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COUNT III
UNJUST ENRICHMENT AGAINST DEFENDANTS MS.
WINFREY AND HARPO

37. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

38. Defendants have unjustly secured and will likely continue to unjustly secure economic gain and advantage on the basis of their unauthorized possession, control and use of Plaintiffs' copyrighted works.

39. Defendants continued retention and use of Plaintiffs' copyrighted work has occurred and continues to occur without legal justification.

40. Defendants remain and shall remain unjustly enriched in the future unless Defendants pay full and complete restitution to Plaintiffs for and in the amount of the value of all gains, benefits, and advantages that Plaintiffs have derived and will likely derive in the future there from.

41. Plaintiffs lack an adequate remedy at law to otherwise recover complete restitution from Defendants to avoid their unjust enrichment.

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COUNT IV
QUANTUM MERUIT AGAINST DEFENDANTS MS. WINFREY
AND HARPO

42. Plaintiffs reallege and incorporate by reference the allegations set forth in each of the preceding paragraphs of this Complaint.

43. Defendants have had use of Mr. Harris' copyrighted work in

1 “Oprah Winfrey Show” for the display of approximately 40,000,000
2 viewers without compensating owner of said copyrighted material.

3 44. Moreover, Defendants’ will realized additional unauthorized
4 benefit from use of the Plaintiffs copyrighted work as a result of
5 additional dissemination via the internet, dvd and ect.

6
7 45. Plaintiffs are entitled to the reasonable value of the cost for
8 the use and display of his copyrighted work to the estimated 40,000,000
9 plus viewers.

10 46. The reasonable value of the cost of such use is yet to be
11 determined.

12 **V. PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiffs, demand judgment in their favor and
14 against Defendants solely, jointly, or jointly and severally as follows:

15 47. A. An injunction preliminarily and permanently
16 restraining Defendants, their agents, employees and all persons acting in
17 concert with them from engaging in any further acts in violation of the
18 copyright laws.

19 48. B. For actual damages or statutory damages pursuant to
20 17 U.S.C. § 504, at the election of Plaintiffs.

21 49. C. Judgment in the amount of:

22 50. a. Plaintiffs’ actual, incidental, and consequential damages
23 that they have suffered and will likely suffer in the future as the direct
24 and proximate result of Defendants’ unlawful and willful infringement
25 of Plaintiffs’ copyrighted work.

26 51. b. Defendants’ individual and collective gains, profits and
27 advantages which they have secured and will likely secure in the future
28 as the direct and proximate result of their willful and unauthorized

1 infringement of Plaintiffs' copyrighted work.

2 52. c. For Plaintiff's costs.

3 53. d. For Plaintiffs' reasonable attorneys' fees.

4
5 **JURY DEMAND**

6 Plaintiffs demand a trial by jury on all issues so triable.

7
8 Respectfully submitted,

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12 By: 

13 JAMES LEE, ESQUIRE

14 1500 Market Street,
15 12th Floor/East Tower
16 Philadelphia, Pa 19102

17 *Attorney for Plaintiffs*
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Dated: October 25, 2010

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LIST OF EXHIBITS

Exhibit	Description	Pages
"1"	Certificate of Registration of Copyright.	14
"2"	Acknowledgement of the work by The Democratic Party (Democratic National Committee) dated 2004	15
"3"	Acknowledgement of the work by The Republican Party (Republican National Committee) dated 2004	16
"4"	Letter dated January 1, 2008	17
"5"	Front cover page of the proposed booklet.	18
"6"	Certified receipt of the booklet shipment.	19
"7"	Letter dated February 10, 2010.	20
"8"	Demand Letter.	21

EXHIBIT 1

CERTIFICATE OF REGISTRATION



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

FOKIM 1A
For a Nondramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

REGIS

TXu 931-707



EFFECTIVE DATE OF REGISTRATION

Month 1 Day 6 Year 2000

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

1 TITLE OF THIS WORK ▼ United States of America

HOW AMERICA ELECTS IT'S PRESIDENTS

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2 NAME OF AUTHOR ▼
a CHARLES HARRIS

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼
1940

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

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

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No
If the answer to either of these questions is "Yes," see detailed instructions.

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

NOTE

Under the law, the "author" of "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was made for hire, check "Yes" in the space provided, give the employer's name for whom the work was prepared) "Author" of all part, and give the date of birth and death blank.

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

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

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

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No
If the answer to either of these questions is "Yes," see detailed instructions.

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

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

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

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

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No
If the answer to either of these questions is "Yes," see detailed instructions.

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

3 **a** YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED
1999 This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
Complete this information ONLY if this work has been published. Month Day Year
Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. **CHARLES HARRIS**
2200 BEN FRANKLIN PKWY - E1805A
PHILADELPHIA, PA 19130

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

APPLICATION RECEIVED

JAN 06 2000

ONE DEPOSIT RECEIVED

JAN 06 2000

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions. • Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 2 pages

☐ CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

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

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

☒ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

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

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

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

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

Year of Registration ►

DERIVATIVE WORK OR COMPILATION

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

a 6

See instructions
before completing
this space.

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

b

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

a 7

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

CHARLES HARRIS

200 BEN FRANKLIN PKWY - E 1805A

PHILADELPHIA, PA 19130

b

Area code and daytime telephone number ► (215) 569-1936

Fax number ► (215) 557-7627

mail ►

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

Check only one ►

☒ author

☐ other copyright claimant

☐ owner of exclusive right(s)

☐ authorized agent of _____

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

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

8

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

CHARLES HARRIS

Date ► 1/3/2000

Handwritten signature (X) ▼



x Charles Harris

Certificate
will be
mailed in
envelope
with this
address:

Name ▼

CHARLES HARRIS

Number/Street/Apt ▼

2200 BEN FRANKLIN PKWY E 1805A

City/State/ZIP ▼

PHILADELPHIA, PA 19130

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

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

9

As of
July 1,
1999,
the
filing
fee for
Form TX
is \$30.

17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Form 1999-200,000
EB REV: June 1999

PRINTED ON RECYCLED PAPER

U.S. GOVERNMENT PRINTING OFFICE: 1999-454-879/49

EXHIBIT 2