

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Valmiki Ramani

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

You Tube LLC

COMPLAINT

Do you want a jury trial?
☐ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED
CLERK OF COURT
2022 DEC 28 AM 10:53

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Illegal use of my name and image and intellectual property to create and identify Two YouTube Channels

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, YouTube LLC, is incorporated under the laws of
the State of California

and has its principal place of business in the State of California
or is incorporated under the laws of (foreign state) _____

and has its principal place of business in 901 Cherry Ave San Bruno CA

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

<u>Valmiki</u>	<u>D</u>	<u>Ramani</u>
First Name	Middle Initial	Last Name
<u>139-05 85 DR</u>	<u>GD</u>	
Street Address		
<u>BRIARWOOD</u>	<u>NY</u>	<u>11435</u>
County, City	State	Zip Code
<u>718-291-2978</u>	<u>valmiki.d.h@gmail.com</u>	
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: You Tube LLC
 First Name Last Name
Media
 Current Job Title (or other identifying information)
901 Cherry Ave
 Current Work Address (or other address where defendant may be served)
San Bruno CA
 County, City State Zip Code

Defendant 2: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: ON LINEDate(s) of occurrence: 2022**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Defendant has illegally used my name and image and intellectual property to create a channel using illegally gotten album of my music Across the Pond from TuneCore who was not authorized to give it to YouTube, a civil case in Queens Civil Court is awaiting decision

I previously had a channel VALMIKI Ramani International Songs of Love in which defendant forced me out and took it over when the above name is typed into the browser the above appears, my name, image, and description of my music above YouTube channel content.

Please See attached exhibits
that are current

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am here by seeking compensation of
\$2,000,000 from the defendant for
illegally using my name, image,
and intellectual property to create their
channel (s)

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

12-28-22
 Dated _____
Valmiki D Ramani
 First Name Middle Initial Last Name
139-05 85 DR APT 6D
 Street Address
BRIARWOOD NY 11435
 County, City State Zip Code
218-291-2978 valmiki.d.p@gmail.com
 Telephone Number Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

**VALMIKI
RAMANI**

INTERNATIONAL SONGS OF LOVE™
139-05 85th Drive, Suite 6D
Briarwood, NY 11435
Tel: 718-291-2978
Email: valmiki.d.r@gmail.com

Exhibit A

The attached screen shot is current. When you type in my name Valmiki Ramani into Youtube browser you will get this channel that Youtube created using an album that TuneCore was not to have given them, "Across the Pond" which is trademarked, and I have published volume I, II, III. I have a Face book music video channel which I created after Youtube took the channel I had on their media. In this channel I described that my music is for the golden years of popular music. Youtube has used this to describe this illegal channel they have created.

valmiki ramani

Filters



Valmiki Ramani

@valmikiramani580 • 25 subscribers

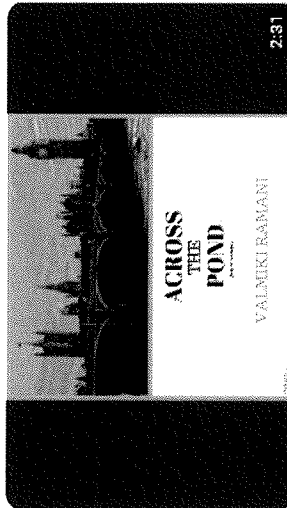
My channel features love songs from the golden age of American pop culture to now. There are no oldies in music just music from ...



Valmiki Ramani - Topic

6 subscribers • 8 videos

Subscribe



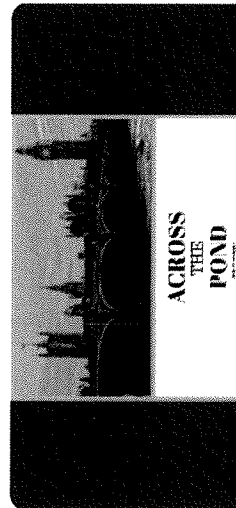
From Russia WITH Love

24 views



Valmiki Ramani - Topic

Provided to YouTube by TuneCore From Russia WITH Love · VALMIKI RAMANI Across the Pond © 2021 VRISOL,tm Released on ...



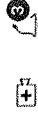
I Only Live to Love You

7 views



Valmiki Ramani - Topic

Provided to YouTube by TuneCore I Only Live to Love You · VALMIKI RAMANI Across the Pond © 2021 VRISOL,tm Released on ...



**VALMIKI
RAMANI**

INTERNATIONAL SONGS OF LOVE™
139-05 85th Drive, Suite 6D
Briarwood, NY 11435
Tel: 718-291-2978
Email: valmiki.d.r@gmail.com

Exhibit B

This is a screen shot of the result you get when you type into YouTube browser the above channel what I deleted, Valmiki Ramani International Songs of Love, you are brought to where my old channel was, which is now YT's Indian - Western channel of International Songs of Love.

Much more disgusting and bold the channel name in Exhibit A appears. This is outrageous violation of my rights, to my name and intellectual property.

B

valmiki ramani international songs of love



Valmiki Ramani

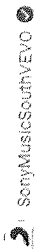
@valmikiramani580 • 25 subscribers

My channel features love songs from the golden age of American pop culture to now. There are no oodies in music just music from ...



Gaddalakonda Ganesh (Valmiki) - Jarra Jarra Video | Varun Tej, Atharvaa | Mickey J Meyer

66M views • 3 years ago



Movie - Valmiki Song - Jarra Jarra Singers - Anurag Kulkarni, Uma Neha Lyrics - Bhaskarbhathia Ravikumar Starring - Varun Tej, ...

CC



Pitbull - International Love (Lyrics) ft. Chris Brown

4M views • 2 years ago



Pitbull - International Love (Lyrics) ft. Chris Brown Stream/Download: <http://smarturl.it/PBSpot?Qid=PitL> Follow our Spotify ...



Pitbull - International Love (Official Video) ft. Chris Brown

860M views • 11 years ago



Ask your voice device to play Pitbull! Lyrics: You put it down like New York City, I never sleep (Yeah) Wild like Los Angeles, my ...

VALMIKI
RAMANI

Exhibit C

This is a screen shot from my
FaceBook music channel.

Here you will find copy of which
I have described my music.

You Tube have taken this content of copy
to describe the channel they have
created using my name and image
all illegally.

VALMIKI RAMANI

IN ALL MAJOR ONLINE STORES



VRISOL,tm

12 likes • 24 followers



Message

Like

Search

Posts About Mentions Reviews Followers Photos More

Switch into VRISOL,tm's Page to start managing it.



Go to Ad Center to promote your Page

You'll have tools to create and manage ads for VRISOL,tm

Promote

Featured



VRISOL,tm

December 23, 2019

Hello welcome to VRISOL,tm, a channel that tries to capture good love songs from the 50's to the 90's, the type of music that will never grow old.All videos of VRISOL,tm are (C)

Intro

VRISOL, takes you back in time when western civilization experienced

Switch Now

