461544F293503A24A3ECBAE97 File Hash: 71B5CA2BE906122090168ED5474897BFE2E7A6DE27F38F921D05921FAF72D031	09/23/2019 04:39:45	Vixen	09/21/2019	10/01/2019	PA0002217349
46	Info Hash: 4377D001F4E80BB56FC09EEC160D3E44683A7EAF File Hash: DD98AF23D306256E0C8E4D4925F2A17C4E0FCBC11B5EAD6F2D4F1EC3754EE213	09/18/2019 02:09:23	Vixen	09/16/2019	10/01/2019	PA0002217346
47	Info Hash: 55298BBC330B3C971890294BDE7CAC90F58A2867 File Hash: EF17C6057A199AC47C226513F0BEC501FBFB2D28FE227250303876F41F1C4DED	09/12/2019 03:58:19	Vixen	11/05/2018	11/25/2018	PA0002136632
48	Info Hash: 73A2A94B799E648A0B3BF984EF26B33BDB6D9F3B File Hash: 3A43357A29B98E7B2324EEF0D6C3A5757CB6607382EEDD5ABFAB1839DE1F84DA	09/12/2019 02:13:25	Vixen	09/11/2019	09/25/2019	PA0002203160
49	Info Hash: 2F83CE09B1F20BE375C20F1028CD3FBFEF3813FDE File Hash: BOCF8CDC8AB738EDE332DBC1B97E7D7E6A7F0F85DE8FDA2BE1DA130155775A70	09/11/2019 10:28:21	Vixen	02/18/2019	03/11/2019	PA0002158598
50	Info Hash: FD451C17F6CD6A9FC4992E362A68B0846555EE33 File Hash: 5766A50CC7D6782D469A8FA391E32FD0AF2DFEB1E38100728F719AAA687FF95E	09/08/2019 06:39:13	Tushy	03/12/2019	04/29/2019	PA0002169947
51	Info Hash: DE594CC044853E9ED28B5ACEB333532543494492 File Hash: CF14983D0E63229DE13ACF22FBFF522E865C9F1012B5A78A320F5302BF9D387F	09/07/2019 13:05:17	Vixen	09/06/2019	09/13/2019	PA0002200698
52	Info Hash: B4EFB93C49D53B219C15A29151550C0608A3CAC8 File Hash: 898649E79C1B5285951DF547905C88294A8EE6AC895D95500CDA7DB79B684CA5	09/01/2019 20:35:22	Vixen	09/01/2019	09/17/2019	PA0002216134
53	Info Hash: 9D0E21B1D1C9024F4EF0D3735144C55F30ED31D0 File Hash: 9DFCEE7F0D7B68230FA013942CE356F37B792EFF1C7A6C435ED842955671C8DC	08/28/2019 04:28:29	Vixen	08/27/2019	09/17/2019	PA0002216129

Work	Hashes	UTC	Site	Published	Registered	Registration
54	Info Hash: AB4B65F71419221DE70FCB74DAD797CB21429F3C File Hash: 5C3E9D9640776F9015FAA4C3BAE04738AC158D6C3F389D00F116B215009FC300	08/25/2019 20:24:20	Tushy	08/24/2019	09/17/2019	PA0002216213
55	Info Hash: A1A9B874F9CE90668C5F19EBE278281917395AE0 File Hash: E5C75759B09CA4471A54B5F73E198474E0AB4D9EC231E074E7A4C687FA1483CD	08/18/2019 04:46:53	Vixen	08/17/2019	09/10/2019	PA0002199413
56	Info Hash: DA2B01E9B71CDF13CF8442E993A3A22EC96B6326 File Hash: 729F402DA3A322A41FDAFC129556F5345D580D042C22F5047B669F5F17AF4448	08/08/2019 09:07:50	Vixen	08/07/2019	08/26/2019	PA0002213240
57	Info Hash: 5DF8FA648DEEAE1D73E962DB195061E646F82B4E File Hash: BA5A079E645206AA74CFD54D5EA02C345EB7CA9D87D07AE53C3DB2E8CC913CEE	08/05/2019 01:43:09	Tushy	08/04/2019	08/22/2019	PA0002195508
58	Info Hash: 00783959987FB8DB89EF83A65108801CE87E72DE File Hash: E85980CA85AD8EDAA171D8682A1F5D353E18F525631C246FCAF60067AD8BF4D4	08/03/2019 03:32:27	Vixen	08/02/2019	08/22/2019	PA0002195510
59	Info Hash: 05EBD8C29118D473550899941352F12A097DDC23 File Hash: BEAA0130023E4E46AD715FDF6EC6BECFE10D6F1EAC3BF60423DAA9EABA50788A	08/01/2019 02:39:58	Tushy	07/30/2019	08/22/2019	PA0002195506
60	Info Hash: 1BB2EF62252597B1353F2947F015A86982A0E19F File Hash: F41BE8C6350F2DB9D42BCFC852F0226B8CF802B79821D9C42A3895FCCFC5E94A	07/29/2019 09:26:07	Vixen	07/28/2019	08/22/2019	PA0002195513
61	Info Hash: 425B69EBF37AF69ECEF370C54A0B8F23AB28C401 File Hash: 7C0FB3C1BB3F1DF8CAAC603A4D2F6E76DC9BDB04138DC2CBABB665BADAE3B47B	07/28/2019 04:37:35	Vixen	06/28/2019	08/27/2019	PA0002213233
62	Info Hash: B9B81CF9CBB5D7F20ABD0C5309DBDA097FB73E8F File Hash: 0849B9D7F5C9F028EE9A411A4BF78ABD002C61F54554764DDDEE9A1D9EBD3E91	07/26/2019 04:05:08	Vixen	07/23/2019	08/27/2019	PA0002213247

Work	Hashes	UTC	Site	Published	Registered	Registration
63	Info Hash: AB6F5DDED2290838AD429C5C8048ECD822E37AFC File Hash: E3929017009B2C9EFC94F419309B16346A86AAE8361D5BA626E7E98131473127	07/09/2019 03:59:47	Vixen	07/08/2019	09/10/2019	PA0002199411
64	Info Hash: 4F6E919AF772D9342F71D3479F6A4379B5E5EA40 File Hash: 43E7C3F0959D28BD2DC831D5CD246DC20B922B97BA2F286171CA282186F026A8	06/24/2019 00:10:00	Vixen	06/23/2019	08/27/2019	PA0002213299
65	Info Hash: B7BCBF2FCDD44A8BDB3A063EB66E0773C0B07526 File Hash: A2C5BAE81898F9DEA282CA577741FAA9602957AC0D4DC6CBA2937249EC4B5130	06/12/2019 02:29:18	Tushy	12/07/2018	01/22/2019	PA0002149849
66	Info Hash: 2792CFE99C40641407BFC00440005D0FBAC48D6F File Hash: B2B70AF825DA3A42749A3F89B4FEB1063147F96E183103F31834AF78A4FC5780	05/25/2019 22:53:44	Tushy	07/25/2018	09/05/2018	PA0002134601
67	Info Hash: 8A396158B2DF15777FAEF364CFE9F0EA1B91740F File Hash: F5C75F0735A62FC1184A875BF6158EED4765B71592D873CAA81A8F606DCEB9F0	05/15/2019 06:53:57	Vixen	05/14/2019	07/05/2019	PA0002206408
68	Info Hash: 8F104C89FA74744BEB02B58214813B42F91E779A File Hash: 3AC4C4ABEF58092E0A30B0621D5016FAB655BFD1954D745D95DF327D6A702E11	04/30/2019 08:55:08	Vixen	04/29/2019	06/03/2019	PA0002178770
69	Info Hash: CA440BF020303D9EE5CAF3AFC9F6F990F10B7FFE File Hash: D8DA3B246C73F0C13B0C8682F85B951D2217FF7689C445472FC2A69B9D36D0D4	04/26/2019 04:13:35	Vixen	04/24/2019	06/03/2019	PA0002178769
70	Info Hash: 72A7FDEB188736A60CD05E8EC28E9EBBDC00883D File Hash: 98BD87B3C2A1609BC8B116546007CA40E6C69C2318A7D79260DE010976C30A7C	04/19/2019 05:34:00	Vixen	04/14/2019	05/28/2019	PA0002200761
71	Info Hash: 23118C154A2FD4EBC3BD00500D2DCDEA4F2C56B1 File Hash: 3DA5CEB1E2331B505481C38046515105224F4DBBA22196663E8B26FDDBA4A8E7	03/25/2019 04:32:11	Vixen	03/20/2019	04/17/2019	PA0002186982

Work	Hashes	UTC	Site	Published	Registered	Registration
72	Info Hash: 6A9C3A31CC22405729F230BE6332DE0A31F7BB38 File Hash: DE864C21C0DFA3742AEC23B95F6C8923074845FBA3A4CD279078B5046D7C4BE7	02/21/2019 04:21:45	Vixen	12/20/2018	01/22/2019	PA0002147683
73	Info Hash: 1D652D14E624CF4FE65234E00AB298914C6B5B1B File Hash: 18CDA84EF37DE57838D54104CA2FE7097D1377666228E4D0B55F6AD2ED7F389A	01/04/2019 20:55:43	Vixen	01/04/2019	01/22/2019	PA0002147681
74	Info Hash: A7671D9A943B4580C4CA097645722A9860A70621 File Hash: 72E74631F4ADA633B04B9331C52924F1A7B9409CADA4E594E20FF2294EA23A82	12/31/2018 00:16:48	Vixen	12/30/2018	01/22/2019	PA0002147900
75	Info Hash: FFB59D7B851B2FAC080AAAD07215FDA138C5D5B9 File Hash: 4D2854BA411686AAE8016C70FC4069BB3DAFC98CE09D501E044B032EF5879205	11/20/2018 05:10:37	Vixen	08/07/2018	09/05/2018	PA0002135684

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
(914) 358-6423

DEFENDANTS

JOHN DOE subscriber assigned IP address 172.101.201.71

County of Residence of First Listed Defendant Livingston

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

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

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

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

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

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

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
			IMMIGRATION	
			<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	

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: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE 7/14/2020 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.

AO 121 (Rev. 06/16)

TO: <p style="text-align: center;">Register of Copyrights U.S. Copyright Office 101 Independence Ave. S.E. Washington, D.C. 20559-6000</p>	<p>REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT</p>
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In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION <input type="checkbox"/> APPEAL		COURT NAME AND LOCATION	
DOCKET NO.		DATE FILED	
		7/14/2020	
		United States District Court - Western District of New York 100 State Street Rochester, NY 14614	
PLAINTIFF		DEFENDANT	
STRIKE 3 HOLDINGS, LLC		JOHN DOE subscriber assigned IP address 172.101.201.71	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OR WORK	
1	SEE ATTACHED		
2			
3			
4			
5			

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY		
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill
	<input type="checkbox"/> Other Pleading		
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK	
1			
2			
3			

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK	DATE

DISTRIBUTION:

1) Upon initiation of action, mail copy to Register of Copyrights 2) Upon filing of document adding copyright(s), mail copy to Register of Copyrights 3) Upon termination of action, mail copy to Register of Copyrights

4) In the event of an appeal, forward copy to Appellate Court 5) Case File Copy