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CENTRAL DISTRICT OF CALIFORNIA
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CENTRAL DISTRICT OF CALIFORNIA
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1 Name: BLUELEDA DIGITAL, LLC
2 Address: 21540 Prairie St
3 Ste A
4 Chatsworth, CA 91311
5 Phone number: 415-251-3649
6 E-mail Address: legal@blueleda.com
7 Pro Se

10 UNITED STATE DISTRICT COURT CENTRAL DISTRICT OF
11 CALIFORNIA, WESTERN DIVISION

14 BLUELEDA DIGITAL, LLC., a
15 Delaware
16 corporation qualified to do business in
17 the)
18 State of California,

20 Plaintiff,

21 vs.

22 GOOGLE, INC., a Delaware corporation
23 qualified to do business in the State of
24 California; YOUTUBE LLC, a Delaware
25 limited liability company qualified to do
26 business in the State of California;
27 NAVA KAKMAR MANDEGAR CO, an
28 Iranian company, REZA ROSTAMI, an

CASE NO. 2:20-CV-03522-JAK-ASx

COMPLAINT FOR:

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

DEMAND FOR JURY TRIAL

004234

1 individual; ALIREZA JAFARI, an
2 individual; EHSAN RAZZAZI, an
3 individual; SAEED VAYGHANI, an
4 individual;
5 Defendants.

6
7
8 Plaintiff Blueleda Digital, LLC., alleges as follows:

9 **PARTIES**

10 1. Plaintiff Blueleda Digital LLC. (hereinafter sometimes referred to as
11 “Blueleda” or “Plaintiff”) is and, at all times mentioned herein, was a Delaware
12 corporation qualified to do business in the State of California, with offices in the
13 City of Chatsworth, County of Los Angeles, State of California, also having
14 multiple branched in Australia include Blueleda Pty Ltd and Natro Technic Pty
15 Ltd.

16 2. Blueleda informed and believes and based on such information and belief
17 alleges that Defendant Google, Inc., is and, at all times mentioned herein, was a
18 Delaware corporation qualified to do business in the State of California, with
19 offices in Mountain View, California.

20 3. Blueleda is informed and believes and based on such information and belief
21 alleges that Defendant YouTube, LLC, is and, at all times mentioned herein, was a
22 Delaware limited liability company qualified to do business in the State of
23 California, with offices in Mountain View, California. Blueleda is informed and
24 believes and based on such information and belief alleges that Defendant
25 YouTube, LLC, is a wholly owned subsidiary of Defendant Google Inc.

26 4. Blueleda is informed and believes and based on such information and belief
27 alleges that Defendants Google, Inc., and YouTube, LLC, own and operate
28 YouTube, a video-sharing website with offices in San Bruno, California.

- 1 5. Blueleda is informed and believes and based on such information and belief
2 alleges that Defendants "Navaa Kamkar Mandegar Co", doing business as
3 "Navaak"(hereinafter referred to as "Navaak"), a digital media distribution
4 company and owner of "TPM - Top Persian Music " Youtube Channel
5 <https://youtube.com/channel/UC-Nk4Gjd50qfttcg1ydWyPA> , it incorporated
6 in the Islamic Republic of Iran with offices in Dmond group, North Kargar
7 Street, Campus of Tehran Technical College, Qalamchi Library Parking,
8 Tehran, 515-14395 Islamic Republic of Iran.
- 9 6. Blueleda is informed and believes and based on such information and belief
10 alleges that Defendant Reza Rostami is and, at all times mentioned herein,
11 was an individual and a citizen of Germany and residing in Gartenallee 32,
12 Bremen, Bremen 28359 DE, Germany. Reza Rostami is owner of two
13 YouTube channel called "Persian Media Group"
14 <https://youtube.com/channel/UCuGnnvoIOfRfkvYVHzTUWYQ> and
15 "Persian Music Group"
16 <https://youtube.com/channel/UC8u6telGfDJ2wd8lSwLoauQ>.
- 17 7. Blueleda is informed and believes and based on such information and belief
18 alleges that Defendant Ehsan Razzazi is and, at all times mentioned herein,
19 was an individual and a citizen of the Islamic Republic of Iran and residing
20 in Tehran, Iran, and working for Defendant Navaak.
- 21 8. Blueleda is informed and believes and based on such information and belief
22 alleges that Defendant Alireza Jafari is and, at all times mentioned herein,
23 was an individual and a citizen of the Islamic Republic of Iran and residing
24 in Tehran, Iran, and working for Defendant Navaak.
- 25 9. Blueleda is informed and believes and based on such information and belief
26 alleges that Defendant Reza Zaniani is and, at all times mentioned herein,
27 was an individual and a citizen of the Islamic Republic of Iran and residing
28 in Tehran, Iran and working for Defendant Reza Rostami.

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10. Blueleda is informed and believes and based on such information and belief alleges that Defendant Saeed Vayghani is and, at all times mentioned herein, was an individual and a citizen of the Islamic Republic of Iran and residing in Tehran, Iran, and working for Defendant Navaak.

1 "Mano Ashegham Kard", "Maghrour", "Kojaei", "Yare Dordoone", "Dooset
2 Daram", "Halamo Nemifahme", "Azizam", "Alaghe Live", "Bi Nazir", "Eshghe
3 Delam", "Ghadam Mizanam", "Eteraf", "Hame Donyami", "Ye Alameh", "Khabe
4 Boland", "Kojaei", "Asheghet Misham", "Age Nabinamet", "Mage Darim",
5 "Namahdood", "Bi Khabi", "Ye Doroogh", and "Harasoon" Each individual song
6 in the Singles collection albums and individual tracks were registered with the
7 United States Copyright Offices.

8 **DEFENDANTS INITIAL ACTS OF INFRINGEMENT**

9 15. After May 1, 2019 and after the copyright registration of the above-
10 mentioned Artists performances, Defendants, and each of them, infringed
11 the registered copyrights by uploading videos and sound recordings
12 containing the above-mentioned copyrighted material of Blueleda as
13 follows:

- 14 a. Defendant Reza Rostami uploaded copyrighted material to
15 http://youtube.com/watch?v=vVv_oabALxw under the display name
16 "Heif" Blueleda copyright number for this song is: SR0000857490;
- 17 b. Defendant Reza Rostami uploaded copyrighted material to
18 http://youtube.com/watch?v=F_mp4_kZrAs under the display name
19 "Koja Beram";Blueleda copyright number for this song is:
20 SR0000857490;
- 21 c. Defendant Reza Rostami uploaded copyrighted material to
22 <http://youtube.com/watch?v=wBmIL8U6opI> under the display name
23 "Chizi Nagoo";Blueleda copyright number for this song is:
24 SR0000857490;
- 25 d. Defendant Reza Rostami uploaded copyrighted material to
26 <http://youtube.com/watch?v=BE9ipm9kv1g> under the display name
27 "Akharin Lahze";Blueleda copyright number for this song is:
28 SR0000859916;

- 1 e. Defendant Reza Rostami uploaded copyrighted material to
2 <http://youtube.com/watch?v=27WmJypyMGY> under the display name
3 "Gole Sorkh";Blueleda copyright number for this song is:
4 SR0000849492;
- 5 f. Defendant Reza Rostami uploaded copyrighted material to
6 <http://youtube.com/watch?v=SXmRJ1kpM5o> under the display name
7 "Koname Shiran";Blueleda copyright number for this song is:
8 SR0000849492;
- 9 g. Defendant Reza Rostami uploaded copyrighted material to
10 <http://youtube.com/watch?v=MDkaUEyiXz0> under the display name
11 "Shahre Hasood";Blueleda copyright number for this song is:
12 SR0000849492;
- 13 h. Defendant Reza Rostami uploaded copyrighted material to
14 <http://youtube.com/watch?v=CtkjZJgJtXw> under the display name
15 "Sattarkhan";Blueleda copyright number for this song is:
16 SR0000849492;
- 17 i. Defendant Reza Rostami uploaded copyrighted material to
18 <http://youtube.com/watch?v=wV1ua0V9EFM> under the display name
19 "Lahzeye Shirin";Blueleda copyright number for this song is:
20 SR0000849492;
- 21 j. Defendant Reza Rostami uploaded copyrighted material to
22 <http://youtube.com/watch?v=4Q6wDucq8f8> under the display name
23 "Ye Gharibeh";Blueleda copyright number for this song is:
24 SR0000849492;
- 25 k. Defendant Alireza Jafari uploaded copyrighted material to
26 <http://youtube.com/watch?v=ELJ1V8tVUTQ> under the display name
27 "Jadde Shab";Blueleda copyright number for this song is:
28 SR0000849492;

- 1 l. Defendant Alireza Jafari uploaded copyrighted material to
2 http://youtube.com/watch?v=aEU3r_iWQkI under the display name
3 "Be Soye to";Blueleda copyright number for this song is:
4 SR0000849492;
- 5 m. Defendant Alireza Jafari uploaded copyrighted material to
6 http://youtube.com/watch?v=ZK5U_QmpFWs under the display name
7 "Zendegi Kon";Blueleda copyright number for this song is:
8 SR0000849492;
- 9 n. Defendant Alireza Jafari uploaded copyrighted material to
10 <http://youtube.com/watch?v=XbRLJ2kdcOM> under the display name
11 "Iran";Blueleda copyright number for this song is: SR0000849492;
- 12 o. Defendant Alireza Jafari uploaded copyrighted material to
13 <http://youtube.com/watch?v=YyUNVIQx3qI> under the display name
14 "Vaghte Gole Ney";Blueleda copyright number for this song is:
15 SR0000852625;
- 16 p. Defendant Reza Rostami uploaded copyrighted material to
17 <http://youtube.com/watch?v=58IjXp6t5pc> under the display name
18 "Eshghe Ghadimi";Blueleda copyright number for this song is:
19 SR0000857490;
- 20 q. Defendant Reza Rostami uploaded copyrighted material to
21 <http://youtube.com/watch?v=nKKbwb8DgFU> under the display name
22 "Fekr E Bekr";Blueleda copyright number for this song is:
23 SR0000848432;
- 24 r. Defendant Alireza Jafari uploaded copyrighted material to
25 <https://youtube.com/watch?v=QUI5sCviUkw> under the display name
26 "Shahre Baran";Blueleda copyright number for this song is:
27 SR0000862171;
- 28 s. Defendant Reza Rostami uploaded copyrighted material to

1 https://youtube.com/watch?v=1yzp_-RFTQg under the display name
2 "Halamo Nemifahme";Blueleda copyright number for this song is: 1-
3 8157530191;

4 t. Defendant Reza Rostami uploaded copyrighted material to
5 <https://youtube.com/watch?v=WKqJAi3WZhM> under the display
6 name "Bezan Be Bikhiali ";Blueleda copyright number for this song
7 is: 1-8157530191;

8 u. Defendant Reza Rostami uploaded copyrighted material to
9 <https://youtube.com/watch?v=YBWRWckODQQ> under the display
10 name "Maghrour";Blueleda copyright number for this song is: 1-
11 8157530191;

12 v. Defendant Reza Rostami uploaded copyrighted material to
13 <https://youtube.com/watch?v=BcdIaoVQ5E0> under the display name
14 "Mano Ashegham Kard";Blueleda copyright number for this song is:
15 1-8682349177;

16 w. Defendant Reza Rostami uploaded copyrighted material to
17 <https://youtube.com/watch?v=NHZ5tvHcRYY> under the display
18 name "Alaghe Live";Blueleda copyright number for this song is: 1-
19 8157530191;

20 x. Defendant Reza Rostami uploaded copyrighted material to
21 <https://youtube.com/watch?v=ERA09Vx0nDA> under the display
22 name "Namahdoud";Blueleda copyright number for this song is: 1-
23 8157530191;

24 y. Defendant Reza Rostami uploaded copyrighted material to
25 <https://youtube.com/watch?v=0712iH67o2A> under the display name
26 "Mano Ashegham Kard";Blueleda copyright number for this song is:
27 1-8682349177;

28 z. Defendant Reza Rostami uploaded copyrighted material to

1 <https://youtube.com/watch?v=iUeD5KFylRg> under the display name
2 "Maghrour";Blueleda copyright number for this song is: 1-
3 8157530191;

4 aa. Defendant Reza Rostami uploaded copyrighted material to
5 <https://youtube.com/watch?v=QeQuYjpOI0M> under the display name
6 "Kojaei";Blueleda copyright number for this song is: 1-8157530191;

7 bb. Defendant Reza Rostami uploaded copyrighted material to
8 <https://youtube.com/watch?v=IKKQ68sac1c> under the display name
9 "Yare Dordoone";Blueleda copyright number for this song is: 1-
10 8157530191;

11 cc. Defendant Reza Rostami uploaded copyrighted material to
12 <https://youtube.com/watch?v=O45rb8Xlcic> under the display name
13 "Dooset Daram";Blueleda copyright number for this song is: 1-
14 8157530191;

15 dd. Defendant Reza Rostami uploaded copyrighted material to
16 <https://youtu.be/tnHu5H3bZgs> under the display name "Halamo
17 Nemifahme";Blueleda copyright number for this song is: 1-
18 8157530191;

19 ee. Defendant Reza Rostami uploaded copyrighted material to
20 https://youtu.be/szrL-ci4x_0 under the display name
21 "Azizam";Blueleda copyright number for this song is: 1-8157600382;

22 ff. Defendant Reza Rostami uploaded copyrighted material to
23 <https://youtu.be/q7mZ00WRfb0> under the display name "Alaghe
24 Live";Blueleda copyright number for this song is: 1-8157530191;

25 gg. Defendant Reza Rostami uploaded copyrighted material to
26 <https://youtu.be/tpPIReb2TYM> under the display name "Bi
27 Nazir";Blueleda copyright number for this song is: 1-8157530191;

28 hh. Defendant Reza Rostami uploaded copyrighted material to

- 1 <https://youtu.be/kv4tpoROm3E> under the display name "Eshghe
2 Delam";Blueleda copyright number for this song is: 1-8157530191;
- 3 ii. Defendant Reza Rostami uploaded copyrighted material to
4 <https://youtu.be/rHiq6HSsdq0> under the display name "Ghadam
5 Mizanam";Blueleda copyright number for this song is: 1-
6 8157530191;
- 7 jj. Defendant Reza Rostami uploaded copyrighted material to
8 <https://youtu.be/gzJ4SqoOWAg> under the display name
9 "Eteraf";Blueleda copyright number for this song is: 1-8157530191;
- 10 kk. Defendant Reza Rostami uploaded copyrighted material to
11 <https://youtu.be/NAyFz-Kw9wM> under the display name "Hame
12 Donyami";Blueleda copyright number for this song is: 1-
13 8157530191;
- 14 ll. Defendant Reza Rostami uploaded copyrighted material to
15 <https://youtu.be/Z3oivjKR-TU> under the display name "Ye
16 Alameh";Blueleda copyright number for this song is: 1-8157530191;
- 17 mm. Defendant Ehsan Razzazi uploaded copyrighted material to
18 <https://youtube.com/watch?v=G4ESzYVWH14> under the display
19 name "Khabe Boland";Blueleda copyright number for this song is: 1-
20 8157530191;
- 21 nn. Defendant Reza Rostami uploaded copyrighted material to
22 <https://youtube.com/watch?v=ayg8uDCINwY> under the display name
23 "Kojaei";Blueleda copyright number for this song is: 1-8157530191;
- 24 oo. Defendant Alireza Jafari uploaded copyrighted material to
25 https://youtube.com/watch?v=ypS_OCEmam8 under the display name
26 "Asheghet Misham";Blueleda copyright number for this song is: 1-
27 8682349225;
- 28 pp. Defendant Reza Rostami uploaded copyrighted material to

1 <https://youtu.be/vfomBkRT5jc> under the display name "Age
2 Nabinamet";Blueleda copyright number for this song is: 1-
3 8157530191;

4 qq. Defendant Reza Rostami uploaded copyrighted material to
5 <https://youtu.be/jgAlXWqi2EA> under the display name "Mage
6 Darim";Blueleda copyright number for this song is: 1-8157530191;

7 rr. Defendant Reza Rostami uploaded copyrighted material to
8 <https://youtu.be/3gn7uJFwYfM> under the display name
9 "Namahdood";Blueleda copyright number for this song is: 1-
10 8157530191;

11 ss. Defendant Reza Rostami uploaded copyrighted material to
12 <https://youtu.be/xN4govf66es> under the display name "Bi
13 Khabi";Blueleda copyright number for this song is: 1-8157530191;

14 tt. Defendant Reza Rostami uploaded copyrighted material to
15 <https://youtu.be/GV8IanBR6RU> under the display name "Ye
16 Doroooh";Blueleda copyright number for this song is: 1-8157530191;

17 uu. Defendant Reza Rostami uploaded copyrighted material to
18 <https://youtu.be/l2hCDD0m2sI> under the display name
19 "Harasoon";Blueleda copyright number for this song is: 1-
20 8682349273;

21 **NOTIFICATIONS AND COUNTER-NOTIFICATIONS UNDER THE**
22 **DIGITAL MILLENNIUM COPYRIGHT ACT**

23 16. From Nov 2019 to March 2020, pursuant to the Digital Millennium
24 Copyright Act, 17 U.S.C. 9512, Blueleda gave written notifications of
25 infringement to YouTube in regard to the URLs set forth in Paragraph 15 above.
26 Blueleda is informed and believes and based on such information and belief alleges
27 that Defendant YouTube, LLC, informed Defendants Navaak, Reza Rostami,
28 Alireza Jafari, Ehsan Razzazi, Saeed Vayghani, and each of them, of the written

1 notifications of infringement.

2 17. In response to the above-mentioned notification, YouTube removed
3 the material set forth in Paragraph 16 and/or disabled access to the infringing
4 material.

5 18. From October 2019 to March 2020, Defendants sent counter-
6 notifications to YouTube pursuant to the Digital Millennium Copyright Act, 17
7 U.S.C. §512.

8 19. As a result of the counter-notifications, YouTube reinstated most of
9 the URLs set forth in Paragraph 15 and, thus, restored access to the infringing
10 material.

11
12 FIRST CLAIM FOR RELIEF FOR COPYRIGHT INFRINGEMENT BY
13 PLAINTIFF BLUELEDA, AGAINST DEFENDANTS NAVAAK, REZA
14 ROSTAMI, ALIREZA JAFARI, EHSAN RAZZAZI, SAEED VAYGHANI
15

16 20. Plaintiff incorporates by reference each and every allegation
17 contained in Paragraphs | through 29 as though fully set forth herein.

18 21. At no time has Plaintiff authorized Defendants Navaak, Reza
19 Rostami, Alireza Jafari, Ehsan Razzazi, Saeed Vayghani to reproduce, adapt, or
20 distribute the abovementioned copyrighted material.

21 22. Through the notification process pursuant to the Digital Millennium
22 Copyright Act, 17 U.S.C. §512, set forth above in Paragraph 16, Blueleda notified
23 Defendants, Navaak, Reza Rostami, Alireza Jafari, Ehsan Razzazi, Saeed
24 Vayghani that they have infringed the copyrights of Blueleda, and Defendants
25 Navaak, Reza Rostami, Alireza Jafari, Ehsan Razzazi, Saeed Vayghani willfully,
26 intentionally, and recklessly continue to infringe the above-mentioned copyrights.

27 23. By reason of the infringement and threatened infringement of
28 Defendants Navaak, Reza Rostami, Alireza Jafari, Ehsan Razzazi, Saeed

1 Vayghani, Plaintiff has sustained and will continue to sustain substantial injury
2 loss, and damage to its ownership rights in the copyrighted work.

3 24. Plaintiff is entitled to recover from Defendants Navaak, Reza
4 Rostami, Alireza Jafari, Ehsan Razzazi, Saeed Vayghani, and each of them, the
5 damages sustained as a result of Defendants' acts of copyright infringement.
6 Plaintiff is at present unable to ascertain the full extent of the monetary damages
7 that it has suffered by reason of Defendants' acts of copyright infringement, but
8 Plaintiff is informed and believes, and on the basis of such information and belief
9 alleges, that Plaintiff has sustained damage in an amount exceeding \$2,000,000.00.

10 25. Plaintiff is further entitled to recover from Defendants Navaak, Reza
11 Rostami, Alireza Jafari, Ehsan Razzazi, Saeed Vayghani, and each of them, the
12 gains, profits, and advantages said Defendants have obtained as a result of their
13 acts of copyright infringement. Plaintiff is at present unable to ascertain the full
14 extent of the gains, profits, and advantages said Defendants have obtained by
15 reason of their acts of copyright — infringement, but Plaintiff is informed and
16 believe, and on the basis of such information and belief alleges, that said
17 Defendants obtained such gains, profits, and advantages in an amount exceeding
18 \$2,000,000.00.

19 **SECOND CLAIM FOR RELIEF FOR INJUNCTIVE RELIEF BY**
20 **PLAINTIFF BLUELEDA, AGAINST DEFENDANTS NAVAAK, REZA**
21 **ROSTAMI, ALIREZA JAFARI, EHSAN RAZZAZI, SAEED VAYGHANI**

22 26. Plaintiff incorporates by reference each and every allegation
23 contained in Paragraphs | through 25 as though fully set forth herein.

24 27. Irreparable harm to Plaintiff is imminent as a result of the conduct of
25 'Defendants Navaak, Reza Rostami, Alireza Jafari, Ehsan Razzazi, Saeed
26 Vayghani, and Plaintiff is without an adequate remedy at law. Plaintiff is entitled
27 to an injunction restraining said Defendants, their employees, representatives, and
28 all persons acting in concert with them from engaging in further acts of copyright

1 infringement.

2
3 **THIRD CLAIM FOR RELIEF FOR INJUNCTIVE RELIEF**
4 **BY PLAINTIFF BLUELEDA, - AGAINST DEFENDANTS GOOGLE,**
5 **INC., AND YOUTUBE, LCC**

6 28. Plaintiff incorporates by reference each and every allegation contained
7 in Paragraphs | through 25 as though fully set forth herein.

8 29. Irreparable harm to Plaintiff is imminent as a result of the conduct of
9 Defendants Navaak, Reza Rostami, Alireza Jafari, Ehsan Razzazi, Saeed
10 Vayghani, and Plaintiff is without an adequate remedy at law.

11 30. Pursuant to the Digital Millennium Copyright Act, 17 U.S.C.
12 §512, Plaintiff is entitled to the following:

- 13 a. An order restraining Google, Inc., and YouTube, LLC, from providing
- 14 access to the above-mentioned infringing material or activity residing
- 15 at the above-mentioned URLs; and
- 16 b. An order restraining Google, Inc., and YouTube, LLC, from providing
- 17 access to Defendants Navaak, Reza Rostami, Alireza Jafari, Ehsan
- 18 Razzazi, Saeed Vayghani, who are engaging in infringing activity, by
- 19 terminating said Defendants' accounts.

20
21 **PRAYER**

22 Wherefore, Plaintiff prays as follows:

23 **IN REGARD TO THE FIRST CLAIM FOR RELIEF FOR COPYRIGHT**
24 **INFRINGEMENT:**

- 25
- 26 1. For actual damages and Defendants' profits in an amount in excess of
- 27 \$4,000,000.00 to be determined at trial, plus interest;
- 28

1 RELIEF:
2

- 3 2. For a temporary restraining order, preliminary injunction, and permanent
4 injunction restraining Defendants Navaak, Reza Rostami, Alireza Jafari,
5 Ehsan Razzazi, Saeed Vayghani, and each of them, and all persons acting
6 in concert with them from reproducing, distributing, adapting, displaying,
7 promoting, offering for sale, or posting on the internet any of Plaintiff's
8 copyrighted material includes but not limited to: "Heif", "Koja Beram",
9 "Chizi Nagoo", "Akharin Lahze", "Gole Sorkh", "Koname Shiran",
10 "Shahre Hasood", "Sattarkhan", "Lahzeye Shirin", "Ye Gharibeh", "Jadde
11 Shab", "Be Soye to", "Zendegi Kon", "Iran", "Vaghte Gole Ney",
12 "Eshghe Ghadimi", "Fekr E Bekr", "Shahre Baran", "Halamo
13 Nemifahme", "Bezan Be Bikhiali", "Maghrour", "Mano Ashegham
14 Kard", "Alaghe Live", "Namahdoud", "Mano Ashegham Kard",
15 "Maghrour", "Kojaei", "Yare Dordoone", "Dooset Daram", "Halamo
16 Nemifahme", "Azizam", "Alaghe Live", "Bi Nazir", "Eshghe Delam",
17 "Ghadam Mizanam", "Eteraf", "Hame Donyami", "Ye Alameh", "Khabe
18 Boland", "Kojaei", "Asheghet Misham", "Age Nabinamet", "Mage
19 Darim", "Namahdood", "Bi Khabi", "Ye Doroogh", and "Harasoon".

20 IN REGARD TO THE THIRD CLAIM FOR RELIEF FOR INJUNCTIVE
21 RELIEF:

- 22 3. For a temporary restraining order, preliminary injunction, and permanent
23 injunction restraining Google, Inc., and YouTube, LLC, from providing
24 access to the above-mentioned infringing material or activity residing at
25 the above-mentioned URLs;
- 26 4. or a temporary restraining order, preliminary injunction, and permanent
27 injunction ordering Google, Inc., and YouTube, LLC, to terminate the
28 accounts of Defendants Navaak, Reza Rostami, Alireza Jafari, Ehsan

Razzazi, Saeed Vayghani, who are engaging in infringing activity;

IN REGARD TO ALL CLAIMS FOR RELIEF:

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

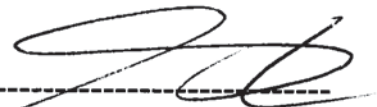
Dated: March 30, 2020

By 
 Plaintiff Blueleda

DEMAND FOR JURY TRIAL

Plaintiff Blueleda, hereby demands a trial by jury in this action.

Dated: March 30, 2020

By 
 Plaintiff Blueleda

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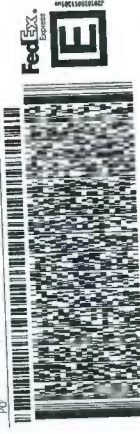
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[0901]

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187
1 15:00
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04 13

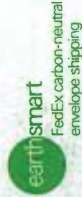


Extremely Urgent

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