

LAW OFFICES OF

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1901 AVENUE OF THE STARS  
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Attorneys for Plaintiff  
E. TV NETWORKS, INC.

UNITED STATE DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

E. TV NETWORKS, INC., a Delaware corporation qualified to do business in the State of California,

Plaintiff,

vs.

GOOGLE, INC., a Delaware corporation qualified to do business in the State of California; YOUTUBE, LLC, a Delaware limited liability company qualified to do business in the State of California; OMAR LEWIS, an individual; COREY HILTON, an individual; ACHOURI MOHAMED AMINE, an individual; JOSH PARRIS, an individual; MICHAEL KOWAL, an individual; MARIO COSTA DE SOUZA, an individual; TAMIKA LORICK, an individual; JESSE SHAIRES, an individual; HAKIM HAFSI, an individual; AUSTIN RATLIFF, an individual; HERVE NSINGI NKOSI, an individual; FABIANO COSTA DE SOUZA, an individual; MARVIN I. ALLEN, an individual; MIKE BOANE, an individual; RAYNAR GORDON, an individual; and MATTHEW JOSEPH WERNER, an individual,

Defendants.

CASE NO.

**COMPLAINT  
FOR:**

- 1. COPYRIGHT INFRINGEMENT;**
- 2. INJUNCTIVE RELIEF; AND**
- 3. INJUNCTIVE RELIEF.**

**DEMAND FOR JURY TRIAL**

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1 Plaintiff E. TV Networks, Inc., alleges as follows:

2 **PARTIES**

3 1. Plaintiff E. TV Networks, Inc. (hereinafter sometimes referred to as “E.  
4 TV Networks” or “Plaintiff”) is and, at all times mentioned herein, was a Delaware  
5 corporation qualified to do business in the State of California, with offices in the  
6 City of Beverly Hills, County of Los Angeles, State of California.  
7

8 2. E. TV Networks is informed and believes and based on such  
9 information and belief alleges that Defendant Google, Inc., is and, at all times  
10 mentioned herein, was a Delaware corporation qualified to do business in the State  
11 of California, with offices in Mountain View, California.  
12

13 3. E. TV Networks is informed and believes and based on such  
14 information and belief alleges that Defendant YouTube, LLC, is and, at all times  
15 mentioned herein, was a Delaware limited liability company qualified to do business  
16 in the State of California, with offices in Mountain View, California. E. TV  
17 Networks is informed and believes and based on such information and belief alleges  
18 that Defendant YouTube, LLC, is a wholly owned subsidiary of Defendant Google,  
19 Inc.  
20

21 4. E. TV Networks is informed and believes and based on such  
22 information and belief alleges that Defendants Google, Inc., and YouTube, LLC,  
23 own and operate YouTube, a video-sharing website with offices in San Bruno,  
24 California.  
25

26 5. E. TV Networks is informed and believes and based on such  
27 information and belief alleges that Defendant Omar Lewis is and, at all times  
28 mentioned herein, was an individual and a citizen of the State of New York residing

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1 in the Bronx, New York, New York.

2 6. E. TV Networks is informed and believes and based on such  
3 information and belief alleges that Defendant Corey Hilton is and, at all times  
4 mentioned herein, was an individual and a citizen of the State of North Carolina  
5 residing in Fayetteville, North Carolina.  
6

7 7. E. TV Networks is informed and believes and based on such  
8 information and belief alleges that Defendant Achouri Mohamed Amine is and, at  
9 all times mentioned herein, was an individual and a citizen of Poland residing in  
10 Ilawa, Mazura, Poland.

11 8. E. TV Networks is informed and believes and based on such  
12 information and belief alleges that Defendant Josh Parris is and, at all times  
13 mentioned herein, was an individual and a citizen of the State of Pennsylvania  
14 residing in Philadelphia, Pennsylvania.  
15

16 9. E. TV Networks is informed and believes and based on such  
17 information and belief alleges that Defendant Michael Kowal is and, at all times  
18 mentioned herein, was an individual and a citizen of Pennsylvania residing in  
19 McKeesport, Pennsylvania.  
20

21 10. E. TV Networks is informed and believes and based on such  
22 information and belief alleges that Defendant Mario Costa de Souza is and, at all  
23 times mentioned herein, was an individual and a citizen of Mexico residing in the  
24 Distrito Federal, Mexico City, Mexico.

25 11. E. TV Networks is informed and believes and based on such  
26 information and belief alleges that Defendant Tamika Lorick is and, at all times  
27 mentioned herein, was an individual and a citizen of the District of Columbia  
28

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1 residing in Washington, D.C.

2 12. E. TV Networks is informed and believes and based on such  
3 information and belief alleges that Defendant Jesse Shaire is and, at all times  
4 mentioned herein, was an individual and a citizen of the United Kingdom residing  
5 in London, England.  
6

7 13. E. TV Networks is informed and believes and based on such  
8 information and belief alleges that Defendant Hakim Hafsi is and, at all times  
9 mentioned herein, was an individual and a citizen of Poland residing in Olsztyn,  
10 Poland.  
11

12 14. E. TV Networks is informed and believes and based on such  
13 information and belief alleges that Defendant Austin Ratliff is and, at all times  
14 mentioned herein, was an individual and a citizen of the State of Florida residing in  
15 Tampa, Florida.  
16

17 15. E. TV Networks is informed and believes and based on such  
18 information and belief alleges that Defendant Herve Nsingi Nkosi is and, at all times  
19 mentioned herein, was an individual and a citizen of the United Kingdom residing  
20 in Stratford, London, England.

21 16. E. TV Networks is informed and believes and based on such  
22 information and belief alleges that Defendant Fabiano de Souza is and, at all times  
23 mentioned herein, was an individual and a citizen of Mexico residing in the Distrito  
24 Federal, Mexico City, Mexico.  
25

26 17. E. TV Networks is informed and believes and based on such  
27 information and belief alleges that Defendant Marvin I. Allen is and, at all times  
28 mentioned herein, was an individual and a citizen of the State of New Jersey

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1 residing in Patterson, New Jersey.

2 18. E. TV Networks is informed and believes and based on such  
3 information and belief alleges that Defendant Mike Boane is and, at all times  
4 mentioned herein, was an individual and a citizen of the State of New York residing  
5 in the Bronx, New York, New York.

6  
7 19. E. TV Networks is informed and believes and based on such  
8 information and belief alleges that Defendant Raynar Gordon is and, at all times  
9 mentioned herein, was an individual and a citizen of the State of Maryland residing  
10 in Fort Washington, Maryland.

11 20. E. TV Networks is informed and believes and based on such  
12 information and belief alleges that Defendant Matthew Joseph Werner is and, at all  
13 times mentioned herein, was an individual and a citizen of the State of California  
14 residing in Oakland, California.

15  
16 **JURISDICTION AND VENUE**

17 21. The Court has subject matter jurisdiction over this action pursuant to  
18 28 U.S.C. §1338 and 17 U.S.C. §301.

19 22. Venue is proper pursuant to 28 U.S.C. §1391(b) because Plaintiff's  
20 claims arose in the District.

21  
22 **PLAINTIFF'S OWNERSHIP OF SUBJECT COPYRIGHT**

23 23. On May 1, 2015, E. TV Networks and Keith Cozart, professionally  
24 known as Chief Keef (hereinafter referred to as "Chief Keef"), entered into a written  
25 Artist And Record Company Multiple Rights Agreement (hereinafter sometimes  
26 referred to as "the Agreement"). Pursuant to the Agreement, E. TV Networks  
27 engaged Chief Keef to render exclusive "Entertainment Services" and Chief Keef  
28

1 accepted such engagement and agreed to render such services exclusively in the  
2 “Territory” to E. TV Networks during the “Term” of the Agreement. “Entertainment  
3 Services” was defined as the exclusive services of Chief Keef, including but not  
4 limited to, recording, publishing, merchandise rights, and live performances. The  
5 “Term” of the Agreement is two years, with options, and the “Territory” is the  
6 World.  
7

8 24. Pursuant to the Agreement, E. TV Networks produced, recorded, and  
9 distributed certain Chief Keef performances. E. TV Networks complied in all  
10 respects with the Copyright Act of 1976 and all other laws governing copyright and  
11 registered said works with the United States Copyright Offices, including the Chief  
12 Keef albums *Bang 3, Part 1* and *Bang 3, Part 2*. The *Bang 3* albums include the  
13 following songs: “Ain’t Missing You”; “Bouncin”; “Cappin”; “Facts”; “Go Harder”;  
14 “Green Light”; “I Just Wanna”; “Irri”; “Laurel Canyon”; “Millions”; “New  
15 School”; “Pick One”; “Singing The Cheese”; “Superheroes”; “Unstoppable”; and  
16 “Yes”. Each individual song in the *Bang 3* albums was registered with the United  
17 States Copyright Offices. Each performance of the songs in the *Bang 3* albums was  
18 registered with the United States Copyright Offices.  
19  
20

#### 21 DEFENDANTS’ INITIAL ACTS OF INFRINGEMENT

22 25. After May 1, 2015 and after the copyright registration of the above-  
23 mentioned Chief Keef performances, Defendants, and each of them, infringed the  
24 registered copyrights by uploading videos containing the above-mentioned  
25 copyrighted material of E. TV Networks as follows:  
26

- 27 a. Defendant Omar Lewis uploaded copyrighted material to  
28 <http://www.youtube.com/watch?v=fFipiz75PCw> under the

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display name “WAY UP”;

b. Defendant Corey Hilton uploaded copyrighted material to <http://www.youtube.com/watch?v=eJh-khdOY5U> under the display name “SB Lowkey”;

c. Defendant Achouri Mohamed Amine uploaded copyrighted material under the display names “Chief Keef” and “ H o t N e w H i p H o p ” to <http://www.youtube.com/watch?v=cEVqpviwBj8>, <http://www.youtube.com/watch?v=J8PM4lszN9Y>, <http://www.youtube.com/watch?v=Oibdzh4fhNI>, <http://www.youtube.com/watch?v=elq3so5go-I>, <http://www.youtube.com/watch?v=NWT1oKZwIxs>, <http://www.youtube.com/watch?v=cqbZSs20xO4>, <http://www.youtube.com/watch?v=QK22iMwn5-E>, <http://www.youtube.com/watch?v=14isAcdaphI>, <http://www.youtube.com/watch?v=BYHucjZVsck>, <http://www.youtube.com/watch?v=60LHFiysevw>, <http://www.youtube.com/watch?v=Z3BcKicYjsU>, <http://www.youtube.com/watch?v=MqG-GNhZDCM>, <http://www.youtube.com/watch?v=6kX3bUhdWPE>, <http://www.youtube.com/watch?v=4nxyaCvbEp0>, and <http://www.youtube.com/watch?v=tZnQ65f-I>;

d. Defendant Josh Parris uploaded copyrighted material to <http://www.youtube.com/watch?v=2VP0V3CNI-Q> under the

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- display name “Hyper”;
- e. Defendant Michael Kowal uploaded copyrighted material to <http://www.youtube.com/watch?v=UaoMwRZ9TDQ> under the display name “Buymixtapes”;
- f. Defendant Mario Costa de Souza uploaded copyrighted material to <http://www.youtube.com/watch?v=1oDKtow-3I0> under the display name “Mario Costa”;
- g. Defendant Tamika Lorick uploaded copyrighted material to <http://www.youtube.com/watch?v=-owwwi39Zts> under the display name “tragedyscene2”;
- h. Defendant Jesse Shaire uploaded copyrighted material to [http://www.youtube.com/watch?v=lfFN4Trj\\_I0](http://www.youtube.com/watch?v=lfFN4Trj_I0) under the display name “AlmightyJS (DaGhost™)”;
- i. Defendant Hakim Hafsi uploaded copyrighted material to [http://www.youtube.com/watch?v=gNh5lvIk\\_I8](http://www.youtube.com/watch?v=gNh5lvIk_I8) under the display name “No Rules”;
- j. Defendant Austin Ratliff uploaded copyrighted material under the display name “a k a y” to [http://www.youtube.com/watch?v=UX2fvVScN\\_Q](http://www.youtube.com/watch?v=UX2fvVScN_Q) and <http://www.youtube.com/watch?v=8f5WlCwZpfA>;
- k. Defendant Herve Nsingi Nkosi uploaded copyrighted material to <http://www.youtube.com/watch?v=wivfL0hE0RE> under the display name “Mixtape Lyric Vault”;



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- 1           l. Defendant Fabiano Costa de Souza uploaded copyrighted  
2 material under the display name “Young Dolph” to  
3 <http://www.youtube.com/watch?v=RlQtGbCTNfs>,  
4 <http://www.youtube.com/watch?v=cdzk3tKhhho>,  
5 <http://www.youtube.com/watch?v=fuJvX7zdG5U>,  
6 <http://www.youtube.com/watch?v=fuJvX7zdG5U>,  
7 <http://www.youtube.com/watch?v=DkfNTR9q1WU>,  
8 <http://www.youtube.com/watch?v=Rf4h64rUjtk>,  
9 [http://www.youtube.com/watch?v=0\\_cN6jHfsqs](http://www.youtube.com/watch?v=0_cN6jHfsqs),  
10 <http://www.youtube.com/watch?v=9rsFEsR761s>, and  
11 <http://www.youtube.com/watch?v=LmLpyoSDiuo>;  
12  
13  
14           m. Defendant Marvin I. Allen uploaded copyrighted material to  
15 <http://www.youtube.com/watch?v=ZjzedIQ3iGA> under the  
16 display name “I Am Hip-Hop (Second)”;  
17  
18           n. Defendant Mike Boane uploaded copyrighted material to  
19 <http://www.youtube.com/watch?v=DyvoBxOqy8E>;  
20  
21           o. Defendant Raynar Gordon uploaded copyrighted material to  
22 <http://www.youtube.com/watch?v=MEUzRGluHn4> under the  
23 display name “YoungRay GloPromo”; and  
24  
25           p. Defendant Matthew Joseph Werner uploaded copyrighted  
26 material to <http://www.youtube.com/watch?v=1n9JHCsZkNw>  
27 under the display name “TheThizzler”.  
28

1                   **NOTIFICATIONS AND COUNTER-NOTIFICATIONS UNDER THE**  
2                   **DIGITAL MILLENNIUM COPYRIGHT ACT**  
3

4           26.    From July 2015 to October 2015, pursuant to the Digital Millennium  
5 Copyright Act, 17 U.S.C. §512, E. TV Networks, through its agent FilmOn TV  
6 Networks, gave written notifications of infringement to YouTube in regard to the  
7 URLs set forth in Paragraph 25 above. E. TV Networks is informed and believes  
8 and based on such information and belief alleges that Defendant YouTube, LLC,  
9 informed Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh  
10 Parris, Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim  
11 Hafsi, Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I.  
12 Allen, Mike Boane, Raynar Gordon, or Matthew Joseph Werner, and each of them,  
13 of the written notifications of infringement.  
14

15  
16           27.    In response to the above-mentioned notification, YouTube removed the  
17 material set forth in Paragraph 26 and/or disabled access to the infringing material.  
18

19           28.    In July, August, September, and October 2015, Defendants sent  
20 counter-notifications to YouTube pursuant to the Digital Millennium Copyright Act,  
21 17 U.S.C. §512, as follows:

- 22                   a.    On July 30, 2015, YouTube received a counter-notification  
23                           under 17 U.S.C. §512(g) from Defendant Omar Lewis;  
24                   b.    On July 30, 2015, YouTube received a counter-notification  
25                           under 17 U.S.C. §512(g) from Defendant Corey Hilton;  
26                   c.    On August 19, 2015, YouTube received counter-notifications  
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1 under 17 U.S.C. §512(g) from Defendant Achouri Mohamed  
2 Amine;

3  
4 d. On August 20, 2015, YouTube received a counter-notification  
5 under 17 U.S.C. §512(g) from Defendant Josh Parris;

6  
7 e. On August 27, 2015, YouTube received a counter-notification  
8 under 17 U.S.C. §512(g) from Defendant Michael Kowal;

9  
10 f. On August 28, 2015, YouTube received a counter-notification  
11 under 17 U.S.C. §512(g) from Defendant Mario Costa de Souza;

12  
13 g. On August 31, 2015, YouTube received a counter-notification  
14 under 17 U.S.C. §512(g) from Defendant Tamika Lorick;

15  
16 h. On September 1, 2015, YouTube received a counter-notification  
17 under 17 U.S.C. §512(g) from Defendant Jesse Shaire;

18  
19 i. On September 3, 2015, YouTube received a counter-notification  
20 under 17 U.S.C. §512(g) from Defendant Hakim Hafsi;

21  
22 j. On September 3, 2015, YouTube received a counter-notification  
23 under 17 U.S.C. §512(g) from Defendant Austin Ratliff;

24  
25 k. On September 9, 2015, YouTube received a counter-notification  
26 under 17 U.S.C. §512(g) from Defendant Herve Nsingi Nkosi;

27  
28 l. On September 11, 2015, and September 19, 2015, YouTube  
received counter-notifications under 17 U.S.C. §512(g) from  
Defendant Fabiano Costa de Souza;

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- m. On September 16, 2015, YouTube received a counter-notification under 17 U.S.C. §512(g) from Defendant Marvin I. Allen;
- n. On September 19, 2015, YouTube received a counter-notification under 17 U.S.C. §512(g) from Defendant Mike Boane;
- o. On October 2, 2015, YouTube received a counter-notification under 17 U.S.C. §512(g) from Defendant Raynar Gordon; and
- p. On October 15, 2015, YouTube received a counter-notification under 17 U.S.C. §512(g) from Defendant Matthew Joseph Werner.

29. As a result of the counter-notifications set forth in Paragraph 28, YouTube reinstated the URLs set forth in Paragraph 25 and, thus, restored access to the infringing material.

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**FIRST CLAIM FOR RELIEF FOR COPYRIGHT INFRINGEMENT**

**BY PLAINTIFF E.TV NETWORKS, INC.,**

**AGAINST DEFENDANTS OMAR LEWIS, COREY HILTON, ACHOURI  
MOHAMED AMINE, JOSH PARRIS, MICHAEL KOWAL, MARIO  
COSTA DE SOUZA, TAMIKA LORICK, JESSE SHAIRES, HAKIM  
HAFSI, AUSTIN RATLIFF, HERVE NSINGI NKOSI, FABIANO COSTA  
DE SOUZA, MARVIN I. ALLEN, MIKE BOANE, RAYNAR GORDON,  
AND MATTHEW JOSEPH WERNER**

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30. Plaintiff incorporates by reference each and every allegation contained in Paragraphs 1 through 29 as though fully set forth herein.

31. At no time has Plaintiff authorized Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and/or Matthew Joseph Werner to reproduce, adapt, or distribute the above-mentioned copyrighted material.

32. Through the notification process pursuant to the Digital Millennium Copyright Act, 17 U.S.C. §512, set forth above in Paragraph 26, E. TV Networks notified Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and Matthew Joseph Werner that they have

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1 infringed the copyrights of E.TV Networks, and Defendants Omar Lewis, Corey  
2 Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De  
3 Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi  
4 Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and  
5 Matthew Joseph Werner willfully, intentionally, and recklessly continue to infringe  
6 the above-mentioned copyrights.  
7

8  
9 33. By reason of the infringement and threatened infringement of  
10 Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris,  
11 Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi,  
12 Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike  
13 Boane, Raynar Gordon, and Matthew Joseph Werner, Plaintiff has sustained and  
14 will continue to sustain substantial injury loss, and damage to its ownership rights  
15 in the copyrighted work.  
16

17 34. Plaintiff is entitled to recover from Defendants Omar Lewis, Corey  
18 Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De  
19 Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi  
20 Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and  
21 Matthew Joseph Werner, and each of them, the damages sustained as a result of  
22 Defendants' acts of copyright infringement. Plaintiff is at present unable to  
23 ascertain the full extent of the monetary damages that it has suffered by reason of  
24 Defendants' acts of copyright infringement, but Plaintiff is informed and believes,  
25 and on the basis of such information and belief alleges, that Plaintiff has sustained  
26 damage in an amount exceeding \$10,000,000.00.  
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1           35. Plaintiff is further entitled to recover from Defendants Omar Lewis,  
2 Corey Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa  
3 De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi  
4 Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and  
5 Matthew Joseph Werner, and each of them, the gains, profits, and advantages said  
6 Defendants have obtained as a result of their acts of copyright infringement.  
7 Plaintiff is at present unable to ascertain the full extent of the gains, profits, and  
8 advantages said Defendants have obtained by reason of their acts of copyright  
9 infringement, but Plaintiff is informed and believe, and on the basis of such  
10 information and belief alleges, that said Defendants obtained such gains, profits, and  
11 advantages in an amount exceeding \$10,000,000.00.  
12  
13

14                           **SECOND CLAIM FOR RELIEF FOR INJUNCTIVE RELIEF**

15   **BY PLAINTIFF E.TV NETWORKS, INC.,**

16  
17                   **AGAINST DEFENDANTS OMAR LEWIS, COREY HILTON, ACHOURI**  
18                   **MOHAMED AMINE, JOSH PARRIS, MICHAEL KOWAL, MARIO**  
19                   **COSTA DE SOUZA, TAMIKA LORICK, JESSE SHAIRES, HAKIM**  
20                   **HAFSI, AUSTIN RATLIFF, HERVE NSINGI NKOSI, FABIANO COSTA**  
21                   **DE SOUZA, MARVIN I. ALLEN, MIKE BOANE, RAYNAR GORDON,**  
22                   **AND MATTHEW JOSEPH WERNER**  
23  
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25           36. Plaintiff incorporates by reference each and every allegation contained  
26 in Paragraphs 1 through 35 as though fully set forth herein.  
27

28 //

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1           37. Irreparable harm to Plaintiff is imminent as a result of the conduct of  
2 Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris,  
3 Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi,  
4 Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike  
5 Boane, Raynar Gordon, and Matthew Joseph Werner, and Plaintiff is without an  
6 adequate remedy at law. Plaintiff is entitled to an injunction restraining said  
7 Defendants, their employees, representatives, and all persons acting in concert with  
8 them from engaging in further acts of copyright infringement.  
9

10  
11                   **THIRD CLAIM FOR RELIEF FOR INJUNCTIVE RELIEF**

12                                   **BY PLAINTIFF E. TV NETWORKS, INC.,**

13  
14                                   **AGAINST DEFENDANTS GOOGLE, INC., AND YOUTUBE, LCC**

15  
16           38. Plaintiff incorporates by reference each and every allegation contained  
17 in Paragraphs 1 through 35 as though fully set forth herein.

18           39. Irreparable harm to Plaintiff is imminent as a result of the conduct of  
19 Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris,  
20 Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi,  
21 Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike  
22 Boane, Raynar Gordon, and Matthew Joseph Werner, and Plaintiff is without an  
23 adequate remedy at law.  
24

25           40. Pursuant to the Digital Millennium Copyright Act, 17 U.S.C. §512,  
26 Plaintiff is entitled to the following;  
27

28           a. An order restraining Google, Inc., and YouTube, LLC, from



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providing access to the above-mentioned infringing material or activity residing at the above-mentioned URLs; and

- b. An order restraining Google, Inc., and YouTube, LLC, from providing access to Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike Boane, Raynar Gordon, and Matthew Joseph Werner, who are engaging in infringing activity, by terminating said Defendants' accounts.

**PRAYER**

Wherefore, Plaintiff prays as follows:

IN REGARD TO THE FIRST CLAIM FOR RELIEF FOR COPYRIGHT INFRINGEMENT:

- 1. For actual damages and Defendants' profits in an amount in excess of \$20,000,000.00 to be determined at trial, plus interest;

IN REGARD TO THE SECOND CLAIM FOR RELIEF FOR INJUNCTIVE RELIEF:

- 2. For a temporary restraining order, preliminary injunction, and permanent injunction restraining Defendants Omar Lewis, Corey Hilton, Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin

1 Ratliff, Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen,  
2 Mike Boane, Raynar Gordon, and Matthew Joseph Werner, and each  
3 of them, and all persons acting in concert with them from reproducing,  
4 distributing, adapting, displaying, promoting, offering for sale, or  
5 posting on the internet any of Plaintiff's copyrighted material from  
6 *Bang 3, Part 1* and *Bang3, Part 2*;  
7

8  
9 IN REGARD TO THE THIRD CLAIM FOR RELIEF FOR INJUNCTIVE  
10 RELIEF:

- 11 3. For a temporary restraining order, preliminary injunction, and  
12 permanent injunction restraining Google, Inc., and YouTube, LLC,  
13 from providing access to the above-mentioned infringing material or  
14 activity residing at the above-mentioned URLs;  
15  
16 4. For a temporary restraining order, preliminary injunction, and  
17 permanent injunction ordering Google, Inc., and YouTube, LLC, to  
18 terminate the accounts of Defendants Omar Lewis, Corey Hilton,  
19 Achouri Mohamed Amine, Josh Parris, Michael Kowal, Mario Costa  
20 De Souza, Tamika Lorick, Jesse Shaire, Hakim Hafsi, Austin Ratliff,  
21 Herve Nsingi Nkosi, Fabiano Costa De Souza, Marvin I. Allen, Mike  
22 Boane, Raynar Gordon, and Matthew Joseph Werner, who are  
23 engaging in infringing activity;  
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26 IN REGARD TO ALL CLAIMS FOR RELIEF:

- 27 5. For Plaintiff's attorney's fees and costs; and  
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6. For such other and further relief as the Court deems just and proper.

Dated: February 8, 2016

LAW OFFICES OF BARRY K. ROTHMAN

By \_\_\_\_\_



Barry K. Rothman

Attorneys for Plaintiff E. TV Networks, Inc.

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**DEMAND FOR JURY TRIAL**

Plaintiff E. TV Networks, Inc., hereby demands a trial by jury in this action.

Dated: February 8, 2016

LAW OFFICES OF BARRY K. ROTHMAN

By \_\_\_\_\_



Barry K. Rothman

Attorneys for Plaintiff E. TV Networks, Inc.

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