

1 Rhonda R. Trotter (State Bar No. 169241)  
Email address: rhonda.trotter@kayescholer.com  
2 Oscar Ramallo (State Bar No. 241487)  
Email address: oscar.ramallo@kayescholer.com  
3 KAYE SCHOLER LLP  
1999 Avenue of the Stars  
4 Suite 1600  
Los Angeles, California 90067  
5 Telephone: (310) 788-1000  
Facsimile: (310) 788-1200  
6

7 Attorneys for Plaintiff  
PRINCE ROGERS NELSON  
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9  
10 **UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KAYE | SCHOLER<sub>LLP</sub>

12 PRINCE ROGERS NELSON, an  
13 individual,

14 Plaintiff,

15 v.

16 DAN CHODERA, an individual;  
17 KARINA JINDROVA, an individual;  
DOE 1 (aka PURPLEHOUSE2); DOE  
18 2 (aka DABANG319); DOE 3 (aka  
PURPLEKISSTWO); DOE 4 (aka  
19 WORLDOFBOOTLEG); DOE 5 (aka  
FUNKYEXPERIENCEFOUR); DOE  
20 6 (aka NPRUNIVERSE); DOE 7 (aka  
PSPMUSICBLOG); DOE 8 (aka  
21 THEULTIMATE  
BOOTLEGEXPERIENCE); and  
22 DOES 9-20).

23 Defendants.  
24  
25  
26  
27  
28

) Case No.

) **PLAINTIFF PRINCE ROGERS  
NELSON'S COMPLAINT**

) **(1) Direct Copyright  
Infringement**

) **(2) Unauthorized Fixation**

) **(3) Contributory Copyright  
Infringement & Bootlegging**

) **DEMAND FOR JURY TRIAL**

1 **COMPLAINT**

2 For his Complaint, Plaintiff Prince Rogers Nelson (“Prince”) alleges as  
3 follows:

4 **JURISDICTION AND VENUE**

5 1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331  
6 and 1338(a).

7 2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2)  
8 in that a substantial part of the events or omissions giving raise to the claim  
9 occurred in this district.

10 **THE PARTIES AND THEIR CONDUCT**

11 **Prince**

12 3. Prince, doing business as Controversy Music, is the owner of more than  
13 600 copyright registrations for various musical compositions. Prince often puts on  
14 live performances of musical works.

15 **Defendants Generally**

16 4. The Defendants in this case engage in massive infringement and  
17 bootlegging of Prince’s material. For example, in just one of the many takedown  
18 notices sent to Google with respect to Doe 2 (aka DaBang319), Prince identified  
19 363 separate infringing links to file sharing services, with each link often containing  
20 copies of bootlegged performances of multiple separate musical compositions.  
21 Thus, each Defendant is responsible for up to thousands of separate acts of  
22 infringement and bootlegging.

23 5. The Defendants rely on either Google’s Blogger platform or Facebook, or  
24 both, to accomplish their unlawful activity. Blogger is a service provided by  
25 Google that allows individuals to create personal blogs. Defendants, rather than  
26 publishing lawful content to their blogs, typically publish posts that list all the  
27 songs performed at a certain Prince live show and then provide a link to a file  
28 sharing service where unauthorized copies of the performance can be downloaded.

1 Defendants use their Facebook accounts to post similar unlawful content directly to  
2 their Facebook accounts or to direct users to their blogs, or both.

3 6. The true names and capacities of Does 1-20 are unknown to Prince. As to  
4 Does 1-8, their true names are unknown because these Does operate Google  
5 Blogger accounts and/or Facebook accounts under pseudonyms. These blogs and  
6 Facebook accounts are used to facilitate copyright infringement and distribution of  
7 bootlegged copies of Prince's live performances.

8 7. On information and belief, Does 9-20 act in concert with the other  
9 Defendants in this case with respect to the unlawful activity alleged herein. Indeed,  
10 Defendants constitute an interconnected network of bootleg distribution, which is  
11 able to broadly disseminate unauthorized copies of Prince's musical compositions  
12 and live performances. On information and belief, some or all of the Defendants  
13 directly communicate with each other to obtain and distribute the unlawful material  
14 described in this Complaint.

15 8. On information and belief, each of the Defendants was the agent, servant,  
16 employee, joint venturer and/or co-conspirator of each of the other Defendants. On  
17 information and belief, each of the acts alleged to have been done by each  
18 Defendant was done in that Defendant's capacity as the agent, servant, employee,  
19 joint venturer and/or co-conspirator of the other Defendants.

20 9. Each of the Defendants has purposefully directed his activities in  
21 California, consummated transactions with residents of California and purposefully  
22 availed himself of the privilege of conducting activities of California, thereby  
23 invoking the benefits and protections of its laws.

24 10. In particular, Defendants use Facebook and Google's Blogger forum to  
25 conduct the infringing activity alleged herein, which services are widely known to  
26 be headquartered in California and in this judicial district. Thus, Defendants have  
27 consummated transactions with residents of California and purposefully availed  
28 themselves of the privilege of conducting activities in California.

1           11. Moreover, by using these services, the Defendants have expressly  
2 invoked the benefits and protections of California's laws. Indeed, Facebook's terms  
3 and conditions state "You will resolve any claim, cause of action or dispute (claim)  
4 you have with us arising out of or relating to this Statement or Facebook  
5 exclusively in the U.S. District Court for the Northern District of California or a  
6 state court located in San Mateo County, and you agree to submit to the personal  
7 jurisdiction of such courts for the purpose of litigating all such claims. The laws of  
8 the State of California will govern this Statement, as well as any claim that might  
9 arise between you and us, without regard to conflict of law provisions."

10           12. Similarly, the terms and conditions governing Google's Blogger service  
11 state that "The laws of California, U.S.A., excluding California's conflict of laws  
12 rules, will apply to any disputes arising out of or relating to these terms or the  
13 Services. All claims arising out of or relating to these terms or the Services will be  
14 litigated exclusively in the federal or state courts of Santa Clara County, California,  
15 USA, and you and Google consent to personal jurisdiction in those courts."

16           13. In addition to conducting their infringing activities in California, the  
17 Defendants have aimed the harm caused by their activities to this state. On  
18 information and belief, a substantial portion of the recipients of the infringing files  
19 are located in California, and California residents constitute a substantial portion of  
20 the fan-base of these infringing blogs and Facebook accounts. Thus, Defendants  
21 committed intentional acts of infringement, expressly aimed at California, causing  
22 harm that Defendants know is likely to be suffered in California.

23           14. Moreover, the claims in this case directly arise out of and relate to the  
24 Defendants' activities in California, and the exercise of jurisdiction comports with  
25 fair play and substantial justice.

26           15. Further, to the extent that any Defendant resides outside of the United  
27 States, such Defendant has intentionally targeted the harm of their conduct to the  
28 United States. In particular, Defendants are well aware that Prince is a citizen and

1 resident of United States and would thus suffer harm from their unlawful activities  
 2 here in the United States. Moreover, a substantial portion of people interested in  
 3 downloading unauthorized Prince material are in the United States, and Defendants  
 4 directly target their unlawful content to such people. Thus, while foreign  
 5 Defendants are subject to jurisdiction in California for the reasons described above,  
 6 in the alternative, they are subject to jurisdiction in the United States as a whole  
 7 pursuant to Federal Rule of Civil Procedure 4(k)(2).

8 16. Finally, as alleged more specifically below, Defendants Chodera and  
 9 Jindrova have expressly consented to this Court's jurisdiction.

10 **Doe 1 - PurpleHouse2**

11 17. PurpleHouse2 maintained a blog at PurpleHouse2.blogspot.co.uk and  
 12 several other mirror blogs on the Blogger platform. He also maintained a Facebook  
 13 account at www.facebook.com/pages/Prince-Purple-House. The Facebook account  
 14 directed users to his blogs and his blogs directed users to file sharing services to  
 15 obtain unauthorized copies of bootlegged Prince performances. For example, one  
 16 blog post contained a link to download bootleg recordings of the following musical  
 17 compositions:

18 COMPOSITION	19 REGISTRATION NUMBER
20 Endorphinmachine	PAu001731960
21 Bambi	PA0000523663
22 Let's Go Crazy Reloaded	PA0000224634

23  
 24 **Doe 2 - DaBang319**

25 18. DaBang319 maintained a blog at Dabang319.blogspot.com. He also  
 26 maintained a Facebook account at www.facebook.com/DaBang319. The Facebook  
 27 account directed users to his blog and the blog directed users to file sharing services  
 28

1 to obtain unauthorized copies of bootlegged Prince performances. For example,  
 2 one blog post contained a link to download bootleg recordings of the following  
 3 musical compositions:

COMPOSITION	REGISTRATION NUMBER
Days of Wild	PAu001989947
1999	PAu000440507 / PA0000157921
Something in the Water (Does Not Compute)	PA0000157928
Let's Go Crazy	PA0000217248
She's Always in My Hair	PAu000722566
Nothing Compares 2 U	PA0000261000
Satisfied	PA0000427521
Housequake	PA0000339606
When Doves Cry	PA0000225932 / PA0000220373 / PAu000609914
Sign O' the Times	PA0000322108
Most Beautiful Girl in the World	PA0000692506
Hot Thing	PA0000339611
I Would Die 4 U	PA0000247244 / PA0000241298 / PA0000217252 / PAu000613662
Let's Work	PA0000130921
U Got the Look	PA0000339613
Purple Rain	PAu000613664 / PA0000217254

26 **Doe 3 - PurpleKissTwo**

27 19. PurpleKissTwo maintains a blog at PurpleKissTwo.blogspot.com. The  
 28 blog is used to direct users to file sharing services to obtain unauthorized copies of

1 bootlegged Prince performances. For example, one blog post contained a link to  
 2 download bootleg recordings of Prince's March 24, 2011, Charlotte, North Carolina  
 3 performance at which the following musical compositions were performed.

COMPOSITION	REGISTRATION NUMBER
When Doves Cry	PA0000225932 / PA0000220373 / PAu000609914
Darling Nikki	PAu000613661 / PA0000217251
Sign O' the Times	PA0000322108
Most Beautiful Girl in the World	PA0000732864 / PAu001832359 / PA0000692506
Uptown	PA0000724137
Raspberry Beret	PA0000270334 / PA0000252652 / PA0000255668 / PAu000705005
Cream	PA0000543529 / PA0000549273 PAu001547996
Cool	PAu000302976
Let's Work	PA0000130921
U Got the Look	PA0000339613
Nothing Compares 2 U	PA0000261000
Take Me With U	PA0000217249
Anotherloverholenyohead	PA0000291374
Controversy	PA0000130927
Shhh	PAu001805925
Elixer	PA0001695093

20. After counsel for Prince began issuing Digital Millennium Copyright Act  
 ("DMCA") notices to Google and to file sharing services used by PurpleKissTwo,

1 rather than using file sharing services, PurpleKissTwo began posting live  
 2 performance set lists on his blog with the instruction "U know what 2 do now."  
 3 Clicking "do" leads to the email address gettoffte@gmail.com. On information and  
 4 belief, this email account is used to distribute bootleg recordings. One such post  
 5 contains the set list for Prince's April 24, 2002, Oakland performance at which the  
 6 following musical compositions were performed:

COMPOSITION	REGISTRATION NUMBER
Rainbow Children	PA0001074922
Muse 2 The Pharaoh	PA0001074923
Mellow	PA0001074928
1+1+1=3	PA0001074929
Strange Relationship	PA0000339615
When You Were Mine	PA0000724137
Family Name	PA0001074933
Take Me With U	PA0000217249
Raspberry Beret	PAu000705005 / PA0000255668 / PA0000252652 / PA0000270334
Everlasting Now	PA0001074934
Adore	PA0000339619
Do Me Baby	PA0000130925
Girls and Boys	PA0000291369
Joy in Repetition	PA0000498333 / PA0000502599
Free	PA0000157929 / PAu000440514
Starfish And Coffee	PA0000339609
Sometimes It Snows in April	PA0000291375
Condition of the Heart	PA0000255665 / PAu000705004



Diamonds and Pearls	PA0000549272 / PAu001547993 / PA0000585432
Beautiful Ones	PA0000217250 / PAu000613659
Most Beautiful Girl in The World	PA0000692506 / PA0000732864 / PAu001832359
Purple Rain	PA0000217254 / PAu000613664 / PA0000238407 /
How Come U Don't Call Me Anymore	PA0000157922
Nothing Compares 2 U	PA0000261000
Anna Stesia	PAu001081255 / PA0000377935

**Doe 4 - WorldOfBootleg**

21. WorldOfBootleg maintains a blog at [WorldOfBootleg.blogspot.com](http://WorldOfBootleg.blogspot.com). The blog is used to direct users to file sharing services to obtain unauthorized copies of bootlegged Prince performances. For example, one blog post contained a link to download bootleg recordings of Prince's April 10, 1983, Chicago performance at which the following musical compositions were performed:

COMPOSITION	REGISTRATION NUMBER
Controversy	PA0000130927
Let's Work	PA0000130921
Do Me, Baby	PA0000130925
Free	PA0000157929 / PAu000440514
Something in the Water	PAu000440513 / PA0000157928
How Come U Don't Call Me Anymore?	PA0000157922

1	Lady Cab Driver	PA0000157930 / PAu000440515
2	Little Red Corvette	PA0000157923 / PAu000440508 /
3		PA0000174670
4	Sexuality	PA0000130926
5	Let's Pretend We're Married	PAu000440510 / PA0000157925 /
6		PA0000202417
7	International Lover	PAu000440517 / PA0000157932
8	1999	PAu000440507 / PA0000157921 /
9		PA0000165680

10 **Doe 5 - FunkyExperienceFour**

11 22. FunkyExperienceFour maintains a blog at  
 12 FunkyExperienceFour.blogspot.com. The blog is used to direct users to file sharing  
 13 services to obtain unauthorized copies of bootlegged Prince performances. For  
 14 example, one blog post contains a link to download bootleg recordings of Prince's  
 15 December 2013 Mohegan Sun Arena performance at which the following musical  
 16 compositions were performed:

18	COMPOSITION	REGISTRATION NUMBER
19	Days of Wild	PAu001989947
20	1999	PAu000440507 / PA0000157921
21	Something in the Water (Does Not	PA0000157928
22	Compute)	
23	Let's Go Crazy	PA0000217248
24	She's Always in My Hair	PAu000722566
25	Nothing Compares 2 U	PA0000261000
26	Satisfied	PA0000427521
27	Housequake	PA0000339606

1	When Doves Cry	PA0000225932 / PA0000220373 /
2		PAu000609914
3	Sign O' the Times	PA0000322108
4	Most Beautiful Girl in the World	PA0000692506
5	Hot Thing	PA0000339611
6	I Would Die 4 u	PA0000247244 / PA0000241298 /
7		PA0000217252 / PAu000613662
8	Let's Work	PA0000130921
9	U Got the Look	PA0000339613
10	Purple Rain	PAu000613664 / PA0000217254

11  
12 **Doe 6 - NPRUniverse**

13 23. NPRUniverse maintains a blog at NPRUniverse.blogspot.com. The blog  
14 is used to direct users to file sharing services to obtain unauthorized copies of  
15 bootlegged Prince performances. For example, one blog post contained a link to  
16 download bootleg recordings of Prince's performance of the following musical  
17 compositions:  
18

19	COMPOSITION	REGISTRATION NUMBER
20	Let's Go Crazy	PA0000217248 / PAu000613658 /
21		PA0000224634 / PA0000243437
22	Take Me With U	PA0000217249
23	Darling Nikki	PA0000217251 / PAu000613661
24	Joy in Repetition	PA0000498333 / PA0000502599
25	When Doves Cry	PA0000220373 / PAu000609914 /
26		PA0000225932 / PA0000224949
27	Computer Blue	PA0000217247 / PAu000645373 /
28		PAu000662613 / PAu000613660

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1	I Would Die 4 U	PA0000217252 / PA0000241298 /
2		PA0000247244 / PAu000613662
3	God	PAu000617271
4	Purple Rain	PA0000217254 / PAu000613664 /
5		PA0000238407 /
6	When You Were Mine	PA0000724137
7	Bambi	PA0000523663 / PAu001541679 /
8		PAu001475738
9	And God Created Woman	PA0000608655 / PAu001640802
10	3 Chains o' Gold	PAu001640803 / PA0000608654
11	Anna Stesia	PAu001081255 / PA0000377935
12	Still Would Stand All Time	PA0000498326 / PA0000502605
13	Adore	PA0000339619
14	Little Red Corvette	PA0000157923 / PAu000440508 /
15		PA0000174670
16	Housequake	PAu000952526 / PAu000952525 /
17		PA0000339606
18	The Ballad of Dorothy Parker	PA0000339607
19	Free	PA0000157929 / PAu000440514
20	Starfish And Coffee	PA0000339609
21	Sometimes It Snows in April	PA0000291375
22	How Come U Don't Call Me	PA0000157922
23	Anymore?	
24		

**Doe 7 - PSPMusicBlog**

24. PSPMusicBlog maintained a blog at [PSPMusicBlog.blogspot.com](http://PSPMusicBlog.blogspot.com).  
PSPMusicBlog also maintains a Facebook account at

1 www.facebook.com/PRINCEsoloPrince. The Facebook account directed users to  
 2 his blog and the blog directed users to file sharing services to obtain unauthorized  
 3 copies of bootlegged Prince performances. For example, one blog post contained a  
 4 link to download bootleg recordings of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
She's Always in My Hair	PAu000722566 / PA0000259277
Dreamer	PA0001695103
Bambi	PA0000523663 / PAu001541679 / PAu001475738
Let's Go Crazy	PA0000217248 / PAu000613658 / PA0000224634 / PA0000243437
Diamonds and Pearls	PA0000549272 / PAu001547993 / PA0000585432
Beautiful Ones	PA0000217250 / PAu000613659
Endorphinmachine	PAu001731960
Take Me With U	PA0000217249
Raspberry Beret	PAu000705005 / PA0000255668 / PA0000252652 / PA0000270334
The Max	PA0000608662 / PAu001640809
Electric Chair	PA0000427515 / PA0000433157
U Got The Look	PA0000339613
Colonized Mind	PA0001695121
Bambi	PA0000523663 / PAu001541679 / PAu001475738
Housequake	PAu000952526 / PAu000952525 / PA0000339606

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Sign O' the Times	PA0000335119 / PA0000322108 / PA0000325919
Nothing Compares 2 U	PA0000261000
Purple Rain	PA0000217254 / PAu000613664 / PA0000238407 /

**Doe 8 - TheUltimateBootlegExperience**

25. TheUltimateBootlegExperience operates a blog at TheUltimateBootlegExperience7.blogspot.com. His blog is used to direct users to Guitars101.com, which in turn contains links to file sharing services to bootlegs of many artists, including Prince. For example, one blog post contained a link that allowed users to reach links to download Prince's live performances of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
Future	PA0000427514
1999	PAu000440507 / PA0000157921 / PA0000165680
Housequake	PAu000952526 / PAu000952525 / PA0000339606
Kiss	PA0000284474 / PA0000289688
Purple Rain	PA0000217254 / PAu000613664 / PA0000238407 /
Take Me With U	PA0000217249
If I Had a Harem	PAu001166396
Alphabet Street	PA0000377936 / PA0000371276 / PAu001081257

Question of U	PA0000498334 / PA0000502595
Under the Cherry Moon	PA0000291368 / PAu000875301

**Dan Chodera & Karina Jindrova**

26. Dan Chodera and Karina Jindrova operate a Facebook account at [www.facebook.com/kristynafanpage](http://www.facebook.com/kristynafanpage). The Facebook account has posted numerous videos of bootlegged Prince performances, including of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
Let's Go Crazy	PA0000217248 / PAu000613658 / PA0000224634 / PA0000243437
Bambi	PA0000523663 / PAu001541679 / PAu001475738
She's Always in My Hair	PAu000722566 / PA0000259277
Most Beautiful Girl in the World	PA0000692506 / PA0000732864 / PAu001832359
I Hate U	PA0000774220 / PAu001989956
Satisfied	PA0001331131
Dreamer	PA0001695103

27. In response to Prince's DMCA takedown notices to Facebook, Chodera submitted two counter-notifications pursuant to 17 U.S.C. § 512(g)(2) on January 9, 2014. Jindrova submitted a similar counter-notification on January 15, 2014. Both Chodera and Jindrova provided a foreign address. As a result, pursuant to 17 U.S.C. § 512(g)(3)(D), Chodera and Jindrova have expressly consented to the jurisdiction of any Federal District Court in which the service provider (Facebook)

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1 can be found. Thus, Chodera and Jindrova have expressly consented to jurisdiction  
2 in this district in which Facebook maintains its headquarters.

3 **Does 9-10**

4 28. On information and belief, Does 9-10 are responsible for the initial  
5 fixation of the bootlegged material described in this Complaint. Does 9 through 10  
6 are either the operators of one of the blogs and Facebook accounts described herein  
7 and/or provide their material to operators of the blogs and Facebook accounts  
8 described herein for further distribution.

9 **Does 11-20**

10 29. On information and belief, Does 11-20 are additional individuals or  
11 entities responsible for one or more the blogs and Facebook accounts of Does 1-8,  
12 Chodera and Jindrova.

13 **FIRST CLAIM FOR RELIEF**

14 **Direct Copyright Infringement**

15 **17 U.S.C. § 501**

16 **(All Defendants)**

17 30. All preceding paragraphs are incorporated here.

18 31. Prince is the owner of copyright registrations in numerous musical  
19 compositions, each of which is a valid copyright.

20 32. As alleged herein, Defendants have reproduced and distributed copies of  
21 these works without Prince's permission.

22 33. As a result, Defendants have committed direct copyright infringement.

23 34. Defendants' actions are and have been willful within the meaning of  
24 17 U.S.C. § 504(2).

25 35. Defendants' infringements have caused and will continue to cause  
26 substantial, immediate and irreparable injury to Prince for which there is no  
27 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against  
28 Defendants.



1 36. In addition, Prince has suffered and is continuing to suffer damages in an  
2 amount according to proof, but no less than \$1 million per Defendant and, in  
3 addition, is also entitled to recover from Defendants costs and attorneys' fees  
4 pursuant to 17 U.S.C. § 505.

5 37. Prince is also entitled to recover statutory damages pursuant to 17 U.S.C.  
6 § 504 in an amount according to proof, but no less than \$1 million per Defendant.

7 38. Prince is also entitled to recover the Defendants' profits in an amount  
8 according to proof pursuant to 17 U.S.C. § 504(b).

9 39. Finally, Prince requests that the Court, to the extent practicable, order  
10 impoundment and return to Prince all infringing material pursuant to 17 U.S.C.  
11 § 503 and the Court's inherent equitable powers.

12 **SECOND CLAIM FOR RELIEF**

13 **Unauthorized Fixation and Trafficking in Sound Recordings**

14 **17 U.S.C. § 1101.**

15 **(All Defendants)**

16 40. All preceding paragraphs are incorporated here.

17 41. As described herein, Defendants have fixed the sounds or sound and  
18 images of numerous live musical performances of Prince in copies or phonorecords  
19 without Prince's consent ("Bootlegged Recordings").

20 42. Defendants have transmitted or otherwise communicated the Bootlegged  
21 Recordings to the public and have distributed and offered to distribute the  
22 Bootlegged Recordings.

23 43. As a result, Defendants have committed direct copyright infringement.

24 44. Defendants' actions are and have been willful within the meaning of  
25 17 U.S.C. § 504(2).

26 45. Defendants' infringements have caused and will continue to cause  
27 substantial, immediate and irreparable injury to Prince for which there is no  
28

1 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against  
2 Defendants.

3 46. In addition, Prince has suffered and is continuing to suffer damages in an  
4 amount according to proof, but no less than \$1 million per Defendant, and, in  
5 addition, is also entitled to recover from Defendants costs and attorneys' fees  
6 pursuant to 17 U.S.C. § 505.

7 47. Prince is also entitled to recover statutory damages pursuant to 17 U.S.C.  
8 § 504 in an amount according to proof, but no less than \$1 million per Defendant.

9 48. Prince is also entitled to recover the Defendants' profits in an amount  
10 according to proof pursuant to 17 U.S.C. § 504(b).

11 49. Finally, Prince requests that the Court, to the extent practicable, order  
12 impoundment and return to Prince all unlawful material pursuant to 17 U.S.C.  
13 § 503 and the Court's inherent equitable powers.

14 **THIRD CLAIM FOR RELIEF**

15 **Contributory Copyright Infringement & Bootlegging**

16 **(All Defendants)**

17 50. All preceding paragraphs are incorporated here.

18 51. When Defendants posted the infringing and bootlegged material to their  
19 blogs and Facebook accounts, they knew that the users of those blogs and accounts  
20 would download such material in violation of Prince's rights.

21 52. Defendants intentionally induced and materially contributed to such  
22 user's actions. Indeed, Defendants' entire purpose in setting up their blogs and  
23 accounts was to induce such wrongful actions by their users.

24 53. Defendants' actions are and have been willful within the meaning of  
25 17 U.S.C. § 504(2).

26 54. Defendants' infringements have caused and will continue to cause  
27 substantial, immediate and irreparable injury to Prince for which there is no  
28

1 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against  
2 Defendants.

3 55. In addition, Prince has suffered and is continuing to suffer damages in an  
4 amount according to proof, but no less than \$1 million per Defendant and, in  
5 addition, is also entitled to recover from Defendants costs and attorneys' fees  
6 pursuant to 17 U.S.C. § 505.

7 56. Prince is also entitled to recover statutory damages pursuant to 17 U.S.C.  
8 § 504 in an amount according to proof, but no less than \$1 million per Defendant.

9 57. Prince is also entitled to recover the Defendants' profits in an amount  
10 according to proof pursuant to 17 U.S.C. § 504(b).

11 58. Finally, Prince requests that the Court, to the extent practicable, order  
12 impoundment and return to Prince all unlawful material pursuant to 17 U.S.C.  
13 § 503 and the Court's inherent equitable powers.

### 14 PRAYER FOR RELIEF

15 **WHEREFORE** Prince prays for relief as follows:

- 16 A. For an award of actual or statutory damages in an amount according to  
17 proof, but no less than:
- 18 i. \$1 million against Dan Chodera,
  - 19 ii. \$1 million against Karina Jindrova,
  - 20 iii. \$1 million against Doe 1 (PurpleHouse2),
  - 21 iv. \$1 million against Doe 2 (DaBang319),
  - 22 v. \$1 million against Doe 3 (PurpleKissTwo),
  - 23 vi. \$1 million against Doe 4 (WorldOfBootleg),
  - 24 vii. \$1 million against Doe 5 (FunkyExperienceFour),
  - 25 viii. \$1 million against Doe 6 (NPRUniverse),
  - 26 ix. \$1 million against Doe 7 (PSPMusicBlog),
  - 27 x. \$1 million against Doe 8 (TheUltimateBootlegExperience), and
  - 28 xi. \$1 million each for each of the remaining Defendants;
- B. A permanent injunction prohibiting each Defendant (and anyone acting  
in concert with one or more Defendants) from violating any of Prince's

1 rights under the Copyright Act, including but not limited to an  
2 injunction against violations of 17 U.S.C. §§ 501 and 1101, as well as  
3 an injunction prohibiting each Defendant from materially contributing  
4 or inducing third parties to violate those rights;

5 C. Disgorgement of ill-gotten gains according to proof;

6 D. Interest;

7 E. An order pursuant to 17 U.S.C. § 503 and/or the Court's inherent  
8 equitable powers impounding unlawful materials and requiring  
9 delivery of possession to such materials to Prince;

10 F. Reasonable attorneys' fees pursuant to 17 U.S.C. § 505;

11 G. For such further relief as the Court deems just and proper.

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13 Dated: January 16, 2014

Respectfully submitted,

KAYE SCHOLER LLP

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16 By: \_\_\_\_\_ /s/  
17 Rhonda R. Trotter  
18 Oscar Ramallo  
19 Attorneys for Plaintiff  
20 PRINCE ROGERS NELSON  
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**DEMAND FOR JURY TRIAL**

Prince Rogers Nelson demands a jury trial on all issues so triable.

Dated: January 16, 2014

Respectfully submitted,  
KAYE SCHOLER LLP

\_\_\_\_\_  
/s/  
Rhonda R. Trotter  
Oscar Ramallo  
Attorneys for Plaintiff  
PRINCE ROGERS NELSON

KAYE SCHOLER<sup>LLP</sup>

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