

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO.:

GARY BENFIELD,

Plaintiff,

vs.

05 - 22292

CLERK
2005 AUG 18 PM 1:33
CLERK OF DISTRICT COURT
S.D. OF FLA - MIA

UK ACQUISITION CO., PARK WEST
GALLERIES, INC., KEATON, INC. d/b/a
PARK WEST AT SEA, CARNIVAL CORP.,
HOLLAND AMERICA, ROYAL CARIBBEAN
INTERNATIONAL, and CELEBRITY CRUISES,

Defendants.

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND INJUNCTIVE RELIEF

Plaintiff, GARY BENFIELD, by and through his undersigned counsel, sues Defendants, UK ACQUISITION CO. ("UK"), PARK WEST GALLERIES, INC. ("Park West"), KEATON, INC. d/b/a PARK WEST AT SEA ("Keaton"), CARNIVAL CORP. ("Carnival"), HOLLAND AMERICA ("HA"), ROYAL CARIBBEAN ("RCL"), and CELEBRITY CRUISES ("Celebrity"), and alleges as follows:

INTRODUCTION

Gary Benfield ("Benfield") is a very successful artist living and working in England. In 1999 he entered into an Agreement with a British company, London Contemporary Art ("LCA"). The Agreement between Benfield and LCA was subsequently assigned to UK Acquisition Company ("UK"), a company wholly owned by Park West Galleries, Inc. ("Park West"). In essence, LCA was to produce and distribute authorized limited edition copies of Benfield's original works, which were

1/2

sold mostly through auctions conducted on board cruise ships. Over the years, the volume of sales of Benfield's works ranged into the tens of millions of dollars. Recently, Benfield has discovered that LCA, UK and Park West, its successors in interest, have been producing, and with the participation of the cruise lines, have been selling, unauthorized forgeries of his art work. Through the sales of these forgeries, not only are these sellers defrauding and taking advantage of Benfield and unsuspecting and trusting cruise line customers, but they are also making illegal profits, violating the copyrights owned by Benfield, and have caused and continue to cause substantial damage to Benfield by disparaging his good name and reputation. In order to stop these illegal actions, Benfield now files this Complaint against all responsible entities.

JURISDICTION AND VENUE

1. This is a suit for copyright infringement under the United States Copyright Act of 1976, as amended, 17 U.S.C. Sections 101 et seq. (The "Copyright Act"). This Court has jurisdiction pursuant to 28 U.S.C. Section 1338(a).

2. Venue is proper in this judicial district pursuant to 28 U.S.C. Section 1400(a).

PARTIES

3. Plaintiff, GARY BENFIELD, ("Benfield"), is an artist who resides and works in England.

4. Defendant, UK ACQUISITION CO. ("UK"), is a Delaware corporation that, upon information and belief, is not authorized to do business in the State of Florida, but in fact does business in Florida, and is *sui juris*, having filed the instant lawsuit. UK is the successor in interest to London Contemporary Art ("LCA"), the entity that originally contracted with Benfield to produce and distribute authentic editions of Benfield's original art works. (A copy of the purported assignment and correspondence from UK confirming the assignment are attached as Exhibit "A".)

5. PARK WEST GALLERIES, INC. (“Park West”) is a corporation headquartered in Michigan, but who maintains an office in Broward County, Florida, and does business in Florida. Park West owns UK, and its president, Albert Scaglione, is also the president of UK.

6. KEATON, INC. d/b/a PARK WEST AT SEA (“Keaton”) is a Delaware corporation. KEATON, INC., under its d/b/a conducts the ship-based auctions on the various cruise lines. PARK WEST AT SEA was incorporated in Florida as the name Keaton, Inc. was not available. Keaton is a wholly-owned subsidiary of Park West

7. ROYAL CARIBBEAN INTERNATIONAL (“RCL”) is a division of Royal Caribbean Cruise, LTD. It is a Liberian company with its principal offices in Miami-Dade County, Florida. It is one of the world’s largest cruise companies, with twenty-nine (29) modern ships operating throughout the world. At all times material hereto, it authorized, participated in and profited from the art auctions onboard their cruise ships in which forged art works were sold.

8. CELEBRITY CRUISES, INC., (“Celebrity”) is a foreign corporation with its principal place of business in Miami-Dade County, Florida. In 1997, Celebrity merged with Royal Caribbean International to form Royal Caribbean Cruises LTD. At all times material hereto, it authorized, participated in and profited from the art auctions onboard their cruise ships in which forged art works were sold.

9. CARNIVAL CRUISE LINES (“Carnival”) is the most popular and most profitable cruise line in the world. Its principal place of business is in Miami-Dade County, Florida. At all times material hereto, it authorized, participated in and profited from the art auctions onboard their cruise ships in which forged art worked was sold.

10. HOLLAND AMERICA LINE, INC. (“HA”) is a leader in the premium cruise sector. It is a Washington corporation with offices in Miami-Dade County, Florida. It operates a fleet of 12

ships, and visits more than 200 ports in its primary destinations. At all times material hereto, it authorized, participated in and profited from the art auctions onboard their cruise ships in which forged artworks were sold.

GENERAL BACKGROUND

11. In essence, the manner in which this particular sector of the art 'business' functions is as follows:

a. An artist creates an original work of art, in whatever medium, whether oil on canvas, a watercolor, etc;

b. The artist then engages a publisher who will select original paintings to use as a study for limited edition prints. An edition size is agreed with the artist. For example, the publisher and artist may agree to produce an edition of 1,000 numbered and signed pieces. The publisher and artist then create the plates and silk screens used to create the limited edition. Typically, the edition will also include a certain number of pieces referred to as "artist proofs," which may or may not be numbered, but are still counted within the total edition quantity. All are signed by the artist, however.

c. The artist and publisher inspect the edition for quality control purposes and the artist then signs the acceptable prints. In order to allow for variances in the production, it is normal to overproduce several hundred extra pieces until the edition quantity is acceptable. The waste, or overprint, is then destroyed.

d. The publisher then sells the final pieces to auction houses or galleries, who then sell the pieces either through actual galleries, or through auctions at hotels or on board cruise ships.

ALLEGATIONS COMMON TO ALL COUNTS

12. On November 29, 1999, Benfield entered into an agreement with LCA (hereinafter "Agreement"). Among other things that agreement provided as follows:

- a. that the artist, BENFIELD, would maintain the copyright of all images;
- b. that the artist will sell original paintings to LCA;
- c. that the artist will be paid for editions of 750 prints: £1700 for 24"x36", £1400 for 17"x23", and £1000 for 12"x18";
- d. that he will receive ten (10) Artists Proofs of each edition; and
- e. that the agreement was for a term of five (5) years, with an option to renew the agreement for an additional five (5) years if LCA "abided by all of its contractual undertakings." A copy of the agreement is attached as Exhibit "B".

13. The agreement was modified on December 22, 2003. It increased the size of each edition from 750 to 1200 prints and increased the price paid to BENFIELD to £3200 for 24"x36", £2600 for 17"x23", and £1800 for 12"x18".

14. Defendant, UK, claims to be the assignee, as of July 30, 2004, of the agreement between LCA and BENFIELD. As such, UK stands in the shoes of LCA and is subject to the same claims.

15. According to the agreement with LCA, BENFIELD produced various original paintings. These were then submitted to LCA. LCA was to produce a specific amount of limited editions, artists proofs, both printed on canvas, and limited edition serigraphs which were printed on linen. Initially the editions were to be for 750 pieces each, but this was later increased to 1,200 pieces. Due to inherent imperfections with the printing process, approximately 400 to 600 extra

copies were printed, until the selection process was completed for the entire run, and then the waste was to be destroyed.

16. In fact, however, LCA did not destroy the plates, stencils, and silk screens used to print limited editions. Instead, LCA secretly overprinted or failed to dispose of the waste, and sold these prints without the knowledge of BENFIELD. Moreover, because BENFIELD was aware of the number of prints, artists editions, and linen serigraphs for any given limited edition, LCA could not have him sign any extra prints. Therefore employees and officers of LCA forged BENFIELD's signature on the limited editions and artists proofs and sold these as 'originals.'

17. Upon information and belief, LCA, with the knowledge and consent of UK, Park West and its affiliates and subsidiaries, forged BENFIELD's signature on hundreds of copies of AT LEAST the following editions: "L'amour", "Sienna Nights", "Equinox", "Confidences I," "Appassionata I," "Lovers," "Desire" and "Miranda". Indeed, at least 250 prints of "Miranda" were forged as the total edition was limited to 350 prints and LCA sold at least 600 copies.

18. UK, Park West, Keaton and all the cruise lines have made tremendous profits from the sale of Benfield art works. In 2004, Benfield published 9 editions, with each edition having at least 1,200 pieces, at an average sale price to the retail consumer of \$600.00 per piece, for a total gross income for each edition of approximately \$720,000.00. If that amount is then multiplied by the number of editions for 2004, it results in a potential gross income of \$6,500,000.00, just for Benfield art! In 2003, Benfield produced 21 editions, which equals a potential gross income of \$15,000,000.00. In 2002, Benfield produced 17 editions, which equals a potential gross income of \$7,650,000.00.

19. Upon information and belief, Defendants, UK, Park West and Keaton have engaged in a course of conduct and have acted in a similar fashion with respect to at least two (2) other artists, forging the artist's names on limited edition pieces, which have been sold at cruise art auctions.

20. The use of Benfield's forged signature on limited editions prints without his knowledge and permission constitutes infringement of copyright in violation of Title 17 of the United States Code.

21. Defendants, Carnival, HA, RCL, and Celebrity, each had the right and ability to supervise the art auctions and the sale of forged Benfield pieces, in the following respects among others:

- a. they controlled and investigated the selection of the companies to conduct the art auctions;
- b. they controlled which vessels would conduct art auctions;
- c. they controlled the frequency and content of on board announcements for the art auctions;
- d. they provided cruise line personnel for auction duties;
- e. they controlled the scheduling and frequency of art auctions;
- f. they received and processed all revenue generated from the art auctions;

22. In addition, Defendants, Carnival, HA, RCL, and Celebrity, each received a direct financial benefit as a result of the sale of the copies bearing forged signatures. As such, Defendants, Carnival, HA, RCL, and Celebrity, are vicariously liable for the copyright infringement.

23. Defendants, UK and Park West, with knowledge of the forging of Benfield's signature, by their actions or inaction induced, caused, or materially contributed to, or substantially participated in, the illegal conduct.

24. Defendants, UK, as the purported assignee of LCA, or as the corporate parent of LCA, is responsible for the actions taken by the employees and officers of LCA.

25. Defendants, Park West, as the corporate parent of UK, and as the operator of Park West at Sea, possessed and exercised the right and ability to supervise the activities of its subsidiaries and their employees and officers, and also possessed and received a direct financial interest in the exploited copyrighted materials. As such, Park West is vicariously liable for the violation of Benfield's copyright.

26. On information and belief, Defendants, UK and Park West have sold additional unauthorized forgeries of other Benfield works.

27. The specific acts of copyright infringement alleged, as well as the Defendants' entire course of conduct, have caused and are causing Plaintiff substantial and incalculable harm, and, unless enjoined by this Court, Defendants, UK, Park West, and Keaton will continue to sell such unauthorized, infringing works, and Defendants, Carnival, HA, RCL, and Celebrity, will continue to profit from these unauthorized, infringing works. Unless this Court restrains the Defendants from committing further acts of copyright infringement, Plaintiff will suffer further irreparable injury for which he has no adequate remedy at law.

28. By their actions above, Defendants have infringed and, on information and belief, will continue to infringe the copyrighted pictorial works of the Plaintiff by selling and profiting the unauthorized works

COUNT I - COPYRIGHT INFRINGEMENT OF "LOVERS"

29. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

30. Benfield is the owner of the copyright in his work entitled "Lovers."

31. The Registration Number is VA 1-309-559. A copy of the Certificate of Registration is attached as Exhibit "C".

32. Defendants, UK, Park West, and Keaton, have sold limited editions of “Lovers” with forged Benfield signatures.

33. Defendants, Carnival, HA, RCL, and Celebrity have allowed limited edition prints of “Lovers” with forged Benfield signatures to be sold on auctions aboard their ships.

34. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity have profited from the selling of forged Benfield limited editions of “Lovers”.

COUNT II - COPYRIGHT INFRINGEMENT OF “APPASSIONATA I”

35. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

36. Benfield is the owner of the copyright in his work entitled “Appassionata I.”

37. The Registration Number is VA 1-309-558. A copy of the Certificate of Registration is attached as Exhibit “D”.

38. Defendants, UK, Park West, and Keaton, have sold limited editions of “Appassionatta I” with forged Benfield signatures.

39. Defendants, Carnival, HA, RCL, and Celebrity, have allowed limited edition prints of “Appassionatta I” with forged Benfield signatures to be sold on auctions aboard their ships.

40. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity, have profited from the selling of forged Benfield limited editions of “Appassionatta I”.

COUNT III - COPYRIGHT INFRINGEMENT OF “DESIRE”

41. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

42. Benfield is the owner of the copyright in his work entitled “Desire.”

43. The Registration Number is VA 1-309-557. A copy of the Certificate of Registration is attached as Exhibit "E".

44. Defendants, UK, Park West, and Keaton, have sold limited editions of "Desire" with forged Benfield signatures.

45. Defendants, Carnival, HA, RCL, and Celebrity, have allowed limited edition prints of "Desire" with forged Benfield signatures to be sold on auctions aboard their ships.

46. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity have profited from the selling of forged Benfield limited editions of "Desire".

COUNT IV - COPYRIGHT INFRINGEMENT OF "CONFIDENCES I"

47. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

48. Benfield is the owner of the copyright in his work entitled "Confidences I."

49. The Registration Number is VA 1-309-556. A copy of the Certificate of Registration is attached as Exhibit "F".

50. Defendants, UK, Park West, and Keaton, have sold limited editions of "Confidences I" with forged Benfield signatures.

51. Defendants, Carnival, HA, RCL, and Celebrity, have allowed limited edition prints of "Confidences I" with forged Benfield signatures to be sold on auctions aboard their ships.

52. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity, have profited from the selling of forged Benfield limited editions of "Confidences I."

COUNT V - COPYRIGHT INFRINGEMENT OF "L'AMOUR"

53. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

54. Benfield is the owner of the copyright in his work entitled "L'Amour."

55. The Registration Number is VA 1-309-555. A copy of the Certificate of Registration is attached as Exhibit "G".

56. Defendants, UK, Park West, and Keaton, have sold limited editions of "L'Amour" with forged Benfield signatures.

57. Defendants, Carnival, HA, RCL, and Celebrity have allowed limited edition prints of "L'Amour" with forged Benfield signatures to be sold on auctions aboard their ships.

58. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity have profited from the selling of forged Benfield limited editions of "L'Amour".

COUNT VI - COPYRIGHT INFRINGEMENT OF "EQUINOX"

59. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

60. Benfield is the owner of the copyright in his work entitled "Equinox."

61. The Registration Number is VA 1-309-554. A copy of the Certificate of Registration is attached as Exhibit "H".

62. Defendants, UK, Park West, and Keaton, have sold limited editions of "Equinox" with forged Benfield signatures.

63. Defendants, Carnival, HA, RCL, and Celebrity have allowed limited edition prints of "Equinox" with forged Benfield signatures to be sold on auctions aboard their ships.

64. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity, have profited from the selling of forged Benfield limited editions of "Equinox".

COUNT VII - COPYRIGHT INFRINGEMENT OF "MIRANDA"

65. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

66. Benfield is the owner of the copyright in his work entitled "Equinox."

67. The Registration Number is VA 1-309-553. A copy of the Certificate of Registration is attached as Exhibit "I".

68. Defendants, UK, Park West, and Keaton, have sold limited editions of "Equinox" with forged Benfield signatures.

69. Defendants, Carnival, HA, RCL, and Celebrity, have allowed limited edition prints of "Equinox" with forged Benfield signatures to be sold on auctions aboard their ships.

70. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity, have profited from the selling of forged Benfield limited editions of "Equinox".

COUNT VIII - COPYRIGHT INFRINGEMENT OF "SIENNA NIGHTS"

71. Benfield realleges and reaffirms the allegations in paragraphs 1 through 28.

72. Benfield is the owner of the copyright in his work entitled "Sienna Nights."

73. The Registration Number is VA 1-309-552. A copy of the Certificate of Registration is attached as Exhibit "J".

74. Defendants, UK, Park West, and Keaton, have sold limited editions of "Sienna Nights" with forged Benfield signatures.

75. Defendants, Carnival, HA, RCL, and Celebrity, have allowed limited edition prints of "Sienna Nights" with forged Benfield signatures to be sold on auctions aboard their ships.

76. Through agreements with Defendants, Park West and Keaton, Defendants, Carnival, HA, RCL, and Celebrity, have profited from the selling of forged Benfield limited editions of "Equinox".

WHEREFORE, Plaintiff respectfully requests that:

A. Defendants, their agents, servants, employees, and all persons acting under their permission and authority, be enjoined and restrained from infringing, in any manner, the artworks copyrighted by Plaintiff pursuant to 17 U.S.C. §502;

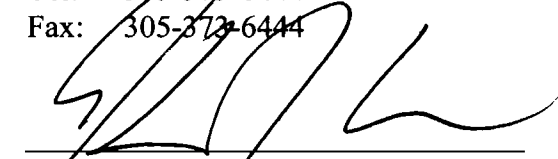
B. Defendants be ordered to pay to Plaintiff all of the gains, profits and advantages obtained by them as a result of their activities of infringement of Plaintiff's copyrighted artworks;

C. Defendants be ordered to pay costs, reasonable attorney's fees, pursuant to 17 U.S.C. §505; and

D. Any further and just relief that this Court may deem just and proper.

Dated: August 18th, 2005.

Alberto J. Ordoñez, P.A.
One Brickell Square, PH1
801 Brickell Avenue
Miami, FL 33131-4943
Tel: 305-373-0444
Fax: 305-373-6444



Alberto J. Ordoñez
Fla. Bar No. 345369
Joel D. Lucoff, Of Counsel
Fla. Bar No. 192163



LONDON CONTEMPORARY ART
PUBLISHERS OF ORIGINAL PRINTS

Acknowledgement

Re: the contract dated.....1999..... between..... *Cary Buford* (artist).....
and London Contemporary Art (LCA).

The artist acknowledges that LCA is in negotiation with UK Acquisition Co, owned by Park West Galleries Inc (the company) who wish to acquire part of LCA's business and assets. Should this occur, the artist agrees that their contract will be assigned to the new company and that as long as the company is not in default of the agreed contract the artist will fulfil the contract according to it's terms.

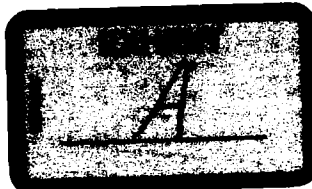
Signature..... *[Handwritten Signature]*.....

Date..... *22/12/03*.....

LONDON CONTEMPORARY ART LIMITED.
88 PETERBOROUGH ROAD, LONDON SW6 3JH.
TELEPHONE: (020) 7731 7770, FAX: (020) 7610 6413
REGISTERED OFFICE AT THE ABOVE ADDRESS
COMPANY REGISTRATION NUMBER 3009286

www.lca-art.com

sales@lca-art.com





LONDON CONTEMPORARY ART

PUBLISHERS OF ORIGINAL PRINTS

Agreement

Between London Contemporary Art LTD (LCA) of 88, Peterborough Road, London SW6 3HH and Gary Benfield (Artist)

Dated 29.11.99

LCA undertake to publish not less than six editions yearly of the Artist's work.

LCA may arrange exhibitions for the Artist's work and will distribute and promote the Artist's work worldwide.

LCA may publish literature in the form of books and leaflets about the Artist, illustrating the Artist's life and works.

The Artist will make available to LCA all his works for LCA to select images to be published and/or to purchase.

LCA will be the exclusive publisher of Limited Edition prints of the Artist.

The Artists maintains the copyright of all images.

The Artist will sell original paintings to LCA at £400 for 18x28 size approx, £500 for 36x26 size approx and £700 for 33x46 approx.

The Artist will invoice LCA when the prints are signed. LCA will make payment 30 days after the receipt of invoice.

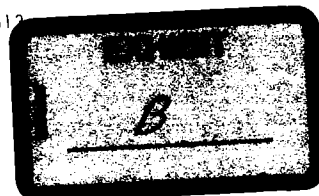
The price paid to the Artist for per edition of 750 will be £1,700 for images of 36x24 size approx, £1,400 for images of 23x17 size approx and £1,000 for images over 12x18 size approx.

The Artist will receive 10 Artists Proofs of each edition.

The agreement will last for five years. LCA will have the option to renew the agreement for another five years if it has abided by all its contracted undertakings.

Signed [Signature] FOR LONDON CONTEMPORARY ART Signed [Signature] FOR THE ARTIST

LONDON CONTEMPORARY ART LIMITED
88 PETERBOROUGH ROAD, LONDON SW6 3HH
TELEPHONE: (020) 7731 7770, FAX: (020) 7610 6612
REGISTERED OFFICE AT THE ABOVE ADDRESS
COMPANY REGISTRATION NUMBER 2009585





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.

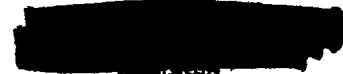
Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-559



VA VAU

Effective Date of Registration

JUL 08 2005

Application Received

JUL 08 2005

Deposit Received

One

Two JUL 08 2005

Fee Received

Examined By

JH

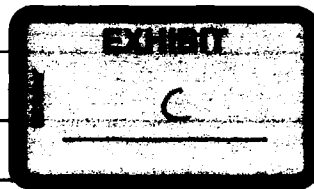
Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work: Alternative title or title of larger work in which this work was published:	1	Lovers I
Name and Address of Author and Owner of the Copyright: Nationality or domicile: Phone, fax, and email:	2	Gary Benfield 56 Dale Park Rd. London, SE19 3TY, United Kingdom Phone (305) 373-0444 Fax (305) 373-6444 Email c/o aordonez@ordonezlaw.com
Year of Creation:	3	2002
If work has been published, Date and Nation of Publication:	4	a. Date <u>January</u> <u>1</u> <u>2002</u> (Month, day, and year all required) Month Day Year b. Nation
Type of Authorship in This Work: Check all that this author created.	5	<input type="checkbox"/> 3-Dimensional sculpture <input type="checkbox"/> Photograph <input type="checkbox"/> Map <input checked="" type="checkbox"/> 2-Dimensional artwork <input type="checkbox"/> Jewelry design <input type="checkbox"/> Text <input type="checkbox"/> Technical drawing
Signature: Registration cannot be completed without a signature.	6	I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one: <input type="checkbox"/> Author <input checked="" type="checkbox"/> Authorized agent X <i>[Signature]</i>
OPTIONAL Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:	7	<input type="checkbox"/> Check here if same as #2 above. Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131 Phone (305) 373-0444 Fax (305) 373-6444 Email aordonez@ordonezlaw.com

8
Certificate will be mailed in window envelope to this address:

Name ▼	Alberto J. Ordonez, Esq.
Number/Street/Apt ▼	801 BRICKELL AVE PH1
City/State/ZIP ▼	MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9 Deposit Account # _____
 Name _____

DO NOT WRITE HERE Page 1 of 1 pages

*17 U.S.C. § 508(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



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.

Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-558

Effective Date of Registration

JUL 08 2005

Application Received
 JUL 08 2005

Deposit Received
 One

JUL 08 2005

Fee Received

Examined By

JTB

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:	1	Appassionata I
Alternative title or title of larger work in which this work was published:		
Name and Address of Author and Owner of the Copyright:	2	Gary Benfield 56 Dale Park Rd. London, SE19 3TY, United Kingdom
Nationality or domicile: Phone, fax, and email:		Phone (305) 373-0444 Fax (305) 373-6444 Email c/o aordonez@ordonezlaw.com
Year of Creation:	3	2002
If work has been published, Date and Nation of Publication:	4	a. Date <u>February</u> <u>1</u> <u>2002</u> (Month, day, and year all required) Month Day Year b. Nation
Type of Authorship in This Work: Check all that this author created.	5	<input type="checkbox"/> 3-Dimensional sculpture <input type="checkbox"/> Photograph <input type="checkbox"/> Map <input checked="" type="checkbox"/> 2-Dimensional artwork <input type="checkbox"/> Jewelry design <input type="checkbox"/> Text <input type="checkbox"/> Technical drawing
Signature: Registration cannot be completed without a signature.	6	I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one: <input type="checkbox"/> Author <input checked="" type="checkbox"/> Authorized agent X <i>[Signature]</i>
Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:	7	<input type="checkbox"/> Check here if same as #2 above. Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131 Phone (305) 373-0444 Fax (305) 373-6444 Email aordonez@ordonezlaw.com

OPTIONAL

8
 Certificate will be mailed in window envelope to this address:

Name ▼
 Alberto J. Ordonez, Esq.
 Number/Street/Apt ▼
 801 BRICKELL AVE PH1
 City/State/ZIP ▼
 MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9 Deposit Account # _____
 Name _____

DO NOT WRITE HERE Page 1 of 1 pages

*17 U.S.C. § 508(a) 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



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.

Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-557



Effective Date of Registration

JUL 08 2005

Application Received

JUL 08 2005

Deposit Received

One

Two

JUL 08 2005

Fee Received

Examined By

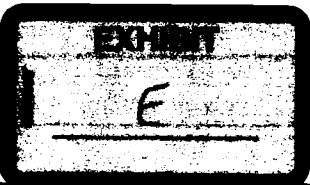
AB
 Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:	1	Desire
Alternative title or title of larger work in which this work was published:		
Name and Address of Author and Owner of the Copyright:	2	Gary Benfield 56 Dale Park Rd. London, SE19 3TY, United Kingdom
Nationality or domicile: Phone, fax, and email:		Phone (305) 373-0444 Fax (305) 373-6444 Email c/o aordonez@ordonezlaw.com
Year of Creation:	3	2003
If work has been published, Date and Nation of Publication:	4	a. Date <u>January</u> <u>1</u> <u>2003</u> (Month, day, and year all required) Month Day Year b. Nation
Type of Authorship in This Work: Check all that this author created.	5	<input type="checkbox"/> 3-Dimensional sculpture <input type="checkbox"/> Photograph <input type="checkbox"/> Map <input checked="" type="checkbox"/> 2-Dimensional artwork <input type="checkbox"/> Jewelry design <input type="checkbox"/> Text <input type="checkbox"/> Technical drawing
Signature: Registration cannot be completed without a signature.	6	I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one: <input type="checkbox"/> Author <input checked="" type="checkbox"/> Authorized agent X _____
OPTIONAL Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:	7	<input type="checkbox"/> Check here if same as #2 above. Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131 Phone (305) 373-0444 Fax (305) 373-6444 Email aordonez@ordonezlaw.com

8
 Certificate will be mailed in window envelope to this address:

Name ▼	Alberto J. Ordonez, Esq.
Number/Street/Apt ▼	801 BRICKELL AVE PH1
City/State/ZIP ▼	MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9 Deposit Account # _____
 Name _____

*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 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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.

Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-556



VA VAU

Effective Date of Registration

JUL 08 2005

Application Received
 JUL 08 2005

Deposit Received
 One

JUL 08 2005
 Two

Fee Received

Examined By

YB

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

1

Confidences *I*

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

2

Gary Benfield
 56 Dale Park Rd.
 London, SE19 3TY, United Kingdom

Nationality or domicile:
 Phone, fax, and email:

Phone (305) 373-0444 Fax (305) 373-6444
 Email c/o aordonez@ordonezlaw.com

Year of Creation:

3

2002

If work has been published, Date and Nation of Publication:

4

a. Date March 1 2002 (Month, day, and year all required)
 Month Day Year
 b. Nation

Type of Authorship in This Work:
 Check all that this author created.

5

3-Dimensional sculpture Photograph Map
 2-Dimensional artwork Jewelry design Text
 Technical drawing

Signature:

6

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

Author Authorized agent

Registration cannot be completed without a signature.

X _____

Name and Address of Person to Contact for Rights and Permissions:
 Phone, fax, and email:

7

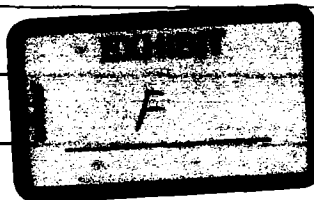
Check here if same as #2 above.
 Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131
 Phone (305) 373-0444 Fax (305) 373-6444
 Email aordonez@ordonezlaw.com

OPTIONAL

8

Certificate will be mailed in window envelope to this address:

Name ▼
 Alberto J. Ordonez, Esq.
 Number/Street/Apt ▼
 801 BRICKELL AVE PH1
 City/State/ZIP ▼
 MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9

Deposit Account # _____
 Name _____

DO NOT WRITE HERE Page 1 of 1 pages

*17 U.S.C. § 508(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-555



Effective Date of Registration

JUL 08 2005

Application Received

JUL 08 2005

Deposit Received

One

JUL 08 2005

Two

Fee Received

Examined By

Jfb

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

1

L'Amour

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

2

Gary Benfield
 56 Dale Park Rd.
 London, SE19 3TY, United Kingdom

Nationality or domicile: Phone, fax, and email:

Phone (305) 373-0444
 Email c/o aordonez@ordonezlaw.com

Fax (305) 373-6444

Year of Creation:

3

2003

If work has been published, Date and Nation of Publication:

4

a. Date July 1 2003 (Month, day, and year all required)

b. Nation

Type of Authorship in This Work:

5

Check all that this author created.

- 3-Dimensional sculpture Photograph Map
 2-Dimensional artwork Jewelry design Text
 Technical drawing

Signature:

6

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

- Author Authorized agent

Registration cannot be completed without a signature.

X _____

Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:

7

Check here if same as #2 above.
 Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131

Phone (305) 373-0444
 Email aordonez@ordonezlaw.com

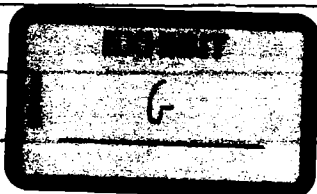
Fax (305) 373-6444

OPTIONAL

8

Certificate will be mailed in window envelope to this address:

Name ▼
 Alberto J. Ordonez, Esq.
 Number/Street/Apt ▼
 801 BRICKELL AVE PH1
 City/State/ZIP ▼
 MIAMI FL 33131-4943



9

Deposit Account # _____

Name _____

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Page 1 of 1 pages

*17 U.S.C. § 508(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-554



0000013970041

VAU

Effective Date of Registration

JUL 08 2005

Application Received
JUL 08 2005

Deposit Received
 One

Two **JUL 08 2005**

Fee Received

Examined By

[Signature]

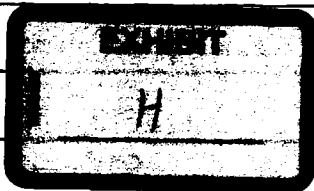
Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:	1	Equinox
Alternative title or title of larger work in which this work was published:		
Name and Address of Author and Owner of the Copyright:	2	Gary Benfield 56 Dale Park Rd. London, SE19 3TY, United Kingdom
Nationality or domicile: Phone, fax, and email:		Phone (305) 373-0444 Fax (305) 373-6444 Email c/o aordonez@ordonezlaw.com
Year of Creation:	3	2003
If work has been published, Date and Nation of Publication:	4	a. Date <u>March</u> <u>1</u> <u>2003</u> (Month, day, and year all required) Month Day Year b. Nation
Type of Authorship in This Work: Check all that this author created.	5	<input type="checkbox"/> 3-Dimensional sculpture <input type="checkbox"/> Photograph <input type="checkbox"/> Map <input checked="" type="checkbox"/> 2-Dimensional artwork <input type="checkbox"/> Jewelry design <input type="checkbox"/> Text <input type="checkbox"/> Technical drawing
Signature: Registration cannot be completed without a signature.	6	I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one: <input type="checkbox"/> Author <input checked="" type="checkbox"/> Authorized agent X _____
OPTIONAL Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:	7	<input type="checkbox"/> Check here if same as #2 above. Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131 Phone (305) 373-0444 Fax (305) 373-6444 Email aordonez@ordonezlaw.com

8
 Certificate will be mailed in window envelope to this address:

Name ▼	Alberto J. Ordonez, Esq.
Number/Street/Apt ▼	801 BRICKELL AVE PH1
City/State/ZIP ▼	MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9 Deposit Account # _____
 Name _____

*17 U.S.C. § 306(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500



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Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-553



Effective Date of Registration

JUL 08 2005

Application Received

JUL 08 2005

Deposit Received
 One

Two JUL 08 2005

Fee Received

Examined By

JH

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

1

Miranda

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

2

Gary Benfield
 56 Dale Park Rd.
 London, SE19 3TY, United Kingdom

Nationality or domicile:
 Phone, fax, and email:

Phone (305) 373-0444
 Email c/o aordonez@ordonezlaw.com

Fax (305) 373-6444

Year of Creation:

3

2003

If work has been published, Date and Nation of Publication:

4

a. Date January 1 2003 (Month, day, and year all required)
 Month Day Year

b. Nation

Type of Authorship in This Work:

5

Check all that this author created.

- 3-Dimensional sculpture Photograph Map
 2-Dimensional artwork Jewelry design Text
 Technical drawing

Signature:

6

Registration cannot be completed without a signature.

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

- Author Authorized agent

X _____

Name and Address of Person to Contact for Rights and Permissions:
 Phone, fax, and email:

7

Check here if same as #2 above.
 Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131

Phone (305) 373-0444

Fax (305) 373-6444

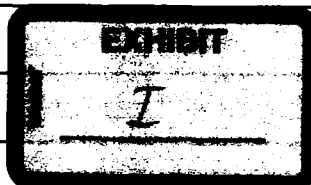
Email aordonez@ordonezlaw.com

OPTIONAL

8

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Name ▼
 Alberto J. Ordonez, Esq.
 Number/Street/Apt ▼
 801 BRICKELL AVE PH1
 City/State/ZIP ▼
 MIAMI FL 33131-4943



9 Complete this space only if you currently hold a Deposit Account in the Copyright Office.

Deposit Account # _____

Name _____

DO NOT WRITE HERE

Page 1 of 1 page

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Marybeth Peters

Register of Copyrights, United States of America

Short Form VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

VA 1-309-552

Effective Date of Registration

JUL 08 2005

Application Received

JUL 08 2005

Deposit Received

One

Two

JUL 08 2005

Fee Received

Examined By

Jfb

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

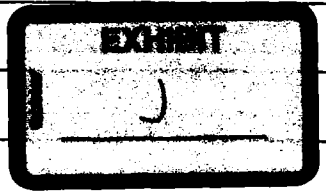
Title of This Work:	1	Sienna Nights
Alternative title or title of larger work in which this work was published:		
Name and Address of Author and Owner of the Copyright:	2	Gary Benfield 56 Dale Park Rd. London, SE19 3TY, United Kingdom
Nationality or domicile: Phone, fax, and email:		Phone (305) 373-0444 Fax (305) 373-6444 Email c/o aordonez@ordonezlaw.com
Year of Creation:	3	2003
If work has been published, Date and Nation of Publication:	4	a Date <u>June</u> <u>1</u> <u>2003</u> (Month, day, and year all required) b. Nation
Type of Authorship in This Work: Check all that this author created.	5	<input type="checkbox"/> 3-Dimensional sculpture <input type="checkbox"/> Photograph <input type="checkbox"/> Map <input checked="" type="checkbox"/> 2-Dimensional artwork <input type="checkbox"/> Jewelry design <input type="checkbox"/> Text <input type="checkbox"/> Technical drawing
Signature: Registration cannot be completed without a signature.	6	I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one: <input type="checkbox"/> Author <input checked="" type="checkbox"/> Authorized agent X _____
Name and Address of Person to Contact for Rights and Permissions: Phone, fax, and email:	7	<input type="checkbox"/> Check here if same as #2 above. Alberto J. Ordonez, Esq., 801 Brickell Ave., PH1, Miami, FL 33131 Phone (305) 373-0444 Fax (305) 373-6444 Email aordonez@ordonezlaw.com

OPTIONAL

8

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Name ▼
Alberto J. Ordonez, Esq.
Number/Street/Apt ▼
801 BRICKELL AVE PH1
City/State/ZIP ▼
MIAMI FL 33131-4943



Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9

Deposit Account # _____

Name _____

DO NOT WRITE HERE

Page 1 of 1 pages

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AO 121 (6/90)

TO: Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559	REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT
---------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------

In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> X ACTION <input type="checkbox"/> APPEAL		COURT NAME AND LOCATION UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA	
DOCKET NO. 05-22292-CV-PCH	DATE FILED 08/18/05	301 N. Miami Avenue Miami, FL 33128	
PLAINTIFF Gary Benfield		DEFENDANT UK Acquisition Co., et al.	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OR WORK	
1 (see attached)			
2			
3			
4			
5			

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading		
COPYRIGHT REGISTRATION NO.	TITLE OF WORK	AUTHOR OF WORK	
1			
2			
3			

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK CLARENCE MADDOX	(BY) DEPUTY CLERK N. Toloza	DATE 8/19/05

- DISTRIBUTION:**
- 1) Upon initiation of action, mail copy to Register of Copyrights
 - 2) Upon filing of document adding copyright(s), mail copy to Register of Copyrights
 - 3) Upon termination of action, mail copy to Register of Copyrights
 - 4) In the event of an appeal, forward copy to Appellate Court
 - 5) Case File Copy

05-22292

CIVIL COVER SHEET

JS 44 (Rev. 11/04)

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS
 Gary Benfield
 (b) County of Residence of First Listed Plaintiff United Kingdom
 (EXCEPT IN U.S. PLAINTIFF CASES)
 (c) Attorney's (Firm Name, Address, and Telephone Number)
 Alberto J. Cardozo MAGISTRATE JUDGE
 801 Brickell Ave. PH 2 SIMONTON
 Miami, FL 33131

DEFENDANTS
 UK Acquisition Co. Park West
 Batteries, Inc. Festival
 Holland America Royal Caribbean Int'l. Celebrity
 County of Residence of First Listed Defendant United States
 (IN U.S. PLAINTIFF CASES ONLY)
 NOTE: IN LAND CONDEMNATION CASES USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
 Attorneys (If Known)

FLA DISTRICT COURT
 PH 1:32

(d) Check County Where Action Arose: DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

1 U.S. Government Plaintiff Federal Question (U.S. Government Not a Party)
 2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

Dade OSCV 22292 Huck AWS

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	BANKRUPTCY <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deposition <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):
 17 U.S.C. § 502 Defendants in fringed on Plaintiff's copyrights.
 LENGTH OF TRIAL via 10 days estimated (for both sides to try entire case)

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$** **CHECK YES only if demanded in complaint:** **JURY DEMAND:** Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): **JUDGE** **DOCKET NUMBER**

DATE: Aug. 18, 2005 SIGNATURE OF ATTORNEY OF RECORD: [Signature]

FOR OFFICE USE ONLY: RECEIPT # 925945 AMOUNT 250 APPLYING IFP