

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

THOMAS P. MACZUZAK  
32 North Parkway Drive  
Eastlake, Ohio 44095

Plaintiff,

v.

JOHN DOE (real name unknown)  
(real address unknown)

Defendant.

) CASE NO.  
)  
) JUDGE:  
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) COMPLAINT  
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) COPYRIGHT INFRINGEMENT  
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Now comes plaintiff, Thomas P Maczuzak, for his complaint against the defendant does hereby state and aver as follows:

**NATURE OF THE ACTION**

1. This is a civil action arising under the laws of the United States, specifically under 17 USC § 501 for copyright infringement.

**PARTIES**

2. Multiple websites have published the copyright infringing images marked Exhibit 'A' through 'F' (hereafter, the "Images") on their websites; and, Google.com and Bing.com each display the Images in its search results.

**JURISDICTION AND VENUE**

3. The Court has subject matter jurisdiction pursuant to 17 USC § 501 for copyright infringement law of the United States.

4. The Court has personal jurisdiction over the Defendants. On information and belief, defendant has conducted acts of copyright infringement.

5. Venue is proper in this District. On information and belief, Defendants are subject to personal jurisdiction in this District and the acts complained of herein take place within this District.

**FACTS**

6. Plaintiff is the authorized copyright agent for the infringing Images.
7. Plaintiff is the copyright owner of the Images.
8. That use and publication of the Images on the infringing websites is unauthorized and is a DMCA infringement on Plaintiff's ownership rights.
9. The Images published on the websites were widely distributed and published to third parties.

**COUNT I - COPYRIGHT INFRINGEMENT**

10. All prior paragraphs and averments are included as if fully restated herein.
11. Defendants use of the Images is directly resulting in severe harm to Plaintiff resulting in defamation, disparagement and invasion of privacy to Plaintiff.
12. As a direct result of Defendant's use of the Images, Plaintiff has been severely harmed, ridicules, and suffered direct loss to reputation, loss of business, shame and dishonor and egregious harm and damage.

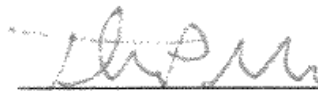
**WHEREFORE :**

Plaintiffs pray for relieve as follows:

1. An order demanding Google.com and Bing.com to remove search results containing the Images from when keywords "Tom Maczuzak", "Thomas Maczuzak", "Lily Maczuzak", "Li Li Maczuzak" and "LiLi Maczuzak".

Respectfully submitted,

Thomas P. Maczuzak, Esq.



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