

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Karen Moore  
421 Oxford Rd.  
Ladson, SC 29456

Civil Case No 2:13-CV-3034-RMG-BM

**Complaint**

VS.

Google, Inc.  
1600 Ampitheatre Parkway  
Mountain View, CA 94043

The Federal Courts have jurisdiction because my complaint regard a US registered copyright I hold of a book called Charleston in Pictures. I believe the infringement took place in Goose Creek, SC, in that the information had to pass through one of the server stations in that area.

Allegation 1

Google exposed my book on their Android platform software as well as their internet platform for free against my wishes. They violated my copyright by diluting any financial gain I could get selling the book. The Google partnership program was offered to the public in such a way that controlling what was available to be seen in preview was up to the actual book owner. I set the preview to 20%. The system that I went to separate from my own computer showed the book was 100% available. There was a reasonable expectation that they would not violate this agreement and offer bare protection of the copyrights that are on their system. The registration number of the Copyright is TXu 1-789-616.

Relief Sought:

I am seeking \$451,000 in that there is case precedence of such wins of this amount. I am also asking for any other damages punitive or otherwise that can be awarded be granted. I am also asking that any physical books that are out be confiscated in that the book was only released in the US as a digital copy, not a physical one.



Karen Moore  
421 Oxford Rd.  
Ladson, SC 29456  
843-751-8996

## General Information

**Court** United States District Court for the District of South Carolina

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