

2012 JUN 18 PM 4: 19

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

COPY

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Manwin Licensing International S.à.r.l.
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10

11 MANWIN LICENSING
INTERNATIONAL S.A.R.L.,

12 Plaintiff,

13 v.

14 DOES 1 through 10, d/b/a "deutsches-
youporn.com," "youporn.org,"
15 "downloadyouporn.net,"
"sexyouporn.net," "xhamster-
16 youporn.com," "youporn-gratuit.com,"
"youpornhubs.com," "youpornix.com,"
17 "you-porno.org,"
"youpornogratuit.com,"
18 "youpornoredtube.com,"
"youpornos.net," "youpornotube.org,"
19 "youpornotubesex.com,"
"youpornsex.net," "youporn-sexe.com,"
20 "youporn-vip.com," "pornhub-fr.com,"
"thepornhubx.com,"
21 "livepornhub.com," "porn-hubs.com,"
"timtube-pornhub.com,"
22 "pornhubmovies.com," "pornhub-
vip.com," "youpornhubs.com,"
23 "pornhub-porno.com,"
"pornhubsexvideos.com," and
24 "youporn-pornhub.info,"

25 Defendants.
26
27

CASE NO.

CV 12-5290

-CBM
EJC

**COMPLAINT FOR VIOLATION
OF THE ANTI-
CYBERSQUATTING CONSUMER
PROTECTION ACT**

28

1 Plaintiff Manwin Licensing International S.à.r.l. (“Manwin”) avers as
2 follows:

3
4 **PRELIMINARY STATEMENT**

5 1. This is an action for unlawful cybersquatting and for violation of the
6 Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d) (“ACPA”).
7 By this action, Manwin seeks to put an immediate stop to, and to obtain redress
8 for, Defendants’ massive and coordinated campaign of cybersquatting and
9 misappropriating Manwin’s YOUPORN and PORNHUB trademarks in no fewer
10 than 28 domain names, each of which was registered unlawfully and in bad faith
11 by Defendants.

12 2. Manwin owns and licenses the trademarks and domain names used for
13 many of the best-known adult-oriented websites in the world. Among the brands
14 and trademarks owned and controlled by Manwin are the marks YOUPORN and
15 PORNHUB. “YouPorn” and “PornHub” are used by Manwin and its licensee as
16 the names of two popular Internet websites, www.youporn.com (the “YouPorn
17 website”) and www.pornhub.com (the “PornHub website”). The YouPorn and
18 PornHub websites are visited by millions of people each day and are among the
19 most popular and most visited websites in the United States.

20 3. Defendants are one or more individuals in the “business” of acquiring
21 and exploiting Internet domain names incorporating well-known trademarks
22 owned by others (a practice known as “cybersquatting”). Cybersquatters seek to
23 trade off popular brand names and websites owned by others by registering and
24 using confusingly similar domain names to re-direct (or mis-direct) members of the
25 public to the cybersquatter’s website, rather than to the trademark owner’s
26 legitimate website. This case presents a paradigmatic example of unlawful
27 cybersquatting. Defendants, who have no rights in the trademarks YOUPORN or
28 PORNHUB, registered no fewer than 28 domain names containing variants of the

1 YOUPORN and PORNHUB marks and then used those domain names for
2 websites providing competing adult-oriented services. Some of the unauthorized
3 YOUPORN and PORNHUB variants used by Defendants are intended to confuse
4 consumers into believing that their websites are foreign variants of the YouPorn or
5 PornHub websites (e.g., “deutsches-youporn.com,” “pornhub-fr.com”). Others are
6 intended to take advantage of common misspellings or typographical errors, a
7 practice sometimes known as “typosquatting” (e.g. “youporn.org,”
8 “youpornos.net”). All of Defendants’ infringing domain names direct the user to
9 adult-oriented content and services that directly compete with Manwin’s YouPorn
10 and PornHub websites.

11 4. Defendants’ bad faith and willful conduct has caused, and is
12 continuing to cause, severe and irreparable damage to Manwin. This lawsuit seeks
13 to enjoin such conduct and compensate Manwin for the injury it has suffered.
14

15 JURISDICTION AND VENUE

16 5. This is an action arising under the Lanham Act, 15 U.S.C. § 1125, *et*
17 *seq.* This Court has subject matter jurisdiction over this action pursuant to 15
18 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338 because it arises under the federal
19 Lanham Act.

20 6. Defendants are subject to personal jurisdiction in the State of
21 California because their acts and omissions took place in substantial part and
22 caused impacts in the State of California, including in Los Angeles County,
23 California.

24 7. Venue is proper in this judicial district pursuant to 28 U.S.C.
25 § 1391(b) because a substantial part of the acts, omissions and events giving rise to
26 the claims asserted in this Complaint occurred in this judicial district.
27

1 users to identify a computer using an easier-to-remember alphanumeric "domain
2 name" such as "YouPorn.com." The unique domain name is incorporated into a
3 Uniform Resource Locator ("URL"). Internet users connect to a website by typing
4 the URL into (or linking to the URL through) their browser. The DNS ensures that
5 each unique alphanumeric "domain name" and URL corresponds to a specific
6 numerical IP address. When an Internet user enters a domain name and URL into
7 a browser, the URL is sent to a DNS server. The server looks up the IP address
8 assigned to that domain name. The browser then links to the server having that IP
9 address, which hosts the desired website.

10 12. To acquire a domain name, members of the public ("registrants")
11 purchase that domain name from "registrars" such as GoDaddy and Network
12 Solutions. Registrants pay an initial registration fee, along with an annual fee, to
13 the registrar. In return, the domain name is reserved for the exclusive use of the
14 registrant and cannot be used by any other person or entity.

15 13. Typically, registrars record and make publicly available the names
16 and contact information of registrants. Such information generally can be found
17 using a search of the Internet "WhoIs" database. The WhoIs database is intended,
18 among other things, to ensure that members of the public, such as the owners of
19 intellectual property rights, have the ability to make contact with the owners of a
20 website or domain name, including to register complaints concerning the content
21 of the website or domain name. However, many individuals and entities have
22 sought to exploit the Internet for various nefarious ends. These individuals do not
23 wish to be located by rights holders or others, and thus have sought ways to
24 register websites anonymously. As a result, an entire industry has arisen offering
25 so-called domain name "privacy services." These domain "privacy services,"
26 including the "WhoisGuard" service used by Defendants, register domain names
27 on behalf of their clients in the name of the privacy service (rather than in the name
28 of the client). The privacy service then licenses the domain name back to the

1 client. Thus, a “WhoIs” search for a domain name registered by a privacy service
2 will disclose the registrant of the domain name as the *privacy service* and the only
3 contact information listed will be an email address used by the privacy service.
4

5 PLAINTIFF AND ITS TRADEMARKS

6 14. Manwin owns and licenses one of the largest portfolios of premium
7 adult-oriented domain names and trademarks. Among Manwin’s most popular
8 websites are YouPorn, located at www.youporn.com, and PornHub, located at
9 www.pornhub.com. The YouPorn and PornHub websites each offer visitors access
10 to a library of user-uploaded adult-oriented content. The YouPorn and PornHub
11 websites are among the most visited websites on the Internet, and millions of
12 people throughout the world visit each of these websites every day. Indeed,
13 according to web metrics firm “Alexa,” the YouPorn website and the PornHub
14 website are, respectively, the 94th and 58th most visited websites in the United
15 States.

16 15. The YouPorn and PornHub websites distinguish themselves from
17 other similar websites by offering a large selection of high-quality content in a
18 searchable, easy-to-use, secure environment. Manwin has invested considerable
19 resources designing and maintaining the YouPorn and PornHub websites,
20 advertising the websites, and ensuring that the websites convey a distinctive and
21 recognizable image and commercial impression. As a result, the YouPorn and
22 PornHub websites are widely recognized around the world and have obtained a
23 reputation among members of the consuming public for high-quality adult content.

24 16. Manwin is the owner of common law rights, and of a valid and
25 subsisting trademark registration for YOUPORN, Reg. No. 3534702, which is
26 registered on the Principal Register of the United States Patent and Trademark
27 Office. (“The YOUPORN Mark”). Additionally, Manwin has filed an application
28 for the U.S. service mark PORNHUB (Serial No. 85388929) for video-on-demand

1 transmission services and related services, and possesses common law rights in the
2 mark PORNHUB in connection with adult-oriented Internet services (the
3 “PORNHUB Marks”).

4 17. The YOUPORN and PORNHUB Marks are protectable and not
5 generic. Plaintiff has invested considerable time, effort, and financial resources
6 cultivating consumer recognition and goodwill in the YOUPORN and PORNHUB
7 Marks and in the YouPorn and PornHub websites, and establishing a strong
8 association in the minds of the consuming public between the YOUPORN and
9 PORNHUB Marks and premium, free adult entertainment. As a result, the
10 YOUPORN and PORNHUB Marks have achieved secondary meaning within the
11 adult entertainment industry and in the minds of the public at large.

12
13 **DEFENDANTS AND THEIR UNLAWFUL CONDUCT**

14 18. Defendants are individuals or entities with no affiliation to Manwin
15 and without any rights to the YOUPORN or PORNHUB Marks. Nevertheless,
16 between 2007 and 2011, Defendants caused to be registered no fewer than 28
17 domain names that contain the phrases “YouPorn” and/or “PornHub,” and/or are
18 confusingly similar to Manwin’s YOUPORN and PORNHUB Marks.

19 19. Among the domain names registered by Defendants are the following
20 28 domain names: “deutsches-youporn.com,” “youporn.org,”
21 “downloadyouporn.net,” “sexyouporn.net,” “xhamster-youporn.com,” “youporn-
22 gratuit.com,” “youpornhubs.com,” “youpornix.com,” “you-porno.org,”
23 “youpornogratuit.com,” “youpornoredtube.com,” “youpornos.net,”
24 “youpornotube.org,” “youpornotubesex.com,” “youpornsex.net,” “youporn-
25 sexe.com,” “youporn-vip.com,” “pornhub-fr.com,” “thepornhubx.com,”
26 “livepornhub.com,” “porn-hubs.com,” “timtube-pornhub.com,”
27 “pornhubmovies.com,” “pornhub-vip.com,” “youpornhubs.com,” “pornhub-

1 porno.com,” “pornhubsexvideos.com,” “youporn-pornhub.info” (the “Infringing
2 Domains”).

3 20. Each of the Infringing Domains is held in the name of the privacy
4 service “WhoisGuard,” was registered through the domain name registrar “eNom,”
5 and lists as its administrative contact an e-mail address that is a string of numbers
6 followed by “.protect@whoisguard.com.” Accordingly, the Infringing Domains
7 were registered by the privacy service WhoisGuard on behalf of one or more of
8 Defendants, using the domain name registrar eNom.

9 21. Based on the similarity of the Infringing Domains and the manner in
10 which they were registered, Manwin is informed and believes, and on that basis
11 avers, that all of the Infringing Domains were registered (or caused to be
12 registered) either by a single individual or a group of individuals acting in concert
13 with each other. Because Defendants have used the services of WhoisGuard to
14 protect their identities, Manwin has been unable to determine the true identities of
15 Defendants, but will amend its complaint upon learning such information.

16 22. Defendants are, and at all relevant times were, well aware of the
17 infringing nature of the Infringing Domains. Indeed, the only reason why
18 Defendants obtained the Infringing Domains was to divert traffic away from
19 Manwin’s YouPorn and PornHub websites and confuse consumers into visiting
20 their competing websites instead. Moreover, Defendants’ knowledge of their
21 infringing conduct is evidenced by their anonymous registration of the Infringing
22 Domains through WhoisGuard, rather than in their own names.

23
24 **FIRST CLAIM FOR RELIEF**

25 [Violation of the Anti-Cybersquatting Act – 15 U.S.C. § 1125(d)]
26

27 23. Manwin realleges each and every allegation set forth in Paragraphs 1
28 through 22, inclusive, and incorporates them by reference herein.

1 24. Manwin owns all rights in and to the YOUPORN and PORNHUB
2 Marks. The YOUPORN and PORNHUB Marks are distinctive and famous.

3 25. Defendants have registered, trafficked in, and/or used the Infringing
4 Domains, which are identical or confusingly similar to Manwin's YOUPORN
5 and/or PORNHUB Marks. Indeed, the Infringing Domains each incorporate the
6 YOUPORN and/or PORNHUB Marks.

7 26. Defendants' use of the Infringing Domains has, at all times, been an
8 intentional and willful attempt to profit, in bad faith, from the YOUPORN and/or
9 PORNHUB Marks. Among other things, (a) Defendants have no trademark or
10 other intellectual property rights in the YOUPORN or PORNHUB Marks or the
11 Infringing Domains; (b) Defendants are not making any *bona fide* noncommercial
12 or fair use of the YOUPORN or PORNHUB Marks; (c) Defendants intend to divert
13 traffic from the official YouPorn and PornHub websites; (d) the YOUPORN and
14 PORNHUB Marks are well known marks, associated throughout the world with
15 Manwin's premium, free adult entertainment services; and (e) Defendants at all
16 times knew that they did not possess any trademark, other intellectual property
17 rights, or any other rights whatsoever in the YOUPORN and PORNHUB Marks,
18 and registered the Infringing Domains with (and despite) that knowledge.

19 27. As a direct and proximate result of Defendants' conduct, Manwin is
20 entitled to damages and to Defendants' profits in amounts to be proven at trial,
21 which are not currently ascertainable. Alternatively, Manwin is entitled to
22 maximum statutory damages of \$100,000 for each Infringing Domain pursuant to
23 15 U.S.C. § 1117(d), for a total amount of up to \$2.8 million.

24 28. Manwin further is entitled to its attorneys' fees and costs pursuant to
25 15 U.S.C. § 1117(a).

26 29. As a result of Defendants' acts and conduct, Manwin has sustained
27 and will continue to sustain substantial, immediate, and irreparable injury, for
28 which there is no adequate remedy at law. Manwin is informed and believes, and

1 on that basis avers, that, unless enjoined and restrained by this Court, Defendants
2 will continue to infringe Manwin's valuable YOUPORN and PORNHUB Marks.
3 Manwin is entitled to temporary, preliminary, and permanent injunctive relief to
4 restrain and enjoin Defendants' continuing infringing conduct.

5
6 **PRAYER FOR RELIEF**

7 WHEREFORE, Manwin respectfully requests judgment against Defendants
8 and each of them as follows:

9 1. Preliminarily and permanently enjoining Defendants, their agents,
10 representatives, employees, assigns and suppliers, and all persons acting in concert
11 or privity with them, from using the Infringing Domains, or any other name or
12 mark or domain name that is likely to cause confusion, to cause mistake, or to
13 deceive with respect to the YOUPORN or PORNHUB Marks, or from otherwise
14 competing unfairly with Manwin;

15 2. Directing Defendants to transfer to Manwin the domain name
16 registrations for the Infringing Domains, including but not limited to the domain
17 names "deutsches-youporn.com," "youporn.org," "downloadyouporn.net,"
18 "sexyouporn.net," "xhamster-youporn.com," "youporn-gratuit.com,"
19 "youpornhubs.com," "youpornix.com," "you-porno.org," "youpornograttuit.com,"
20 "youpornoredtube.com," "youpornos.net," "youpornotube.org,"
21 "youpornotubesex.com," "youpornsex.net," "youporn-sexe.com," "youporn-
22 vip.com," "pornhub-fr.com," "thepornhubx.com," "livepornhub.com," "porn-
23 hubs.com," "timtube-pornhub.com," "pornhubmovies.com," "pornhub-vip.com,"
24 "youpornhubs.com," "pornhub-porno.com," "pornhubsexvideos.com," and
25 "youporn-pornhub.info."

26 3. Awarding Manwin maximum statutory damages under 15 U.S.C. §
27 1117(d), of \$100,000 per infringing domain name, for a total of up to \$2.8 million
28 in statutory damages;

- 1 4. Awarding Manwin its damages and Defendants' profits derived by
2 reason of the unlawful acts complained of herein as provided by law;
3 5. Awarding Manwin its reasonable attorneys' fees, prejudgment
4 interest, and costs of suit as provided by law;
5 6. Such other relief as the Court may deem just and proper.
6

7 DATED: June 15, 2012

MARC E. MAYER
EMILY F. EVITT
MITCHELL SILBERBERG & KNUPP LLP

9
10 By: 
11 Marc E. Mayer
12 Attorneys for Plaintiff
13 Manwin Licensing International S.à.r.l.
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DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issues triable of right by jury.

DATED: June 15, 2012

MARC E. MAYER
EMILY F. EVITT
MITCHELL SILBERBERG & KNUPP LLP

By: 

Marc E. Mayer
Attorneys for Plaintiff
Manwin Licensing International S.à.r.l.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Consuelo B. Marshall and the assigned discovery Magistrate Judge is Jacqueline Chooljian.

The case number on all documents filed with the Court should read as follows:

CV12- 5296 CBM (JCx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

MARC E. MAYER (SBN 190969), nem@msk.com
MITCHELL SILBERBERG & KNUPP LLP
11377 W. Olympic Boulevard
Los Angeles, California 90064
Telephone: (310) 312-2000
Facsimile: (310) 312-3100

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MANWIN LICENSING INTERNATIONAL SARL, :

PLAINTIFF(S)

v.

DOES 1 through 10, d/b/a "deutsches-youporn.com,"
"youporn.org," "downloadyouporn.net,"
"sexyouporn.net," "xhamster-youporn.com," "youporn-
gratuit.com," SEE ATTACHMENT

DEFENDANT(S).

CASE NUMBER

CV12-5296 → CBM (JC)

SUMMONS

TO DEFENDANT(S): DOES 1 through 10, d/b/a "deutsches-youporn.com," "youporn.org,"
"downloadyouporn.net," "sexyouporn.net," "xhamster-youporn.com," "youporn-gratuit.com,"
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pornhub.com," "pornhubmovies.com," "pornhub-vip.com," "youpornhubs.com," "pornhub-porno.com,"
"pornhubsexvideos.com," and "youporn-pornhub.info"

A lawsuit has been filed against you.

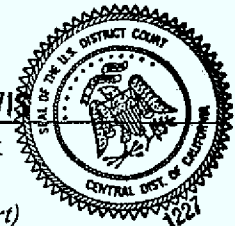
Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Marc E. Mayer, whose address is Mitchell Silberberg & Knupp LLP, 11377 W. Olympic Boulevard, Los Angeles, California 90064. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated: JUN 18 2012

Clerk, U.S. District Court

By: MARILYN DAVIS
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Attachment to Summons

DEFENDANTS:

DOES 1 through 10, d/b/a “deutsches-youporn.com,” “youporn.org,”
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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MANWIN LICENSING INTERNATIONAL SARL, et al.

PLAINTIFF(S)

v.

DOES 1 through 10, d/b/a "deutsches-youporn.com,"
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DEFENDANT(S)

CASE NUMBER

CV 12-5296 - CBM (JC)

SUMMONS

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"pornhubsexvideos.com," and "youporn-pornhub.info"

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Marc E. Mayer, whose address is Mitchell Silberberg & Knupp LLP, 11377 W. Olympic Boulevard, Los Angeles, California 90064. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated: JUN 18 2012

Clerk, U.S. District Court

By: Mandy Jones
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Attachment to Summons

DEFENDANTS:

DOES 1 through 10, d/b/a "deutsches-youporn.com," "youporn.org,"
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"pornhubsexvideos.com," and "youporn-pornhub.info"

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

(a) PLAINTIFFS (Check box if you are representing yourself)
MANWIN LICENSING INTERNATIONAL S.A.R.L.

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
 Marc E. Mayer (SBN 190969), mem@msk.com
 MITCHELL SILBERBERG & KNUPP LLP
 11377 W. Olympic Blvd., Los Angeles, CA 90064
 (310) 312-2000

DEFENDANTS
 DOES 1 through 10, d/b/a "deutsches-youporn.com," "youporn.org," "downloadyouporn.net," "sexyouporn.net," "shamster-youporn.com," "youporn-gratuit.com," "youpornhubs.com," "youpornix.com," "you-porno.org," "youpornogratis.com," "youpornredtube.com," "youpornos.net," "youpornotube.org," "youpornotubesex.com," "youpornsex.net," "youporn-sexe.com," "youporn-vip.com," "pornhub-fr.com," "thepornhub.com," "livepornhub.com," "porn-hubs.com," "tintube-pornhub.com," "pornhubmovies.com," "pornhub-vip.com," "youpornhubs.com," "pornhub-porno.com," "pornhubsexvideos.com," and "youporn-pornhub.info,"

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 - For Diversity Cases Only (Place an X in one box for plaintiff and one 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. 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 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)
CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT: \$ 2.80**

VI. CAUSE OF ACTION (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
COMPLAINT FOR VIOLATION OF THE ANTI-CYBERSQUATTING CONSUMER PROTECTION ACT

VII. NATURE OF SUIT (Place an X in one box only.)

<p>OTHER STATUTES</p> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<p>CONTRACT</p> <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 Loan (Excl. 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 <p>REAL PROPERTY</p> <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	<p>TORTS PERSONAL INJURY</p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. 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-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p>IMMIGRATION</p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<p>TORTS PERSONAL PROPERTY</p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage-Product Liability <p>BANKRUPTCY</p> <input type="checkbox"/> 22 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p>CIVIL RIGHTS</p> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<p>PRISONER PETITIONS</p> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <p>FORFEITURE/PENALTY</p> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<p>LABOR</p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <p>PROPERTY RIGHTS</p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input checked="" type="checkbox"/> 840 Trademark <p>SOCIAL SECURITY</p> <input type="checkbox"/> 61 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)) <p>FEDERAL TAX SUITS</p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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FOR OFFICE USE ONLY: Case Number: **CV12-5296**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Luxemburg - Manwin Licensing International SARRL

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Unknown	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties
Note: In land condemnation cases, use the location of the tract of land involved.

X. SIGNATURE OF ATTORNEY (OR PRO PER): Man E. Reyes by etc Date June 18, 2012

Notice to Counsel/Parties: The CV-71 (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. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3 -1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))