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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

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Ventura Content Ltd.*

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

CV 12-05716 MMM(MRWx)

VENTURA CONTENT LTD. an Anguillan
corporation,

Plaintiff,

v.

GOTYS PRODUCTIONS, INC. D/B/A
CLIPHUNTER.COM, a Seychelles
Corporation; GREEN PARK HOLDINGS,
LLC, a Pennsylvania limited liability
company; JUSTIN ELEAZER, an
individual; and DOES 1-10 inclusive,

Defendants.

Case No.

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Ventura Content Ltd., by and through their attorneys of record, complains against Gotys Productions, Inc. d/b/a Cliphunter.com, Green Park Holdings, LLC, Justin Eleazer, and DOES 1-10 inclusive, (collectively, “Defendants”) as follows:

JURISDICTION AND VENUE

1. This is a civil action against Defendants for copyright infringement in breach of the United States Copyright Act, 17 U.S.C. §§ 101 *et seq.* This Court has subject matter jurisdiction over the copyright infringement under 28 U.S.C. § 1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a) and (b).

2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28 U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be found and transact business in this Judicial District, and the injury suffered by Plaintiff took place in this Judicial District. Defendants are subject to the general and specific personal jurisdiction of this Court because of their contacts with the State of California.

3. This Court has personal jurisdiction over Defendants. Amongst other things, Defendants have engaged in direct, contributory, vicarious, and/or otherwise induced acts of copyright infringement in this judicial district. Further, Defendants have engaged in continuous and systematic business in California and, upon information and belief, derive substantial revenues from commercial activities in California. Plaintiff is informed and believes and, upon such, alleges that Defendants have also engaged in a multiplicity of acts directed toward California, including without limitation: soliciting and engaging in numerous commercial transactions with California users, operating highly interactive websites that permit Defendants’ California users to upload and download infringing and unlawful files, publishing advertisements on www.cliphunter.com geo-targeted to California users, and using the lure of infringing materials to openly encourage California users to visit www.cliphunter.com. As a result, there is a direct and substantial nexus between Ventura’s claims in this case and Defendants’ transaction of business with their California users. Moreover, Defendants’ website lies at the most interactive end of the *Zippo* spectrum in terms of its overall design, use and functionality.

PARTIES

4. Plaintiff Ventura Content Ltd. (“Ventura”) is an Anguillan corporation with its principal place of business in Anguilla. Ventura owns copyrights in certain adult-oriented content and distributes such content throughout the United States including in this District through its affiliates and licensees located in the United States. Ventura has produced content in California through its agents who, at all relevant times, were registered to do business in California. Further, Ventura hosts its online content in California. The primary market for Ventura’s content is in the United States, and virtually all of its business operations relating to the matters at issue in this case are conducted in the United States through its affiliated companies and licensees. Ventura owns each of the relevant copyrights at issue in this litigation..

5. Plaintiff is informed and believes and, upon such, alleges that Defendant Gotys Productions, Inc. d/b/a Cliphunter.com (“Gotys”), is a Seychelles corporation, with a listed address at State House Avenue, Suite 206, Victoria House, Victoria - Mahe, Seychelles.

6. Plaintiff is informed and believes and, upon such, alleges that Green Park Holdings, LLC (“Green Park”) is a Pennsylvania corporation with a registered office address at 28 Simmons Hall, Po Box 10292, State College, PA 16805.

7. Plaintiff is informed and believes and, upon such, alleges that Justin Eleazer (“Eleazer”) is an individual who resides in State College, Pennsylvania.

8. The above-identified defendants are, on information and belief, alter egos of each other and have a tangled set of relationships. One or all are responsible in part for the copyright infringement that occurred on the website www.cliphunter.com. The above defendants are, on information and belief, engaged in a coordinated scheme to undermine the copyright laws by way of stealing copyrighted videos of content owners, such as Plaintiff Ventura, using those video on their web sites and then gaining significant traffic to their Website as a result of the high quality adult video.

1 9. In the marketplace, high-end, professional adult content carries tremendous
2 value. Ventura has licensed such content to major content outlets. Ventura is in the market
3 of providing these videos, on an exclusive and non-exclusive basis, to major outlets.

4 10. High-end, professional adult video is amongst the most valued internet
5 commodities to generate traffic to websites. Defendants herein have driven massive traffic
6 to their Website in part due to the presence of the sought after and searched-for high quality
7 and professionally made adult videos, particularly those featuring recognizable actors and
8 actresses. All of this traffic translates into significant advertising revenue. As such,
9 content websites may effectively monetize the content on their websites by securing
10 eyeballs on the sites which translates to ad revenue.

11 11. Defendants appear to be part of a coordinated scheme to generate massive web
12 traffic and then monetize that traffic.

13 12. According to Gotys' Interim Designation of Agent Notification of Claimed
14 Infringement application ("Goyts' DMCA Registration"), apparently first filed on or after
15 March 15, 2012, Gotys does business as the following service providers:
16 www.cliphunter.com, www.pichunter.com, and www.pichunterblog.com (collectively the
17 "Hunter Websites").

18 13. Notwithstanding Goyts' DMCA Registration, the internet "whois" records for
19 Hunter Websites reveals that pichunterblog.com is owned by Defendant Green Park. Thus,
20 on information and belief, all of the Hunter Websites are collectively owned by Green Park
21 and Gotys.

22 14. Green Park is owned by Defendant Eleazer. Thus, on information and belief,
23 Eleazer owns Gotys as well. Further, Plaintiff is informed and believes and, upon such,
24 alleges that Eleazer is the chief operator of all the Hunter Websites, including the
25 www.cliphunter.com (the "Website" or "www.cliphunter.com"), which is the platform
26 through which the copyright infringement complained of in this lawsuit arises.

27 15. Thus, Plaintiff is informed and believes and, upon such, alleges that Gotys,
28 Green Park, and Eleazer collectively own and/or operate www.cliphunter.com.

16. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this Complaint and insert the true names and capacities of said Defendants when the same have been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the Defendants designated herein as a "DOE" is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiff's damages as alleged herein were proximately caused by such Defendants. Plaintiff believes that some of the DOE defendants are partial owners of Gotys/Green Park or contribute heavily to the Website's content, and are personally liable for the copyright infringement complained of herein.

FACTS COMMON TO ALL COUNTS

Plaintiff's business and copyrights:

17. Ventura is a prominent high quality adult video agency. Through its affiliates and related companies in the United States, it has invested and continues to invest hundreds of thousands of dollars annually to cultivate and distribute its videos because the Copyright Act protects its economic incentive to do so. Ventura, through its affiliated companies, distributes and publicly displays and performs these works (within the meaning of the Copyright Act), and/or licenses them for distribution and/or public performance: (a) through websites owned by its affiliated companies (such as www.pinkvisual.com, www.pinkvisualpass.com, and www.ipinkvisualpass.com) and a small number of other authorized Internet distribution channels; (b) on DVD and other video formats; and (c) by telecast on pay-per-view television systems.

18. Ventura owns numerous copyrights for its high quality adult videos, including in each of the works listed in Exhibit A hereto. Ventura is the owner of each of these works by virtue of being the author of the works or by means of a valid, written assignment from its original owner. Each of these works has been registered in the United States Copyright Office in accordance with the provisions of the United States Copyright Act. Ventura owns both the copyrights in these compilations as well as all of the constituent

1 copyrighted elements contained therein including all new matter and preexisting materials
2 (which consist of copyrighted videos also owned by Ventura).

3 Defendant's business and their unlawful acts:

4 19. Defendants own, operate, and profit from its website located at
5 www.cliphunter.com, which provides access to a library of online adult videos that Internet
6 users may view free of charge. According to the Alexa.com and QuantCast.com,
7 www.cliphunter.com, is in the top 1,400 websites within the United States, and reaches an
8 audience of 600,000 to 1,000,000 people in the U.S. per day.

9 20. Using the anonymity and power of the Internet, Defendants steal copyrighted
10 content on a massive scale for their own benefit by allowing their users to upload, view,
11 and obtain copies of a vast library of infringing adult video content for free.

12 21. Defendants appear to maintain the fiction that they offer a forum for users to
13 upload and share their own original "user-generated" adult video content; however, in
14 reality, they function as repositories for large collections of copyrighted, professionally
15 made adult videos, including works belonging to Ventura. For example, Defendants'
16 Website contain a prominent link for users to "Upload Video[s]," but the vast majority of
17 videos contained on the sites are not "user generated," but rather comprised of
18 professionally made, copyrighted content.

19 22. The cornerstone of the Defendants' business plan is their ability to offer their
20 users access to free, copyrighted adult videos as a means to attract users to their sites.
21 www.cliphunter.com is extremely popular, generating a substantial volume of unique views
22 each month. Defendants use this traffic to generate money for themselves and their related
23 businesses by selling advertising space and various third-party services. Defendants have
24 amassed substantial profits by appropriating the value of content they do not own on a
25 massive scale without payment to, or any permission from, the copyright owners.

26 23. Defendants openly promote and enable infringement of adult entertainment
27 content by users of the Website. For example, Defendants provide users with the ability to
28 search for videos of "pornstars," i.e., professional actors who appear in studio-produced

1 videos. Moreover, Defendants openly encourage users to “stream without having to
2 download our sex movies to your computer ... [www.]Cliphunter.com is the [] most
3 advanced and revolutionary porn tube site offering a huge database of pornstars” and seek
4 to attract users to their Website touting “[i]t’s all here and 100% free porn.”

5 24. Defendants are not only enabling massive infringement by their users, they
6 knowingly distribute, display, and publicly perform the copyrighted works uploaded to the
7 Website. Defendants host copies of the infringing videos on servers they control, they
8 create their own copies of the videos in the desired format, and they publicly perform and
9 display the infringing videos.

10 25. In an attempt to service its audience, Defendants have reproduced, publicly
11 distributed and publicly displayed photographs belonging to Ventura via their website,
12 www.cliphunter.com, without permission, consent, or license.

13 26. Despite having no permission, consent, or license to do so, beginning on April
14 2011 and continuing presently, Defendants reproduced, publicly distributed and publicly
15 displayed, as well as made available for other’s download and display, certain
16 professionally made adult videos (the “Videos”) belonging to Ventura. A list of these valid
17 copyrighted works (i.e. the Videos) infringed by Defendants herein is attached to this
18 Complaint as Exhibit A.

19 27. Ventura filed for copyright registration of the Videos within 90 days of their
20 authorship and first publication. The Videos are the subject of the copyright registrations
21 identified in Exhibit A.

22 28. The Videos had substantial monetary value for Ventura.

23 29. Defendants’ infringement of Ventura’s copyrighted works (as identified in
24 Exhibit A) began well before the Goyts’ DMCA Registration was ever filed.

25
26 **FIRST CLAIM FOR RELIEF**

27 **(Copyright Infringement Against all Defendants)**

1 30. Plaintiff Ventura incorporates here by reference the allegations in paragraphs 1
2 through 29 above.

3 31. Ventura is the owner of all rights, title and interest in the copyrights to the
4 Videos, which substantially consist of material wholly original with Plaintiff and which are
5 copyright subject matter under the laws of the United States. Ventura has complied in all
6 respects with the Copyright Act and all of the laws of the United States governing
7 copyrights. The Videos have been registered with the United States Copyright Office.

8 32. Defendants, including DOE Defendants and www.cliphunter.com's principals
9 whose full identity is not known today, have directly, vicariously and/or contributorily
10 infringed, and unless enjoined, will continue to infringe Ventura's copyrights by
11 reproducing, displaying, distributing and utilized the Videos for purposes of trade violation
12 of 17 U.S.C. § 501 *et seq.*

13 33. On information and belief, Defendants have willfully infringed, and unless
14 enjoined, will continue to infringe Ventura's copyrights by knowingly reproducing,
15 displaying, distributing and utilizing the Videos for purposes of trade.

16 34. All of the Defendant's acts are and were performed without the permission,
17 license or consent of Ventura.

18 35. The said wrongful acts of Defendants have caused, and are causing, great
19 injury to Ventura, which damage cannot be accurately computed, and unless this Court
20 restrains Defendants from further commission of said acts, Ventura will suffer irreparable
21 injury, for all of which it is without an adequate remedy at law. Accordingly, Ventura
22 seeks a declaration that Defendants are infringing Ventura's copyrights and an order under
23 17 U.S.C. § 502 enjoining Defendants from any further infringement of Ventura's
24 copyrights.

25 36. As a result of the acts of Defendants alleged herein, Ventura has suffered and
26 is suffering substantial damage to its business in the form of diversion of trade, loss of
27 profits, injury to goodwill and reputation, and the dilution of the value of its rights, all of
28 which are not yet fully ascertainable.

1 37. Because of the willful nature of the copyright infringement, Ventura is entitled
2 to an award of statutory damages equal to \$150,000 per infringement.

3 38. Ventura has identified at least 30 instances of infringement on
4 www.cliphunter.com by way of unlawful reproduction and display of the Videos (as well
5 as the unlawful facilitation of other's reproduction of the Videos), and is therefore entitled
6 to a potential award of \$4,500,000 in statutory damages by Defendants. If other
7 infringements are discovered in this case, this pleading will be augmented accordingly.

8 39. Ventura is also entitled to its attorney's fees in prosecuting this action under
9 17 U.S.C. § 505.

10
11 **SECOND CLAIM FOR RELIEF**

12 **(Contributory Copyright Infringement Against all Defendants)**

13 40. Plaintiff Ventura incorporates here by reference the allegations in paragraphs 1
14 through 39 above.

15 41. Users of Defendants' Website have infringed and are infringing Ventura's
16 rights in their registered copyrighted works by inter alia uploading and downloading
17 infringing copies of Ventura's copyrighted works listed in Exhibit A hereto on the Website.
18 Defendants' users are therefore directly infringing Ventura's exclusive rights of
19 reproduction and distribution under 17 U.S.C. § 106.

20 42. Defendants are liable under the Copyright Act for inducing the infringing acts
21 of Defendants' users. Defendants operate and maintain their sites with the object of
22 promoting their use to infringe Ventura's copyrighted works. Defendants' inducement of
23 copyright infringement is apparent from, among other things, the predominantly infringing
24 content available on their sites; Defendants' open listing, categorization, and advertising of
25 obviously infringing works; Defendants' express invitations to view the most sought-after
26 video content for free; Defendants' failure to make any earnest effort to prevent or filter
27 copyright infringement on their sites; and Defendants' business model for the Website,
28 which is dependent upon widespread copyright infringement including the offering of

1 incentive programs rewarding users for uploading content. Defendants unlawfully have
2 induced the direct infringement of Ventura's copyrighted works listed on Exhibit A hereto,
3 in violation of Ventura's exclusive rights under the copyright laws of the United States. 17
4 U.S.C. § 106.

5 43. In addition, Defendants have actual and constructive knowledge of the
6 infringing activity that occurs on and through their sites. Through the creation,
7 maintenance, and operation of the sites and facilities for this infringement, Defendants
8 knowingly cause and/or otherwise materially contribute to the unlawful reproduction,
9 distribution, and public performance and display of Ventura's copyrighted works, including
10 those listed on Exhibit A hereto, in violation of Ventura's exclusive rights under the
11 copyright laws of the United States.

12 44. The foregoing acts of infringement by Defendants have been willful,
13 intentional and purposeful, in disregard of and indifferent to Ventura's rights.

14 45. As a direct and proximate result of Defendants' infringement of Ventura's
15 copyrights and exclusive rights under copyright, Ventura is entitled to maximum statutory
16 damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each
17 work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).
18 Alternatively, at Ventura's election, pursuant to 17 U.S.C. § 504(b), Ventura shall be
19 entitled to its actual damages, including Defendants' profits from infringement, as will be
20 proven at trial.

21 46. Ventura further is entitled to its attorneys' fees and full costs pursuant to 17
22 U.S.C. § 505.

23 47. Defendants' conduct is causing and, unless enjoined by this Court, will
24 continue to cause Ventura great and irreparable injury that cannot fully be compensated for
25 or measured in money. Ventura has no adequate remedy at law. Pursuant to 17 U.S.C. §
26 502, Ventura is entitled to an injunction prohibiting further infringements of its copyrights
27 and exclusive rights under copyright.

THIRD CLAIM FOR RELIEF

(Vicarious Copyright Infringement Against all Defendants)

48. Plaintiff Ventura incorporates here by reference the allegations in paragraphs 1 through 47 above

49. Users of Defendants' Website have infringed and are infringing Ventura's rights in their registered copyrighted works by inter alia uploading and downloading infringing copies of Ventura's copyrighted works listed in Exhibit A hereto on the Website. Defendants' users are therefore directly infringing Ventura's exclusive rights of reproduction and distribution under 17 U.S.C. § 106.

50. Defendants are vicariously liable for such infringing acts. Defendants have the right and ability to supervise and control the infringing activities that occur through the use of their Website, and at all relevant times have derived a direct financial benefit attributable to the infringement through that site. Defendants are therefore vicariously liable for the unlawful reproduction and distribution of Ventura's copyrighted works listed on Exhibit A hereto, in violation of Ventura's exclusive rights under the copyright laws of the United States.

51. The foregoing acts of infringement by Defendants have been willful, intentional and purposeful, in disregard of and indifferent to Ventura's rights.

52. As a direct and proximate result of Defendants' infringement of Ventura's copyrights and exclusive rights under copyright, Ventura is entitled to maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c). Alternatively, at Ventura's election, pursuant to 17 U.S.C. § 504(b), Ventura shall be entitled to its actual damages, including Defendants' profits from infringement, as will be proven at trial.

53. Ventura further is entitled to its attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

54. Defendants' conduct is causing and, unless enjoined by this Court, will continue to cause Ventura great and irreparable injury that cannot fully be compensated for or measured in money. Ventura has no adequate remedy at law.

55. Pursuant to 17 U.S.C. § 502, Ventura is entitled to a preliminary and permanent injunction prohibiting further infringements of its copyrights and exclusive rights under copyright.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

1. The Defendants, their officers, agents, servants, employees, representatives, and attorneys, and all persons in active concert or participation with them, be permanently enjoined from designing, copying, reproducing, displaying, promoting, advertising, distributing, or selling, or any other form of dealing or transaction in, any and all advertising and promotional materials, print media, signs, Internet web sites, or any other media, either now known or hereafter devised, bearing any design or mark which infringe, contributorily infringe, or vicariously infringe upon Plaintiff Ventura's rights in the Videos.

2. Defendants be held liable to Plaintiff in statutory damages for copyright infringement, including willful infringement, in accordance with 17 U.S.C. §§ 504(a)(2) & (c) and for costs, interest and reasonable attorney's fees pursuant to 17 U.S.C. § 505, for an amount of \$4,500,000 plus fees.

3. An accounting be made for all profits, income, receipts or other benefit derived by Defendants from the reproduction, copying, display, promotion, distribution or sale of products and services, or other media, either now known or hereafter devised, that improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).

4. Requiring Defendants to account for and pay over to Plaintiff all profits derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff

1 for all damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C.
2 §§ 504 (a)(1) & (b).

3 5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§ 504
4 (a)(1) & (b).

5 6. For Ventura's costs, including reasonable attorneys' fees, pursuant to 17
6 U.S.C. § 505.

7 7. For pre- and post-judgment interest according to law

8 8. That Plaintiff be awarded any such other and further relief as the Court may
9 deem just and appropriate.

10
11 Dated: June 27, 2012

12 **ONE LLP**

13
14 By:  _____

15 Imran F. Vakil, Esq.
16 Attorneys for Plaintiff,
17 Ventura Content Ltd.
18
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DEMAND FOR JURY TRIAL

Plaintiff Ventura Content, Ltd. hereby demands trial by jury of all issues so triable under the law.

Dated: June 27, 2012

ONE LLP

By: 

Imran F. Vakil, Esq.
Attorneys for Plaintiff,
Ventura Content Ltd.

EXHIBIT “A”

No.	Short Title/ Episode Number	Copyright Registration Number	Copyright Registration Effective Date	Upload Date
1	HFA190	PA0001678353	March 30, 2010	June 25, 2011
2	HFA197	PA0001678353	March 30, 2010	June 25, 2011
3	HFA213	PA0001678353	March 30, 2010	June 25, 2011
4	ASP065	PA0001649295	January 23, 2009	June 20, 2011
5	CST022	PA0001649295	January 23, 2009	June 20, 2011
6	HFB191	PA0001646260	November 12, 2008	June 26, 2011
7	HFB201	PA0001653824	November 13, 2008	June 26, 2011
8	HFB202	PA0001653824	November 13, 2008	June 26, 2011
9	HFB205	PA0001653824	November 13, 2008	June 26, 2011
10	CST109	PA0001649208	January 23, 2009	June 26, 2011
11	CST111	PA0001649208	January 23, 2009	September 23, 2011
12	CST112	PA0001649208	January 23, 2009	June 26, 2011
13	CST122	PA0001649208	January 23, 2009	June 26, 2011
	CST122		January 23, 2009	September 23, 2011
14	CST008	PA0001339094	June 29, 2006	June 18, 2011
15	HFDP117	PA0001673967	January 22, 2010	July 4, 2011
16	HFDP115	PA0001649271	January 23, 2009	July 20, 2011
17	HFDP131	PA0001649271	January 23, 2009	July 18, 2011
18	HFDP143	PA0001649271	January 23, 2009	July 7, 2011
	HFDP143		January 23, 2009	July 20, 2011
19	HFDP163	PA0001680245	May 7, 2010	September 20, 2011
20	HFDP175	PA0001680245	May 7, 2010	September 20, 2011
21	HFDP176	PA0001680245	May 7, 2010	September 20, 2011
22	HFDP181	PA0001680245	May 7, 2010	September 20, 2011
23	HCG004	PA0001673969	January 22, 2010	July 2, 2011
24	HCG005	PA0001673969	January 22, 2010	July 2, 2011
25	HCT002	PA0001383963	May 4, 2007	April 26, 2011
26	HCT016	PA0001678345	March 30, 2010	September 28, 2011
27	HCT019	PA0001678345	March 30, 2010	September 28, 2011
28	HCT035	PA0001678345	March 30, 2010	October 10, 2011
29	WS027	PA0001673990	February 2, 2010	July 4, 2011
30	WS050	PA0001673990	February 2, 2010	July 4, 2011

**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 Margaret M. Morrow and the assigned discovery Magistrate Judge is Michael Wilner.

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

CV12- 5716 MMM (MRWx)

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.

COPY

Name & Address:

Peter R. Afrasiabi (pafrasiabi@onellp.com)
 Imran F. Vakil (ivakil@onellp.com)
 ONE LLP 4000 MacArthur Blvd
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 P (949) 502-2870 F (949) 258-5081

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

VENTURA CONTENT, LTD., an Anguillan
 corporation,

PLAINTIFF(S)

v.

GOTYS PRODUCTIONS, INC. D/B/A
 CLIPHUNTER.COM, a Seychelles Corporation;
 GREEN PARK HOLDINGS, LLC; et al.

DEFENDANT(S).

see attached

CASE NUMBER

CV12-05716*MMM(MRW)***SUMMONS**

TO: DEFENDANT(S): GOTYS PRODUCTIONS, INC. D/B/A CLIPHUNTER.COM; GREEN PARK
 HOLDINGS, LLC; JUSTIN ELEAZER; and DOES 1-10 inclusive.

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, Imran F. Vakil, whose address is ONE LLP, 4000 MacArthur Blvd, Suite 1100, Newport Beach, CA 92660. 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.

JUL - 2 2012

Dated: _____

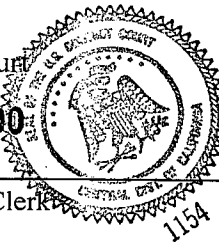
Clerk, U.S. District Court

JULIE PRADO

By: _____

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)].

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

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> VENTURA CONTENT, LTD.,	DEFENDANTS GOTYS PRODUCTIONS, INC. D/B/A CLIPHUNTER.COM; GREEN PARK HOLDINGS, LLC; JUSTIN ELEAZER; and DOES 1-10, Inclusive.
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) John Tehranian (Bar No. 211616); Imran F. Vakil (Bar No. 248859) One LLP, 4000 MacArthur Blvd. Suite 1100 Newport Beach, CA 92660 Telephone: (949) 502-2870	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 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.) <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;"></td> <td style="width: 10%; text-align: center;">PTF</td> <td style="width: 10%; text-align: center;">DEF</td> <td style="width: 33%;"></td> <td style="width: 10%; text-align: center;">PTF</td> <td style="width: 10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		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
	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:** \$ proven at trial

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.)
 Copyright Infringement, Permanent Injunction, and Damages

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

OTHER STATUTES <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	CONTRACT <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 REAL PROPERTY <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	TORTS 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 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 IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <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 BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <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	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 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 FORFEITURE / PENALTY <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	LABOR <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 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <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)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-05716

FOR OFFICE USE ONLY: Case Number: _____

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
	Anguilla

- (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
	(1) Seychelles (2) Centre County, Pennsylvania

- (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, CA	

* 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): _____ Date July 2, 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))