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6 *Attorney for Plaintiff Righthaven LLC*

7 **UNITED STATES DISTRICT COURT**  
 8 **DISTRICT OF NEVADA**  
 9

10 RIGHTHAVEN LLC, a Nevada limited-  
 liability company,

Case No.: 2:11-cv-00532

**COMPLAINT AND DEMAND FOR  
 JURY TRIAL**

11  
 12 Plaintiff,

13 v.

14 RICK ALLEC, an individual; and RX  
 ADVERTISING, INC. LLC, a limited-  
 liability company of unknown origin,

15  
 16 Defendants.  
 17

18 Righthaven LLC (“Righthaven”) complains as follows against Rick Allec (“Mr. Allec”),  
 19 and RX Advertising, Inc. LLC (“RX”; collectively with Mr. Allec known herein as the  
 20 “Defendants”), on information and belief, and at all times relevant lawsuit, unless otherwise  
 21 specifically indicated herein to the contrary:  
 22

23 **NATURE OF ACTION**

24 1. This is an action for copyright infringement, and vicarious copyright  
 25 infringement, pursuant to 17 U.S.C. §501 (“Complaint”).  
 26  
 27  
 28

1 **PARTIES**

2 2. Righthaven is a Nevada limited-liability company with its principal place of  
3 business in Nevada.

4 3. Righthaven is in good standing with the Nevada Secretary of State.

5 4. Mr. Allec is a resident of Nevada.

6 5. Mr. Allec is identified by the current registrar, Safenames LTD (“Safenames”), as  
7 the registrant of the Internet domain found at <therxforum.com> (the “Domain”).

8 6. Mr. Allec is in control of the content accessible through the Domain (said content  
9 accessible through the Domain and the Domain itself collectively known herein as the  
10 “Website”).

11 7. Mr. Allec is the owner of the Domain, as evidenced by information found at the  
12 Internet domain <website.informer.com>, attached hereto as Exhibit 1.

13 8. RX is a limited-liability company of unknown origin.

14 9. Attempts to find evidence of the formal organizational status in the respective  
15 Secretary of State offices of California, Delaware, Illinois, Nevada, New York, Tennessee and  
16 Texas demonstrate that, at least with respect to these states, RX is not a formally organized  
17 business entity.

18 10. RX is in control of the content accessible through the Website.

19 11. RX is the self-proclaimed owner of the copyright(s) in the literary works posted  
20 on the Website as evidenced by a copyright notice displayed on the Website: “(c) 2007 RX  
21 Advertising, Inc. LLC, All Rights Reserved” (the “Copyright Notice”).

22 12. As of the date of the filing of this Complaint, RX continues to claim ownership of  
23 the copyright(s) in the literary works posted on the Website, inclusive of the Infringing Works,  
24 as evidenced by the Copyright Notice.

25 **JURISDICTION**

26  
27 13. This Court has original subject matter jurisdiction over this copyright  
28 infringement action pursuant to 28 U.S.C. §1331 and 28 U.S.C. §1338(a).



1 Request No. 1-561050694, and attached hereto as Exhibit 4 is the official USCO application  
2 submittal for the Rockets Work depicting the occurrence of the Complete Application.

3 25. Righthaven is the owner of the copyright in the literary work entitled, “Hawks 11-  
4 10-10” (the “Hawks Work”), attached hereto as Exhibit 5.

5 26. The Hawks Work was originally published on November 10, 2010.

6 27. On or about November 10, 2010, the Defendants displayed, and continue to  
7 display, an unauthorized reproduction of the Hawks Work (the “Hawks Infringement”), attached  
8 hereto as Exhibit 6, on the Website.

9 28. On February 7, 2011, the United States Copyright Office (the “USCO”) received  
10 Righthaven’s Complete Application for the registration of the Hawks Work, Service Request No.  
11 1-561090692, and attached hereto as Exhibit 7 is the official USCO application submittal for the  
12 Hawks Work depicting the occurrence of the Complete Application.

13 29. Righthaven is the owner of the copyright in the literary work entitled, “Ravens  
14 These two very good teams meet 11-11-10” (the “Good Teams Work”), attached hereto as  
15 Exhibit 8.

16 30. The Good Teams Work was originally published on November 11, 2010.

17 31. On or about November 11, 2010, the Defendants displayed, and continue to  
18 display, an unauthorized reproduction of the Good Teams Work (the “Good Teams  
19 Infringement”), attached hereto as Exhibit 9, on the Website.

20 32. On February 9, 2011, the United States Copyright Office (the “USCO”) received  
21 Righthaven’s Complete Application for the registration of the Good Teams Work, Service  
22 Request No. 1-562371672, and attached hereto as Exhibit 10 is the official USCO application  
23 submittal for the Good Teams Work depicting the occurrence of the Complete Application.

24 33. Righthaven is the owner of the copyright in the literary work entitled, “Ravens If  
25 you haven't heard it by now 11-11-10” (the “Ravens Work”), attached hereto as Exhibit 11.

26 34. The Ravens Work was originally published on November 11, 2010.

1           35.     On or about November 11, 2010, the Defendants displayed, and continue to  
2 display, an unauthorized reproduction of the Ravens Work (the “Ravens Infringement”), attached  
3 hereto as Exhibit 12, on the Website.

4           36.     On February 9, 2011, the United States Copyright Office (the “USCO”) received  
5 Righthaven’s Complete Application for the registration of the Ravens Work, Service Request  
6 No. 1-562553716, and attached hereto as Exhibit 13 is the official USCO application submittal  
7 for the Ravens Work depicting the occurrence of the Complete Application.

8           37.     Righthaven is the owner of the copyright in the literary work entitled, “Cardinal  
9 Arizona State has been in every game 11-13-10” (the “Cardinal Work”), attached hereto as  
10 Exhibit 14.

11           38.     The Cardinal Work was originally published on November 13, 2010.

12           39.     On or about November 13, 2010, the Defendants displayed, and continue to  
13 display, an unauthorized reproduction of the Cardinal Work (the “Cardinal Infringement”),  
14 attached hereto as Exhibit 15, on the Website.

15           40.     On February 11, 2011, the United States Copyright Office (the “USCO”) received  
16 Righthaven’s Complete Application for the registration of the Cardinal Work, Service Request  
17 No. 1-563204602, and attached hereto as Exhibit 16 is the official USCO application submittal  
18 for the Cardinal Work depicting the occurrence of the Complete Application.

19           41.     Righthaven is the owner of the copyright in the literary work entitled, “Over the  
20 total Michigan is going to score points 11-13-10” (the “Michigan Work”), attached hereto as  
21 Exhibit 17.

22           42.     The Michigan Work was originally published on November 13, 2010.

23           43.     On or about November 13, 2010, the Defendants displayed, and continue to  
24 display, an unauthorized reproduction of the Michigan Work (the “Michigan Infringement”),  
25 attached hereto as Exhibit 18, on the Website.

26           44.     On February 11, 2011, the United States Copyright Office (the “USCO”) received  
27 Righthaven’s Complete Application for the registration of the Michigan Work, Service Request  
28

1 No. 1-563204636, and attached hereto as Exhibit 19 is the official USCO application submittal  
2 for the Michigan Work depicting the occurrence of the Complete Application.

3 45. Righthaven is the owner of the copyright in the literary work entitled, “49ers Both  
4 of these teams are coming off 11-14-10” (the “49ers Work”), attached hereto as Exhibit 20.

5 46. The 49ers Work was originally published on November 14, 2010.

6 47. On or about November 14, 2010, the Defendants displayed, and continue to  
7 display, an unauthorized reproduction of the 49ers Work (the “49ers Infringement”), attached  
8 hereto as Exhibit 21, on the Website.

9 48. On February 11, 2011, the United States Copyright Office (the “USCO”) received  
10 Righthaven’s Complete Application for the registration of the 49ers Work, Service Request No.  
11 1-563204669, and attached hereto as Exhibit 22 is the official USCO application submittal for  
12 the 49ers Work depicting the occurrence of the Complete Application.

13 49. Righthaven is the owner of the copyright in the literary work entitled, “Browns  
14 Damn right I'm backing Cleveland 11-14-10” (the “Browns Work”), attached hereto as Exhibit  
15 23.

16 50. The Browns Work was originally published on November 14, 2010.

17 51. On or about November 14, 2010, the Defendants displayed, and continue to  
18 display, an unauthorized reproduction of the Browns Work (the “Browns Infringement”),  
19 attached hereto as Exhibit 24, on the Website.

20 52. On February 11, 2011, the United States Copyright Office (the “USCO”) received  
21 Righthaven’s Complete Application for the registration of the Browns Work, Service Request  
22 No. 1-563365704, and attached hereto as Exhibit 25 is the official USCO application submittal  
23 for the Browns Work depicting the occurrence of the Complete Application.

24 53. Righthaven is the owner of the copyright in the literary work entitled, “Temple  
25 How can a team 11-16-10” (the “Temple Work”), attached hereto as Exhibit 26.

26 54. The Temple Work was originally published on November 16, 2010.  
27  
28

1           55.     On or about November 16, 2010, the Defendants displayed, and continue to  
2 display, an unauthorized reproduction of the Temple Work (the “Temple Infringement”),  
3 attached hereto as Exhibit 27, on the Website.

4           56.     On February 11, 2011, the United States Copyright Office (the “USCO”) received  
5 Righthaven’s Complete Application for the registration of the Temple Work, Service Request  
6 No. 1-563365729, and attached hereto as Exhibit 28 is the official USCO application submittal  
7 for the Temple Work depicting the occurrence of the Complete Application.

8           57.     Righthaven is the owner of the copyright in the literary work entitled, “Analysis  
9 Thank Ohio University for this play 11-17-10” (the “Ohio Work”), attached hereto as Exhibit 29.

10          58.     The Ohio Work was originally published on November 17, 2010.

11          59.     On or about November 17, 2010, the Defendants displayed, and continue to  
12 display, an unauthorized reproduction of the Ohio Work (the “Ohio Infringement”), attached  
13 hereto as Exhibit 30, on the Website.

14          60.     On February 11, 2011, the United States Copyright Office (the “USCO”) received  
15 Righthaven’s Complete Application for the registration of the Ohio Work, Service Request No.  
16 1-563365754, and attached hereto as Exhibit 31 is the official USCO application submittal for  
17 the Ohio Work depicting the occurrence of the Complete Application.

18          61.     Righthaven is the owner of the copyright in the literary work entitled, “Suns  
19 Absolutely ridiculous pointspread 11-17-10” (the “Suns Work”), attached hereto as Exhibit 32.

20          62.     The Suns Work was originally published on November 17, 2010.

21          63.     On or about November 17, 2010, the Defendants displayed, and continue to  
22 display, an unauthorized reproduction of the Suns Work (the “Suns Infringement”), attached  
23 hereto as Exhibit 33, on the Website.

24          64.     On February 11, 2011, the United States Copyright Office (the “USCO”) received  
25 Righthaven’s Complete Application for the registration of the Suns Work, Service Request No.  
26 1-563365779, and attached hereto as Exhibit 34 is the official USCO application submittal for  
27 the Suns Work depicting the occurrence of the Complete Application.

1           65.     Righthaven is the owner of the copyright in the literary work entitled, “Don’t look  
2 now, but the defending champs have won six in a row overall (4-2\_ATS and four in a row on the  
3 highway. 12-19-10” (the “Defending Champs Work”), attached hereto as Exhibit 35.

4           66.     The Defending Champs Work was originally published on December 19, 2010.

5           67.     On or about December 19, 2010, the Defendants displayed, and continue to  
6 display, an unauthorized reproduction of the Defending Champs Work (the “Defending Champs  
7 Infringement”), attached hereto as Exhibit 36, on the Website.

8           68.     On March 18, 2011, the United States Copyright Office (the “USCO”) received  
9 Righthaven’s Complete Application for the registration of the Defending Champs Work, Service  
10 Request No. 1-583999148, and attached hereto as Exhibit 37 is the official USCO application  
11 submittal for the Defending Champs Work depicting the occurrence of the Complete  
12 Application.

13           69.     Righthaven is the owner of the copyright in the literary work entitled, “BEARS  
14 Yep, one week after cashing in big 01-16-11” (the “Bears Work”), attached hereto as Exhibit 38.

15           70.     The Bears Work was originally published on January 16, 2011.

16           71.     On or about January 16, 2011, the Defendants displayed, and continue to display,  
17 an unauthorized reproduction of the Bears Work (the “Bears Infringement”), attached hereto as  
18 Exhibit 39, on the Website.

19           72.     On March 22, 2011, the United States Copyright Office (the “USCO”) received  
20 Righthaven’s Complete Application for the registration of the Bears Work, Service Request No.  
21 1-585573660, and attached hereto as Exhibit 40 is the official USCO application submittal for  
22 the Bears Work depicting the occurrence of the Complete Application.

23           73.     Righthaven is the owner of the copyright in the literary work entitled, “1<sup>st</sup> Ever  
24 Bowl 2500 Game of my Life, and it is a play on Fresno State as the small undYerdog versus  
25 Northern Illinois. 12-18-10” (the “Fresno State Work”), attached hereto as Exhibit 41.

26           74.     The Fresno State Work was originally published on December 18, 2010.



1           75.     On or about December 18, 2010, the Defendants displayed, and continue to  
2 display, an unauthorized reproduction of the Fresno State Work (the “Fresno State  
3 Infringement”), attached hereto as Exhibit 42, on the Website.

4           76.     On March 18, 2011, the United States Copyright Office (the “USCO”) received  
5 Righthaven’s Complete Application for the registration of the Fresno State Work, Service  
6 Request No. 1-583999213, and attached hereto as Exhibit 43 is the official USCO application  
7 submittal for the Fresno State Work depicting the occurrence of the Complete Application.

8           77.     Righthaven is the owner of the copyright in the literary work entitled,  
9 “ROCKETS (plus the points and money-line) 7-0 That’s the Rockets’ record 01-21-11” (the  
10 “Rockets II Work”), attached hereto as Exhibit 44.

11          78.     The Rockets II Work was originally published on January 21, 2011.

12          79.     On or about January 21, 2011, the Defendants displayed, and continue to display,  
13 an unauthorized reproduction of the Rockets II Work (the “Rockets II Infringement”), attached  
14 hereto as Exhibit 45, on the Website.

15          80.     On March 22, 2011, the United States Copyright Office (the “USCO”) received  
16 Righthaven’s Complete Application for the registration of the Rockets II Work, Service Request  
17 No. 1-585621705, and attached hereto as Exhibit 46 is the official USCO application submittal  
18 for the Rockets II Work depicting the occurrence of the Complete Application.

19          81.     Righthaven is the owner of the copyright in the literary work entitled,  
20 “TENNESSEE How do you lay points 01-05-11” (the “Tennessee Work”), attached hereto as  
21 Exhibit 47.

22          82.     The Tennessee Work was originally published on January 5, 2011.

23          83.     On or about January 5, 2011, the Defendants displayed, and continue to display,  
24 an unauthorized reproduction of the Tennessee Work (the “Tennessee Infringement”), attached  
25 hereto as Exhibit 48, on the Website.

26          84.     On March 22, 2011, the United States Copyright Office (the “USCO”) received  
27 Righthaven’s Complete Application for the registration of the Tennessee Work, Service Request  
28

1 No. 1-585573450, and attached hereto as Exhibit 49 is the official USCO application submittal  
2 for the Tennessee Work depicting the occurrence of the Complete Application.

3 85. Righthaven is the owner of the copyright in the literary work entitled, "Iron" Joel  
4 Tyson for SatXrday, 30 Dime Stone Cold Lock is an Absolute BlowYout winner on Ohio State  
5 to step it up against South Carolina. 12-18-10 (the "Stone Cold Work"), attached hereto as  
6 Exhibit 50.

7 86. The Stone Cold Work was originally published on December 18, 2010.

8 87. On or about December 18, 2010, the Defendants displayed, and continue to  
9 display, an unauthorized reproduction of the Stone Cold Work (the "Stone Cold Infringement"),  
10 attached hereto as Exhibit 51, on the Website.

11 88. On March 18, 2011, the United States Copyright Office (the "USCO") received  
12 Righthaven's Complete Application for the registration of the Stone Cold Work, Service Request  
13 No. 1-583999238, and attached hereto as Exhibit 52 is the official USCO application submittal  
14 for the Stone Cold Work depicting the occurrence of the Complete Application.

15 89. Righthaven is the owner of the copyright in the literary work entitled, "BYU  
16 playing in the New Mexico Bowl isn't exactly exciting for Cougar fans. 12-18-10" (the "BYU  
17 Work"), attached hereto as Exhibit 53.

18 90. The BYU Work was originally published on December 18, 2010.

19 91. On or about December 18, 2010, the Defendants displayed, and continue to  
20 display, an unauthorized reproduction of the BYU Work (the "BYU Infringement"), attached  
21 hereto as Exhibit 54, on the Website.

22 92. On March 18, 2011, the United States Copyright Office (the "USCO") received  
23 Righthaven's Complete Application for the registration of the BYU Work, Service Request No.  
24 1-583999303, and attached hereto as Exhibit 55 is the official USCO application submittal for  
25 the BYU Work depicting the occurrence of the Complete Application.

26 93. Righthaven is the owner of the copyright in the literary work entitled, "TROY  
27 TROJANS (be sure to by the ½ point) --- Saturday's rather boring slate of football games  
28

1 concludes this evening with the best value on the board. 12-18-10” (the “Trojans Work”),  
2 attached hereto as Exhibit 56.

3 94. The Trojans Work was originally published on December 18, 2010.

4 95. On or about December 18, 2010, the Defendants displayed, and continue to  
5 display, an unauthorized reproduction of the Trojans Work (the “Trojans Infringement”),  
6 attached hereto as Exhibit 57, on the Website.

7 96. On March 18, 2011, the United States Copyright Office (the “USCO”) received  
8 Righthaven’s Complete Application for the registration of the Trojans Work, Service Request  
9 No. 1-583999328, and attached hereto as Exhibit 58 is the official USCO application submittal  
10 for the Trojans Work depicting the occurrence of the Complete Application.

11 97. Righthaven is the owner of the copyright in the literary work entitled, “UTAH  
12 The pointspread took a big plunge on Tuesday 12-22-10” (the “Utah Work”), attached hereto as  
13 Exhibit 59.

14 98. The Utah Work was originally published on December 22, 2010.

15 99. On or about December 22, 2010, the Defendants displayed, and continue to  
16 display, an unauthorized reproduction of the Utah Work (the “Utah Infringement”), attached  
17 hereto as Exhibit 60, on the Website.

18 100. On March 22, 2011, the United States Copyright Office (the “USCO”) received  
19 Righthaven’s Complete Application for the registration of the Utah Work, Service Request No.  
20 1-585573424, and attached hereto as Exhibit 61 is the official USCO application submittal for  
21 the Utah Work depicting the occurrence of the Complete Application.

22 101. Righthaven is the owner of the copyright in the literary work entitled, “OREGON  
23 Let’s go over some undisputed facts. 01-10-11” (the “Oregon Work”), attached hereto as Exhibit  
24 62.

25 102. The Oregon Work was originally published on January 10, 2011.

26 103. On or about January 10, 2011, the Defendants displayed, and continue to display,  
27 an unauthorized reproduction of the Oregon Work (the “Oregon Infringement”), attached hereto  
28 as Exhibit 63, on the Website.

1           104.     On March 22, 2011, the United States Copyright Office (the “USCO”) received  
2 Righthaven’s Complete Application for the registration of the Oregon Work, Service Request  
3 No. 1-585573570, and attached hereto as Exhibit 64 is the official USCO application submittal  
4 for the Oregon Work depicting the occurrence of the Complete Application.

5           105.     Righthaven is the owner of the copyright in the literary work entitled, “RAVENS  
6 80-116. You know what that is? 01-09-11” (the “Ravens II Work”), attached hereto as Exhibit  
7 65.

8           106.     The Ravens II Work was originally published on January 9, 2011.

9           107.     On or about January 9, 2011, the Defendants displayed, and continue to display,  
10 an unauthorized reproduction of the Ravens II Work (the “Ravens II Infringement”), attached  
11 hereto as Exhibit 66, on the Website.

12           108.     On March 22, 2011, the United States Copyright Office (the “USCO”) received  
13 Righthaven’s Complete Application for the registration of the Ravens II Work, Service Request  
14 No. 1-585573545, and attached hereto as Exhibit 67 is the official USCO application submittal  
15 for the Ravens II Work depicting the occurrence of the Complete Application.

16           109.     Righthaven is the owner of the copyright in the literary work entitled, “Love the  
17 Huskies here for a couple reasons, but none bigger than the public’s ovXreaction to the coaching  
18 change. 12-18-10” (the “Huskies Work”), attached hereto as Exhibit 68.

19           110.     The Huskies Work was originally published on December 18, 2010.

20           111.     On or about December 18, 2010, the Defendants displayed, and continue to  
21 display, an unauthorized reproduction of the Huskies Work (the “Huskies Infringement”),  
22 attached hereto as Exhibit 69, on the Website.

23           112.     On March 18, 2011, the United States Copyright Office (the “USCO”) received  
24 Righthaven’s Complete Application for the registration of the Huskies Work, Service Request  
25 No. 1-583999413, and attached hereto as Exhibit 70 is the official USCO application submittal  
26 for the Huskies Work depicting the occurrence of the Complete Application.

1 113. Righthaven is the owner of the copyright in the literary work entitled, “5 dime  
2 pick on Baylor as the favorite againXt visiting Gonzaga in a game being played in Dallas. 12-  
3 18-10” (the “Baylor Work”), attached hereto as Exhibit 71.

4 114. The Baylor Work was originally published on December 18, 2010.

5 115. On or about December 18, 2010, the Defendants displayed, and continue to  
6 display, an unauthorized reproduction of the Baylor Work (the “Baylor Infringement”), attached  
7 hereto as Exhibit 72, on the Website.

8 116. On March 18, 2011, the United States Copyright Office (the “USCO”) received  
9 Righthaven’s Complete Application for the registration of the Baylor Work, Service Request No.  
10 1-583999458, and attached hereto as Exhibit 73 is the official USCO application submittal for  
11 the Baylor Work depicting the occurrence of the Complete Application.

12 117. Righthaven is the owner of the copyright in the literary work entitled, “Although  
13 this pointspread has dropped from an opening number of Northern Illinois minus-3, still have to  
14 respect the underdog’s success in Fresno State bowl games. 12-18-10” (the “Northern Illinois  
15 Work”; collectively with the Rockets Work, the Hawks Work, the Good Teams Work, the  
16 Ravens Work, the Cardinal Work, the Michigan Work, the 49ers Work, the Browns Work, the  
17 Temple Work, the Ohio Work, the Suns Work, the Defending Champs Work, the Bears Work,  
18 the Fresno State Work, the Rockets II Work, the Tennessee Work, the Stone Cold Work, the  
19 BYU Work, the Trojans Work, the Utah Work, the Oregon Work, the Ravens II Work, the  
20 Huskies Work and the Baylor Work known herein as the “Works”), attached hereto as Exhibit  
21 74.

22 118. The Northern Illinois Work was originally published on December 18, 2010.

23 119. On or about December 18, 2010, the Defendants displayed, and continue to  
24 display, an unauthorized reproduction of the Northern Illinois Work (the “Northern Illinois  
25 Infringement”; collectively with the Rockets Infringement, the Hawks Infringement, the Good  
26 Teams Infringement, the Ravens Infringement, the Cardinal Infringement, the Michigan  
27 Infringement, the 49ers Infringement, the Browns Infringement, the Temple Infringement, the  
28 Ohio Infringement, the Suns Infringement, the Defending Champs Infringement, the Bears

1 Infringement, the Fresno State Infringement, the Rockets II Infringement, the Tennessee  
2 Infringement, the Stone Cold Infringement, the BYU Infringement, the Trojans Infringement, the  
3 Utah Infringement, the Oregon Infringement, the Ravens II Infringement, the Huskies  
4 Infringement and the Baylor Infringement known herein as the “Infringing Works”), attached  
5 hereto as Exhibit 75, on the Website.

6 120. On March 18, 2011, the United States Copyright Office (the “USCO”) received  
7 Righthaven’s Complete Application for the registration of the Northern Illinois Work, Service  
8 Request No. 1-583999483, and attached hereto as Exhibit 76 is the official USCO application  
9 submittal for the Northern Illinois Work depicting the occurrence of the Complete Application.

10 121. The Works constitute copyrightable subject matter pursuant to 17 U.S.C.  
11 §102(a)(1).

12 122. Righthaven is the owner of the copyrights in the Works.

13 123. The Defendants did not seek permission, in any manner, to reproduce, display, or  
14 otherwise exploit the Works.

15 124. The Defendants were not granted permission, in any manner, to reproduce,  
16 display, or otherwise exploit the Works.

17 125. The Defendants knew, or reasonably should have known, that websites, such as  
18 the Website, are and were the habitual subject of contributions by others of copyright-infringing  
19 content to the Website.

20 126. The Defendants did not institute any proactive policy of precluding or attempting  
21 to preclude the contributions by others of copyright-infringing content to the Website.

22 127. The Defendants did not institute any proactive policy of monitoring or attempting  
23 to monitor the contributions by others of copyright-infringing content to the Website.

24 128. The Defendants did not institute any proactive policy of deleting or attempting to  
25 delete the contributions by others of copyright-infringing content to the Website.

26 129. The Defendants’ failure to institute any proactive policies intended to address the  
27 contributions by others of copyright-infringing content to the Website constituted and constitutes  
28 the Defendants’ willful blindness to copyright infringements occurring on the Website.

**FIRST CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
**INFRINGEMENT OF THE ROCKETS WORK**

130. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through 128 above.

131. Righthaven holds the exclusive right to reproduce the Rockets Work, pursuant to 17 U.S.C. §106(1).

132. Righthaven holds the exclusive right to prepare derivative works based upon the Rockets Work, pursuant to 17 U.S.C. §106(2).

133. Righthaven holds the exclusive right to distribute copies of the Rockets Work, pursuant to 17 U.S.C. §106(3).

134. Righthaven holds the exclusive right to publicly display the Rockets Work, pursuant to 17 U.S.C. §106(5).

135. The Defendants reproduced the Rockets Work in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(1).

136. The Defendants created an unauthorized derivative of the Rockets Work in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

137. The Defendants distributed, and continue to distribute, an unauthorized reproduction of the Rockets Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(3).

138. The Defendants publicly displayed, and continue to display, an unauthorized reproduction of the Rockets Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(5).

139. Mr. Allec has willfully engaged in the copyright infringement of the Rockets Work.

140. RX has willfully engaged in the copyright infringement of the Rockets Work.

141. Defendants' acts as alleged herein, and the ongoing direct results of those acts, have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.







1           163.    The Defendants distributed, and continue to distribute, an unauthorized  
2 reproduction of the Good Teams Work on the Website, in derogation of Righthaven’s exclusive  
3 rights under 17 U.S.C. §106(3).

4           164.    The Defendants publicly displayed, and continue to display, an unauthorized  
5 reproduction of the Good Teams Work on the Website, in derogation of Righthaven’s exclusive  
6 rights under 17 U.S.C. §106(5).

7           165.    Mr. Allec has willfully engaged in the copyright infringement of the Good Teams  
8 Work.

9           166.    RX has willfully engaged in the copyright infringement of the Good Teams Work.

10          167.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
11 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
12 cannot ascertain, leaving Righthaven with no adequate remedy at law.

13          168.    Unless the Defendants are preliminarily and permanently enjoined from further  
14 infringement of the Good Teams Work, Righthaven will be irreparably harmed, and Righthaven  
15 is thus entitled to preliminary and permanent injunctive relief against further infringement by the  
16 Defendants of the Good Teams Work, pursuant to 17 U.S.C. §502.

17  
18                           **FOURTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
19                           **INFRINGEMENT OF THE RAVENS WORK**

20          169.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
21 168 above.

22          170.    Righthaven holds the exclusive right to reproduce the Ravens Work, pursuant to  
23 17 U.S.C. §106(1).

24          171.    Righthaven holds the exclusive right to prepare derivative works based upon the  
25 Ravens Work, pursuant to 17 U.S.C. §106(2).

26          172.    Righthaven holds the exclusive right to distribute copies of the Ravens Work,  
27 pursuant to 17 U.S.C. §106(3).

1 173. Righthaven holds the exclusive right to publicly display the Ravens Work,  
2 pursuant to 17 U.S.C. §106(5).

3 174. The Defendants reproduced the Ravens Work in derogation of Righthaven's  
4 exclusive rights under 17 U.S.C. §106(1).

5 175. The Defendants created an unauthorized derivative of the Ravens Work in  
6 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

7 176. The Defendants distributed, and continue to distribute, an unauthorized  
8 reproduction of the Ravens Work on the Website, in derogation of Righthaven's exclusive rights  
9 under 17 U.S.C. §106(3).

10 177. The Defendants publicly displayed, and continue to display, an unauthorized  
11 reproduction of the Ravens Work on the Website, in derogation of Righthaven's exclusive rights  
12 under 17 U.S.C. §106(5).

13 178. Mr. Allec has willfully engaged in the copyright infringement of the Ravens  
14 Work.

15 179. RX has willfully engaged in the copyright infringement of the Ravens Work.

16 180. Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
17 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
18 cannot ascertain, leaving Righthaven with no adequate remedy at law.

19 181. Unless the Defendants are preliminarily and permanently enjoined from further  
20 infringement of the Ravens Work, Righthaven will be irreparably harmed, and Righthaven is  
21 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
22 Defendants of the Ravens Work, pursuant to 17 U.S.C. §502.

23  
24 **FIFTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
25 **INFRINGEMENT OF THE CARDINAL WORK**

26 182. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
27 181 above.

1           183.    Righthaven holds the exclusive right to reproduce the Cardinal Work, pursuant to  
2 17 U.S.C. §106(1).

3           184.    Righthaven holds the exclusive right to prepare derivative works based upon the  
4 Cardinal Work, pursuant to 17 U.S.C. §106(2).

5           185.    Righthaven holds the exclusive right to distribute copies of the Cardinal Work,  
6 pursuant to 17 U.S.C. §106(3).

7           186.    Righthaven holds the exclusive right to publicly display the Cardinal Work,  
8 pursuant to 17 U.S.C. §106(5).

9           187.    The Defendants reproduced the Cardinal Work in derogation of Righthaven's  
10 exclusive rights under 17 U.S.C. §106(1).

11           188.    The Defendants created an unauthorized derivative of the Cardinal Work in  
12 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

13           189.    The Defendants distributed, and continue to distribute, an unauthorized  
14 reproduction of the Cardinal Work on the Website, in derogation of Righthaven's exclusive  
15 rights under 17 U.S.C. §106(3).

16           190.    The Defendants publicly displayed, and continue to display, an unauthorized  
17 reproduction of the Cardinal Work on the Website, in derogation of Righthaven's exclusive  
18 rights under 17 U.S.C. §106(5).

19           191.    Mr. Allec has willfully engaged in the copyright infringement of the Cardinal  
20 Work.

21           192.    RX has willfully engaged in the copyright infringement of the Cardinal Work.

22           193.    Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
23 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
24 cannot ascertain, leaving Righthaven with no adequate remedy at law.

25           194.    Unless the Defendants are preliminarily and permanently enjoined from further  
26 infringement of the Cardinal Work, Righthaven will be irreparably harmed, and Righthaven is  
27 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
28 Defendants of the Cardinal Work, pursuant to 17 U.S.C. §502.

**SIXTH CLAIM FOR RELIEF: DIRECT COPYRIGHT  
INFRINGEMENT OF THE MICHIGAN WORK**

195. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through 194 above.

196. Righthaven holds the exclusive right to reproduce the Michigan Work, pursuant to 17 U.S.C. §106(1).

197. Righthaven holds the exclusive right to prepare derivative works based upon the Michigan Work, pursuant to 17 U.S.C. §106(2).

198. Righthaven holds the exclusive right to distribute copies of the Michigan Work, pursuant to 17 U.S.C. §106(3).

199. Righthaven holds the exclusive right to publicly display the Michigan Work, pursuant to 17 U.S.C. §106(5).

200. The Defendants reproduced the Michigan Work in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(1).

201. The Defendants created an unauthorized derivative of the Michigan Work in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

202. The Defendants distributed, and continue to distribute, an unauthorized reproduction of the Michigan Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(3).

203. The Defendants publicly displayed, and continue to display, an unauthorized reproduction of the Michigan Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(5).

204. Mr. Allec has willfully engaged in the copyright infringement of the Michigan Work.

205. RX has willfully engaged in the copyright infringement of the Michigan Work.

206. Defendants' acts as alleged herein, and the ongoing direct results of those acts, have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

1           207. Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Michigan Work, Righthaven will be irreparably harmed, and Righthaven is  
3 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
4 Defendants of the Michigan Work, pursuant to 17 U.S.C. §502.

5  
6                                   **SEVENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**

7                                   **INFRINGEMENT OF THE 49ERS WORK**

8           208. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 207 above.

10           209. Righthaven holds the exclusive right to reproduce the 49ers Work, pursuant to 17  
11 U.S.C. §106(1).

12           210. Righthaven holds the exclusive right to prepare derivative works based upon the  
13 49ers Work, pursuant to 17 U.S.C. §106(2).

14           211. Righthaven holds the exclusive right to distribute copies of the 49ers Work,  
15 pursuant to 17 U.S.C. §106(3).

16           212. Righthaven holds the exclusive right to publicly display the 49ers Work, pursuant  
17 to 17 U.S.C. §106(5).

18           213. The Defendants reproduced the 49ers Work in derogation of Righthaven's  
19 exclusive rights under 17 U.S.C. §106(1).

20           214. The Defendants created an unauthorized derivative of the 49ers Work in  
21 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

22           215. The Defendants distributed, and continue to distribute, an unauthorized  
23 reproduction of the 49ers Work on the Website, in derogation of Righthaven's exclusive rights  
24 under 17 U.S.C. §106(3).

25           216. The Defendants publicly displayed, and continue to display, an unauthorized  
26 reproduction of the 49ers Work on the Website, in derogation of Righthaven's exclusive rights  
27 under 17 U.S.C. §106(5).

28           217. Mr. Allec has willfully engaged in the copyright infringement of the 49ers Work.



1           229.    The Defendants publicly displayed, and continue to display, an unauthorized  
2 reproduction of the Browns Work on the Website, in derogation of Righthaven’s exclusive rights  
3 under 17 U.S.C. §106(5).

4           230.    Mr. Allec has willfully engaged in the copyright infringement of the Browns  
5 Work.

6           231.    RX has willfully engaged in the copyright infringement of the Browns Work.

7           232.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
8 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
9 cannot ascertain, leaving Righthaven with no adequate remedy at law.

10           Unless the Defendants are preliminarily and permanently enjoined from further  
11 infringement of the Browns Work, Righthaven will be irreparably harmed, and Righthaven is  
12 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
13 Defendants of the Browns Work, pursuant to 17 U.S.C. §502.

14  
15                                   **NINTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
16                                   **INFRINGEMENT OF THE TEMPLE WORK**

17           233.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
18 232 above.

19           234.    Righthaven holds the exclusive right to reproduce the Temple Work, pursuant to  
20 17 U.S.C. §106(1).

21           235.    Righthaven holds the exclusive right to prepare derivative works based upon the  
22 Temple Work, pursuant to 17 U.S.C. §106(2).

23           236.    Righthaven holds the exclusive right to distribute copies of the Temple Work,  
24 pursuant to 17 U.S.C. §106(3).

25           237.    Righthaven holds the exclusive right to publicly display the Temple Work,  
26 pursuant to 17 U.S.C. §106(5).

27           238.    The Defendants reproduced the Temple Work in derogation of Righthaven’s  
28 exclusive rights under 17 U.S.C. §106(1).





1           249.    Righthaven holds the exclusive right to distribute copies of the Ohio Work,  
2 pursuant to 17 U.S.C. §106(3).

3           250.    Righthaven holds the exclusive right to publicly display the Ohio Work, pursuant  
4 to 17 U.S.C. §106(5).

5           251.    The Defendants reproduced the Ohio Work in derogation of Righthaven's  
6 exclusive rights under 17 U.S.C. §106(1).

7           252.    The Defendants created an unauthorized derivative of the Ohio Work in  
8 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

9           253.    The Defendants distributed, and continue to distribute, an unauthorized  
10 reproduction of the Ohio Work on the Website, in derogation of Righthaven's exclusive rights  
11 under 17 U.S.C. §106(3).

12          254.    The Defendants publicly displayed, and continue to display, an unauthorized  
13 reproduction of the Ohio Work on the Website, in derogation of Righthaven's exclusive rights  
14 under 17 U.S.C. §106(5).

15          255.    Mr. Allec has willfully engaged in the copyright infringement of the Ohio Work.

16          256.    RX has willfully engaged in the copyright infringement of the Ohio Work.

17          257.    Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
18 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
19 cannot ascertain, leaving Righthaven with no adequate remedy at law.

20          258.    Unless the Defendants are preliminarily and permanently enjoined from further  
21 infringement of the Ohio Work, Righthaven will be irreparably harmed, and Righthaven is thus  
22 entitled to preliminary and permanent injunctive relief against further infringement by the  
23 Defendants of the Ohio Work, pursuant to 17 U.S.C. §502.

24  
25                           **ELEVENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
26                           **INFRINGEMENT OF THE SUNS WORK**

27          259.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
28 258 above.

1           260.   Righthaven holds the exclusive right to reproduce the Suns Work, pursuant to 17  
2 U.S.C. §106(1).

3           261.   Righthaven holds the exclusive right to prepare derivative works based upon the  
4 Suns Work, pursuant to 17 U.S.C. §106(2).

5           262.   Righthaven holds the exclusive right to distribute copies of the Suns Work,  
6 pursuant to 17 U.S.C. §106(3).

7           263.   Righthaven holds the exclusive right to publicly display the Suns Work, pursuant  
8 to 17 U.S.C. §106(5).

9           264.   The Defendants reproduced the Suns Work in derogation of Righthaven's  
10 exclusive rights under 17 U.S.C. §106(1).

11           265.   The Defendants created an unauthorized derivative of the Suns Work in  
12 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

13           266.   The Defendants distributed, and continue to distribute, an unauthorized  
14 reproduction of the Suns Work on the Website, in derogation of Righthaven's exclusive rights  
15 under 17 U.S.C. §106(3).

16           267.   The Defendants publicly displayed, and continue to display, an unauthorized  
17 reproduction of the Suns Work on the Website, in derogation of Righthaven's exclusive rights  
18 under 17 U.S.C. §106(5).

19           268.   Mr. Allec has willfully engaged in the copyright infringement of the Suns Work.

20           269.   RX has willfully engaged in the copyright infringement of the Suns Work.

21           270.   Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
22 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
23 cannot ascertain, leaving Righthaven with no adequate remedy at law.

24           271.   Unless the Defendants are preliminarily and permanently enjoined from further  
25 infringement of the Suns Work, Righthaven will be irreparably harmed, and Righthaven is thus  
26 entitled to preliminary and permanent injunctive relief against further infringement by the  
27 Defendants of the Suns Work, pursuant to 17 U.S.C. §502.

**TWELFTH CLAIM FOR RELIEF: DIRECT COPYRIGHT  
INFRINGEMENT OF THE DEFENDING CHAMPS WORK**

1  
2  
3 272. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
4 271 above.

5 273. Righthaven holds the exclusive right to reproduce the Defending Champs Work,  
6 pursuant to 17 U.S.C. §106(1).

7 274. Righthaven holds the exclusive right to prepare derivative works based upon  
8 Defending Champs Work, pursuant to 17 U.S.C. §106(2).

9 275. Righthaven holds the exclusive right to distribute copies of Defending Champs  
10 Work, pursuant to 17 U.S.C. §106(3).

11 276. Righthaven holds the exclusive right to publicly display Defending Champs  
12 Work, pursuant to 17 U.S.C. §106(5).

13 277. The Defendants reproduced Defending Champs Work in derogation of  
14 Righthaven's exclusive rights under 17 U.S.C. §106(1).

15 278. The Defendants created an unauthorized derivative of Defending Champs Work  
16 in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

17 279. The Defendants distributed, and continue to distribute, an unauthorized  
18 reproduction of Defending Champs Work on the Website, in derogation of Righthaven's  
19 exclusive rights under 17 U.S.C. §106(3).

20 280. The Defendants publicly displayed, and continue to display, an unauthorized  
21 reproduction of Defending Champs Work on the Website, in derogation of Righthaven's  
22 exclusive rights under 17 U.S.C. §106(5).

23 281. Mr. Allec has willfully engaged in the copyright infringement of Defending  
24 Champs Work.

25 282. RX has willfully engaged in the copyright infringement of Defending Champs  
26 Work.



1           293.    The Defendants publicly displayed, and continue to display, an unauthorized  
2 reproduction of the Bears Work on the Website, in derogation of Righthaven’s exclusive rights  
3 under 17 U.S.C. §106(5).

4           294.    Mr. Allec has willfully engaged in the copyright infringement of the Bears Work.

5           295.    RX has willfully engaged in the copyright infringement of the Bears Work.

6           296.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
7 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
8 cannot ascertain, leaving Righthaven with no adequate remedy at law.

9           297.    Unless the Defendants are preliminarily and permanently enjoined from further  
10 infringement of the Bears Work, Righthaven will be irreparably harmed, and Righthaven is thus  
11 entitled to preliminary and permanent injunctive relief against further infringement by the  
12 Defendants of the Bears Work, pursuant to 17 U.S.C. §502.

13  
14                           **FOURTEENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
15                           **INFRINGEMENT OF THE FRESNO STATE WORK**

16           298.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
17 297 above.

18           299.    Righthaven holds the exclusive right to reproduce the Fresno State Work,  
19 pursuant to 17 U.S.C. §106(1).

20           300.    Righthaven holds the exclusive right to prepare derivative works based upon the  
21 Fresno State Work, pursuant to 17 U.S.C. §106(2).

22           301.    Righthaven holds the exclusive right to distribute copies of the Fresno State  
23 Work, pursuant to 17 U.S.C. §106(3).

24           302.    Righthaven holds the exclusive right to publicly display the Fresno State Work,  
25 pursuant to 17 U.S.C. §106(5).

26           303.    The Defendants reproduced the Fresno State Work in derogation of Righthaven’s  
27 exclusive rights under 17 U.S.C. §106(1).

1           304.    The Defendants created an unauthorized derivative of the Fresno State Work in  
2 derogation of Righthaven’s exclusive rights under 17 U.S.C. §106(2).

3           305.    The Defendants distributed, and continue to distribute, an unauthorized  
4 reproduction of the Fresno State Work on the Website, in derogation of Righthaven’s exclusive  
5 rights under 17 U.S.C. §106(3).

6           306.    The Defendants publicly displayed, and continue to display, an unauthorized  
7 reproduction of the Fresno State Work on the Website, in derogation of Righthaven’s exclusive  
8 rights under 17 U.S.C. §106(5).

9           307.    Mr. Allec has willfully engaged in the copyright infringement of the Fresno State  
10 Work.

11           308.    RX has willfully engaged in the copyright infringement of the Fresno State Work.

12           309.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
13 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
14 cannot ascertain, leaving Righthaven with no adequate remedy at law.

15           310.    Unless the Defendants are preliminarily and permanently enjoined from further  
16 infringement of the Fresno State Work, Righthaven will be irreparably harmed, and Righthaven  
17 is thus entitled to preliminary and permanent injunctive relief against further infringement by the  
18 Defendants of the Fresno State Work, pursuant to 17 U.S.C. §502.

19  
20                           **FIFTEENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**

21                                   **INFRINGEMENT OF THE ROCKETS II WORK**

22           311.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
23 310 above.

24           312.    Righthaven holds the exclusive right to reproduce the Rockets II Work, pursuant  
25 to 17 U.S.C. §106(1).

26           313.    Righthaven holds the exclusive right to prepare derivative works based upon the  
27 Rockets II Work, pursuant to 17 U.S.C. §106(2).

1           314.     Righthaven holds the exclusive right to distribute copies of the Rockets II Work,  
2 pursuant to 17 U.S.C. §106(3).

3           315.     Righthaven holds the exclusive right to publicly display the Rockets II Work,  
4 pursuant to 17 U.S.C. §106(5).

5           316.     The Defendants reproduced the Rockets II Work in derogation of Righthaven's  
6 exclusive rights under 17 U.S.C. §106(1).

7           317.     The Defendants created an unauthorized derivative of the Rockets II Work in  
8 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

9           318.     The Defendants distributed, and continue to distribute, an unauthorized  
10 reproduction of the Rockets II Work on the Website, in derogation of Righthaven's exclusive  
11 rights under 17 U.S.C. §106(3).

12           319.     The Defendants publicly displayed, and continue to display, an unauthorized  
13 reproduction of the Rockets II Work on the Website, in derogation of Righthaven's exclusive  
14 rights under 17 U.S.C. §106(5).

15           320.     Mr. Allec has willfully engaged in the copyright infringement of the Rockets II  
16 Work.

17           321.     RX has willfully engaged in the copyright infringement of the Rockets II Work.

18           322.     Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
19 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
20 cannot ascertain, leaving Righthaven with no adequate remedy at law.

21           323.     Unless the Defendants are preliminarily and permanently enjoined from further  
22 infringement of the Rockets II Work, Righthaven will be irreparably harmed, and Righthaven is  
23 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
24 Defendants of the Rockets II Work, pursuant to 17 U.S.C. §502.





1           336. Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Tennessee Work, Righthaven will be irreparably harmed, and Righthaven is  
3 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
4 Defendants of the Tennessee Work, pursuant to 17 U.S.C. §502.

5  
6                           **SEVENTEENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**

7                                   **INFRINGEMENT OF THE STONE COLD WORK**

8           337. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 336 above.

10          338. Righthaven holds the exclusive right to reproduce the Stone Cold Work, pursuant  
11 to 17 U.S.C. §106(1).

12          339. Righthaven holds the exclusive right to prepare derivative works based upon the  
13 Stone Cold Work, pursuant to 17 U.S.C. §106(2).

14          340. Righthaven holds the exclusive right to distribute copies of the Stone Cold Work,  
15 pursuant to 17 U.S.C. §106(3).

16          341. Righthaven holds the exclusive right to publicly display the Stone Cold Work,  
17 pursuant to 17 U.S.C. §106(5).

18          342. The Defendants reproduced the Stone Cold Work in derogation of Righthaven's  
19 exclusive rights under 17 U.S.C. §106(1).

20          343. The Defendants created an unauthorized derivative of the Stone Cold Work in  
21 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

22          344. The Defendants distributed, and continue to distribute, an unauthorized  
23 reproduction of the Stone Cold Work on the Website, in derogation of Righthaven's exclusive  
24 rights under 17 U.S.C. §106(3).

25          345. The Defendants publicly displayed, and continue to display, an unauthorized  
26 reproduction of the Stone Cold Work on the Website, in derogation of Righthaven's exclusive  
27 rights under 17 U.S.C. §106(5).



1           357.    The Defendants distributed, and continue to distribute, an unauthorized  
2 reproduction of the BYU Work on the Website, in derogation of Righthaven’s exclusive rights  
3 under 17 U.S.C. §106(3).

4           358.    The Defendants publicly displayed, and continue to display, an unauthorized  
5 reproduction of the BYU Work on the Website, in derogation of Righthaven’s exclusive rights  
6 under 17 U.S.C. §106(5).

7           359.    Mr. Allec has willfully engaged in the copyright infringement of the BYU Work.

8           360.    RX has willfully engaged in the copyright infringement of the BYU Work.

9           361.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
10 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
11 cannot ascertain, leaving Righthaven with no adequate remedy at law.

12          362.    Unless the Defendants are preliminarily and permanently enjoined from further  
13 infringement of the BYU Work, Righthaven will be irreparably harmed, and Righthaven is thus  
14 entitled to preliminary and permanent injunctive relief against further infringement by the  
15 Defendants of the BYU Work, pursuant to 17 U.S.C. §502.

16  
17                                   **NINETEENTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**

18   **INFRINGEMENT OF THE TROJANS WORK**

19          363.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
20 362 above.

21          364.    Righthaven holds the exclusive right to reproduce the Trojans Work, pursuant to  
22 17 U.S.C. §106(1).

23          365.    Righthaven holds the exclusive right to prepare derivative works based upon the  
24 Trojans Work, pursuant to 17 U.S.C. §106(2).

25          366.    Righthaven holds the exclusive right to distribute copies of the Trojans Work,  
26 pursuant to 17 U.S.C. §106(3).

27          367.    Righthaven holds the exclusive right to publicly display the Trojans Work,  
28 pursuant to 17 U.S.C. §106(5).

1           368.    The Defendants reproduced the Trojans Work in derogation of Righthaven's  
2 exclusive rights under 17 U.S.C. §106(1).

3           369.    The Defendants created an unauthorized derivative of the Trojans Work in  
4 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

5           370.    The Defendants distributed, and continue to distribute, an unauthorized  
6 reproduction of the Trojans Work on the Website, in derogation of Righthaven's exclusive rights  
7 under 17 U.S.C. §106(3).

8           371.    The Defendants publicly displayed, and continue to display, an unauthorized  
9 reproduction of the Trojans Work on the Website, in derogation of Righthaven's exclusive rights  
10 under 17 U.S.C. §106(5).

11          372.    Mr. Allec has willfully engaged in the copyright infringement of the Trojans  
12 Work.

13          373.    RX has willfully engaged in the copyright infringement of the Trojans Work.

14          374.    Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
15 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
16 cannot ascertain, leaving Righthaven with no adequate remedy at law.

17          375.    Unless the Defendants are preliminarily and permanently enjoined from further  
18 infringement of the Trojans Work, Righthaven will be irreparably harmed, and Righthaven is  
19 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
20 Defendants of the Trojans Work, pursuant to 17 U.S.C. §502.

21  
22                   **TWENTIETH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
23                   **INFRINGEMENT OF THE UTAH WORK**

24          376.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
25 375 above.

26          377.    Righthaven holds the exclusive right to reproduce the Utah Work, pursuant to 17  
27 U.S.C. §106(1).

1           378.     Righthaven holds the exclusive right to prepare derivative works based upon the  
2 Utah Work, pursuant to 17 U.S.C. §106(2).

3           379.     Righthaven holds the exclusive right to distribute copies of the Utah Work,  
4 pursuant to 17 U.S.C. §106(3).

5           380.     Righthaven holds the exclusive right to publicly display the Utah Work, pursuant  
6 to 17 U.S.C. §106(5).

7           381.     The Defendants reproduced the Utah Work in derogation of Righthaven's  
8 exclusive rights under 17 U.S.C. §106(1).

9           382.     The Defendants created an unauthorized derivative of the Utah Work in  
10 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

11           383.     The Defendants distributed, and continue to distribute, an unauthorized  
12 reproduction of the Utah Work on the Website, in derogation of Righthaven's exclusive rights  
13 under 17 U.S.C. §106(3).

14           384.     The Defendants publicly displayed, and continue to display, an unauthorized  
15 reproduction of the Utah Work on the Website, in derogation of Righthaven's exclusive rights  
16 under 17 U.S.C. §106(5).

17           385.     Mr. Allec has willfully engaged in the copyright infringement of the Utah Work.

18           386.     RX has willfully engaged in the copyright infringement of the Utah Work.

19           387.     Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
20 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
21 cannot ascertain, leaving Righthaven with no adequate remedy at law.

22           388.     Unless the Defendants are preliminarily and permanently enjoined from further  
23 infringement of the Utah Work, Righthaven will be irreparably harmed, and Righthaven is thus  
24 entitled to preliminary and permanent injunctive relief against further infringement by the  
25 Defendants of the Utah Work, pursuant to 17 U.S.C. §502.

**TWENTY-FIRST CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
**INFRINGEMENT OF THE OREGON WORK**

1  
2  
3 389. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
4 388 above.

5 390. Righthaven holds the exclusive right to reproduce the Oregon Work, pursuant to  
6 17 U.S.C. §106(1).

7 391. Righthaven holds the exclusive right to prepare derivative works based upon the  
8 Oregon Work, pursuant to 17 U.S.C. §106(2).

9 392. Righthaven holds the exclusive right to distribute copies of the Oregon Work,  
10 pursuant to 17 U.S.C. §106(3).

11 393. Righthaven holds the exclusive right to publicly display the Oregon Work,  
12 pursuant to 17 U.S.C. §106(5).

13 394. The Defendants reproduced the Oregon Work in derogation of Righthaven's  
14 exclusive rights under 17 U.S.C. §106(1).

15 395. The Defendants created an unauthorized derivative of the Oregon Work in  
16 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

17 396. The Defendants distributed, and continue to distribute, an unauthorized  
18 reproduction of the Oregon Work on the Website, in derogation of Righthaven's exclusive rights  
19 under 17 U.S.C. §106(3).

20 397. The Defendants publicly displayed, and continue to display, an unauthorized  
21 reproduction of the Oregon Work on the Website, in derogation of Righthaven's exclusive rights  
22 under 17 U.S.C. §106(5).

23 398. Mr. Allec has willfully engaged in the copyright infringement of the Oregon  
24 Work.

25 399. RX has willfully engaged in the copyright infringement of the Oregon Work.

26 400. Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
27 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
28 cannot ascertain, leaving Righthaven with no adequate remedy at law.

1           401.     Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Oregon Work, Righthaven will be irreparably harmed, and Righthaven is  
3 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
4 Defendants of the Oregon Work, pursuant to 17 U.S.C. §502.

5  
6                   **TWENTY-SECOND CLAIM FOR RELIEF: DIRECT COPYRIGHT**

7                           **INFRINGEMENT OF THE RAVENS II WORK**

8           402.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 401 above.

10          403.     Righthaven holds the exclusive right to reproduce the Ravens II Work, pursuant  
11 to 17 U.S.C. §106(1).

12          404.     Righthaven holds the exclusive right to prepare derivative works based upon the  
13 Ravens II Work, pursuant to 17 U.S.C. §106(2).

14          405.     Righthaven holds the exclusive right to distribute copies of the Ravens II Work,  
15 pursuant to 17 U.S.C. §106(3).

16          406.     Righthaven holds the exclusive right to publicly display the Ravens II Work,  
17 pursuant to 17 U.S.C. §106(5).

18          407.     The Defendants reproduced the Ravens II Work in derogation of Righthaven's  
19 exclusive rights under 17 U.S.C. §106(1).

20          408.     The Defendants created an unauthorized derivative of the Ravens II Work in  
21 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

22          409.     The Defendants distributed, and continue to distribute, an unauthorized  
23 reproduction of the Ravens II Work on the Website, in derogation of Righthaven's exclusive  
24 rights under 17 U.S.C. §106(3).

25          410.     The Defendants publicly displayed, and continue to display, an unauthorized  
26 reproduction of the Ravens II Work on the Website, in derogation of Righthaven's exclusive  
27 rights under 17 U.S.C. §106(5).



1           411.    Mr. Allec has willfully engaged in the copyright infringement of the Ravens II  
2 Work.

3           412.    RX has willfully engaged in the copyright infringement of the Ravens II Work.

4           413.    Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
5 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
6 cannot ascertain, leaving Righthaven with no adequate remedy at law.

7           414.    Unless the Defendants are preliminarily and permanently enjoined from further  
8 infringement of the Ravens II Work, Righthaven will be irreparably harmed, and Righthaven is  
9 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
10 Defendants of the Ravens II Work, pursuant to 17 U.S.C. §502.

11  
12                           **TWENTY-THIRD CLAIM FOR RELIEF: DIRECT COPYRIGHT**

13   **INFRINGEMENT OF THE HUSKIES WORK**

14           415.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
15 414 above.

16           416.    Righthaven holds the exclusive right to reproduce the Huskies Work, pursuant to  
17 17 U.S.C. §106(1).

18           417.    Righthaven holds the exclusive right to prepare derivative works based upon the  
19 Huskies Work, pursuant to 17 U.S.C. §106(2).

20           418.    Righthaven holds the exclusive right to distribute copies of the Huskies Work,  
21 pursuant to 17 U.S.C. §106(3).

22           419.    Righthaven holds the exclusive right to publicly display the Huskies Work,  
23 pursuant to 17 U.S.C. §106(5).

24           420.    The Defendants reproduced the Huskies Work in derogation of Righthaven's  
25 exclusive rights under 17 U.S.C. §106(1).

26           421.    The Defendants created an unauthorized derivative of the Huskies Work in  
27 derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

1           422.    The Defendants distributed, and continue to distribute, an unauthorized  
2 reproduction of the Huskies Work on the Website, in derogation of Righthaven’s exclusive rights  
3 under 17 U.S.C. §106(3).

4           423.    The Defendants publicly displayed, and continue to display, an unauthorized  
5 reproduction of the Huskies Work on the Website, in derogation of Righthaven’s exclusive rights  
6 under 17 U.S.C. §106(5).

7           424.    Mr. Allec has willfully engaged in the copyright infringement of the Huskies  
8 Work.

9           425.    RX has willfully engaged in the copyright infringement of the Huskies Work.

10          426.    Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
11 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
12 cannot ascertain, leaving Righthaven with no adequate remedy at law.

13          427.    Unless the Defendants are preliminarily and permanently enjoined from further  
14 infringement of the Huskies Work, Righthaven will be irreparably harmed, and Righthaven is  
15 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
16 Defendants of the Huskies Work, pursuant to 17 U.S.C. §502.

17  
18                           **TWENTY-FOURTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
19                           **INFRINGEMENT OF THE BAYLOR WORK**

20          428.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
21 427 above.

22          429.    Righthaven holds the exclusive right to reproduce the Baylor Work, pursuant to  
23 17 U.S.C. §106(1).

24          430.    Righthaven holds the exclusive right to prepare derivative works based upon the  
25 Baylor Work, pursuant to 17 U.S.C. §106(2).

26          431.    Righthaven holds the exclusive right to distribute copies of the Baylor Work,  
27 pursuant to 17 U.S.C. §106(3).

1           432.   Righthaven holds the exclusive right to publicly display the Baylor Work,  
2 pursuant to 17 U.S.C. §106(5).

3           433.   The Defendants reproduced the Baylor Work in derogation of Righthaven’s  
4 exclusive rights under 17 U.S.C. §106(1).

5           434.   The Defendants created an unauthorized derivative of the Baylor Work in  
6 derogation of Righthaven’s exclusive rights under 17 U.S.C. §106(2).

7           435.   The Defendants distributed, and continue to distribute, an unauthorized  
8 reproduction of the Baylor Work on the Website, in derogation of Righthaven’s exclusive rights  
9 under 17 U.S.C. §106(3).

10          436.   The Defendants publicly displayed, and continue to display, an unauthorized  
11 reproduction of the Baylor Work on the Website, in derogation of Righthaven’s exclusive rights  
12 under 17 U.S.C. §106(5).

13          437.   Mr. Allec has willfully engaged in the copyright infringement of the Baylor  
14 Work.

15          438.   RX has willfully engaged in the copyright infringement of the Baylor Work.

16          439.   Defendants’ acts as alleged herein, and the ongoing direct results of those acts,  
17 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
18 cannot ascertain, leaving Righthaven with no adequate remedy at law.

19          440.   Unless the Defendants are preliminarily and permanently enjoined from further  
20 infringement of the Baylor Work, Righthaven will be irreparably harmed, and Righthaven is thus  
21 entitled to preliminary and permanent injunctive relief against further infringement by the  
22 Defendants of the Baylor Work, pursuant to 17 U.S.C. §502.

23  
24                   **TWENTY-FIFTH CLAIM FOR RELIEF: DIRECT COPYRIGHT**  
25                   **INFRINGEMENT OF THE NORTHERN ILLINOIS WORK**

26          441.   Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
27 440 above.

1           442.     Righthaven holds the exclusive right to reproduce the Northern Illinois Work,  
2 pursuant to 17 U.S.C. §106(1).

3           443.     Righthaven holds the exclusive right to prepare derivative works based upon the  
4 Northern Illinois Work, pursuant to 17 U.S.C. §106(2).

5           444.     Righthaven holds the exclusive right to distribute copies of the Northern Illinois  
6 Work, pursuant to 17 U.S.C. §106(3).

7           445.     Righthaven holds the exclusive right to publicly display the Northern Illinois  
8 Work, pursuant to 17 U.S.C. §106(5).

9           446.     The Defendants reproduced the Northern Illinois Work in derogation of  
10 Righthaven's exclusive rights under 17 U.S.C. §106(1).

11           447.     The Defendants created an unauthorized derivative of the Northern Illinois Work  
12 in derogation of Righthaven's exclusive rights under 17 U.S.C. §106(2).

13           448.     The Defendants distributed, and continue to distribute, an unauthorized  
14 reproduction of the Northern Illinois Work on the Website, in derogation of Righthaven's  
15 exclusive rights under 17 U.S.C. §106(3).

16           449.     The Defendants publicly displayed, and continue to display, an unauthorized  
17 reproduction of the Northern Illinois Work on the Website, in derogation of Righthaven's  
18 exclusive rights under 17 U.S.C. §106(5).

19           450.     Mr. Allec has willfully engaged in the copyright infringement of the Northern  
20 Illinois Work.

21           451.     RX has willfully engaged in the copyright infringement of the Northern Illinois  
22 Work.

23           452.     Defendants' acts as alleged herein, and the ongoing direct results of those acts,  
24 have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven  
25 cannot ascertain, leaving Righthaven with no adequate remedy at law.

26           453.     Unless the Defendants are preliminarily and permanently enjoined from further  
27 infringement of the Northern Illinois Work, Righthaven will be irreparably harmed, and  
28

1 Righthaven is thus entitled to preliminary and permanent injunctive relief against further  
2 infringement by the Defendants of the Northern Illinois Work, pursuant to 17 U.S.C. §502.

3  
4 **TWENTY-SIXTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
5 **INFRINGEMENT OF THE ROCKETS WORK**

6 454. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
7 453 above.

8 455. The Defendants directly profited and continue to directly profit from infringement  
9 of the Rockets Work.

10 456. The Defendants have the right to stop or limit infringement of the Rockets Work  
11 by contributors to the Website, but have declined to meaningfully exercise that right.

12 457. Righthaven has been damaged as a result of the Defendants' acts as alleged  
13 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
14 504(a)(2).

15 458. The Defendants' acts as alleged herein, and the ongoing direct results of those  
16 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
17 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

18 459. Unless the Defendants are preliminarily and permanently enjoined from further  
19 infringement of the Rockets Work, Righthaven will be irreparably harmed, and Righthaven is  
20 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
21 Defendants of the Rockets Work, pursuant to 17 U.S.C. § 502.

22  
23 **TWENTY-SEVENTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
24 **INFRINGEMENT OF THE HAWKS WORK**

25 460. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
26 459 above.

27 461. The Defendants directly profited and continue to directly profit from infringement  
28 of the Hawks Work.

1           462.    The Defendants have the right to stop or limit infringement of the Hawks Work  
2 by contributors to the Website, but have declined to meaningfully exercise that right.

3           463.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
4 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
5 504(a)(2).

6           464.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
7 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
8 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

9           465.    Unless the Defendants are preliminarily and permanently enjoined from further  
10 infringement of the Hawks Work, Righthaven will be irreparably harmed, and Righthaven is thus  
11 entitled to preliminary and permanent injunctive relief against further infringement by the  
12 Defendants of the Hawks Work, pursuant to 17 U.S.C. § 502.

13  
14                   **TWENTY-EIGHTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
15                   **INFRINGEMENT OF THE GOOD TEAMS WORK**

16           466.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
17 465 above.

18           467.    The Defendants directly profited and continue to directly profit from infringement  
19 of the Good Teams Work.

20           468.    The Defendants have the right to stop or limit infringement of the Good Teams  
21 Work by contributors to the Website, but have declined to meaningfully exercise that right.

22           469.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
23 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
24 504(a)(2).

25           470.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
26 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
27 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

1           471. Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Good Teams Work, Righthaven will be irreparably harmed, and Righthaven  
3 is thus entitled to preliminary and permanent injunctive relief against further infringement by the  
4 Defendants of the Good Teams Work, pursuant to 17 U.S.C. § 502.

5  
6                           **TWENTY-NINTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**

7                                   **INFRINGEMENT OF THE RAVENS WORK**

8           472. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 471 above.

10           473. The Defendants directly profited and continue to directly profit from infringement  
11 of the Ravens Work.

12           474. The Defendants have the right to stop or limit infringement of the Ravens Work  
13 by contributors to the Website, but have declined to meaningfully exercise that right.

14           475. Righthaven has been damaged as a result of the Defendants' acts as alleged  
15 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
16 504(a)(2).

17           476. The Defendants' acts as alleged herein, and the ongoing direct results of those  
18 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
19 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

20           477. Unless the Defendants are preliminarily and permanently enjoined from further  
21 infringement of the Ravens Work, Righthaven will be irreparably harmed, and Righthaven is  
22 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
23 Defendants of the Ravens Work, pursuant to 17 U.S.C. § 502.

24                           **THIRTIETH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**

25                                   **INFRINGEMENT OF THE CARDINAL WORK**

26           478. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
27 477 above.

1           479.    The Defendants directly profited and continue to directly profit from infringement  
2 of the Cardinal Work.

3           480.    The Defendants have the right to stop or limit infringement of the Cardinal Work  
4 by contributors to the Website, but have declined to meaningfully exercise that right.

5           481.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
6 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
7 504(a)(2).

8           482.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
9 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
10 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

11           483.    Unless the Defendants are preliminarily and permanently enjoined from further  
12 infringement of the Cardinal Work, Righthaven will be irreparably harmed, and Righthaven is  
13 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
14 Defendants of the Cardinal Work, pursuant to 17 U.S.C. § 502.

15  
16                           **THIRTY-FIRST CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
17                           **INFRINGEMENT OF THE MICHIGAN WORK**

18           484.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
19 483 above.

20           485.    The Defendants directly profited and continue to directly profit from infringement  
21 of the Michigan Work.

22           486.    The Defendants have the right to stop or limit infringement of the Michigan Work  
23 by contributors to the Website, but have declined to meaningfully exercise that right.

24           487.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
25 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
26 504(a)(2).



1           488.     The Defendants’ acts as alleged herein, and the ongoing direct results of those  
2 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
3 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

4           489.     Unless the Defendants are preliminarily and permanently enjoined from further  
5 infringement of the Michigan Work, Righthaven will be irreparably harmed, and Righthaven is  
6 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
7 Defendants of the Michigan Work, pursuant to 17 U.S.C. § 502.

8  
9                           **THIRTY-SECOND CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
10                           **INFRINGEMENT OF THE 49ERS WORK**

11           490.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
12 489 above.

13           491.     The Defendants directly profited and continue to directly profit from infringement  
14 of the 49ers Work.

15           492.     The Defendants have the right to stop or limit infringement of the 49ers Work by  
16 contributors to the Website, but have declined to meaningfully exercise that right.

17           493.     Righthaven has been damaged as a result of the Defendants’ acts as alleged  
18 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
19 504(a)(2).

20           494.     The Defendants’ acts as alleged herein, and the ongoing direct results of those  
21 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
22 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

23           495.     Unless the Defendants are preliminarily and permanently enjoined from further  
24 infringement of the 49ers Work, Righthaven will be irreparably harmed, and Righthaven is thus  
25 entitled to preliminary and permanent injunctive relief against further infringement by the  
26 Defendants of the 49ers Work, pursuant to 17 U.S.C. § 502.





1 entitled to preliminary and permanent injunctive relief against further infringement by the  
2 Defendants of the Ohio Work, pursuant to 17 U.S.C. § 502.

3  
4 **THIRTY-SIXTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
5 **INFRINGEMENT OF THE SUNS WORK**

6 514. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
7 513 above.

8 515. The Defendants directly profited and continue to directly profit from infringement  
9 of the Suns Work.

10 516. The Defendants have the right to stop or limit infringement of the Suns Work by  
11 contributors to the Website, but have declined to meaningfully exercise that right.

12 517. Righthaven has been damaged as a result of the Defendants' acts as alleged  
13 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
14 504(a)(2).

15 518. The Defendants' acts as alleged herein, and the ongoing direct results of those  
16 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
17 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

18 519. Unless the Defendants are preliminarily and permanently enjoined from further  
19 infringement of the Suns Work, Righthaven will be irreparably harmed, and Righthaven is thus  
20 entitled to preliminary and permanent injunctive relief against further infringement by the  
21 Defendants of the Suns Work, pursuant to 17 U.S.C. § 502.

22  
23 **THIRTY-SEVENTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
24 **INFRINGEMENT OF THE DEFENDING CHAMPS WORK**

25 520. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
26 519 above.

27 521. The Defendants directly profited and continue to directly profit from infringement  
28 of the Defending Champs Work.

1           522.     The Defendants have the right to stop or limit infringement of the Defending  
2 Champs Work by contributors to the Website, but have declined to meaningfully exercise that  
3 right.

4           523.     Righthaven has been damaged as a result of the Defendants' acts as alleged  
5 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
6 504(a)(2).

7           524.     The Defendants' acts as alleged herein, and the ongoing direct results of those  
8 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
9 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

10          525.     Unless the Defendants are preliminarily and permanently enjoined from further  
11 infringement of the Defending Champs Work, Righthaven will be irreparably harmed, and  
12 Righthaven is thus entitled to preliminary and permanent injunctive relief against further  
13 infringement by the Defendants of the Defending Champs Work, pursuant to 17 U.S.C. § 502.  
14

15                   **THIRTY-EIGHTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
16                   **INFRINGEMENT OF THE BEARS WORK**

17          526.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
18 525 above.

19          527.     The Defendants directly profited and continue to directly profit from infringement  
20 of the Bears Work.

21          528.     The Defendants have the right to stop or limit infringement of the Bears Work by  
22 contributors to the Website, but have declined to meaningfully exercise that right.

23          529.     Righthaven has been damaged as a result of the Defendants' acts as alleged  
24 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
25 504(a)(2).

26          530.     The Defendants' acts as alleged herein, and the ongoing direct results of those  
27 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
28 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

1           531. Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Bears Work, Righthaven will be irreparably harmed, and Righthaven is thus  
3 entitled to preliminary and permanent injunctive relief against further infringement by the  
4 Defendants of the Bears Work, pursuant to 17 U.S.C. § 502.

5  
6                           **THIRTY-NINTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
7                           **INFRINGEMENT OF THE FRESNO STATE WORK**

8           532. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 531 above.

10           533. The Defendants directly profited and continue to directly profit from infringement  
11 of the Fresno State Work.

12           534. The Defendants have the right to stop or limit infringement of the Fresno State  
13 Work by contributors to the Website, but have declined to meaningfully exercise that right.

14           535. Righthaven has been damaged as a result of the Defendants' acts as alleged  
15 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
16 504(a)(2).

17           536. The Defendants' acts as alleged herein, and the ongoing direct results of those  
18 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
19 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

20           537. Unless the Defendants are preliminarily and permanently enjoined from further  
21 infringement of the Fresno State Work, Righthaven will be irreparably harmed, and Righthaven  
22 is thus entitled to preliminary and permanent injunctive relief against further infringement by the  
23 Defendants of the Fresno State Work, pursuant to 17 U.S.C. § 502.

24  
25                           **FORTIETH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
26                           **INFRINGEMENT OF THE ROCKETS II WORK**

27           538. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
28 537 above.

1           539.    The Defendants directly profited and continue to directly profit from infringement  
2 of the Rockets II Work.

3           540.    The Defendants have the right to stop or limit infringement of the Rockets II  
4 Work by contributors to the Website, but have declined to meaningfully exercise that right.

5           541.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
6 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
7 504(a)(2).

8           542.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
9 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
10 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

11           543.    Unless the Defendants are preliminarily and permanently enjoined from further  
12 infringement of the Rockets II Work, Righthaven will be irreparably harmed, and Righthaven is  
13 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
14 Defendants of the Rockets II Work, pursuant to 17 U.S.C. § 502.

15  
16                   **FORTY-FIRST CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
17                   **INFRINGEMENT OF THE TENNESSEE WORK**

18           544.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
19 543 above.

20           545.    The Defendants directly profited and continue to directly profit from infringement  
21 of the Tennessee Work.

22           546.    The Defendants have the right to stop or limit infringement of the Tennessee  
23 Work by contributors to the Website, but have declined to meaningfully exercise that right.

24           547.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
25 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
26 504(a)(2).

1           548.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
2 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
3 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

4           549.    Unless the Defendants are preliminarily and permanently enjoined from further  
5 infringement of the Tennessee Work, Righthaven will be irreparably harmed, and Righthaven is  
6 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
7 Defendants of the Tennessee Work, pursuant to 17 U.S.C. § 502.

8  
9                           **FORTY-SECOND CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
10                           **INFRINGEMENT OF THE STONE COLD WORK**

11           550.    Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
12 549 above.

13           551.    The Defendants directly profited and continue to directly profit from infringement  
14 of the Stone Cold Work.

15           552.    The Defendants have the right to stop or limit infringement of the Stone Cold  
16 Work by contributors to the Website, but have declined to meaningfully exercise that right.

17           553.    Righthaven has been damaged as a result of the Defendants' acts as alleged  
18 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
19 504(a)(2).

20           554.    The Defendants' acts as alleged herein, and the ongoing direct results of those  
21 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
22 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

23           555.    Unless the Defendants are preliminarily and permanently enjoined from further  
24 infringement of the Stone Cold Work, Righthaven will be irreparably harmed, and Righthaven is  
25 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
26 Defendants of the Stone Cold Work, pursuant to 17 U.S.C. § 502.



1 **FORTY-THIRD FOR RELIEF: VICARIOUS COPYRIGHT**

2 **INFRINGEMENT OF THE BYU WORK**

3 556. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
4 555 above.

5 557. The Defendants directly profited and continue to directly profit from infringement  
6 of the BYU Work.

7 558. The Defendants have the right to stop or limit infringement of the BYU Work by  
8 contributors to the Website, but have declined to meaningfully exercise that right.

9 559. Righthaven has been damaged as a result of the Defendants' acts as alleged  
10 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
11 504(a)(2).

12 560. The Defendants' acts as alleged herein, and the ongoing direct results of those  
13 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
14 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

15 561. Unless the Defendants are preliminarily and permanently enjoined from further  
16 infringement of the BYU Work, Righthaven will be irreparably harmed, and Righthaven is thus  
17 entitled to preliminary and permanent injunctive relief against further infringement by  
18 Defendants of the BYU Work, pursuant to 17 U.S.C. § 502.

19  
20 **FORTY-FOURTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**

21 **INFRINGEMENT OF THE TROJANS WORK**

22 562. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
23 561 above.

24 563. The Defendants directly profited and continue to directly profit from infringement  
25 of the Trojans Work.

26 564. The Defendants have the right to stop or limit infringement of the Trojans Work  
27 by contributors to the Website, but have declined to meaningfully exercise that right.  
28

1           565.     Righthaven has been damaged as a result of the Defendants’ acts as alleged  
2 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
3 504(a)(2).

4           566.     The Defendants’ acts as alleged herein, and the ongoing direct results of those  
5 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
6 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

7           567.     Unless the Defendants are preliminarily and permanently enjoined from further  
8 infringement of the Trojans Work, Righthaven will be irreparably harmed, and Righthaven is  
9 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
10 Defendants of the Trojans Work, pursuant to 17 U.S.C. § 502.

11  
12                           **FORTY-FIFTH FOR RELIEF: VICARIOUS COPYRIGHT**  
13                           **INFRINGEMENT OF THE UTAH WORK**

14           568.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
15 567 above.

16           569.     The Defendants directly profited and continue to directly profit from infringement  
17 of the Utah Work.

18           570.     The Defendants have the right to stop or limit infringement of the Utah Work by  
19 contributors to the Website, but have declined to meaningfully exercise that right.

20           571.     Righthaven has been damaged as a result of the Defendants’ acts as alleged  
21 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
22 504(a)(2).

23           572.     The Defendants’ acts as alleged herein, and the ongoing direct results of those  
24 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
25 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

26           573.     Unless the Defendants are preliminarily and permanently enjoined from further  
27 infringement of the Utah Work, Righthaven will be irreparably harmed, and Righthaven is thus  
28

1 entitled to preliminary and permanent injunctive relief against further infringement by the  
2 Defendants of the Utah Work, pursuant to 17 U.S.C. § 502.

3  
4 **FORTY-SIXTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
5 **INFRINGEMENT OF THE OREGON WORK**

6 574. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
7 573 above.

8 575. The Defendants directly profited and continue to directly profit from infringement  
9 of the Oregon Work.

10 576. The Defendants have the right to stop or limit infringement of the Oregon Work  
11 by contributors to the Website, but have declined to meaningfully exercise that right.

12 577. Righthaven has been damaged as a result of the Defendants' acts as alleged  
13 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
14 504(a)(2).

15 578. The Defendants' acts as alleged herein, and the ongoing direct results of those  
16 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
17 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

18 579. Unless the Defendants are preliminarily and permanently enjoined from further  
19 infringement of the Oregon Work, Righthaven will be irreparably harmed, and Righthaven is  
20 thus entitled to preliminary and permanent injunctive relief against further infringement by the  
21 Defendants of the Oregon Work, pursuant to 17 U.S.C. § 502.

22  
23 **FORTY-SEVENTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
24 **INFRINGEMENT OF THE RAVENS II WORK**

25 580. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
26 579 above.

27 581. The Defendants directly profited and continue to directly profit from infringement  
28 of the Ravens II Work.

1           582.     The Defendants have the right to stop or limit infringement of the Ravens II Work  
2 by contributors to the Website, but have declined to meaningfully exercise that right.

3           583.     Righthaven has been damaged as a result of the Defendants' acts as alleged  
4 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
5 504(a)(2).

6           584.     The Defendants' acts as alleged herein, and the ongoing direct results of those  
7 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
8 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

9           585.     Unless the Defendants are preliminarily and permanently enjoined from further  
10 infringement of the Ravens II Work, Righthaven will be irreparably harmed, and Righthaven is  
11 thus entitled to preliminary and permanent injunctive relief against further infringement by  
12 Defendants of the Ravens II Work, pursuant to 17 U.S.C. § 502.

13  
14                   **FORTY-EIGHTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**  
15                   **INFRINGEMENT OF THE HUSKIES WORK**

16           586.     Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
17 585 above.

18           587.     The Defendants directly profited and continue to directly profit from infringement  
19 of the Huskies Work.

20           588.     The Defendants have the right to stop or limit infringement of the Huskies Work  
21 by contributors to the Website, but have declined to meaningfully exercise that right.

22           589.     Righthaven has been damaged as a result of the Defendants' acts as alleged  
23 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
24 504(a)(2).

25           590.     The Defendants' acts as alleged herein, and the ongoing direct results of those  
26 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
27 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

1           591. Unless the Defendants are preliminarily and permanently enjoined from further  
2 infringement of the Huskies Work, Righthaven will be irreparably harmed, and Righthaven is  
3 thus entitled to preliminary and permanent injunctive relief against further infringement by  
4 Defendants of the Huskies Work, pursuant to 17 U.S.C. § 502.

5  
6                           **FORTY-NINTH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**

7   **INFRINGEMENT OF THE BAYLOR WORK**

8           592. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
9 591 above.

10           593. The Defendants directly profited and continue to directly profit from infringement  
11 of the Baylor Work.

12           594. The Defendants have the right to stop or limit infringement of the Baylor Work by  
13 contributors to the Website, but have declined to meaningfully exercise that right.

14           595. Righthaven has been damaged as a result of the Defendants' acts as alleged  
15 herein, and the Defendants are liable to Righthaven for such damages pursuant to 17 U.S.C. §  
16 504(a)(2).

17           596. The Defendants' acts as alleged herein, and the ongoing direct results of those  
18 acts, have caused and will continue to cause irreparable harm to Righthaven in an amount  
19 Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

20           597. Unless the Defendants are preliminarily and permanently enjoined from further  
21 infringement of the Baylor Work, Righthaven will be irreparably harmed, and Righthaven is thus  
22 entitled to preliminary and permanent injunctive relief against further infringement by  
23 Defendants of the Baylor Work, pursuant to 17 U.S.C. § 502.

24  
25                           **FIFTIETH CLAIM FOR RELIEF: VICARIOUS COPYRIGHT**

26   **INFRINGEMENT OF THE NORTHERN ILLINOIS WORK**

27           598. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through  
28 597 above.



1           a.       All evidence and documentation relating in any way to Defendants' use of  
2 the Works , in any form, including, without limitation, all such evidence and  
3 documentation relating to the Website;

4           b.       All evidence and documentation relating to the names and addresses  
5 (whether electronic mail addresses or otherwise) of any person with whom the  
6 Defendants have communicated regarding the Defendants' use of the Works; and

7           c.       All financial evidence and documentation relating to the Defendants' use  
8 of the Works;

9           3.       Order the surrender to Righthaven of all hardware, software, electronic media and  
10 domains, including the Domain, used to store, disseminate and display the unauthorized versions  
11 of any and all copyrighted Works as provided for under 17 U.S.C. § 505(b) and/or as authorized  
12 by Federal Rule of Civil Procedure 64;

13           4.       Award Righthaven statutory damages for the willful infringement of the Works,  
14 pursuant to 17 U.S.C. §504(c);

15           5.       Award Righthaven costs, disbursements, and attorneys' fees incurred by  
16 Righthaven in bringing this action, pursuant to 17 U.S.C. §505;

17           6.       Award Righthaven pre- and post-judgment interest in accordance with applicable  
18 law; and

19           7.       Grant Righthaven such other relief as this Court deems appropriate.  
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