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**Quentin Tarantino**

8  
 9 **UNITED STATES DISTRICT COURT**  
 10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
 11 **WESTERN DIVISION**

12 **QUENTIN TARANTINO**, an  
 individual;

13 Plaintiff,

14 v.

15 **GAWKER MEDIA, LLC**, a/k/a  
 16 Gawker Media, a Delaware  
 corporation,

17 Defendant.

**CASE NO. 14-CV-00603-JFW**  
**[HON. JOHN F. WALTER]**

**FIRST AMENDED COMPLAINT**  
**FOR:**

1. **COPYRIGHT INFRINGEMENT**  
**(DIRECT AND**  
**CONTRIBUTORY )**

***[JURY TRIAL DEMANDED]***

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1 Plaintiff Quentin Tarantino (“Plaintiff” and/or “Tarantino”), alleges:

2 **THE NATURE OF THIS ACTION**

3 1. This action is necessitated by Gawker’s blatant both direct and  
4 contributory copyright infringement. Gawker engaged in direct copyright  
5 infringement by their unauthorized download of a PDF copy of the leaked  
6 unreleased complete screenplay for Quentin Tarantino's motion picture The Hateful  
7 Eight (the "Screenplay"). Gawker also engaged in contributory copyright  
8 infringement, both by their solicitation for its readers to violate copyright and “leak  
9 the script to us,” and, after obtaining the unauthorized Screenplay in response to  
10 their initial contributory infringement solicitation, by their promotion, aiding and  
11 abetting and materially contributing to the dissemination to third-parties of  
12 unauthorized downloadable PDF copies of the leaked Screenplay.

13 2. Gawker has made a business of predatory journalism, violating people’s  
14 rights to make a buck. This time they went too far. Rather than merely publishing  
15 a news story reporting that Plaintiff’s screenplay may have been circulating within  
16 certain limited Hollywood circles without his permission, Gawker crossed the  
17 journalistic line, first by requesting that a reader “leak” an infringing copy directly  
18 to Gawker, then second, after obtaining a link to and itself directly downloading an  
19 infringing PDF copy, and then third, by promoting itself to the public as the first  
20 source to download and read the entire Screenplay illegally and directing the public  
21 to do so.

22 3. After Gawker caused one of its readers to “leak” an infringing copy to  
23 Gawker, and obtained an infringing copy, Gawker posted an article with headline  
24 that boasts “*Here Is the Leaked Quentin Tarantino Hateful Eight Script*” –  
25 “**Here**,” not someplace else, but “**Here**” on the Gawker website. The article then  
26 contains multiple direct links for downloading the entire Screenplay through a  
27 conveniently anonymous URL by simply clicking button-links on the Gawker page,  
28 and brazenly encourages Gawker visitors to obtain and read the Screenplay illegally

1 with the invitation to “**Enjoy!**” it. There was nothing newsworthy or journalistic  
2 about Gawker itself directly infringing copyright, nor facilitating, encouraging and  
3 directly inducing the public’s violation of Plaintiff’s copyright in the Screenplay, and  
4 it’s conduct will not shield Gawker from liability for their unlawful activity.

5 4. Notwithstanding repeat demands for the removal of the posted URL  
6 links for direct downloading of the unlawfully posted script, including submissions  
7 of DMCA notices of copyright infringement, Gawker failed and expressly refused  
8 to remove their directions to and URL links to get the infringing materials. Gawker  
9 knowingly and actively acted as a promoter of copyright pirates, and, itself, did  
10 directly cause, induce, contribute to, enable and materially facilitate copyright  
11 infringement. The reason for the Copyright Act is to protect against the Gawker’s  
12 conduct.

13 5. This is an action to obtain redress for Gawker’s, and their co-  
14 conspirators’, blatant violation of Tarantino’s copyrighted work, among other  
15 calculated wrongful and tortious conduct.

16 **JURISDICTION & VENUE**

17 6. This action is brought, and exclusive subject matter jurisdiction lies  
18 within this Court upon multiple grounds, including pursuant to the United States  
19 Copyright Act, 17 U.S.C. Sections 101 et seq., based on acts of copyright  
20 infringement committed in the United States (28 U.S.C. §§ 1331 and 1338(a)). This  
21 Court has federal question jurisdiction over this matter pursuant to 28 U.S.C. §  
22 1338(a), and pursuant to 17 U.S.C. § 410(d) and § 411.

23 7. Venue lies within this District pursuant to 28 U.S.C. §1400, and is also  
24 proper in this District pursuant to 28 U.S.C. § 1391 (b) and (c) because Defendants,  
25 and each of them, are subject to personal jurisdiction in this District as a substantial  
26 part of the events or omissions giving rise to the claims herein occurred in this  
27 District. This Court also has jurisdiction and venue of this action under 15 U.S.C.  
28 §1125 *et seq.*, 28 U.S.C. §§1331, 1338(a) and (b). Some of the key acts giving rise

1 to the claims asserted herein occurred in Los Angeles, California. The amount in  
2 controversy includes statutory damages for copyright infringement of up to  
3 \$150,000 per violation, which Plaintiff sustained in the County of Los Angeles.

4 **FACTS COMMON TO ALL CLAIMS FOR RELIEF**

5 **THE PARTIES**

6 8. Plaintiff **Quentin Tarantino** (“Plaintiff” and/or “Tarantino”) is, and  
7 at all times relevant hereto was, an individual residing in and who is engaged in and  
8 doing business in the County of Los Angeles, State of California. Tarantino is a  
9 multiple Oscar winning and nominated writer and director.

10 9. Defendant **Gawker Media, LLC**, also know as (a/k/a) and doing  
11 business as (d/b/a) Gawker Media (“Gawker”), is, and at all times relevant hereto  
12 was, a limited liability company organized and operating under the laws of the State  
13 of Delaware, with its principal place of business in the State of New York, and who  
14 is engaged in and doing business and commercial activities in and causing a direct  
15 effect in the County of Los Angeles, State of California.

16  
17 **PLAINTIFF’S REGISTERED COPYRIGHT**

18 10. Plaintiff Tarantino wrote a screenplay for a new ensemble western  
19 motion picture, titled *The Hateful Eight* (the “Screenplay”), that he would direct.  
20 Plaintiff previously filed for registration of copyright with the United States  
21 Copyright Office (“USCO”) for the subject work, the Screenplay, as a “motion  
22 picture screenplay” literary textual work under the title “*The Hateful Eight*,”  
23 pursuant to USCO Claim ID Number 1-JAFORJ, and Registration Number PAU  
24 3-704-198. Said copyright registration application has been fully completed and was  
25 submitted, effective as of January 23, 2014 at 3:19:26 PM ET, including with full  
26 payment tendered of the service fee and deposit of the subject material -- all prior  
27 to the infringements set forth herein.

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**BACKGROUND AND NATURE OF THIS ACTION**

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2           11.     On or about January 21, 2014, Plaintiff discovered that a copy of his  
3 Screenplay had, without his knowledge or authorization, been copied without his  
4 permission and leaked, albeit only in a limited manner within certain Hollywood  
5 circles (*i.e.*, online search engine searches for a copy of the script, through January  
6 23, did not have any positive results, nor were there any publicly known or reported  
7 copies available). After learning of the leak, Plaintiff decided to postpone working  
8 on the movie, and stated publicly -- in an interview that was widely reported in the  
9 media -- that he intended to publish it as a literary work. Plaintiff routinely  
10 publishes his final versions of his screenplays for substantial advances and royalties.

11           12.     Seizing upon this information, Gawker — itself admittedly unable to lay  
12 hands on the confidential Screenplay, which was at that point not publicly available  
13 anywhere on the Internet nor outside of certain very limited Hollywood circles —  
14 publicly solicited its purported 47 million monthly United States readers to infringe  
15 Tarantino’s copyright, asking and inducing anyone to leak and provide Gawker with  
16 an unauthorized infringing copy of the Screenplay. Specifically, on January 22,  
17 2014 at 10:37 AM ET, Gawker posted an article on the “Defamer” section of its  
18 Gawker Website -- at <[http://defamer.gawker.com/quentin-tarantino-  
19 throws-temper-tantrum-after-script-le-1506541036](http://defamer.gawker.com/quentin-tarantino-throws-temper-tantrum-after-script-le-1506541036)> (Gawker’s “January 22nd  
20 Article”) -- about the leaked script and about Plaintiff’s public statements on the  
21 matter. In Gawker’s January 22nd Article, Gawker actively solicited and induced  
22 its readers to infringe Tarantino’s copyright, and to provide it with an unauthorized  
23 infringing copy of the Screenplay, stating **“if anyone would like to ... leak the  
24 script to us, please do so at [gawker email address].”**

25           13.     Gawker's solicitation and direct inducement for copyright infringement  
26 worked, as, by the next day, Gawker itself obtained a PDF of the Screenplay and  
27 a theretofore publicly unknown universal resource locator ("URL") link to an  
28 anonymous file storage and download site that had stored for download an infringing

1 unauthorized full PDF copy of the complete copyright registered Screenplay. The  
2 PDF of the Screenplay was uploaded, for storage and download availability, on the  
3 obscure file storage website AnonFiles.com (“AnonFiles Website”) page, at the url  
4 <<https://anonfiles.com/file/ba77fe6f664d451a4725fbcca0846f67>> (the “Screenplay  
5 Download URL”).

6 14. The AnonFiles Website, operated by a person currently referred to as  
7 DOE-1, is a file storage site that allows a user to upload an individual file to the  
8 storage site, and, upon uploading the file, receive a secret private URL at which the  
9 user can later retrieve and download the file and/or share the URL link to allow  
10 another person to download the file via a “download” button on the page at the  
11 particular secret private URL. The AnonFiles Website is not a searchable site nor  
12 do any files nor any pages have tags, terms or content locateable by the public,  
13 whereby, upon uploading a file, if the uploader does not document/save a copy of  
14 his/her secret private auto-generated URL, the file can never again be located and  
15 retrieved, whether via the site or any search engine.

16 15. An unidentified direct copyright infringer, referred to as Doe-  
17 FileUploader 2, uploaded an unauthorized full copy of the Screenplay to the  
18 AnonFiles Website. The copying of, use, reproduction, distribution, display,  
19 transmission and/or dissemination of copies of the Screenplay and any physical  
20 embodiment thereof, uploaded to the AnonFiles Website, is unauthorized, and  
21 constitutes an infringement of Plaintiff's rights, including of the Screenplay  
22 copyright, and violation of copyright law. The AnonFiles Website and its user  
23 involved in the upload of the Screenplay to the AnonFiles Website have infringed  
24 Plaintiff's exclusive copyright in and to the Screenplay directly and indirectly by  
25 use, reproduction, display, transmission and/or dissemination of the copyrighted  
26 work, causing the copyrighted work to be copied and distributed, all without the  
27 consent of Plaintiff.

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1           16. The copy of the Screenplay was stored on AnonFiles.com only in the  
2 popular portable document format ("PDF") file format, and then only available  
3 pursuant to a file "download" button, which by its very nature cannot simply be  
4 viewed on a computer's screen without first being completely downloaded through  
5 the Internet to an individual's computer. Anyone who sought to read or obtain the  
6 Screenplay from the Screenplay Download URL necessarily had to first download  
7 a PDF copy of the work onto their own computer.

8           17. On January 23, 2014, after Gawker obtained the Screenplay Download  
9 URL in response to its request for leak of an unauthorized infringing copy of the  
10 Screenplay, Gawker itself illegally downloaded to its computers an unauthorized  
11 infringing PDF copy of the Screenplay -- read it and learned that the PDF download  
12 document was 146 pages -- directly infringing Tarantino's copyright.

13           18. Immediately thereafter, on January 23, 2014 at 4:50 PM ET, with full  
14 knowledge that the Screenplay Download URL was to an unauthorized PDF copy  
15 of Tarantino's unreleased copyrighted script, Gawker fabricated a "story" that the  
16 script had been made *publicly* available online so that Gawker could then trumpet  
17 to the world and begin promoting itself as the very first source for the public to be  
18 able to obtain the entire Screenplay. Gawker posted an article on its Gawker  
19 Website -- at <http://defamer.gawker.com/here-are-plot-details-from-quentin-tarantinos-leaked-1507675261> > (Gawker's "January  
20 23rd Article") -- with direct URL click-through links for the transmission and  
21 downloading of the complete Screenplay at the Screenplay Download URL. In its  
22 January 23rd Article, titled "***Here Is the Leaked Quentin Tarantino Hateful Eight***  
23 ***Script***", Gawker posted an otherwise private in-line hyperlink to the obscure private  
24 file hosting website AnonFiles.com, where an illegal PDF pirated copy of the  
25 Screenplay was otherwise privately stored.

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1           19. In its January 23rd Article, Gawker specifically encouraged its readers  
2 to download the PDF “document” and then read the Screenplay illegally, with the  
3 invitation that the “document is 146 pages of pure Tarantino. Enjoy!,” with the text  
4 “146 pages” also a link to the downloadable PDF copy of the Screenplay on  
5 AnonFiles.com. In its January 23rd Article, Gawker expressly and specifically  
6 directed, encouraged and solicited its “47,000,000 Monthly US Readers” and the  
7 general public with click-through URL links on where and how (*i.e.*, "Here") to  
8 obtain an unauthorized downloadable PDF copy of the unreleased Screenplay on  
9 AnonFiles.com, by which they intended to and did directly cause, contribute to,  
10 enable, facilitate, aid, abet, induce and/or participate in the direct infringement of  
11 Plaintiff’s copyrighted work, thereby propagating such unauthorized download and  
12 infringement of Plaintiff's work by both AnonFiles and various third-party Internet  
13 users.

14           20. Between January 23, 2014 and January 26, 2014, and based on and as  
15 a direct result of Gawker’s January 23rd Article and their following the Gawker’s  
16 click-through URL links to the Screenplay on the AnonFiles Website, specific third-  
17 party infringers, including but not limited to persons identified and referred to  
18 herein as Doe-Downloader(s) 3 through 6, did each download a copy of the  
19 unauthorized PDF of the Screenplay from the AnonFiles Website to their  
20 computers. Gawker caused, induced and materially contributed to the infringement  
21 of Tarantino’s Screenplay by the subsequent third-party Doe-Downloaders 3-6.

22           21. Doe-Downloaders 3-6, and the general public and other third-party  
23 infringers, would not have known about or found the complete PDF downloadable  
24 copy of the Screenplay on the AnonFiles Website if not for Gawker’s January 23rd  
25 Article post with specific click-through URL links to the Screenplay. Until  
26 publication of Gawker’s article, online search engine searches for the Screenplay did  
27 not yield any positive results for any copy of the Screenplay. Gawker’s article  
28 linked to the first (and otherwise unknown) incidence of the complete Screenplay

1 being posted online or otherwise publicly available. Gawker's article and links  
2 became the source for wide-spread of the otherwise limited leak within certain  
3 Hollywood circles, as it was then widely commented upon and referred to by  
4 various other media outlets and downloaded by Gawker's readers.

5         22. On January 23 and 25, 2014, Plaintiff's authorized agent submitted a  
6 "Digital Millennium Copyright Act ("DMCA") Notice of Infringement" to the  
7 operators of the AnonFiles Website (the "AnonFiles DMCA Notice"). Pursuant to  
8 the AnonFiles DMCA Notice, Plaintiff's authorized agent made demand that the  
9 operators of the AnonFiles Website immediately remove from its website/systems  
10 the unauthorized PDF downloadable copy of the Screenplay and/or any links that  
11 allows for access to the transmission and/or downloading of the Screenplay.  
12 AnonFiles failed to expeditiously comply with the AnonFiles DMCA Notice. And  
13 then, even after the initial Screenplay pdf file was eventually disabled, a  
14 replacement pdf file copy was posted and made available for view and download at  
15 the same AnonFiles Website Screenplay Download URL. On or about January 26,  
16 2014, the ScreenPlay file at the dedicated AnonFiles Website Screenplay Download  
17 URL was disabled.

18         23. On January 26, 2014, as the download URL link to the Screenplay in  
19 Gawker's January 23rd Article temporarily no longer led to an available  
20 downloadable copy of the Screenplay, Gawker was faced with no longer being able  
21 to promote itself and drive traffic to its site as the source for the public to be able  
22 to get the Screenplay "Here," So Gawker updated its January 23rd Article in order  
23 to continue to directly contribute to the further infringement of Tarantino's  
24 copyright. On January 26, 2014, after a Gawker reader and third-party infringer  
25 had downloaded a copy of the Screenplay which originated from the AnonFiles  
26 Screenplay Download URL (prior to the page being disabled) and thereafter  
27 uploaded a PDF copy to the website Scribd.com, Gawker amended and updated its  
28 January 23rd Article, writing: "the script has been made public online here and

1 here,” to add the text “and here” into its article — with the subsequent text “here”  
2 an additional new URL click-through link directly to a subsequent replacement  
3 available copy of the complete Screenplay, hosted on the website Scribd.com.

4 24. On January 26, 2014, based on and as a direct result of Gawker’s  
5 updated (on January 26th) January 23rd Article and the following of the Gawker’s  
6 click-through URL link to the Screenplay, specific third-parties, including but not  
7 limited to a specific person identified and referred to herein as Doe-Downloader 7  
8 who at or about 9:18 pm, did download a copy of the unauthorized PDF of the  
9 Screenplay from the Scribd.com Website to his computer. Gawker caused, induced  
10 and materially contributed to the infringement of Tarantino’s Screenplay by the Doe-  
11 Downloader 7, and other persons, download of the Screenplay.

12 25. Notwithstanding repeated demands for the removal of the posted direct  
13 URL links to downloadable copies of the unlawfully posted infringing materials,  
14 including submissions to Gawker and to AnonFiles of DMCA notices of copyright  
15 infringement, (i) AnonFiles failed to expeditiously disable access to and/or remove  
16 the posted infringing materials, and then, even after the initial downloadable  
17 Screenplay PDF file was eventually removed, soon thereafter a subsequent pdf file  
18 copy was posted and made available for download at the exact same AnonFiles  
19 Website Screenplay Download URL, and (ii) Gawker likewise failed and expressly  
20 refused to remove its directions to and links to the initial downloadable infringing  
21 Screenplay on AnonFiles and, thereafter, subsequent downloadable infringing  
22 Screenplay on Scribd.com.

23  
24 **FIRST CLAIM FOR RELIEF**

25 **Direct and Contributory Copyright Infringement [17 U.S.C. § 101 *et. seq.*]**  
26 **(Against Defendant GAWKER MEDIA, LLC)**

27 26. Plaintiff repeats, realleges and incorporates each and every allegation  
28 contained in Paragraphs 1 through 25, inclusive, as though fully set forth herein.

1           27. Plaintiff is the sole exclusive owner of all right, title and interest in the  
2 work and copyright to the Screenplay, and the physical embodiment(s) thereof. The  
3 subject work of this claim has been properly and fully submitted in Plaintiff's name  
4 to the U.S. Copyright Office ("USCO") for copyright registration, prior to the  
5 infringement alleged herein.

6           28. On January 23, 2014, after Gawker obtained the Screenplay Download  
7 URL in response to its request for leak of an unauthorized infringing copy of the  
8 Screenplay, Gawker itself illegally downloaded to its computers an unauthorized  
9 infringing PDF copy of the Screenplay.

10           29. Gawker's conduct constitutes a direct copyright infringement of  
11 Plaintiff's rights and copyright. Gawker has infringed Plaintiff's exclusive  
12 copyright in and to the Screenplay by itself downloading from the AnonFiles  
13 Website to one or more of its computers an unauthorized infringing PDF copy of  
14 the Screenplay. Gawker then utilized the unauthorized infringing PDF copy of the  
15 Screenplay to disseminate portions of and/or content from the unpublished work.  
16 Accordingly, Gawker is liable to Tarantino for direct copyright infringement.

17           30. On or about January 23, 2014 at 4:50 PM ET -- after the unauthorized  
18 infringing PDF copy of the Screenplay was uploaded and posted on the obscure file  
19 upload website AnonFiles.com ("AnonFiles Website") -- Defendant Gawker posted  
20 its January 23rd Article on their Gawker Website titled "***Here Is the Leaked***  
21 ***Quentin Tarantino Hateful Eight Script***". In the January 23rd Article, Gawker  
22 wrote about how an upset Quentin Tarantino was "betrayed" by someone who  
23 copied and leaked the Screenplay for Tarantino's "latest film, The Hateful Eight."  
24 Gawker's writer also wrote: (i) "Since [Gawker] first posted this item, a document  
25 that appears to be the **script has been made public online here**" -- with the text  
26 "here" a URL click-through link directly to the posted downloadable PDF copy of  
27 the complete Screenplay at the Screenplay Download URL page; and (ii) "For better  
28 or worse, the **document is 146 pages of pure Tarantino. Enjoy!**" -- with the text

1 “146 pages” also a URL click-through link directly to the posted downloadable copy  
2 of the complete Screenplay at the Screenplay Download URL page, first with the  
3 initial downloadable infringing Screenplay and also the subsequent downloadable  
4 infringing Screenplay.

5 31. On January 26th, Gawker amended and updated its January 23rd  
6 Article, writing “... the script has been made public online *here and here*”, to add  
7 the text “and here” into its article -- with the subsequent text “here” an additional  
8 URL click-through link directly to another posted downloadable copy of the  
9 complete Screenplay, posted on the website scribd.com.

10 32. Gawker, through its article and specific URL click-through links  
11 therein, directed the general public on where and how to obtain and download an  
12 otherwise unknown unauthorized copyright infringing PDF copy of the unreleased  
13 Screenplay. Between January 23, 2014 and January 26, 2014, and based on and as  
14 a direct result of Gawker’s January 23rd Article and their following the Gawker’s  
15 click-through URL links to the Screenplay, specific third-party infringers, including  
16 but not limited to persons referred to herein as Doe-Downloader(s) 3 through 6, did  
17 each download the unauthorized PDF of the Screenplay. On January 26, 2014,  
18 based on and as a direct result of Gawker’s updated (on January 26th) January 23rd  
19 Article and the following of the Gawker’s click-through URL link to the Screenplay,  
20 specific third-parties, including but not limited to a specific person referred to herein  
21 as Doe-Downloader 7, did download the unauthorized PDF of the Screenplay.  
22 Gawker intended to and did directly cause, contribute to, enable, facilitate, aid,  
23 abet, induce and/or participate in the dissemination of and infringement of Plaintiff’s  
24 copyrighted work. Gawker, with knowledge of the infringing activity, induced,  
25 solicited, encouraged, caused or materially contributed to the infringing conduct of  
26 (i) DOE-1 a/k/a AnonFiles.com, (ii) Doe-Uploader 2, and (iii) Doe-Downloaders  
27 3-7.

28 / / /

1           33. Gawker’s conduct constitutes a contributory copyright infringement of  
2 Plaintiff’s rights and copyright. Gawker infringed Plaintiff’s exclusive copyright in  
3 and to the Screenplay by knowingly facilitating and directly contributing to the  
4 transmission and/or dissemination of unauthorized copies of the copyrighted work,  
5 and causing the copyrighted work to be copied and distributed worldwide, all  
6 without the consent of Plaintiff. Accordingly, Gawker is liable to Tarantino for  
7 contributory copyright infringement.

8           34. On January 23, 2014 (and again on January 24, 2014), Plaintiff’s  
9 authorized agent submitted a “Digital Millennium Copyright Act (“DMCA”) Notice  
10 of Infringement” to the operators of the Gawker Website (the “Gawker DMCA  
11 Notice”), providing notice that links to access to the infringing copy of the  
12 Screenplay appears at the URL locations on their website as set forth in the Gawker  
13 DMCA Notice. Pursuant to the Gawker DMCA Notice, Plaintiff’s authorized agent  
14 made demand that Gawker immediately remove from its website the URL links to  
15 the unauthorized posting of the Screenplay and/or any links that allows for access  
16 to the transmission and/or downloading of the Screenplay. Plaintiff’s authorized  
17 agent further made demand that Gawker cease and desist from directly or indirectly  
18 using their website to cause, contribute to, enable, facilitate, aid, abet, induce  
19 and/or participate in the infringement of Plaintiff’s copyrighted work, as identified  
20 in Gawker DMCA Notice. Gawker failed and expressly refused to comply with the  
21 Gawker DMCA Notice, and expressly refused to remove from its website the direct  
22 URL links to the AnonFiles Website file storage page with the unauthorized solely  
23 downloadable PDF of the Screenplay. Thereafter, on or about January 26th,  
24 Gawker amended and updated its January 23rd Article to add into it an additional  
25 URL click-through link directly to another and newly posted downloadable copy of  
26 the complete Screenplay, on Scribd.com.

27           35. As a direct and proximate result of Gawker’s infringing activities,  
28 Plaintiff has sustained and will continue to sustain further substantial injury,

1 including damage to his business and profession and loss of value of the Screenplay,  
2 in an amount not yet known but to be determined according to proof at trial.

3 36. Plaintiff lacks an adequate remedy at law.

4 37. Pursuant to 17 U.S.C. § 502, Plaintiff is entitled to an order enjoining  
5 Defendants’ from infringing Plaintiff’s copyright; pursuant to 17 U.S.C. § 503,  
6 Plaintiff is entitled to recover statutory or actual damages, at his election at the time  
7 of trial, from Defendants’ infringement and Defendants’ profits attributable to their  
8 infringing conduct. Pursuant to 17 U.S.C. § 505, Plaintiff is also entitled to recover  
9 the full costs of bringing this action and his reasonable attorneys’ fees.

10 38. Plaintiff has suffered irreparable harm, and will continue to suffer  
11 additional irreparable harm until and unless Defendants’ infringement is enjoined by  
12 this Court.

13

14

**PRAYER FOR RELIEF**

15 **WHEREFORE**, Plaintiff prays for judgment against Defendant(s), as  
16 follows:

17

18 **AS TO THE FIRST CLAIM FOR RELIEF (FOR DIRECT AND**  
19 **CONTRIBUTORY VIOLATION OF COPYRIGHT):**

20 1. For actual damages and Defendants’ profits in an amount exceeding  
21 \$1,000,000 to be determined at trial;

22 2. For statutory damages in an amount at the discretion of the Court;

23 3. For a preliminary injunction and a permanent injunction enjoining  
24 Defendants, and their agents, servants, and employees, and all persons acting under,  
25 in concert with, or for them, from continuing to reproduce, distribute, display,  
26 disseminate, transmit, make available for download or otherwise use the Screenplay  
27 in any manner whatsoever appropriating or in violation of Plaintiff’s copyright;

28 4. Attorneys’ fees and costs, pursuant to 17 U.S.C. §§502-505;

1 **AS TO ALL CAUSES OF ACTION:**

- 2 5. For costs of suit herein;
- 3 6. For reimbursement to Plaintiff of attorneys' fees, as provided by law;
- 4 7. For interest on the above-requested damages and at the maximum legal
- 5 rate as provided by law; and
- 6 8. For such other additional relief as the Court deems just and proper.

8 DATED: April 30, 2014

7 Respectfully submitted,

8 MARTIN D. SINGER  
9 EVAN N. SPIEGEL  
10 HENRY L. SELF, III  
11 LAVELY & SINGER  
12 PROFESSIONAL CORPORATION

12 /s/ - Martin D. Singer  
13 By: \_\_\_\_\_  
14 MARTIN D. SINGER  
15 Attorneys for Plaintiff Quentin Tarantino

16 **REQUEST FOR JURY TRIAL**

17 Plaintiff hereby demands a jury trial pursuant to Rule 38 of the Federal Rules  
18 of Civil Procedure.

20 DATED: April 30, 2014

19 Respectfully submitted,

20 MARTIN D. SINGER  
21 EVAN N. SPIEGEL  
22 HENRY L. SELF, III  
23 LAVELY & SINGER  
24 PROFESSIONAL CORPORATION

24 /s/ - Martin D. Singer  
25 By: \_\_\_\_\_  
26 MARTIN D. SINGER  
27 Attorneys for Plaintiff Quentin Tarantino