

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FOX TELEVISION STATIONS, INC., et al.

Case No. 1:13-cv-00758 (RMC)

Plaintiffs & Counter-
Defendants,

v.

AEREOKILLER LLC, et al.

Defendants & Counter-
Plaintiffs.

DECLARATION OF MARSHA REED

I, Marsha Reed, declare as follows:

1. I am Vice President and Assistant Secretary of Disney Enterprises, Inc. (“DEI”).
2. I submit this declaration in support of Plaintiffs’ Motion for Preliminary

Injunction. This declaration is based on my own personal knowledge, my review of DEI’s books and records, or on information provided to me in my capacity as Vice President and Assistant Secretary of DEI. If called as a witness, I will provide testimony regarding the subject matter addressed in this declaration.

3. DEI and/or its affiliates are engaged in the creation, distribution, licensing, and marketing of television programming and other intellectual property.

4. Attached hereto as Exhibit 1 is a true and correct copy of a non-exhaustive list of television programs in which DEI and its affiliate American Broadcasting Companies, Inc. (“American Broadcasting”) hold the copyrights, which I am informed and believe were broadcast on the ABC Television Network, including WJLA-TV Washington D.C. and

WABC-TV New York, between May 25, 2013 and July 7, 2013. It is my understanding that other episodes of television programs in which DEI and American Broadcasting hold the copyrights have been aired on WJLA-TV and WABC-TV at various times between May 25, 2013, and the present.

5. Attached hereto as Exhibit 2 are true and correct copies of the copyright registrations for the works listed in Exhibit 1. These registrations are maintained by DEI in the ordinary course of business.

6. DEI and American Broadcasting have not licensed to any of the Defendants the right to publicly display or perform, distribute or reproduce copies of any of its television programs or other works in which they own the copyrights, including those works listed in Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this ^{4th} 15 day of July, 2013 at Burbank, California.



Marsha Reed

EXHIBIT 1

No.	Program Title	Broadcast Date	Copyright Owner	Registration
1.	BODY OF PROOF "LOST SOULS" (305)	5/25/2013	Disney Enterprises, Inc.	PA 1-840-662
2.	AMERICA'S FUNNIEST HOME VIDEOS (2308)	5/26/2013	American Broadcasting Companies, Inc.	PA 1-825-047
3.	ZERO HOUR "CHAIN" (104)	6/15/2013	Disney Enterprises, Inc.	PA 1-840-057
4.	CASTLE "AFTER HOURS" (508)	6/23/2013	Disney Enterprises, Inc.	PA 1-825-481
5.	BODY OF PROOF "ABDUCTED, PART 1" (301)	6/25/2013	Disney Enterprises, Inc.	PA 1-840-672
6.	AMERICA'S FUNNIEST HOME VIDEOS (2311)	6/30/2013	American Broadcasting Companies, Inc.	PA 1-827-608
7.	CASTLE "SECRET SANTA" (509)	6/30/2013	Disney Enterprises, Inc.	PA 1-826-387
8.	BODY OF PROOF "ABDUCTED, PART 2" (302)	7/2/2013	Disney Enterprises, Inc.	PA 1-840-657
9.	THE NEIGHBORS "FIFTY SHADES OF GREEN" (107)	7/3/2013	Disney Enterprises, Inc.	PA 1-819-921
10.	AMERICA'S FUNNIEST HOME VIDEOS (2312)	7/7/2013	American Broadcasting Companies, Inc.	PA 1-835-735
11.	CASTLE "SIGNIFICANT OTHERS" (510)	7/7/2013	Disney Enterprises, Inc.	PA 1-827-621

EXHIBIT 2

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.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-840-662

Effective date of
registration:
March 15, 2013

Title

Title of Work: BODY OF PROOF "LOST SOULS" (305)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: March 5, 2013

Nation of 1st Publication: United States

Author

■ Author: ABC Studios

Author Created: entire motion picture

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: March 7, 2013

Applicant's Tracking Number: 104382

Registration #: PA0001840662
Service Request #: 1-902499048



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-825-047

Effective date of registration:

December 10, 2012

Title

Title of Work: AMERICA'S FUNNIEST HOME VIDEOS (2308)

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: November 25, 2012

Nation of 1st Publication: United States

Author

▪ **Author:** American Broadcasting Companies, Inc.

Author Created: All other cinematographic material.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: AMERICAN BROADCASTING COMPANIES, INC.

77 West 66th Street, New York, NY, 10023, United States

Limitation of copyright claim

Material excluded from this claim: Contains preexisting video footage.

New material included in claim: All other cinematographic material.

Certification

Name: Thad Scroggins

Date: November 29, 2012

Applicant's Tracking Number: 102705

Registration #: PA0001825047
Service Request #: 1-857732210



American Broadcasting Companies, Inc.
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-840-057

Effective date of
registration:
March 26, 2013

Title

Title of Work: ZERO HOUR "CHAIN" (104)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: March 7, 2013

Nation of 1st Publication: United States

Author

▪ Author: ABC Studios

Author Created: Entire motion picture.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: March 18, 2013

Applicant's Tracking Number: 104664

Registration #: PA0001840057
Service Request #: 1-907514092



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-825-481

Effective date of
registration:
December 10, 2012

Title

Title of Work: CASTLE "AFTER HOURS" (508)

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: November 19, 2012

Nation of 1st Publication: United States

Author

- Author: ABC Studios
- Author Created: Entire motion picture.
- Work made for hire: Yes
- Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: November 30, 2012

Applicant's Tracking Number: 102837

Registration #: PA0001825481

Service Request #: 1-858325247



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-840-672

Effective date of
registration:
March 15, 2013

Title

Title of Work: BODY OF PROOF "ABDUCTED, PART 1" (301)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: February 19, 2013

Nation of 1st Publication: United States

Author

Author: ABC Studios

Author Created: entire motion picture

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: March 7, 2013

Applicant's Tracking Number: 104381

Registration #: PA0001840672

Service Request #: 1-902498976



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-827-608

Effective date of
registration:

January 22, 2013

Title

Title of Work: AMERICA'S FUNNIEST HOME VIDEOS (2311)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: January 13, 2013

Nation of 1st Publication: United States

Author

Author: American Broadcasting Companies, Inc.

Author Created: All other cinematographic material.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: AMERICAN BROADCASTING COMPANIES, INC.

77 West 66th Street, New York, NY, 10023, United States

Limitation of copyright claim

Material excluded from this claim: Contains preexisting video footage.

New material included in claim: All other cinematographic material.

Certification

Name: Thad Scroggins

Date: January 14, 2013

Applicant's Tracking Number: 103371

Registration #: PA0001827608

Service Request #: 1-877381877



American Broadcasting Companies, Inc.
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-826-387

Effective date of
registration:
December 11, 2012

Title

Title of Work: CASTLE "SECRET SANTA" (509)

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: December 3, 2012

Nation of 1st Publication: United States

Author

Author: ABC Studios

Author Created: Entire motion picture.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: December 3, 2012

Applicant's Tracking Number: 102838

Registration #: PA0001826387
Service Request #: 1-859460147



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-840-657

Effective date of
registration:
March 15, 2013

Title

Title of Work: BODY OF PROOF "ABDUCTED, PART 2" (302)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: February 26, 2013

Nation of 1st Publication: United States

Author

▪ Author: ABC Studios

Author Created: entire motion picture

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

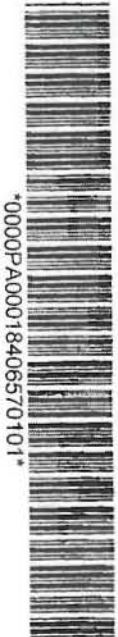
Certification

Name: Thad Scroggins

Date: March 7, 2013

Applicant's Tracking Number: 104383

Registration #: PA0001840657
Service Request #: 1-902499023



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

Certificate of Registration



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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-819-921

Effective date of registration:
November 21, 2012

Title

Title of Work: THE NEIGHBORS "FIFTY SHADES OF GREEN" (107)

Completion/Publication

Year of Completion: 2012

Date of 1st Publication: November 7, 2012

Nation of 1st Publication: United States

Author

▪ **Author:** ABC Studios

Author Created: Entire motion picture.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: November 13, 2012

Applicant's Tracking Number: 102829

Registration #: PA0001819921

Service Request #: 1-850292317



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

Certificate of Registration



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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-835-735

Effective date of
registration:

February 1, 2013

Title

Title of Work: AMERICA'S FUNNIEST HOME VIDEOS (2312)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: January 20, 2013

Nation of 1st Publication: United States

Author

Author: American Broadcasting Companies, Inc.

Author Created: All other cinematographic material.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: AMERICAN BROADCASTING COMPANIES, INC.

77 West 66th Street, New York, NY, 10023, United States

Limitation of copyright claim

Material excluded from this claim: Contains preexisting video footage.

New material included in claim: All other cinematographic material.

Certification

Name: Thad Scroggins

Date: January 25, 2013

Applicant's Tracking Number: 103898 103901

Registration #: PA0001835735

Service Request #: 1-882840671



American Broadcasting Companies, Inc.
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States

Certificate of Registration



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Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
PA 1-827-621

Effective date of
registration:

January 22, 2013

Title

Title of Work: CASTLE "SIGNIFICANT OTHERS" (510)

Completion/Publication

Year of Completion: 2013

Date of 1st Publication: January 7, 2013

Nation of 1st Publication: United States

Author

Author: ABC Studios

Author Created: Entire motion picture.

Work made for hire: Yes

Domiciled in: United States

Copyright claimant

Copyright Claimant: DISNEY ENTERPRISES, INC.

500 S. Buena Vista St., Burbank, CA, 91521, United States

Transfer Statement: Assignment

Certification

Name: Thad Scroggins

Date: January 14, 2013

Applicant's Tracking Number: 103794

Registration #: PA0001827621

Service Request #: 1-877365460



The Walt Disney Company
Thad Scroggins
500 S. Buena Vista St.
Burbank, CA 91521-0635 United States