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14 *(Pro Hac Vice Application to be submitted)*

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16 **UNITED STATES DISTRICT COURT**  
17 **DISTRICT OF NEVADA**

18 CARL ROESSLER,

19 Plaintiff,

20 v.

21 UNIVERSAL CITY STUDIOS, LLC a/k/a  
22 UNIVERSAL PICTURE; UNIVERSAL  
23 CITY STUDIOS PRODUCTIONS, LLLP  
24 a/k/a UNIVERSAL PICTURES;  
25 LEGENDARY PICTURES FILMS, LLC;  
26 LEGENDARY PICTURES FUNDING, LLC;  
27 LEGENDARY PICTURES  
28 PRODUCTIONS, LLC; AMC  
ENTERTAINMENT HOLDINGS, INC.;  
AMC ENTERTAINMENT, INC.; REGAL  
ENTERTAINMENT GROUP; CINEMARK  
HOLDINGS, INC.; and CINEMARK USA,  
INC.,

Defendants.

Case No.:

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT AND INJUNCTION**

Plaintiff Carl Roessler ("Mr. Roessler"), for his Complaint against Defendants Universal City Studios, LLC, Universal City Studios Productions, LLLP, Legendary Pictures Films, LLC,

1 Legendary Pictures Funding, LLC, Legendary Pictures Productions, LLC, AMC Entertainment  
2 Holding, Inc., AMC Entertainment, Inc., Regal Entertainment Group, Cinemark Holdings, Inc.,  
3 and Cinemark USA, Inc. (collectively “Defendants”), alleges:

4 **INTRODUCTION**

5 1. This is an action for direct, contributory and vicarious copyright infringement arising  
6 out of the conduct of Defendants. Acting individually and in concert, Defendants have created,  
7 distributed, and made available to movie patrons the movie “Steve Jobs,” which prominently  
8 features an iconic photograph of a shark that is subject to and protected by the United States  
9 Copyright Act, Title 17 of the U.S. Code.

10  
11 2. Mr. Roessler, an experienced scuba diver and professional photographer, owns and  
12 has registered the copyright for the shark photograph, titled “Maddened Attack,” used in the  
13 recently released movie “Steve Jobs.” Mr. Roessler has not licensed or otherwise authorized  
14 Defendants to copy, use, distribute, license, display, publish or perform this work protected by  
15 copyright.

16  
17 3. Defendants Universal City Studios, LLC, Universal City Studios Production, LLLP,  
18 Legendary Pictures Films, LLC, Legendary Pictures Funding, LLC and Legendary Pictures  
19 Productions, LLC are distributing the “Steve Jobs” movie and national movie theater chains,  
20 including defendants AMC Entertainment Holdings, Inc., AMC Entertainment, Inc., Regal  
21 Entertainment Group, Cinemark Holdings, Inc. and Cinemark USA, Inc., are showing the movie.  
22 Defendants’ conduct constitutes copyright infringement under the Copyright Act.

23 **JURISDICTION AND VENUE**

24  
25 4. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C.  
26 §§ 1331 and 1338(a).

1 5. This Court has personal jurisdiction over all the Defendants by virtue of (a) their  
2 transacting, doing, and soliciting business in the District of Nevada, and/or (b) a substantial part  
3 of the relevant events occurring in the District of Nevada.

4 6. Venue in this District is proper under 28 U.S.C. § 1391(b) and (c) and/or 28 U.S.C. §  
5 1400(a). A substantial part of the acts of infringement complained of herein occurred in this  
6 District, and/or this is a District in which Defendants may be found.

7  
8 **THE PARTIES**

9 7. Plaintiff Roessler, a United States citizen, is an individual residing in Las Vegas,  
10 Nevada. For over forty years Mr. Roessler specialized in photography of sharks and other marine  
11 wildlife.

12 8. Defendants Universal City Studios, LLC and Universal City Studios Productions,  
13 LLLP (collectively the "Universal Defendants"), each also known as Universal Pictures, are,  
14 respectively, a limited liability company and a limited liability limited partnership duly  
15 organized and existing under the laws of the State of Delaware. On information and belief, the  
16 corporate office and principal place of business of each of the Universal Defendants is located at  
17 100 Universal City Plaza, Universal City, California 91608. The Universal Defendants have  
18 caused the movie "Steve Jobs" to be shown to the general public in this District.

19  
20 9. Defendants Legendary Pictures Films, LLC, Legendary Pictures Funding, LLC and  
21 Legendary Pictures Productions, LLC (collectively the "Legendary Defendants"), each also  
22 known as Legendary Pictures and Legendary Entertainment, are entities duly organized and  
23 existing under the laws of the State of Delaware. On information and belief, the corporate office  
24 and principal place of business of each of the Legendary Defendants is The Pointe, 2900 W.  
25 Alameda Ave., Burbank, California 91505. The Legendary Defendants have caused the movie  
26 "Steve Jobs" to be shown to the general public in this District.  
27  
28

1 10. Defendants AMC Entertainment Holdings, Inc., and AMC Entertainment, Inc.  
2 (collectively the “AMC Defendants”), each also known as AMC, are corporations duly organized  
3 and existing under the laws of the State of Delaware. On information and belief, the corporate  
4 office and principal place of business of each of the AMC Defendants is One AMC Way, 11500  
5 Ash St., Lealand, Kansas 66211. The AMC Defendants, and subsidiaries and affiliates thereof,  
6 are showing to the general public the movie “Steve Jobs” in this District.

7  
8 11. Defendant Regal Entertainment Group (“Regal”), also known as Regal, is a  
9 corporation duly organized and existing under the laws of the State of Delaware. On information  
10 and belief, the corporate office and principal place of business of Regal is 7132 Regal Lane,  
11 Knoxville, Tennessee 37918. Regal, and subsidiaries and affiliates thereof, are showing to the  
12 general public the movie “Steve Jobs” in this District.

13 12. Defendants Cinemark Holdings, Inc. and Cinemark USA, Inc. (the “Cinemark  
14 Defendants”), each also known as Cinemark, are corporations duly organized and existing under  
15 the laws of the State of Delaware. On information and belief, the corporate office and principal  
16 place of business of each of the Cinemark Defendants is 3900 Dallas Parkway, Suite 500, Plano,  
17 Texas 75903. The Cinemark Defendants, and subsidiaries and affiliates thereof, are showing to  
18 the general public the movie “Steve Jobs” in this District.

19  
20 **FACTS**

21 **A. Mr. Roessler’s Career in Dive Travel**

22 13. After graduating from Yale University in 1955 with a Bachelor of Science degree in  
23 Industrial Administration, Mr. Roessler worked for General Electric and IBM until 1964 when  
24 he returned to Yale. At Yale, he designed and implemented a university-wide computer-based  
25 accounting, budgeting and personnel administration system, eventually heading Yale’s Scientific  
26 Computer Center with the equivalent rank of full Professor.  
27  
28

1 14. As a young man, Mr. Roessler's hobby and passion was scuba diving. In 1969,  
2 acting on a long-held dream, Mr. Roessler left Yale and, with his wife and children, moved to the  
3 Caribbean islands of Curacao and Bonaire.

4 15. For the next three years, Mr. Roessler hosted dive groups in the Caribbean and by  
5 1972, Mr. Roessler was organizing and leading dive groups throughout the world. Over the next  
6 twenty five years, he popularized expeditionary live-aboard dive cruises to over thirty locations  
7 around the globe.

8 16. For many years, Mr. Roessler was a leader of the international ocean diving industry.  
9 For example, he has served on the board of directors of both the Historical Diving Society and  
10 the International Scuba Diving Hall of Fame.  
11

12 17. In recognition of his leadership role in the fields of scuba diving and diving tourism,  
13 Mr. Roessler has garnered honors and awards, including the following:

- 14 • In 2007, Mr. Roessler was inducted into the International Scuba Diving Hall of Fame.
- 15 • In 2008, the Academy of Underwater Arts & Sciences awarded Mr. Roessler the NOGI  
16 award, which recognizes ocean-related leaders in the fields of art, distinguished services,  
17 environment, science and sports education.
- 18 • In 2011, the Caribbean island of Bonaire awarded Mr. Roessler the Bonaire Lifetime  
19 Achievement Award.
- 20 • In 2013, the Beneath the Sea Show, a leading exposition for divers, awarded Mr. Roessler  
21 the "Diver of the Year Award."
- 22 • In 2014, the Historical Diving Magazine awarded Mr. Roessler its Diving Pioneer Award  
23 "[f]or his lifelong contributions to diving."

#### 24 **B. Mr. Roessler's Career as a Professional Photographer**

25 18. In 1972, shortly after he began leading diving expeditions to ocean locales around  
26 the world, Mr. Roessler also started taking underwater photographs.

27 19. Mr. Roessler eventually became an expert at photographing marine life, in particular,  
28 sharks and coral reefs. Across a span of approximately forty years, he amassed a collection of

1 over 300,000 photographs of marine life that he had taken in tropical ocean waters in the  
2 Caribbean, South Pacific, Indian Ocean, the Red Sea and elsewhere.

3 20. Mr. Roessler is an accomplished and respected photographer of marine life. His  
4 photographs have appeared in numerous books, in illustrated magazine articles, and on website  
5 pages.

6 21. Examples of books authored by Mr. Roessler with his marine life photographs  
7 include:

- 8
- 9 • "Underwater Wilderness: Life around the Great Reefs"(Paul Steiner/Chanticleer Press,  
10 New York), which was an alternate selection of the Book-of-the-Month Club in 1977
- 11 • "The Undersea Predators" (Facts on File, Inc., New York)
- 12 • "Mastering Underwater Photography" (William Morrow, New York)
- 13 • "Diving and Snorkeling Guide to the Caymen Islands: Grand Cayman, Little Cayman and  
14 Cayman Brac" (Pisces Books, Gulf Publishing, Houston)
- 15 • "Coral Kingdoms" (Harry N. Abrams Co., New York), which was an alternate selection  
16 of the Book-of-the-Month Club in 1986
- 17 • "Great Reefs of the World" (Pisces Books, Gulf Publishing, Houston)
- 18 • "Sharks of the World" (self-published)
- 19 • "An Undersea Mystery: Why are some marine creatures so colorful?" (self-published)
- 20 • "Predators" (Pisces Books, Gulf Publishing, Houston)
- 21 • "Australia: Coral Sea and Great Barrier Reef" (Pisces Books, Gulf Publishing, Houston).

22 22. In recent years, Mr. Roessler has focused on photographs of Southwest United States  
23 landscapes. To date, he has authored and published five volumes of the book series  
24 "Masterpieces of Nature," with photographs of desert and mountain parks of the Southwest, as  
25 well as one volume with photographs of the Canadian Rockies.  
26

27 ///

28 ///

1                   **C. The Maddened Attack Shark Photograph**

2                   23. In February 1994, Mr. Roessler led a diving expedition to the vicinity of the Neptune  
3 Islands, about fifty miles southwest of Adelaide, Australia. The trip lasted ten days, and Mr.  
4 Roessler dived up to four times a day.

5                   24. During this February 1994 diving trip near the Neptune Islands, Mr. Roessler took the  
6 Maddened Attack shark photograph from inside a shark cage, a metal cage that is meant to  
7 protect scuba divers while they observe and photograph sharks.

8                   25. The Maddened Attack shark photograph is an image of a young, hungry male Great  
9 White shark, approximately fourteen feet long, with its mouth wide open.

10                  26. The Maddened Attack shark photograph is an iconic shark image, capturing the  
11 aggressive, vicious, predatory nature of the shark, mouth open and teeth ready to crush, kill and  
12 devour its victim.  
13

14                   **D. The Copyright Registration for the Maddened Attack Shark Photograph**

15                  27. Under copyright law, Mr. Roessler is the author of the Maddened Attack shark  
16 photograph and the owner of the copyright in this photograph.

17                  28. On August 9, 1995, Mr. Roessler's agent submitted an application to the Copyright  
18 Office to register the copyright in the Maddened Attack shark photograph and other photographs  
19 of marine wildlife.  
20

21                  29. Shortly thereafter, on August 14, 1995, the Copyright Office issued a Certificate of  
22 Registration, No. VA 712-687, for the work titled "CATALOG IMAGES – Volume 1." This  
23 work encompasses a collection of ten photographs taken by Mr. Roessler of marine wildlife,  
24 including specifically the photograph referred to in this Complaint as the "Maddened Attack  
25 shark photograph," which is photograph "79D" in the copyright deposit accompanying the  
26  
27  
28

1 application. Attached as Exhibit 1 to this Complaint is a copy of this Certificate of Registration,  
2 No. VA 712-687.

3 30. Subsequently, Mr. Roessler elected to submit an application to register his copyright  
4 in the single Maddened Attack shark photograph. Effective December 27, 2012, the Copyright  
5 Office issued a Certificate of Registration, No. VA 1-864-707, for the photographic work titled  
6 “Maddened Attack.” The work covered by Copyright Registration No. VA 1-864-707 is the  
7 single photograph taken by Mr. Roessler referred to in this Complaint as the “Maddened Attack  
8 shark photograph.” Attached as Exhibit 2 to this Complaint is a copy of the Certificate of  
9 Registration, No. VA 1-864-707.  
10

#### 11 **E. Apple’s License and Use of the Maddened Attack Shark Photograph**

12 31. In 1998, Apple Computer, Inc. (“Apple”) licensed use of the Maddened Attack shark  
13 photograph. The license granted Apple the right to use the image for one year from the date of  
14 Apple’s first publication of the image. Specifically, Apple’s use rights were “[u]limited, world-  
15 wide, non-exclusive usage for one year, excluding Television use” with “[n]o electronic or  
16 digital use (website, cd-rom, or other media use).”  
17

18 32. Apple’s right to use the Maddened Attack shark photograph ceased by mid-1999 –  
19 one year after Apple’s first publication of the photograph. Further, Apple did not acquire the  
20 right to re-distribute or sublicense this photograph and, based in information and belief, never did  
21 so.  
22

23 33. On May 6, 1998, Apple first used the Maddened Attack shark photograph during a  
24 presentation by Steve Jobs (“Jobs”), the co-founder and CEO of Apple, introducing Apple’s  
25 PowerBook G3 laptop computer. Jobs sought to humorously make the point that the Apple  
26 PowerBook G3 laptop was substantially faster than laptops using Intel Corporation’s Pentium  
27 chip. Jobs stated: “And, one other thing, it [the PowerBook G3] eats Pentium notebooks for  
28



1 lunch, too.” While Mr. Jobs made this comment during his presentation, a large screen behind  
2 him showed an image of a shark. The shark image used by Apple was Mr. Roessler’s Maddened  
3 Attack shark photograph that had been lawfully licensed by Apple. See  
4 <http://www.youtube.com/watch?v=UJSTwzBYOm8&sns=em> (starting at 9:10 minute mark).

5 34. As used by Jobs at the May 6, 1998 presentation, the Maddened Attack shark  
6 photograph symbolized Apple’s aggressiveness in competing with Windows/Intel computers.

7 35. Apple’s license agreement with Mr. Roessler allowed Apple to use his Maddened  
8 Attack shark photograph as the central image in an advertisement. Apple created an  
9 advertisement consisting entirely of (i) the Maddened Attack shark photograph, with some  
10 cropping (removing some areas at the perimeter of the photograph to change the framing of the  
11 shark’s head and open mouth) and skewing (slightly rotating the image around a point), and (ii)  
12 superimposing on the image – near the bottom in the center, in solid white – the phrase “Think  
13 different” placed below Apple’s logo (an apple silhouette, with a bite taken out on the right side).  
14

15 36. Based on information and belief, Apple made no other use of Mr. Roessler’s  
16 Maddened Attack shark photograph, and both uses of the photograph – the projected image at  
17 Job’s presentation introducing Apple’s PowerBook G3 laptop and the ad – ceased within one  
18 year of Apple’s first publication of the photograph.  
19

#### 20 **F. The “Steve Jobs” Movie**

21 37. In October 2015, Defendants released the movie “Steve Jobs.”

22 38. “Steve Jobs” is a fictionalized biography of Jobs. The movie is loosely based on the  
23 authorized biography of Jobs, titled “Steve Jobs,” by Walter Isaacson that was published in 2011.  
24

25 39. The Maddened Attack shark photograph first appears in the movie when Jobs on  
26 May 6, 1998 interacts with the Apple employees assisting with his preparation offstage in the  
27 technical control room shortly before Jobs goes on stage to introduce the PowerBook G3 laptop  
28

1 and the iMac line of Apple computers. Jobs and his crew refer to the thirty-nine shark images  
2 considered, illustrating Jobs's perfectionism bordering on obsessiveness, fixating on a detail in  
3 the presentation.

4 40. A reviewer of the "Steve Jobs" movie connects the shark image in this scene to the  
5 larger themes of the movie:

6 . . . Fassbender [as Jobs] reads the mood of every room he's in with the hunger of  
7 a shark circling for prey. In fact, the computer image of a Great White [*i.e.*, the  
8 Maddened Attack shark photograph] figures significantly in one scene, as Jobs  
9 berates an underling for failing to provide the perfect shark photo for a big  
product-launch presentation.

10 Stevens, Dana, Slate, "The Shark: Michael Fassbender as a Predatory Steve Jobs in Danny Boyle  
11 and Aaron Sorkin's biopic."  
12 [http://www.slate.com/articles/arts/movies/2015/10/aaron\\_sorkin\\_s\\_steve\\_jobs\\_starring\\_michael](http://www.slate.com/articles/arts/movies/2015/10/aaron_sorkin_s_steve_jobs_starring_michael_fassbender_reviewed.html)  
13 [fassbender\\_reviewed.html](http://www.slate.com/articles/arts/movies/2015/10/aaron_sorkin_s_steve_jobs_starring_michael_fassbender_reviewed.html) (October 9, 2015).

14 41. This scene – the discussion of the shark image by Jobs and his staff immediately  
15 prior to Jobs's presentation – never occurred in real life. First, the Maddened Attack shark  
16 photograph was licensed by Apple several weeks before the May 6, 1998 presentation by Jobs  
17 introducing the PowerBook G3 laptop. Second, the movie's script writer, Aaron Sorkin  
18 ("Sorkin"), apparently "got the idea for the part about finding the right shark picture because  
19 Jobs once tasked an employee to find the perfect picture of a birthday cake to use as a slide  
20 during a product launch celebrating the five-year anniversary of a different product." *See*  
21 Knudsen, Tyler, "What I Learned from Watching: Steve Jobs (2015)," <http://cinematyler.com/archives/566>  
22 <http://cinematyler.com/archives/566> (October 25, 2015). Finally, Walter Isaacson's biography of  
23 Steve Jobs, upon which the movie is loosely based, never even mentions the scene, much less the  
24 shark image.  
25  
26  
27  
28

1 42. In the movie's next scene, the set is the auditorium where Jobs will make his  
2 presentation introducing Apple's PowerBook G3 laptop. Jobs, standing on the stage, is having an  
3 intense argument with Steven Wozniak ("Wozniak"), Apple's co-founder, who is standing in the  
4 auditorium. Throughout the argument, the Maddened Attack shark photograph is displayed on an  
5 enormous screen behind Jobs. The camera angles, the location of Jobs in front and below the  
6 large screen, and cuts between showing all of the shark image and part of the shark image each  
7 serve to emphasize both the continued, looming presence of the shark image throughout the  
8 course of the argument and the enormous size of the shark in relation to Jobs's small stature on  
9 stage.  
10

11 43. The argument between Jobs and Wozniak immediately prior to Jobs's presentation  
12 with the enormous shark image hovering above Jobs's figure never occurred in real life. In a  
13 recent interview with the online magazine "Tech Insider," Wozniak stated when the interviewer  
14 "asked specifically about that scene:"  
15

16 That scene was made up for the movie. I was behind Jobs and the products at each  
17 introduction. I would never even talk to a friend that way. But the sentiment  
18 among many was like that portrayed by my character, so their feelings were put  
19 into my mouth for the movie. I would have liked myself saying those things,  
20 except for the epithet. The comments about Apple II recognition had nothing to  
do with myself. I was a voice for all the employees of that division who were  
being ignored and disrespected, possibly to diminish a source of competition to  
Steve Jobs' Macintosh.

21 Stenovec, Tim, "Steve Wozniak told us one of the pivotal scenes in the new Steve Jobs movie  
22 was made up," Tech Insider, [http://www.techinsider.io/steve-wozniak-says-steve-jobs-scene-](http://www.techinsider.io/steve-wozniak-says-steve-jobs-scene-was-made-up-2015-10)  
23 [was-made-up-2015-10](http://www.techinsider.io/steve-wozniak-says-steve-jobs-scene-was-made-up-2015-10) (Oct. 8, 2015) (emphasis added). *See also* Tetzeli, Rick, "Steve Jobs, the  
24 Movie: 11 Things That Aren't True About the Apple Cofounder, Fast Company,  
25 [http://m.fastcompany.com/3052092/behind-the-brand/steve-jobs-the-movie-11-things-that-arent-](http://m.fastcompany.com/3052092/behind-the-brand/steve-jobs-the-movie-11-things-that-arent-true-about-the-apple-co-founder)  
26 [true-about-the-apple-co-founder](http://m.fastcompany.com/3052092/behind-the-brand/steve-jobs-the-movie-11-things-that-arent-true-about-the-apple-co-founder) (Oct. 9, 2015) ("Apple cofounder Steve Wozniak and Jobs have  
27  
28

1 a dramatic public shouting match before the iMac launch. Pure invention. By this time, Woz had  
2 already withdrawn from active work at Apple and the real blowup was long behind them.”)

3 44. The movie’s script author, Sorkin, also has acknowledged that the movie is not a  
4 literal telling of Job’s life. In a recent interview, Sorkin stated that “(Isaacson’s) job as a  
5 journalist was to be objective. Mine was to be subjective, to infer things, come up with various  
6 hypotheses and dramatize them.” Alexander, Bryan, “Michael Fassbender portrays ‘poorly  
7 made’ Steve Jobs,” USA Today,  
8 [http://www.usatoday.com/story/life/movies/2015/10/12/michael-fassbender-steve-jobs-](http://www.usatoday.com/story/life/movies/2015/10/12/michael-fassbender-steve-jobs-interview/73601092/)  
9 [interview/73601092/](http://www.usatoday.com/story/life/movies/2015/10/12/michael-fassbender-steve-jobs-interview/73601092/) (Oct. 12, 2015).  
10

11 45. In a statement for the United Kingdom’s Daily Mail, Sorkin said that the “Steve  
12 Jobs” movie “is not meant to be a dramatic re-creation of actual events.” Newton, Jennifer,  
13 “Writer of the new controversial Steve Jobs biopic defends film’s inaccuracies saying it is not  
14 meant to depict ‘actual events’,” Dailymail.com, [http://www.dailymail.co.uk/news/article-](http://www.dailymail.co.uk/news/article-3270657/Writer-new-controversial-Steve-Jobs-biopic-defends-film-s-inaccuracies-saying-not-meant-depict-actual-events.html)  
15 [3270657/Writer-new-controversial-Steve-Jobs-biopic-defends-film-s-inaccuracies-saying-not-](http://www.dailymail.co.uk/news/article-3270657/Writer-new-controversial-Steve-Jobs-biopic-defends-film-s-inaccuracies-saying-not-meant-depict-actual-events.html)  
16 [meant-depict-actual-events.html](http://www.dailymail.co.uk/news/article-3270657/Writer-new-controversial-Steve-Jobs-biopic-defends-film-s-inaccuracies-saying-not-meant-depict-actual-events.html) (Oct. 13, 2015).  
17

18 46. Similarly, the movie’s director, Danny Boyle, recently stated: “This is not about  
19 being a Steve Jobs documentary. . . . [Sorkin] takes some of the facts and bases the drama on  
20 them and discards other facts.” Alexander, Bryan, “Michael Fassbender portrays ‘poorly made’  
21 Steve Jobs,” USA Today, [http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-](http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-fassbender-steve-jobs-interview/73601092/)  
22 [fassbender-steve-jobs-interview/73601092/](http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-fassbender-steve-jobs-interview/73601092/) (Oct. 12, 2015).  
23

24 47. In the May 6, 1998 scene, the shark on the screen comes to represent not the  
25 competitiveness of Apple and the superiority of the new Apple laptop to its competitor’s laptops,  
26 but rather the vicious, predatory nature of Jobs himself in relation to Wozniak, Apple’s co-  
27 founder, and the team of Apple employees who designed a prior generation computer, the Apple  
28

1 II, that Jobs now despised. In the movie, Jobs is ruthlessly using the profits generated by  
2 Wozniak's and his team's successful Apple II machines to fund the development and rollout of  
3 the next generation Apple machines, while obstinately refusing to recognize Wozniak and his  
4 team in the about-to-start presentation. By extension, the shark on the screen also represents  
5 Jobs's ruthless and predatory nature in all his significant relationships, extending from his  
6 interactions with Apple employees to his relationship with his daughter and her mother.

7  
8 48. The Maddened Attack shark photograph is central to the "Steve Jobs" movie. The  
9 shark photograph is either actually visible or an omnipresent image on the large screen behind  
10 and above Jobs while he argues with Wozniak for several minutes.

11 49. The shark image is used first as a simple prop to expose Jobs' perfectionism and  
12 obsessiveness; second, the shark image symbolizes the new Apple computers "devouring" its  
13 competitors' computers; third, the shark image symbolizes Jobs's personality – intense, visceral,  
14 vicious, ruthless, and predatory – devouring his co-founder, Apple employees, his own daughter  
15 and her mother; and, fourth, the shark image, looming large above Jobs on the stage, appears  
16 about to devour Jobs himself. In the movie, the enormous Maddened Attack shark image, poised  
17 above Jobs's small figure, comes to symbolize Jobs's inner demons, his uncontrollable,  
18 instinctual viciousness – a meanness well beyond conventional aggressiveness – that devours and  
19 destroys not just his relationships with others, but also his own integrity, his own soul.

20  
21 50. As the movie's script author, Aaron Sorkin, stated in a recent interview: "My  
22 hypothesis going into this was that deep down, Steve believed himself to be kind of an  
23 irreparably damaged person, unworthy of being liked or loved." Alexander, Bryan, "Michael  
24 Fassbender portrays 'poorly made' Steve Jobs," USA Today,  
25 [http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-fassbender-steve-jobs-](http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-fassbender-steve-jobs-interview/73601092/)  
26 [interview/73601092/](http://www.usatoday.com/story/life/movies/2015/10/12/%20michael-fassbender-steve-jobs-interview/73601092/) (Oct. 12, 2015). The Maddened Attack shark photograph, looming over the  
27  
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1 Jobs figure as he argues with Apple's co-founder, Wozniak, dramatically expresses this  
2 hypothesis.

3 51. The movie, via the iconic Maddened Attack shark photograph, visually uses  
4 zoomorphism, attributing the shark's characteristics to Jobs, to unobtrusively inform the movie  
5 audience and comment on Jobs's psyche. The Maddened Attack shark photograph is not a simple  
6 prop or background image, but rather is a key, essential character in the movie's concluding  
7 scenes, crystallizing for the audience the movie makers' answer to the question "who is Steve  
8 Jobs."

9  
10 52. Numerous reviews of the "Steve Jobs" movie acknowledge and refer to the centrality  
11 of the iconic Maddened Attack shark photograph in the movie. Indeed, a review of the movie  
12 published in the online magazine "Slate" is entitled "The Shark: Michael Fassbender as a  
13 predatory Steve Jobs in Danny Boyle and Aaron Sorkin's biopic." *See* Stevens, Dana, Slate,  
14 [http://www.slate.com/articles/arts/movies/2015/10/aaron\\_sorkin\\_s\\_steve\\_jobs\\_starring\\_michael](http://www.slate.com/articles/arts/movies/2015/10/aaron_sorkin_s_steve_jobs_starring_michael_fassbender_reviewed.html)  
15 [fassbender\\_reviewed.html](http://www.slate.com/articles/arts/movies/2015/10/aaron_sorkin_s_steve_jobs_starring_michael_fassbender_reviewed.html) (October 9, 2015) ("the computer image of a Great White figures  
16 significantly in one scene").  
17

18 **G. Defendants Have Infringed the Copyright in the Maddened Attack Shark**  
19 **Photograph Owned by Plaintiff Carl Roessler**

20 53. For their own profit and advantage, Defendants have copied, used, distributed,  
21 published, displayed and misappropriated the Maddened Attack shark photograph that is a work  
22 subject to and protected by the Copyright Act.

23 54. Mr. Roessler never granted permission to or otherwise authorized Defendants to  
24 copy, use, distribute, publish or display the Maddened Attack shark photograph.

25 55. Defendants did not include a copyright notice in the "Steve Jobs" movie stating that  
26 Carl Roessler is the copyright owner for the copyright in the work known as the Maddened  
27 Attack shark photograph. Nor have Defendants provided any attribution or other  
28

1 acknowledgment that Carl Roessler is the photographer who took the photograph of the shark  
2 used in the "Steve Jobs" movie.

3 **FIRST CAUSE OF ACTION**

4 **(Copyright Infringement – All Defendants)**

5 56. Plaintiff incorporates by reference all the allegations of paragraphs 1 through 55,  
6 inclusive.

7 57. Plaintiff Carl Roessler is the author, owner and copyright holder of the work  
8 identified in this Complaint as the Maddened Attack shark photograph.

9 58. Mr. Roessler has complied in all respects with the Copyright Act, 17 U.S.C. §§ 101*et*  
10 *seq.*, and secured the exclusive rights and privileges in and to the copyright in the Maddened  
11 Attack shark photograph.  
12

13 59. Mr. Roessler has been and still is the sole owner of all rights, title, and interest in and  
14 to the Maddened Attack shark photograph.

15 60. Defendants' conduct violates the exclusive rights belonging to Mr. Roessler as owner  
16 of the copyright in the Maddened Attack shark photograph, including without limitation Mr.  
17 Roessler's rights under 17 U.S.C. § 106.  
18

19 61. As a direct and proximate result of their wrongful conduct, Defendants have deprived  
20 Mr. Roessler of license fees, profits and other benefits rightfully belonging to Mr. Roessler.

21 62. Based on information and belief, Mr. Roessler alleges that, as a direct and proximate  
22 result of their wrongful conduct, Defendants have realized and continue to realize profits and  
23 other benefits rightfully belonging to Roessler.  
24

25 63. Accordingly, Mr. Roessler seeks an award of damages pursuant to 17 U.S.C. §§ 504  
26 and 505.  
27  
28

1 64. Alternatively, Mr. Roessler is entitled to recover the maximum allowable statutory  
2 damages, pursuant to 17 U.S.C. § 504(c).

3 65. Mr. Roessler further is entitled to his attorney's fees and full costs pursuant to 17  
4 U.S.C. § 502.

5 **SECOND CAUSE OF ACTION**

6 **(Contributory Infringement of Copyright – Universal Defendants and Legendary**  
7 **Defendants)**

8  
9 66. Plaintiff Mr. Roessler incorporates by reference all the allegations of paragraphs 1  
10 through 65, inclusive.

11 67. The Universal Defendants and the Legendary Defendants knowingly and materially  
12 induced, caused or contributed to the copyright infringement and the creation of the unauthorized  
13 copies of the Maddened Attack shark photograph.

14 68. The Universal Defendants and the Legendary Defendants materially contributed to  
15 the distribution of the unauthorized copies of the Maddened Attack shark photograph by the  
16 AMC Defendants, Regal and the Cinemark Defendants.

17  
18 69. The Universal Defendants and the Legendary Defendants derived substantial and  
19 direct financial benefit from the infringements of the Maddened Attack shark photograph.

20 70. As a direct and proximate result of this wrongful conduct, the Universal Defendants  
21 and the Legendary Defendants have realized profits and other benefits rightfully belonging to  
22 Mr. Roessler and have deprived Mr. Roessler of profits and other benefits rightfully belonging to  
23 him. Accordingly, Mr. Roessler seeks an award of damages pursuant to 17 U.S.C. §§ 504 and  
24 505.  
25

26 71. Alternatively, Mr. Roessler is entitled to recover the maximum allowable statutory  
27 damages, pursuant to 17 U.S.C. § 504(c).  
28



1 72. Mr. Roessler further is entitled to his attorney's fees and full costs pursuant to 17  
2 U.S.C. § 502.

3 **THIRD CAUSE OF ACTION**

4 **(Vicarious Infringement of Copyright – Universal Defendants and Legendary Defendants)**

5 73. Plaintiff Mr. Roessler incorporates by reference all the allegations of paragraphs 1  
6 through 72, inclusive.

7 74. The Universal Defendants and the Legendary Defendants had the right and ability to  
8 supervise and control the infringing conduct. The Universal Defendants and the Legendary  
9 Defendants, however, failed to exercise such supervision and control.  
10

11 75. As a direct and proximate result of such failure to supervise and control, the  
12 Universal Defendants and the Legendary Defendants have infringed Mr. Roessler's copyright in  
13 the Maddened Attack shark photograph.

14 76. The Universal Defendants and the Legendary Defendants derived substantial and  
15 direct financial benefit from the infringements of the Maddened Attack shark photograph.  
16

17 77. As a direct and proximate result of this wrongful conduct, the Universal Defendants  
18 and the Legendary Defendants have realized profits and other benefits rightfully belonging to  
19 Mr. Roessler and have deprived Mr. Roessler of profits and other benefits rightfully belonging to  
20 him. Accordingly, Mr. Roessler seeks an award of damages pursuant to 17 U.S.C. §§ 504 and  
21 505.

22 78. Alternatively, Mr. Roessler is entitled to recover the maximum allowable statutory  
23 damages, pursuant to 17 U.S.C. § 504(c).  
24

25 79. Mr. Roessler further is entitled to his attorney's fees and full costs pursuant to 17  
26 U.S.C. § 502.  
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**FOURTH CAUSE OF ACTION**

**(Injunction – Universal Defendants and Legendary Defendants)**

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80. Plaintiff Mr. Roessler incorporates by reference all the allegations of paragraphs 1 through 79, inclusive.

81. Based on information and belief, the Universal Defendants and the Legendary Defendants intend to and will copy, use, license, distribute, display, publish, perform and sell via on-demand subscription services, movie streaming services, and other non-theatrical movie distribution, including digital video discs (“DVDs”) in standard, high definition (Blu-ray) or other formats, copies of Mr. Roessler’s copyrighted work, the Maddened Attack shark photograph.

82. The Universal Defendants’ and the Legendary Defendants’ conduct threatens to cause and, unless enjoined and restrained by this Court, will cause Mr. Roessler to sustain substantial, immediate, and irreparable injury that cannot fully be compensated for or measured in money. Mr. Roessler has no adequate remedy at law.

83. Mr. Roessler is informed and believes and on that basis avers that unless enjoined and restrained by this Court, the Universal Defendants and the Legendary Defendants will infringe Mr. Roessler’s rights in the Maddened Attack shark photograph and the copyright therein. Pursuant to 17 U.S.C. § 502, Mr. Roessler is entitled to preliminary and permanent injunctions prohibiting infringements of his copyright and exclusive rights under copyright.

84. Mr. Roessler further is entitled to his attorney’s fees and full costs pursuant to 17 U.S.C. § 502.

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**PRAYER FOR RELIEF**

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WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

A. Declaring that Defendants' unauthorized conduct violates Plaintiffs' rights under the Copyright Act;

B. A preliminary injunction during the pendency of this action and a permanent injunction thereafter enjoining the Universal Defendants and the Legendary Defendants, their officers, directors, agents, servants, employees, representatives, attorneys, related companies, including parents and subsidiaries, successors, assigns, and all others in active concert or participation with them from copying, using, licensing, distributing, displaying, publishing, performing and selling via on-demand subscription services, movie streaming services, and other non-theatrical movie distribution, including digital video discs ("DVDs") in standard, high definition (Blu-ray) or other formats, any copies of Plaintiff's copyrighted work without consent or otherwise infringing Plaintiff's copyright in any manner;

C. Ordering Defendants to account to Plaintiff for all gains, profits, and advantages derived by Defendants by their infringement of Plaintiff's copyright or such damages as are proper;

D. Awarding Plaintiff actual damages for Defendants' copyright infringement in an amount to be determined at trial;

E. Awarding Plaintiff the maximum allowable statutory damages for Defendants' copyright infringement in an amount to be determined at trial;

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F. Awarding Plaintiff his costs, reasonable attorneys' fees, and disbursements in this action, pursuant to 17 U.S.C. § 505; and

G. Awarding Plaintiff such other and further relief as is just and proper.

Dated: October 29, 2015.

  
\_\_\_\_\_  
John P. Aldrich  
Nevada Bar No. 6877  
**ALDRICH LAW FIRM, LTD.**  
1601 South Rainbow Boulevard, Suite 160  
Las Vegas, Nevada 89146  
Tel: 702-583-6748  
Fax: 702-227-1975

Tobey B. Marzouk  
**MARZOUK & PARRY, PLLC**  
1901 Pennsylvania Ave., NW, Sixth Floor  
Washington, DC 20006  
Tel: (202) 463-7293  
Fax: (202) 955-9371

*Attorneys for Plaintiff Carl Roessler*

# EXHIBIT 1

# EXHIBIT 1

CERTIFICATE OF REGISTRATION

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



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

REG:

VA 712-687



EFFECTIVE DATE OF REGISTRATION

AUG 1 1995

Month Day Year

REGISTER OF COPYRIGHTS

OFFICIAL SEAL

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

TITLE OF THIS WORK

NATURE OF THIS WORK

CATALOG IMAGES - Volume 1

Photographs

PREVIOUS OR ALTERNATIVE TITLES

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

"The Pacific Stock Collection" Catalog

If published in a periodical or serial give: Volume 1 Number A

Issue Date: July 1995 On Pages: Continuation

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

a Carl Roessler

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

AUTHOR'S NATIONALITY OR DOMICILE: USA Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? Pseudonymous? Yes No

NOTE

NATURE OF AUTHORSHIP: Check appropriate box(es). See instructions

- 3-Dimensional sculpture, 2-Dimensional artwork, Map, Photograph, Text, Technical drawing, Jewelry design, Architectural work, Design on sheetlike material

NAME OF AUTHOR

DATES OF BIRTH AND DEATH

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

AUTHOR'S NATIONALITY OR DOMICILE: USA Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? Pseudonymous? Yes No

NATURE OF AUTHORSHIP: Check appropriate box(es). See instructions

- 3-Dimensional sculpture, 2-Dimensional artwork, Map, Photograph, Text, Technical drawing, Jewelry design, Architectural work, Design on sheetlike material

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED: 1995

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK: July 1995 USA

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2

Carl Roessler, 50 Francisco Street, Suite 205, San Francisco, CA 94133

APPLICATION RECEIVED AUG 14 1995 ONE DEPOSIT RECEIVED AUG 14 1995 TWO DEPOSITS RECEIVED FUNDS RECEIVED

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

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

DO NOT WRITE HERE Page 1 of 1 pages

EXAMINED BY *W.R.*

FORM VA

CHECKED BY

CORRESPONDENCE  
Yes

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

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

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

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

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

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

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

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

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

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

6

See instructions  
before completing  
this space.

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

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

Name ▼

Account Number ▼

7

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

Barbara Brundage

Pacific Stock

758 Kapahulu Avenue, Suite 250

Honolulu, HI 96816

Area Code and Telephone Number ▶ 808-735-7801/FAX: 808-735-7801

Toll Free: 800-321-3239

Be sure to  
give your  
daytime phone  
number

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

check only one ▼

author

other copyright claimant

owner of exclusive right(s)

authorized agent of Carl Roessler

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

8

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

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

Barbara Brundage

Date ▶ August 9, 1995

Handwritten signature (X) ▼

*Barbara Brundage*

MAIL  
CERTIFI-  
CATE TO

Name ▼  
Barbara Brundage  
Pacific Stock

Number/Street/Apt. ▼  
758 Kapahulu Avenue, Suite 250

City/State/ZIP ▼  
Honolulu, HI 96816

Certificate  
will be  
mailed in  
window  
envelope

YOU MUST:

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

SEND ALL 3 ELEMENTS  
IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

Register of Copyrights  
Library of Congress  
Washington, D.C. 20559-6000

9

The Copyright Office has the authority to adjust fees at 5-year intervals based on changes in the Consumer Price Index. The next adjustment is due in 1996. Please contact the Copyright Office after July 1995 to determine the actual fee schedule.

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

# CONTINUATION SHEET FOR APPLICATION FORMS

FORM VA /CON  
UNITED STATES COPYRIGHT OFFICE  
RE VA 712-687



- This Continuation Sheet is used in conjunction with Forms CA, PA, SE, SR, TX, and VA only. Indicate which basic form you are continuing in the space in the upper right-hand corner.
- If at all possible, try to fit the information called for into the spaces provided on the basic form.
- If you do not have space enough for all the information you need to give on the basic form, use this continuation sheet and submit it with the basic form.
- If you submit this continuation sheet, clip (do not tape or staple) it to the basic form and fold the two together before submitting them.
- Part A of this sheet is intended to identify the basic application.  
Part B is a continuation of Space 2.  
Part C (on the reverse side of this sheet) is for the continuation of Spaces 1, 4, or 6. The other spaces on the basic form call for specific items of information and should not need continuation.

PA PAU SE SEG SEU SR SRU TX TXU VA VAU

EFFECTIVE DATE OF REGISTRATION

AUG 16 1995

(Month) (Day) (Year)

CONTINUATION SHEET RECEIVED:

AUG 17 1995

Page 3 of 4 pages

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

IDENTIFICATION OF CONTINUATION SHEET: This sheet is a continuation of the application for copyright registration on the basic form submitted for the following work:

• TITLE: (Give the title as given under the heading "Title of this Work" in Space 1 of the basic form.)

**A**  
Identification  
of  
Application

... CATALOG IMAGES - Volume 1

NAME(S) AND ADDRESS(ES) OF COPYRIGHT CLAIMANT(S): (Give the name and address of at least one copyright claimant as given in Space 4 of the basic form.)

Carl Roessler

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

**B**  
Continuation  
of Space 2

d

Was this contribution to the work a "work made for hire"? **AUTHOR'S NATIONALITY OR DOMICILE**  
Name of Country

Yes  
 No

OR { Citizen of ►  
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?  Yes  No

Pseudonymous?  Yes  No

If the answer to either of these questions is "Yes" see detailed instructions.

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

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

e

Was this contribution to the work a "work made for hire"? **AUTHOR'S NATIONALITY OR DOMICILE**  
Name of Country

Yes  
 No

OR { Citizen of ►  
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?  Yes  No

Pseudonymous?  Yes  No

If the answer to either of these questions is "Yes" see detailed instructions.

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

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

f

Was this contribution to the work a "work made for hire"? **AUTHOR'S NATIONALITY OR DOMICILE**  
Name of Country

Yes  
 No

OR { Citizen of ►  
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?  Yes  No

Pseudonymous?  Yes  No

If the answer to either of these questions is "Yes" see detailed instructions.

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

Use the reverse side of this sheet if you need more space for continuation of Spaces 1, 4, or 6 of the basic form.



CONTINUATION OF (Check which):  Space 1  Space 4  Space 6

**C**

Continuation  
of other  
Spaces

"The Pacific Stock Collection" - Volume 1  
Image/Page Numbers for Author and Claimant: Carl Roessler

79C  
79D  
79G  
79H  
82A  
82G  
83D  
84A  
87A  
90H

TOTAL IMAGES = 10

# EXHIBIT 2

# EXHIBIT 2

# Certificate of Registration



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

*Maria A. Pallante*

Register of Copyrights, United States of America

Registration Number  
**VA 1-864-707**

Effective date of  
registration:  
December 27, 2012

## Title

Title of Work: Maddened Attack

Nature of Work: Photograph

## Completion/Publication

Year of Completion: 1995

Date of 1st Publication: July 1, 1995

Nation of 1st Publication: United States

## Author

Author: Carl Roessler

Author Created: Photograph

Work made for hire: No

Citizen of: United States

Year Born: 1933

Anonymous: No

Pseudonymous: No

## Copyright claimant

Copyright Claimant: Carl Roessler

PO Box 33668, Las Vegas, NV, 89133

## Certification

Name: Carl Roessler

Date: December 14, 2012