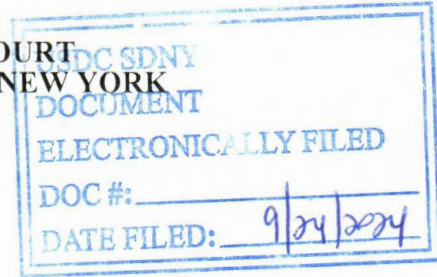


UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK



CENGAGE LEARNING, INC., BEDFORD,
FREEMAN & WORTH PUBLISHING GROUP, LLC
d/b/a MACMILLAN LEARNING. MCGRAW HILL
LLC, and PEARSON EDUCATION, INC.,

Plaintiffs,

v.

DOES 1 – 50 d/b/a Library Genesis, bookwarrior,
cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun,
libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm,
libgen.rocks, libgen.rs, libgen.space, libgen.st, libgen.su,
library.lol, and llhf.com,

Defendants.

Civil Action No. 23-cv-08136-CM

~~PROPOSED~~ DEFAULT JUDGMENT,
PERMANENT INJUNCTION, AND
POST-JUDGMENT RELIEF ORDER

Plaintiffs Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, McGraw Hill LLC, and Pearson Education, Inc. (collectively, “Plaintiffs”) have moved for entry of a default judgment, permanent injunction, and post-judgment relief order (“Motion”) against defendants Does 1 – 50 d/b/a Library Genesis, bookwarrior, cdn1.booksdl.org, jlibgen.tk, libgen.ee, libgen.fun, libgen.gs, libgen.is, libgen.lc, libgen.li, libgen.pm, libgen.rocks, libgen.rs, libgen.space, libgen.st, libgen.su, library.lol, and llhf.com, who are further identified through the additional domains and contact information set forth in Appendix A hereto (collectively, “Defendants”). Plaintiffs so move the Court on the basis that Defendants, with no license or authorization, are unlawfully reproducing and distributing digital copies of Plaintiffs’ copyrighted works on a massive scale in willful violation of the Copyright Act of 1976.

Plaintiffs initiated this action on September 14, 2023. Compl. (ECF No. 1). On October 9, 2023, Plaintiffs filed a Motion to Serve Defendants by Email (ECF No. 12), which the Court

granted on October 10, 2023. Oct. 10, 2023 Memo Endorsement (ECF No. 17) (“Alternative Service Order”). Pursuant to the Alternative Service Order, on October 17, 2023, Plaintiffs served Defendants with the Complaint and Summons. Oct. 23, 2023 Decl. of Service of Process (ECF No. 20). No Defendant has filed an Answer or otherwise responded to the Complaint. Accordingly, on November 21, 2023, Plaintiffs sought, and the Clerk of Court issued, a Certificate of Default as to all Defendants (ECF No. 23). On March 1, 2024, pursuant to the Alternative Service Order and this Court’s Individual Practices and Procedures V.E, Plaintiffs served Defendants with the Motion and supporting papers and the required notice statement. Defendants did not oppose or otherwise respond to the Motion.

Having reviewed the Complaint, Plaintiffs’ filings in support of the Motion, and the entire record herein, the Court makes the following findings of fact and conclusions of law:

Plaintiffs are leading educational publishers in the United States that create and publish works that advance learning. Plaintiffs develop educational content; market, distribute, and sell that content to students; and market and distribute that content to instructors. Plaintiffs’ textbooks are widely available for sale, including from Plaintiffs’ direct sales channels, such as their own websites, and from authorized third-party distributors and physical and online bookstores.

Defendants own, control, and/or operate a group of websites known as “Library Genesis,” or “Libgen” for short. Libgen is a so-called “shadow library,” which enables users to unlawfully download, for free, a wide array of copyrighted content. Libgen operates at multiple domain names, which change from time-to-time (the “Libgen Sites” or “Sites”). Plaintiffs provided a list of currently known Libgen Sites, which is included in Appendix A. In another case in this District, the court found Libgen and its anonymous operators liable for willful copyright infringement and entered a default judgment and permanent injunction against them. *See Elsevier Inc. v. Sci-Hub*,

No. 15-CV-4282 (RWS), 2017 WL 3868800 (S.D.N.Y. June 21, 2017). Additionally, Courts in several European countries have ordered internet service providers to block access to Libgen.

Plaintiffs own or are the exclusive licensees to the copyrights in their respective works described in Appendix B hereto ("Authentic Works"). In total, Appendix B identifies two hundred separate Authentic Works, which are protected by U.S. Copyright Office registrations. Appendix B is a non-exclusive, representative list of Plaintiffs' copyrighted works that Defendants have infringed. The Libgen Sites list in their collection many additional works published by Plaintiffs beyond the Authentic Works. Plaintiffs have not granted Defendants any license or authorization to reproduce, distribute, or otherwise exploit their works.

The Court has personal jurisdiction over Defendants under Federal Rule of Civil Procedure 4(k)(2). Plaintiffs have shown that Defendants operate the Libgen Sites from unknown abroad locations; the Sites target and are continuously accessible to users in the United States; a significant percentage of Site users are located in the United States; on the Sites, users can download the works of many U.S. copyright holders, including Plaintiffs; Plaintiffs downloaded unauthorized copies of the Authentic Works from the Sites from IP addresses in the United States, including an IP address in New York; in operating the Sites, Defendants rely on service providers, including U.S. companies that have registered certain Libgen Site domain names and serve as Interplanetary File Sharing ("IPFS") gateway companies that facilitate downloads from Libgen Sites; several of the Sites purport to identify a copyright agent under the Digital Millennium Copyright Act; and Defendants derive revenue from interstate or international commerce, including through advertisements and donation solicitations. Alternatively, the Court has personal jurisdiction over Defendants pursuant to N.Y. C.P.L.R. § 302(a)(1). Plaintiffs have shown that Defendants transact business and/or contract to supply goods in New York, including distributing infringing works to

Plaintiffs and others in New York via the Sites, and Plaintiffs' claims arise from those activities.

Defendants have been properly served in this action with the Complaint and Summons pursuant to the Alternative Service Order.

Defendants have willfully infringed Plaintiffs' copyrights in the Authentic Works in connection with their knowing reproduction and distribution of unauthorized electronic copies thereof. Defendants are liable for willful copyright infringement under 17 U.S.C. §§ 501, 504(c)(2).

Plaintiffs have been irreparably harmed as a result of Defendants' unlawful conduct and will continue to be irreparably harmed should Defendants be allowed to continue operating the Libgen Sites.

The balance of hardships and public interest weighs in favor of a permanent injunction, including because Defendants will not be harmed by being prevented from engaging in infringement, and the public has an interest in protecting the integrity of copyright holders' copyrights.

NOW, THEREFORE, IT IS HEREBY ORDERED, in accordance with Federal Rule of Civil Procedure 65 and the Copyright Act, 17 U.S.C. § 502(a), that Defendants, their officers, agents, servants, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Permanent Injunction, are enjoined from directly or indirectly infringing any copyrighted work owned or exclusively controlled by any of the Plaintiffs, or any parent, subsidiary, or affiliate of Plaintiffs Cengage, McGraw Hill, and Pearson, or the immediate parent company of Plaintiff Macmillan Learning ("Plaintiffs' Copyrighted Works").

Without limiting the foregoing, IT IS FURTHER ORDERED that Defendants, their

officers, agents, servants, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Order, are permanently enjoined from engaging in any of the following acts:

Copying, reproducing, manufacturing, importing, downloading, uploading, transmitting, distributing, displaying, selling, offering for sale, advertising, marketing, promoting, or otherwise exploiting any of Plaintiffs' Copyrighted Works or enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in such activities;

Using, hosting, operating, maintaining, registering, or providing any computer server, website, domain name, domain name server, cloud storage service, e-commerce platform, online advertising service, social media platform, proxy service (including reverse and forwarding proxies), website optimization service (including website traffic management), caching service, content delivery network, IPFS or other file sharing network, or donation, payment processing, or other financial service to infringe or to enable, facilitate, permit, assist, solicit, encourage, induce, participate with, or act in in concert with the infringement of Plaintiffs' Copyrighted Works;

Transferring ownership or control of the domain names associated with the Libgen Sites other than as set forth herein; and

Displaying or providing links, browser extensions, or other tools used to provide direct access to the Libgen Sites or Plaintiffs' Copyrighted Works on the Libgen Sites.

IT IS FURTHER ORDERED that, pursuant to 17 U.S.C. § 504(c), Plaintiffs' request for statutory damages under the Copyright Act is granted. Plaintiffs are awarded statutory damages in the amount of \$150,000 per Authentic Work, for a total of \$30,000,000.00, as detailed in Appendix B hereto, for which Defendants are jointly and severally liable.

IT IS FURTHER ORDERED that, pursuant to the Copyright Act, 17 U.S.C. § 502(a),

Federal Rule of Civil Procedure 65(d), and/or this Court's inherent equitable powers and its power to coerce compliance with its lawful orders, within twenty-one (21) business days following actual notice of this Order, the registries and/or the individual registrars of the domain names of all active Libgen Sites, as listed in Appendix C hereto, shall transfer such domain names to Plaintiffs' ownership and control, including by changing the registrar of record to the registrar of Plaintiffs' choosing, or otherwise implement technical measures, such as holding, suspending, or canceling the domain names, to ensure the domain names cannot be used by Defendants to infringe Plaintiffs' Copyrighted Works or otherwise used to operate Libgen and infringe Plaintiffs' Copyrighted Works. Should Plaintiffs identify any additional Libgen Sites registered to or operated by any Defendant and used in conjunction with the infringement of Plaintiffs' Copyrighted Works, the registries and/or the individual registrars of such domain names shall further have the authority pursuant to this Order to transfer such additional domain names to Plaintiffs' ownership and control or otherwise implement technical measures to ensure the domain names cannot be used by Defendants or to operate Libgen as described immediately above.

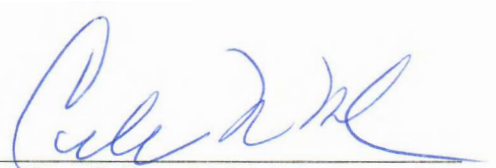
IT IS FURTHER ORDERED that Defendants shall deliver to Plaintiffs for destruction all electronic copies of Plaintiffs' copyrighted works, including but not limited to the Authentic Works, or derivative works thereof, that Defendants have in their possession, custody, or control, and all devices by means of which such copies have been created, pursuant to 17 U.S.C. § 503.

IT IS FURTHER ORDERED that this Court shall retain jurisdiction over the parties and the subject matter of this litigation for the purpose of interpretation and enforcement of this Permanent Injunction.

IT IS FURTHER ORDERED that the Clerk of Court is directed to enter final judgment in favor of Plaintiffs against Defendants, jointly and severally, in the amount of \$30,000,000.00, plus

post-judgment interest calculated at the rate set forth in 28 U.S.C. § 1961.

It is SO ORDERED this 29 day of September, 2024.



Hon. Colleen McMahon
UNITED STATES DISTRICT JUDGE

APPENDIX A

Libgen Site(s)	Email Address
libgen.is	https://sarek.fi/contact/libgen.is/registrant
libgen.rs libgen.su	vlaimir@mail.ru
libgen.st jlibgen.tk library.lol libgen.re (new domain)	https://sarek.fi/contact/libgen.st/registrant https://tieredaccess.com/contact/c92b9688-d38a-4508-835a-1a40142bb777
cdn1.booksdl.org	https://porkbun.com/whois/contact/registrant/llhlf.com
llhlf.com	https://rwhois.internet.ee/contact_requests/new?domain_name=libgen.ee&locale=en
libgen.ee	https://tieredaccess.com/contact/7b899793-c2d9-479c-89b6-e03844717043
libgen.rocks	09d55b0b65744bdf9d09dabb08c22a2f.protect@withheldforprivacy.com
libgen.space	ianzlib@protonmail.com
libgen.gs	ianzlib@protonmail.com
libgen.li	ianzlib@protonmail.com
libgen.lc	ianzlib@protonmail.com
libgen.pm	https://sarek.fi/contact/libgen.pm/registrant
libgen.vg (new domain)	https://whois.nic.vg/contact/libgen.vg/registrant
libgen.click (new domain)	https://tieredaccess.com/contact/c804af34-2bda-4925-9d31-eb8e1256ee78
libgen.fun	2b67ebed9ff14b2da8b124baf5129faa.protect@withheldforprivacy.com

	Title	Author	Copyright Registration Number	Publisher	Copyright Damages
1	A First Course in Differential Equations with Modeling Applications, 11e	Dennis Zill	TX0008369445	Cengage	\$ 150,000.00
2	A Guide to Crisis Intervention, 6e	Kristi Kanel	TX0008764631	Cengage	\$ 150,000.00
3	America's Courts and the Criminal Justice System, 13e	Neubauer; Fradella	TX0008577315	Cengage	\$ 150,000.00
4	Business Analytics: Data Analysis & Decision Making, 7e	Albright; Winston	TX0008793287	Cengage	\$ 150,000.00
5	Business Ethics: Ethical Decision Making and Cases, 12e	O.C. Ferrell	TX0008901888	Cengage	\$ 150,000.00
6	C++ Programming: From Problem Analysis to Program Design, 8e	D.S. Malik	TX0008565086	Cengage	\$ 150,000.00
7	Calculus, 11e	Larson; Edwards	TX0008373820	Cengage	\$ 150,000.00
8	Calculus: Early Transcendentals, 9e	Stewart; Clegg; Watson; Redlin	TX0008935153	Cengage	\$ 150,000.00
9	Chemistry, 10e	Zumdahl; Zumdahl; DeCoste	TX0008587507	Cengage	\$ 150,000.00
10	Cognitive Psychology Connecting Mind, Research, and Everyday Experience, 5e	E. Bruce Goldstein	TX0008655367	Cengage	\$ 150,000.00
11	Communication Between Cultures	Samovar; Porter	TX0008224775	Cengage	\$ 150,000.00
12	Contemporary Mathematics for Business & Consumers, 9e	Robert Brechner	TX0008796011	Cengage	\$ 150,000.00
13	Contemporary World History, 7e	William J. Duiker	TX0008962818	Cengage	\$ 150,000.00
14	Database Systems: Design, Implementation, & Management, 13e	Coronel; Morris	TX0008584508	Cengage	\$ 150,000.00
15	Death & Dying, Life & Living, 8e	Charles A. Corr	TX0008766737	Cengage	\$ 150,000.00
16	Discrete Mathematics with Applications, 5e	Susanna S. Epp	TX0008724377	Cengage	\$ 150,000.00
17	Economics, 13e	Roger Arnold	TX0008555103	Cengage	\$ 150,000.00
18	Essentials of Criminal Justice, 11e	Siegel; Worrall	TX0008598803	Cengage	\$ 150,000.00
19	Essentials of Statistics for the Behavioral Sciences, 10e	Gravetter; Wallnau; Forzano	TX0008950890	Cengage	\$ 150,000.00
20	Financial Management: Theory and Practice, 16e	Eugene Brigham	TX0008899053	Cengage	\$ 150,000.00
21	Foundations of Business, 6e	Pride; Hughes; Kapoor	TX0008571561	Cengage	\$ 150,000.00
22	Fundamentals of Financial Management, Concise Edition, 10e	Eugene Brigham	TX0008899057	Cengage	\$ 150,000.00
23	GOVT10 : Principles of American Government, 10e	Edward Sidlow	TX0008767188	Cengage	\$ 150,000.00
24	Introduction to Comparative Politics: Political Challenges and Changing Agendas, 8e	Mark Kesselman; Joel Krieger; William A. Joseph	TX0008764883	Cengage	\$ 150,000.00
25	Introduction to Health Care, 5e	Lee Haroun	TX0008935170	Cengage	\$ 150,000.00
26	Introduction to Statistics and Data Analysis, 6e	Roxy Peck	TX0008768439	Cengage	\$ 150,000.00

	Title	Author	Copyright Registration Number	Publisher	Copyright Damages
27	Introductory Chemistry: An Active Learning Approach, 7e	Mark Cracolice	TX0008935159	Cengage	\$ 150,000.00
28	Introductory Econometrics: A Modern Approach, 7e	Jeffrey M. Wooldridge	TX0008714557	Cengage	\$ 150,000.00
29	Lifetime Physical Fitness and Wellness, 15e	Werner Hoeger	TX0008901959	Cengage	\$ 150,000.00
30	Managerial Accounting, 15e	Carl Warren	TX0008709294	Cengage	\$ 150,000.00
31	Marketing, 20e	Pride; Ferrell	TX0008779001	Cengage	\$ 150,000.00
32	Medium/Heavy Duty Truck Engines, Fuel & Computerized Management Systems, 6e	Sean Bennett	TX0008968368	Cengage	\$ 150,000.00
33	MGMT, 11e	Chuck Williams	TX0008763491	Cengage	\$ 150,000.00
34	Network+ Guide to Networks, 8e	West; Andrews; Dean	TX0008604011	Cengage	\$ 150,000.00
35	New Perspectives Microsoft Office 365 & Office 2019 Introductory, 1e	Patrick Carey	TX0008792844	Cengage	\$ 150,000.00
36	Nutrition for Health and Health Care, 7e	Linda Kelly DeBruyne	TX0008779450	Cengage	\$ 150,000.00
37	Nutrition Therapy and Pathophysiology, 4e	Nelms; Sucher	TX0008829369	Cengage	\$ 150,000.00
38	Nutrition Through the Life Cycle, 7e	Judith E. Brown	TX0008778834	Cengage	\$ 150,000.00
39	Nutrition: Concepts and Controversies, 15e	Frances Sizer	TX0008724382	Cengage	\$ 150,000.00
40	Organic Chemistry, 9e	McMurry	TX0008115784	Cengage	\$ 150,000.00
41	Organizational Behavior: Managing People and Organizations, 13e	Griffin; Phillips; Gully	TX0008779065	Cengage	\$ 150,000.00
42	Payroll Accounting, 2019e	Bernard J Bieg	TX0008767073	Cengage	\$ 150,000.00
43	Precalculus: Mathematics for Calculus, 7e	Stewart; Redlin; Watson	TX0008004760	Cengage	\$ 150,000.00
44	Principles of Microeconomics, 9e	Mankiw	TX0008988436	Cengage	\$ 150,000.00
45	Probability and Statistics for Engineering and the Sciences, 9e	Devore	TX0008003633	Cengage	\$ 150,000.00
46	Strategic Management: Competitiveness & Globalization, Concepts and Cases, 13e	Michael Hitt; R. Duane Ireland; Robert Hoskisson	TX0008799533	Cengage	\$ 150,000.00
47	Technology for Success and Microsoft Office 365 & Office 2019: Shelly Cashman Series, 1e	Cable; Campbell; Ciampa; Clemens; Freund; Frydenberg; Hooper; Monk	TX0008956899	Cengage	\$ 150,000.00
48	The Legal Environment of Business: Text and Cases, 11e	Cross; Miller	TX0008967773	Cengage	\$ 150,000.00
49	Understanding Basic Statistics, 8e	Charles Henry Brase	TX0008767187	Cengage	\$ 150,000.00
50	Writing Analytically, 8e	Stephen Rosenwasser	TX0008553783	Cengage	\$ 150,000.00
51	50 Essays: A Portable Anthology, 5e	Samuel Cohen	TX0008359721	Macmillan Learning	\$ 150,000.00
52	A Pocket Style Manual, 8e, APA Version	Nancy Sommers	TX0008613598	Macmillan Learning	\$ 150,000.00

	Title	Author	Copyright Registration Number	Publisher	Copyright Damages
53	Abnormal Psychology, 10e	Ronald J. Comer	TX0008610008	Macmillan Learning	\$ 150,000.00
54	Behavioral Genetics, 7e	Valerie S. Knopik	TX0008500953	Macmillan Learning	\$ 150,000.00
55	Biochemistry 9e	Lubert Stryer	TX0008782215	Macmillan Learning	\$ 150,000.00
56	Biochemistry: A Short Course, 3e	John L. Tymoczko	TX0008134104	Macmillan Learning	\$ 150,000.00
57	Biology: How Life Works, 2e	James R. Morris	TX0008345202	Macmillan Learning	\$ 150,000.00
58	Calculus: Early Transcendentals, 4e	W. H. Freeman and Company	TX0008698561	Macmillan Learning	\$ 150,000.00
59	Creative Writing: Four Genres in Brief, 3e	David Starkey	TX0008515308	Macmillan Learning	\$ 150,000.00
60	Discovering Psychology, 7e	Sandra E. Hockenbury	TX0008340982	Macmillan Learning	\$ 150,000.00
61	Ecology: The Economy of Nature, 8e	Rick Relyea	TX0008565908	Macmillan Learning	\$ 150,000.00
62	Essentials of Environmental Science, 2e	Andrew Friedland	TX0008328927	Macmillan Learning	\$ 150,000.00
63	Essentials of General, Organic, and Biochemistry, 3e	Denise Guinn	TX0008788602	Macmillan Learning	\$ 150,000.00
64	Everything's an Argument, 8e	Andrea A. Lunsford	TX0008675679	Macmillan Learning	\$ 150,000.00
65	Exploring Psychology, 11e in Modules	David G. Myers	TX0008710630	Macmillan Learning	\$ 150,000.00
66	From Inquiry to Academic Writing: A Text and Reader, 4e	Bedford; St. Martin's	TX0008582832	Macmillan Learning	\$ 150,000.00
67	Fundamentals of Abnormal Psychology, 9e	Ronald J. Comer	TX0008796830	Macmillan Learning	\$ 150,000.00
68	Introduction to Genetic Analysis, 11e	Anthony J.F. Griffiths	TX0008027137	Macmillan Learning	\$ 150,000.00
69	Introduction to Geospatial Technologies, 4e	Bradley A. Shellito	TX0008605904	Macmillan Learning	\$ 150,000.00
70	Julien's Primer of Drug Action: A Comprehensive Guide to the Actions, Uses, and Side Effects of Psychoactive Drugs, 14e	Claire D. Advokat	TX0008655198	Macmillan Learning	\$ 150,000.00
71	Kuby Immunology, 8e	Jenni Punt	TX0008628766	Macmillan Learning	\$ 150,000.00
72	Lehninger Principles of Biochemistry, 8e	David L. Nelson; Michael M. Cox; Aaron A. Hoskins	TX0009085450	Macmillan Learning	\$ 150,000.00
73	Literature: The Human Experience, 13e	Richard Abcarian	TX0008650943	Macmillan Learning	\$ 150,000.00
74	Macroeconomics, 10e	N. Gregory Mankiw	TX0008710929	Macmillan Learning	\$ 150,000.00
75	Media & Culture: Mass Communication in a Digital Age, 11e	Richard Campbell	TX0008492636	Macmillan Learning	\$ 150,000.00
76	Media & Culture: Mass Communication in a Digital Age, 12e	Richard Campbell	TX0008751176	Macmillan Learning	\$ 150,000.00
77	Modern Principles of Economics, 4e	Tyler Cowen	TX0008568533	Macmillan Learning	\$ 150,000.00
78	Myers' Psychology for the AP Course, 3e	David G. Myers	TX0008564306	Macmillan Learning	\$ 150,000.00

	Title	Author	Copyright Registration Number	Publisher	Copyright Damages
79	Organic Chemistry: Structure and Function, 8e	K. Peter, C. Vollhardt	TX0008593664	Macmillan Learning	\$ 150,000.00
80	Practical Argument: A Text and Anthology, 4e	Laurie G. Kirszner	TX0008897282	Macmillan Learning	\$ 150,000.00
81	Practical Strategies for Technical Communication: A Brief Guide, 3e	Mike Markel	TX0008661381	Macmillan Learning	\$ 150,000.00
82	Psychology in Everyday Life, 4e	David G. Myers	TX0008496502	Macmillan Learning	\$ 150,000.00
83	Psychology, 13e	David G. Myers; C. Nathan DeWall	TX0009054292	Macmillan Learning	\$ 150,000.00
84	Psychology, 12e	David G. Myers; C. Nathan DeWall	TX0008554016	Macmillan Learning	\$ 150,000.00
85	Psychology: A Concise Introduction, 5e	Richard A. Griggs	TX0008389758	Macmillan Learning	\$ 150,000.00
86	Raven Biology of Plants, 8e	Ray F. Evert	TX0007497291	Macmillan Learning	\$ 150,000.00
87	Reflect & Relate: An Introduction to Interpersonal Communication, 5e	Steven McCornack	TX0008699333	Macmillan Learning	\$ 150,000.00
88	Rules for Writers, 9e	Nancy Sommers	TX0008640679	Macmillan Learning	\$ 150,000.00
89	Signs of Life in the U.S.A.: Readings on Popular Culture for Writers, 9e	Sonia Maasik	TX0008657675	Macmillan Learning	\$ 150,000.00
90	Speak Up: An Illustrated Guide to Public Speaking, 4e	Douglas M. Fraleigh	TX0008353154	Macmillan Learning	\$ 150,000.00
91	Statistics: Concepts and Controversies, 9e	David S. Moore	TX0008560788	Macmillan Learning	\$ 150,000.00
92	The Analysis of Biological Data, 3e	Michael C. Whitlock; Dolph Schluter; W. H. Freeman and Company	TX0008969557	Macmillan Learning	\$ 150,000.00
93	The Business Writer's Companion, 8e	Gerald J. Alred	TX0008489502	Macmillan Learning	\$ 150,000.00
94	The Developing Person Through the Life Span, 10e	Kathleen Stassen Berger	TX0008415432	Macmillan Learning	\$ 150,000.00
95	The Development of Children, 8e	Cynthia Lightfoot	TX0008593173	Macmillan Learning	\$ 150,000.00
96	The Film Experience: An Introduction, 5e	Timothy Corrigan	TX0008560971	Macmillan Learning	\$ 150,000.00
97	The Psychology Major's Companion: Everything You Need to Know to Get You Where You Want To Go	Dana S. Dunn	TX0008498269	Macmillan Learning	\$ 150,000.00
98	The St. Martin's Guide to Writing, 12e	Rise B. Axelrod	TX0008683056	Macmillan Learning	\$ 150,000.00
99	The Story and Its Writer: An Introduction to Short Fiction, 10e	Ann Charters	TX0008660570	Macmillan Learning	\$ 150,000.00
100	The Writer's Presence: A Pool of Readings, 9e	Donald McQuade	TX0008640379	Macmillan Learning	\$ 150,000.00
101	A Writer's Resource: A Handbook for Writing and Research, 6e	Elaine P. Maimon	TX0008713750	McGraw Hill	\$ 150,000.00
102	ABC's of Relationship Selling through Service, 13e	Raj Agnihotri	TX0008703076	McGraw Hill	\$ 150,000.00
103	Accounting for Governmental & Nonprofit Entities, 18e	Reck; Lowensohn; Neely	TX0008570028	McGraw Hill	\$ 150,000.00
104	American Democracy Now, 4e	Harrison; Harris; Deardorff	TX0008116817	McGraw Hill	\$ 150,000.00

	Title	Author	Copyright Registration Number	Publisher	Copyright Damages
105	Anatomy & Physiology: The Unity of Form and Function , 8e	Saladin	TX0008398754	McGraw Hill	\$ 150,000.00
106	Biology Laboratory Manual, 12e	Darrell S. Vodopich	TX0008725268	McGraw Hill	\$ 150,000.00
107	Biology, 5e	Robert J. Brooker	TX0008715610	McGraw Hill	\$ 150,000.00
108	Buildings across Time: An Introduction to World Architecture, 5e	Michael Fazio	TX0008702527	McGraw Hill	\$ 150,000.00
109	Business and Society: Stakeholders, Ethics, Public Policy, 16e	Lawrence; Weber	TX0008989218	McGraw Hill	\$ 150,000.00
110	Chemistry, 5e	Julia Burdge	TX0008706012	McGraw Hill	\$ 150,000.00
111	Connect Core Concepts in Health, 13e	Insel; Roth	TX0008051050	McGraw Hill	\$ 150,000.00
112	Crafting & Executing Strategy: Concepts and Cases, 22e	Thompson Jr; Peteraf; Gamble; Strickland III	TX0008725707	McGraw Hill	\$ 150,000.00
113	Drugs, Society, and Human Behavior, 17e	Hart; Ksir	TX0008733303	McGraw Hill	\$ 150,000.00
114	Essentials of Contemporary Management, 6e	Jones; George	TX0007913168	McGraw Hill	\$ 150,000.00
115	Essentials of Contemporary Management, 7e	Jones; George	TX0008544280	McGraw Hill	\$ 150,000.00
116	Essentials of Contemporary Management, 8e	Jones; George	TX0008575677	McGraw Hill	\$ 150,000.00
117	Essentials of Economics, 10e	Primacon; Gebhardt	TX0008278999	McGraw Hill	\$ 150,000.00
118	Essentials of Marketing: A Marketing Strategy Planning Approach, 14e	Perreault; Cannon	TX0008115565	McGraw Hill	\$ 150,000.00
119	Experience Psychology, 4e	Laura A. King	TX0008706657	McGraw Hill	\$ 150,000.00
120	Exploring Writing: Paragraphs and Essays, 4e	Zoe L. Albright	TX0008716047	McGraw Hill	\$ 150,000.00
121	Financial Accounting, 5e	David Spiceland	TX0008713990	McGraw Hill	\$ 150,000.00
122	First Aid Cases for the USMLE Step 1, 4e	Tao T. LE; MD LLC	TX0008719417	McGraw Hill	\$ 150,000.00
123	First Aid for the Psychiatry Clerkship, 5e	Latha Ganti	TX0008699726	McGraw Hill	\$ 150,000.00
124	International Economics, 17e	Thomas A Pugel	TX0008903633	McGraw Hill	\$ 150,000.00
125	Interpersonal Conflict, 10e	Wilmot; Hocker	TX0008748727	McGraw Hill	\$ 150,000.00
126	Introduction to Computing Systems: From Bits & Gates to C/C++ & Beyond, 3e	Yale N Patt	TX0008903632	McGraw Hill	\$ 150,000.00
127	Introduction to Operations Research, 11e	Frederick S. Hillier	TX0008974412	McGraw Hill	\$ 150,000.00
128	Life-Span Development, 16e	Santrock	TX0008595804	McGraw Hill	\$ 150,000.00
129	Life-Span Development, 17e	John W. Santrock	TX0008711635	McGraw Hill	\$ 150,000.00
130	Living with Art, 11e	Getlein	TX0008359535	McGraw Hill	\$ 150,000.00

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131	Maingot's Abdominal Operations, 13e	Michael J Zinner MD FACS; Stanley W Ashley MD FACS; O Joe Hines MD FACS	TX0008707999	McGraw Hill	\$ 150,000.00
132	Management: A Practical Introduction, 9e	Kinicki	TX0008723151	McGraw Hill	\$ 150,000.00
133	Mass Media Law, 20e	Clay Calvert	TX0008726446	McGraw Hill	\$ 150,000.00
134	Matching Supply with Demand: An Introduction to Operations Management, 4e	Gerard Cachon	TX0008716788	McGraw Hill	\$ 150,000.00
135	McGraw-Hill Education Algebra II Review and Workbook, 1e	Monahan	TX0008706741	McGraw Hill	\$ 150,000.00
136	McGraw-Hill Education SAT Subject Test Literature, 4e	The Publisher's Partnership	TX0008699094	McGraw Hill	\$ 150,000.00
137	Mechanics of Materials, 8e	John DeWolf	TX0008717025	McGraw Hill	\$ 150,000.00
138	Organic Chemistry, 6e	Janice Gorzynski Smith	TX0008705965	McGraw Hill	\$ 150,000.00
139	Organizational Behavior, 7e	McShane; Glinow	TX0007920280	McGraw Hill	\$ 150,000.00
140	Prescott's Microbiology, 11e	Joanne Willey	TX0008712613	McGraw Hill	\$ 150,000.00
141	Principles of Corporate Finance, 12e	Brealey; Myers; Allen	TX0008591381	McGraw Hill	\$ 150,000.00
142	Principles of Corporate Finance, 13e	Richard A. Brealey	TX0008712614	McGraw Hill	\$ 150,000.00
143	Schaum's Outline of Intermediate Algebra, 3e	Kerry Bailey	TX0008704987	McGraw Hill	\$ 150,000.00
144	Shigley's Mechanical Engineering Design, 11e	Richard G. Budynas	TX0008710906	McGraw Hill	\$ 150,000.00
145	Social Psychology, 13e	Myers	TX0008661730	McGraw Hill	\$ 150,000.00
146	Strategic Management of Technological Innovation, 5e	Melissa Schilling	TX0008433185	McGraw Hill	\$ 150,000.00
147	Strategic Management of Technological Innovation, 6e	Melissa Schilling	TX0008718386	McGraw Hill	\$ 150,000.00
148	Strategic Management, 5e	Rothaermel	TX0008995568	McGraw Hill	\$ 150,000.00
149	The Art of Public Speaking, 13e	Stephen E. Lucas	TX0008725257	McGraw Hill	\$ 150,000.00
150	The Color Atlas and Synopsis of Family Medicine, 3e	Richard Usatine	TX0008716338	McGraw Hill	\$ 150,000.00
151	A First Course in Probability 10e	Sheldon Ross	TX0008733234	Pearson	\$ 150,000.00
152	Access To Health, 15e	Rebecca J Donatelle	TX0008499753	Pearson	\$ 150,000.00
153	Anatomy and Physiology Coloring Workbook: A Complete Study Guide, 12e	Elaine N Marieb	TX0008476224	Pearson	\$ 150,000.00
154	Applications and Investigations in Earth Science, 8e	Edward J. Tarbuck	TX0008007999	Pearson	\$ 150,000.00
155	Basic Business Statistics: Concepts and Applications, 14e	Mark Berenson	TX0008590406	Pearson	\$ 150,000.00
156	Basic Chemistry, 6e	Karen Timberlake	TX0008766300	Pearson	\$ 150,000.00

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157	Biochemistry: Concepts and Connections, 2e	Dean R. Appling	TX0008592722	Pearson	\$ 150,000.00
158	Business Data Networks and Security, 11e	Raymond R. Panko	TX0008604602	Pearson	\$ 150,000.00
159	Business Mathematics, 14e	Gary Clendenen	TX0008602155	Pearson	\$ 150,000.00
160	Calculus For Biology and Medicine, 4e	Claudia Neuhauser	TX0008599683	Pearson	\$ 150,000.00
161	Calculus: Early Transcendentals, 3e	William Briggs	TX0008589494	Pearson	\$ 150,000.00
162	Campbell Biology, 11e	Lisa A. Urry	TX0008472354	Pearson	\$ 150,000.00
163	Campbell Biology in Focus, 3e	Lisa A. Urry	TX0008764205	Pearson	\$ 150,000.00
164	Chemistry: A Molecular Approach, 5e	Nivaldo J. Tro	TX0008764178	Pearson	\$ 150,000.00
165	Clean Code: A Handbook of Agile Software Craftsmanship, 1e	Robert C. Martin	TX0006897293	Pearson	\$ 150,000.00
166	College Mathematics for Trades and Technologies, 10e	Cheryl Cleaves	TX0008587024	Pearson	\$ 150,000.00
167	Criminalistics: An Introduction to Forensic Science, 12e	Richard Saferstein	TX0008541729	Pearson	\$ 150,000.00
168	Developmental Mathematics, 4e	Elayn Martin-Gay	TX0008766302	Pearson	\$ 150,000.00
169	Electric Circuits 11e	James Nilsson	TX0008712906	Pearson	\$ 150,000.00
170	Elementary Statistics, 13e	Mario F. Triola	TX0008529881	Pearson	\$ 150,000.00
171	Elements of the Nature and Properties of Soils, 3e	Nyle C. Brady	TX0007042871	Pearson	\$ 150,000.00
172	Emergency Medical Responder: First on Scene, 10e	Chris Le Baudour	TX0008122683	Pearson	\$ 150,000.00
173	Engineering Economy, 17e	William G. Sullivan	TX0008733523	pearson	\$ 150,000.00
174	Essentials of Organizational Behavior, 14e	Stephen P. Robbins	TX0008589438	Pearson	\$ 150,000.00
175	Essentials of Statistics, 6e	Mario F. Triola	TX0008602149	Pearson	\$ 150,000.00
176	Financial Management: Principles and Applications, 13e	Sheridan Titman	TX0008497438	Pearson	\$ 150,000.00
177	Foundations For Clinical Mental Health Counseling An Introduction To The Profession, 3e	Mark S. Gerig	TX0008419504	Pearson	\$ 150,000.00
178	Foundations of Finance, 10e	Arthur J. Keown	TX0008771892	Pearson	\$ 150,000.00
179	Fundamentals of Clinical Supervision, 6e	Janine M. Bernard	TX0008604652	Pearson	\$ 150,000.00
180	Fundamentals of Web Development, 2e	Randy Connolly	TX0008597795	Pearson	\$ 150,000.00
181	Human Anatomy & Physiology, 11e	Elaine N. Marieb	TX0008592257	Pearson	\$ 150,000.00
182	Human Anatomy & Physiology, 2e	Erin C. Amerman	TX0008592237	Pearson	\$ 150,000.00

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183	Human Learning, 8e	Jeanne Ellis Ormrod	TX0008770718	Pearson	\$ 150,000.00
184	Intermediate Algebra For College Students, 10e	Dennis C. Runde	TX0008590405	Pearson	\$ 150,000.00
185	Interpersonal Communication: Relating to Others, 9e	Steven A. Beebe	TX0008771084	Pearson	\$ 150,000.00
186	Introductory Chemistry, 6e	Nivaldo J. Tro	TX0008464936	Pearson	\$ 150,000.00
187	Management Information Systems: Managing the Digital Firm, 16e	Kenneth C. Laudon	TX0008792067	Pearson	\$ 150,000.00
188	Marketing Research, 9e	Alvin C. Burns	TX0008771942	Pearson	\$ 150,000.00
189	Microbiology With Diseases By Taxonomy, 6e	Robert W. Bauman	TX0008766307	Pearson	\$ 150,000.00
190	Microbiology: A Laboratory Manual, 12e (Loose-Leaf Edition)	James G. Cappuccino	TX0008792726	Pearson	\$ 150,000.00
191	Microeconomics: Theory and Applications with Calculus, 5e	Jeffrey M. Perloff	TX0008787464	Pearson	\$ 150,000.00
192	Modern Systems Analysis & Design, 9e	Joseph S. Valacich	TX0008789292	Pearson	\$ 150,000.00
193	Pathophysiology Concepts of Human Disease, 1e	Matthew Sorensen	TX0008774441	Pearson	\$ 150,000.00
194	Prebles' Artforms, 11e	Patrick L. Frank	TX0007814257	Pearson	\$ 150,000.00
195	Probability and Statistical Inference, 10e	Robert V. Hogg	TX0008792541	Pearson	\$ 150,000.00
196	Profit Without Honor: White Collar Crime & the Looting of America, 7e	Stephen M. Rosoff	TX0008770802	Pearson	\$ 150,000.00
197	Quantitative Analysis for Management, 11e	Barry Render	TX0007379726	Pearson	\$ 150,000.00
198	Systems Analysis and Design, 10e	Kenneth E. Kendall	TX0008598176	Pearson	\$ 150,000.00
199	Using & Understanding Mathematics: A Quantitative Reasoning Approach, 7e	Jeffrey O. Bennett	TX0008592235	Pearson	\$ 150,000.00
200	Working Effectively with Legacy Code, 1e	Michael Feathers	TX0006085105	Pearson	\$ 150,000.00
	Total Damages				\$ 30,000,000.00

APPENDIX C

Libgen Site(s)	Complaint or New	Registrar	Registry	Host
libgen.is	Complaint	Sarek Oy	Internet Iceland Ltd.	Epinatura LLC
libgen.rs	Complaint	Webglobe d.o.o.	1337 Services LLC	Epinatura LLC
libgen.su	Complaint	Masterhost	Serbian National Internet Domain Registry	Masterhost
libgen.st	Complaint	Sarek	Tecnisys	Epinatura LLC
jlibgen.tk	Complaint	BV Dot TK	Telecommunication Tokelau Corporation	n/a
library.lol	Complaint	Tucows, Inc.	XYZ.COM LLC	Epinatura LLC
libgen.re	Newly Identified	NETIM	Association Française pour le Nommage Internet en Coopération	Cloudflare
cdn1.booksdl.org	Complaint	Tucows, Inc.	Public Interest Registry	IP Volume Inc
llhlf.com	Complaint	Alibaba Cloud	VeriSign, Inc.	Cloudflare
libgen.ee	Complaint	NETIM	Eesti Interneti Sihtasutus (EIS)	Alibaba
libgen.rocks	Complaint	Tucows, Inc.	Identity Digital Inc.	Cloudflare
libgen.space	Complaint	Namecheap Inc.	Radix FZC	Cloudflare
libgen.gs	Complaint	EPAG Domainservices	Government of South Georgia and South Sandwich Islands	Cloudflare
libgen.li	Complaint	Sarek Oy	Swiss Education & Research Network	Cloudflare
libgen.lc	Complaint	EPAG Domainservices	University of Puerto Rico	Cogent Communications
libgen.pm	Complaint	Sarek Oy	Association Française pour le Nommage Internet en Coopération	Cloudflare
libgen.vg	Newly Identified	Sarek Oy	Telecommunications Regulatory Commission of the Virgin Islands	Cloudflare
libgen.click	Newly Identified	Tucows, Inc.	Internet Naming Co.	n/a
libgen.fun	Complaint	Namecheap Inc.	Radix FZC	Data Room