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12 INCENTIVE CAPITAL, LLC

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

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13
14 CAMELOT DISTRIBUTION GROUP, INC.) Case No.: CV11-01949 DDP (FMOx)
15)
16 Plaintiff,)
17 vs.) **NOTICE OF RELATED CASES**
18)
19 DOES 1 through 5865, inclusive,)
20)
21 Defendant.)
22)
23)
24)
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27)
28)

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that the above-entitled action, *Camelot Distribution Group, Inc.*
3 *v. Does 1 through 5865, inclusive*, Case No. CV11-01949 DDP (FMOx) (the "BitTorrent Case"),
4 filed on March 7, 2011, may be related to the following case:

5
6 *Camelot Entertainment, Inc., Camelot Film Group, Inc and Camelot Distribution Group,*
7 *Inc. v. Incentive Capital, LLC, and DOES 1 – 50*, Case No. CV11-02323 GAF (JEMx) (the
8 "Camelot Case"), filed by way of Notice of Removal on March 18, 2011 and assigned to the
9 Honorable Gary A. Feess.

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11 **Factual Statement As to Why the BitTorrent Case and the Camelot Case May Be Related**

12 In the BitTorrent Case, Camelot Distribution Group, Inc. ("Camelot") has filed a copyright
13 infringement action against various Doe Defendants with respect to the motion picture entitled *Nude*
14 *Nuns with Big Guns* (the "Motion Picture"). In the BitTorrent Case, Incentive Capital, LLC
15 ("Incentive Capital") has filed a motion to intervene and a complaint in intervention because
16 Incentive Capital contends that it, not Camelot, is the owner of the distribution rights to the Motion
17 Picture by virtue of a non-judicial foreclosure which took place on or about February 11, 2011,
18 *before* the BitTorrent Case was filed.

19 In short, Incentive Capital contends that Camelot is not the owner of the distribution rights
20 to the Motion Picture and, therefore, does not have standing to file, prosecute or prevail in the
21 BitTorrent Case. Rather, Incentive Capital, as the owner of the distribution rights to the Motion
22 Picture, is the party with standing and the real party in interest who is entitled to file, prosecute and
23 prevail in the BitTorrent Case.

24 The Camelot Case is a case between Camelot Entertainment, Inc., Camelot Film Group, Inc
25 and Camelot Distribution Group, Inc. (the "Camelot Entities"), on the one hand, and Incentive
26 Capital, on the other, with respect to money due and owing to Incentive Capital for the secured
27 loans it made to the Camelot Entities to allow them to acquire a film library, a library which
28 includes the Motion Picture.

1 The same parties, the Camelot Entities and Incentive Capital, have a similar action pending
2 in the Utah State court which pertains to these same matters (payment due to Incentive Capital and
3 ownership of the distribution rights of the motion pictures in the film library, including ownership
4 of the distribution rights in and to the Motion Picture) and Incentive Capital has already filed a
5 motion to dismiss the Camelot Case or transfer it to the Utah State Court.

6 Incentive Capital's motion to dismiss/transfer is on calendar for June 6, 2011 before the
7 Honorable Gary A. Feess.

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9 Dated: May 5, 2011

WYMAN & ISAACS LLP

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11 By: /s/Bruce Isaacs, Esq.

12 Bruce Isaacs, Esq.
13 Attorneys for Intervenor INCENTIVE CAPITAL, LLC
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1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP 5, I certify that I am an employee of the law firm of WYMAN & ISAACS
3 LLP, and that on the date shown below, I caused service of a true and correct copy of the attached:

4 **NOTICE OF RELATED CASES**

5 to be completed by:

6 _____ personally delivering

7 _____ delivery via Nationwide Legal Services

8 _____ sending via Federal Express or other overnight delivery service

9 _____ depositing for mailing in the U.S. mail with sufficient postage affixed thereto

10 _____ delivery via facsimile machine to fax no. _____

11 _____ by E-Mail – PDF Format - I caused the foregoing document to be served by e-mail
12 transmission, in PDF Format, to each of the interested parties at the e-mail address
13 shown below.

14 _____ electronic filing, and thereby delivery via e-mail to:

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24 Dated this 5th day of May, 2011

25
26 /s/Lina Pearmain
27 Lina Pearmain
28