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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

1 Jaime B. Laurent (SBN 261926)
2 ibl@iblauren.com
3 Victor Look (SBN 256591)
4 victor@looklawfirm.com
5 7225 Crescent Park West, Suite 466
6 Playa Vista, CA 90094
7 T: 310 961 4791
8 F: 310 491 5953

9 Attorneys for Plaintiffs,
10 AZITA ZENDEL and AZITA BOOKS & FILMS, INC.

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 AZITA ZENDEL, an individual; AZITA
14 BOOKS & FILMS, INC., a California
15 corporation,

16 Plaintiffs,

17 v.

18 ABC VIDEO PRODUCTIONS, a Delaware
19 corporation, TOUCHSTONE TELEVISION,
20 a Delaware corporation, REVEILLE
21 PRODUCTIONS, a Delaware corporation,
22 VENTANAROSA PRODUCTIONS, a
23 California corporation, SILENT H.
24 PRODUCTIONS, a California corporation,
25 FERNANDO GAITAN, an individual, and
26 DOES 1 through 10, inclusive,

27 Defendants.

CV 10 2889 VBF (L)

CASE NO.

COMPLAINT FOR DAMAGES

1) Copyright Infringement

JURY TRIAL DEMANDED

1 Plaintiffs Azita Zendel and Azita Books & Film, Inc., for their claims against Defendants
2 ABC PRODUCTIONS, TOUCHSTONE TELEVISION, REVELLE PRODUCTIONS,
3 VENTANAROSA PRODUCTIONS, SILENT H. PRODUCTIONS, and FERNANDO GAITAN
4 (collectively "Defendants") respectfully allege as follows:

5 **JURISDICTION AND VENUE**

- 6 1. Plaintiffs files this action against Defendants for copyright infringement under 17 U.S.C.
7 § 101, et seq. This court has subject matter jurisdiction over the copyright infringement
8 claims pursuant to 28 U.S.C. §§ 1121(A), 1331, 1338(a).
- 9 2. This Court has subject matter jurisdiction over all supplemental claims pursuant to 28
10 U.S.C. § 1367, since those claims are related to and arises from the same set of facts as
11 Plaintiffs' copyright infringement claim.
- 12 3. This Court has personal jurisdiction over Defendants because Defendants do business
13 within this judicial district, and the acts complained of occurred in this judicial district.
- 14 4. This action arises out of wrongful acts by Defendants within this judicial district. Venue
15 is proper in this District pursuant to 28 U.S.C. § 1391 because the claims asserted arise in
16 this District. Furthermore, Venue is property pursuant to 28 U.S.C. § 1400(a).

17 **THE PARTIES**

- 18 5. Plaintiff AZITA ZENDEL is an individual and the author of the works at issue herein.
- 19 6. Plaintiff AZITA BOOKS & FILM, INC. is a corporation and qualified to do business and
20 doing business in the State of California at all relevant times herein.
- 21 7. Defendant ABC PRODUCTIONS is a Delaware corporation and qualified to do business
22 and doing business in the State of California at all relevant times herein.
- 23 8. Defendant TOUCHSTONE TELEVISION is a Delaware corporation qualified to do
24 business and doing business in the State of California at all relevant times herein.
- 25 9. Defendant REVELLE PRODUCTIONS is a Delaware corporation and qualified to do
26 business and doing business in the State of California at all relevant times herein.
- 27 10. Defendant VENTANAROSA PRODUCTIONS is a California corporation and qualified
28 to do business and doing business in the State of California at all relevant times herein.



1 11. Defendant SILENT H. PRODUCTIONS is a California corporation and qualified to do
2 business and doing business in the State of California at all relevant times herein.

3 12. Defendant FERNANDO GAITAN is an individual who, upon information and belief,
4 resides in the state of California.

5 13. Plaintiffs is unaware of the names and true capacities of Defendants, whether individual,
6 corporate and/or partnership entities named herein as DOES 1 through 20, inclusive, and
7 therefore sues them by their fictitious names. Plaintiffs will seek leave to amend his
8 complaint when their true names and capacities are ascertained. Plaintiffs are informed
9 and believe and based thereon alleges that said Defendants, DOES 1 through 50,
10 inclusive, are in some manner responsible for the wrongs alleged herein, and that at all
11 times referenced each was the agent and servant of the other Defendants and was acting
12 within the course and scope of said agency and employment.

13 14. Plaintiffs are informed and believe, and based thereon, allege, that at all relevant times
14 herein, Defendants and DOES 1 through 20, inclusive, knew or reasonably should have
15 known of the acts and behavior alleged herein and the damages caused thereby, and by
16 their inaction ratified and encouraged such acts and behavior.

17 15. At all times mentioned herein, the term "Defendants" includes all named defendants and
18 Does 1-20.

19 **BACKGROUND AND PRELIMINARY FACTS**

20 16. In May of 1997, Azita Zendel (hereinafter "Zendel") wrote the screenplay entitled "The
21 Silent Partner" (hereinafter "Screenplay").

22 17. On May 16, 1997, Zendel registered the screenplay under the name "The Silent Partner"
23 with the Writers Guild of America, west, Inc., (hereinafter "WGA") registration number
24 665265. A true and correct copy of the aforementioned registration with the WGA is
25 attached hereto as **Exhibit A**.

26 18. On January 30, 2001, Zendel registered the screenplay with the United States Copyright
27 Office, Library of Congress, under the name "Silent Partners", registration number PAU
28

1 2-560-072. A true and correct copy of the aforementioned registration with the United
2 States Copyright Office is attached hereto as **Exhibit B**.

3
4 19. The Screenplay has had several alternative titles. They are:

- 5 a) Lovestreaks;
- 6 b) The Silent Partner;
- 7 c) Silent Partners;
- 8 d) A Rock & A Hard Place;
- 9 e) Modus Operandi.

10 20. Between the years of 1997 – 2001, Plaintiffs submitted the Screenplay to the Defendants,
11 their principals, employees, agents, servants, and/or the entities from which the Corporate
12 Defendants derive therefrom, for possible production or purchase of Screenplay, as is the
13 common practice within the film industry.

14 21. During this period, Zendel created the motion picture entitled “Controlled Chaos”
15 (hereinafter “Film”) which is base upon and is derivative to the Screenplay.

16 22. On July 7, 2002, Zendel registered the Film with the United States Copyright Office,
17 Library of Congress under the name “Controlled Chaos”, registration number Pau 2-693-
18 369. A true and correct copy of the aforementioned registration with the United States
19 Copyright Office is attached hereto as **Exhibit C**.

20 23. Between the years of 2002 - 2006, Plaintiffs submitted the Film in VHS format, to the
21 Defendants, their principals, employees, agents, servants, and/or the entities from which
22 the Corporate Defendants derive therefrom, for possible distribution of the Film, as is the
23 common practice within the film industry.

24 24. Between the years of 2005 - 2006, Plaintiffs submitted the Film in DVD format, to the
25 Defendants, their principals, employees, agents, servants, and/or the entities from which
26 the Corporate Defendants derive therefrom, for possible distribution of the Film, as is the
27 common practice within the film industry.

1 25. Defendants never approached Plaintiffs for the possible purchase, use, or adaptation of
2 the Film or Screenplay.

3 26. The Film was exhibited at the Women's Image Network's Femme Film Festival, the New
4 York International Film & Video Festival, the American Film Market, the Cannes Film
5 Market, and in Deer Valley concurrently with the Sundance Film Festival. Furthermore,
6 the Film was released theatrically in the United States.

7 27. Defendants produce and distribute the episodic television program "Ugly Betty"
8 (hereinafter "Program"). The pilot for the Program aired on September 28, 2006 and the
9 Program has run since that date.

10 **FIRST CAUSE OF ACTION**

11 **(Copyright Infringement – 17 U.S.C. § 101 et seq.)**

12 28. Plaintiffs repeat and incorporate by reference paragraphs 1 through 20 of this Complaint
13 as though fully set forth herein.

14 29. As stated herein, Plaintiffs are the owner of all right, title and interest to the Film and the
15 Screenplay.

16 30. Upon information and belief, Plaintiffs allege that Defendants have used, incorporated,
17 distributed and displayed to the public, reproduced and/or adapted certain contents,
18 elements, portions, and/ or aspects of the Film and the Screenplay, without the permission
19 of Plaintiffs.

20 31. Upon information and belief, Plaintiffs allege that multiple episodes of the Program are
21 substantially similar to the Screenplay and Film.

22 32. Defendants have engaged and continue to knowingly and systematically induce, cause,
23 and/or materially contribute to the unauthorized copying, reproduction, adaption, display,
24 and/or distributing of certain contents, elements, portions, and/ or aspects of the Film and
25 the Screenplay, without the permission of Plaintiffs.
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1 33. Upon information and belief, Defendants acted knowingly, deliberately and willfully with
2 the intent to infringe upon the copyrights of Plaintiffs. Defendants' conduct is willful,
3 wanton and egregious.

4 34. Upon information and belief, the individual Defendants herein named were active,
5 moving, conscious forces behind the alleged infringing activities.

6 35. In light of the foregoing, Plaintiffs is entitled to injunctive relief, pursuant to 17 U.S.C. §
7 502, prohibiting Defendants from infringing on the copyrights of Plaintiffs, for any
8 purpose, and to recover from Defendants all damages, including attorney's fees pursuant
9 to 17 U.S.C. § 505, that Plaintiffs has sustained and will sustain as a result of such
10 infringing acts, and all gains, profits and advantages obtained by Defendants as a result
11 thereof, in an amount not yet known, as well as the actual damages of Plaintiffs pursuant
12 to 17 U.S.C. § 504, statutory damages pursuant to 17 U.S.C. § 504(c).

13 **WHEREFORE**, Plaintiffs prays for judgment against Defendants, and each of them, as
14 more fully set forth below.

15 **PRAYER FOR RELIEF**

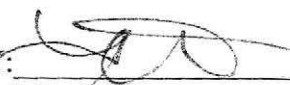
16 **WHEREFORE**, Plaintiffs respectfully prays for the following relief:

- 17 A. That the Defendants, and their officers, agents, servants, employees, representative,
18 successors and assigns, and all person acting in concert or participation with them, be
19 enjoined from:
- 20 a. Copying, reproducing, distributing, adapting, or publicly displaying any part of
21 the Film or the Screenplay;
 - 22 b. Inducing, causing, materially contributing to, and financially benefiting from the
23 foregoing acts committed by others.
- 24 B. That the Defendants be ordered to destroy all copies of the Program containing any
25 contents, elements, portions, and/ or aspects of the Film and the Screenplay.
- 26 C. For Plaintiffs' actual damages.
- 27
28



- 1 D. For a full accounting under supervision of this Court of all profits, income, receipts,
- 2 unjust enrichment, or other benefits derived by Defendants as a result of their unlawful
- 3 conduct.
- 4 E. Alternatively, for statutory damages under the Copyright Act.
- 5 F. For reasonable royalty under California Civil Code § 3426.3(b) if neither damages nor
- 6 unjust enrichment caused by misappropriation are provable.
- 7 G. For attorneys' fees and costs.
- 8 H. For such other and further relief as this Court Deems just and proper.

9 Dated: April 19, 2010

10 BY: 
11 Jaime B. Laurent,
12 Victor Look
13 Attorneys for Plaintiffs,
14 Azita Zendel
15 AZITA BOOKS & FILMS, INC.

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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

Dated: April 19, 2010


BY: 
Jaime B. Laurent,
Victor Look
Attorneys for Plaintiffs,
AZITA ZENDEL
AZITA BOOKS & FILMS, INC.

Exhibit A

Writers Guild of America West, Inc.
7000 West Third Street
Los Angeles, California 90047-1729
Telephone: (213) 782-4500
Fax: (213) 782-4803



Registration Receipt

REGISTRATION NO: 665265 EXPIRATION DATE: 05/16/02
PROCESSING DATE: 05/16/97 EFFECTIVE DATE: 05/16/97
REGISTRATION TYPE: Walk-in EFFECTIVE TIME: 16:48:30
REGISTRATION BY: ZENDEL, AZITA MATERIAL TYPE: SP
10620 EASTBORNE AVE.
APT 201
LOS ANGELES, CA 90024-

MATERIAL TITLE: THE SILENT PARTNER

WRITER(S)							
1.	LAST NAME	FIRST NAME	MIDDLE NAME	2.	LAST NAME	FIRST NAME	MIDDLE NAME
1.	ZENDEL	AZITA	Z.	11.			
	ZENDEL	AZITA		12.			
				13.			
				14.			
				15.			
				16.			
				17.			
				18.			
				19.			
				20.			
				21.			

MEMORANDUM: AMOUNT OF PAYMENT: \$ 20.00
TYPE OF PAYMENT: CHECK 1246
REGISTERED BY: *Azita Zindel* BY: *[Signature]*
AGENT OF WGAW

Exhibit B

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

PKM PA

For UN RE

PAU 2-560-072



PA
EFFECTIVE DATE OF REGISTRATION

30 JAN 2001

Month Day Year

OFFICIAL NOTICE: WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

Silent Partners

PREVIOUS OR ALTERNATIVE TITLES

"A Rock & A Hard Place" "Lovestreaks" "Modus Operandi"

NATURE OF THIS WORK

Motion Picture

NAME OF AUTHOR

a Azita Z. Zendel

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

or Citizen of United States
Domiciled in

DATES OF BIRTH AND DEATH

Year Born Year Died

9/13/69

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

Screenplay

NAME OF AUTHOR

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

or Citizen of
Domiciled in

DATES OF BIRTH AND DEATH

Year Born Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

NAME OF AUTHOR

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

or Citizen of
Domiciled in

DATES OF BIRTH AND DEATH

Year Born Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2001

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Month Day Year

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Azita Z. Zendel
10620 Eastborne Ave # 201
Los Angeles, CA 90024

APPLICATION RECEIVED

JAN 30 2001

ONE DEPOSIT RECEIVED

JAN 30 2001

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

MORE ON BACK Complete all applicable spaces (numbers 6-8) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE Page 1 of 2 pages

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and save the space for dates of birth and death blank.

EXAMINED

FORM PA

CHECKED BY *[Signature]*

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) If your answer is "no," go to space 7.

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number

Year of Registration

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

a

6

See instructions
before completing
this space.

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

Azita Z. Zendel, 10620 Eastborne Ave. #201, Los Angeles, CA 90024

b

Area code and daytime telephone number (310) 475-3773

Fax number (310) 475-4043

Email azitazendel@yahoo.com

CERTIFICATION I, the undersigned, hereby certify that I am the

- Check only one
- author
 - other copyright claimant
 - owner of exclusive right(s)
 - authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

8

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Azita Z. Zendel

Date 1/26/01

Handwritten signature (X)



[Handwritten signature: Azita Z. Zendel]

Certificate will be mailed in window envelope to this address:

Name <input type="checkbox"/>	Azita Z. Zendel
Number/Street/Apt <input type="checkbox"/>	10620 Eastborne Ave. #201
City/State/ZIP <input type="checkbox"/>	Los Angeles, CA 90024

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

As of July 1, 1998, the filing fee for Form PA is \$20.

9



Exhibit C



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

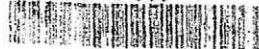
Margaret Petero

REGISTER OF COPYRIGHTS
United States of America

FORM PA
For a Work of the Performing Arts
UNITED STATES COPYRIGHT OFFICE

REC

PAU 2-693-369



EFFECTIVE DATE OF REGISTRATION

7 1 '02
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK
"Controlled Chaos"

PREVIOUS OR ALTERNATIVE TITLES
"Silent Partners"

NATURE OF THIS WORK See instructions
Motion Picture

2 a NAME OF AUTHOR
Azita Z. Zendel

DATES OF BIRTH AND DEATH
Year Born 169 Year Died

Was this contribution to the work a "work made for hire"?
 Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of U.S.A.
Domiciled in U.S.A.

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe the nature of material created by this author in which copyright is claimed.
Motion picture

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

b NAME OF AUTHOR

DATES OF BIRTH AND DEATH
Year Born Year Died

Was this contribution to the work a "work made for hire"?
 Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

c NAME OF AUTHOR

DATES OF BIRTH AND DEATH
Year Born Year Died

Was this contribution to the work a "work made for hire"?
 Yes No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
2002

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
Month N/A Day Year

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.
Azita Z. Zendel
10620 Eastborne Ave #201
Los Angeles, CA 90024

APPLICATION RECEIVED
July 1, 2002

ONE DEPOSIT RECEIVED
July 1, 2002

TWO DEPOSITS RECEIVED
1/2 1/1/D

FUNDS RECEIVED

MORE ON BACK Complete all applicable spaces (numbers 5-9) on the reverse side of this page. See detailed instructions. Sign the form at line 6.

DO NOT WRITE HERE Page 1 of 1 pages

EXAMINED E FORM PA

CHECKED BY 88

CORRESPONDENCE
Yes

FOR COPYRIGHT OFFICE USE ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?
 Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) If your answer is "no," go to space 7.

5

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number PA 112-560-072 Year of Registration 2001

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.
Preexisting material Identify any preexisting work or works that this work is based on or incorporates.

a 6
See instructions before completing this space.

Screenplay

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

Motion Picture + spoken words / dialogue

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name N/A Account Number

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/ZIP

Azita Zendel
10620 Eastborne Ave. #201
Los Angeles, CA 90024

b

Area code and daytime telephone number (310) 475-3773 Fax number (310) 475-4043
E-mail azitazendel@yahoo.com

CERTIFICATION I, the undersigned, hereby certify that I am the

- Check only one Author
 other copyright claimant
 owner of exclusive right(s)
 authorized agent of

8


Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Azita Zendel

Date 3/20/02

Handwritten signature (X) 

Certificate will be mailed in window envelope to this address:

Name Azita Zendel

Number/Street/Apt. 10620 Eastborne Ave. #201

City/State/ZIP Los Angeles, CA 90024

Complete all necessary spaces
Sign your application in space 8

1. Application form
 2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
 3. Deposit material
- Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-8600

As of July 1, 1993, the filing fee for Form PA is \$30.

9

**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 Valerie Baker Fairbank and the assigned discovery Magistrate Judge is Charles Eick.

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

CV10- 2889 VBF (Ex)

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.

Jaime B. Laurent (SBN 261926)
jbl@jblaurent.com
Victor Look (SBN 256591)
7223 Crescent Park West, Suite 466
Playa Vista, CA 90094
T: (310) 961-4791

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Aziza Zandeh, Aziza Books & Film, Inc.

CASE NUMBER

CV10 2889

PLAINTIFF(S)

v.

ABC VIDEO PRODUCTIONS et al.

See Attached

SUMMONS

DEFENDANT(S)

TO: DEFENDANT(S): ABC VIDEOS PRODUCTIONS, TOUCHSTONE TELEVISION, REVELLE PRODUCTIONS, VENTANAROSA PRODUCTIONS, SILENT H. PRODUCTIONS, FERNANDO GATTAN

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, Jaime B. Laurent, whose address is 7223 Crescent Park West, Suite 466, CA 90094. 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.

Clerk, U.S. District Court

Dated: APR 26 2010

By: DONNAMARIE LUENGO
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is in the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(c)(3)].

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Jaime B. Laurent (SBN 261926)
Victor Look (SBN 256591)
7225 Crescent Park West, Suite 466
Playa Vista, CA 90094
T: 310 961 4791
F: 310 491 5953

Attorneys for Plaintiffs,
AZITA ZENDEL and AZITA BOOKS & FILMS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

AZITA ZENDEL, an individual; AZITA
BOOKS & FILMS, INC., a California
corporation,

Plaintiffs,

v.

ABC VIDEO PRODUCTIONS, a Delaware
corporation. TOUCHSTONE TELEVISION,
a Delaware corporation, REVELLE
PRODUCTIONS, a Delaware corporation,
VENTANAROSA PRODUCTIONS, a
California corporation, SILENT H.
PRODUCTIONS, a California corporation,
FERNANDO GAITAN, an individual, and
DOES 1 through 10, inclusive,

Defendants.

1410 2889
CASE NO.

COMPLAINT FOR DAMAGES

1) Copyright Infringement

JURY TRIAL DEMANDED

37

U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

2010 APR 19 PM 3:28

VPF (E)

CIVIL COVER SHEET

The 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, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Azita Zendel, and individual; Azita Books & Films, Inc.

(b) County of Residence of First Listed Plaintiff Los Angeles
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)
Jaime B. Laurent, Esq., Victor Look, Esq.
7225 Crescent Park West, Ste 466; Playa Vista CA 90094
(310) 961-4791

DEPENDANTS

See Civil Cover Sheet Attachment

County of Residence of First Listed Los Angeles
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 2 U.S. Government Defendant
- 3 Federal Question (U.S. Government Not a Party)
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for and One Box for Defendant)

- Citizen of This State 1 DEF 1 PTF
- Citizen of Another State 2 DEF 2 PTF
- Citizen or Subject of a Foreign Country 3 DEF 3 PTF
- Incorporated or Principal Place of Business In This State 4 DEF 4 PTF
- Incorporated and Principal of Business In Another State 5 DEF 5 PTF
- Foreign Nation 6 DEF 6 PTF

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<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 Loans (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	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 Federal 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	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 <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	<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. & Track <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patents <input type="checkbox"/> 840 Trademarks	<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"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities' Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <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 Information Act <input type="checkbox"/> 900 Appeal of Fee Determination <input type="checkbox"/> Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions
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	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"/> 440 Other Civil Rights	PRISONER PETITION <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 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	<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	SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1355B) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 865 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD 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	

V. 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 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

17 USC Section 101, et seq.; Defendants infringed upon Plaintiff's copyrighted materials.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION DEMAND UNDER F.R.C.P. 23

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING DPT _____ JUDGE _____

CV10 2889 4

CIVIL COVER SHEET ATTACHMENT

DEFENDANTS

ABC Video Productions, Inc.; Touchstone Television Productions, LLC; Ventanarosa, Inc;
Silent H Productions; Reveille LLC; Reveille Studios, LLC; Fernando Geitan, an individual; and
DOES 1 through ~~20~~, inclusive.

~~20~~
10

**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
<i>Los Angeles</i>	

- (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
<i>Los Angeles</i>	<i>Delaware</i>

- (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
<i>Los Angeles</i>	

* 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

4/19/10

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))