

B1040 (FORM 1040) (12/15)

<b>ADVERSARY PROCEEDING COVER SHEET</b> (Instructions on Reverse)		<b>ADVERSARY PROCEEDING NUMBER</b> (Court Use Only)
<b>PLAINTIFFS</b>  Curtis James Jackson, III	<b>DEFENDANTS</b>  William Leonard Roberts, II	
<b>ATTORNEYS (Firm Name, Address, and Telephone No.)</b> <small>Zeisler &amp; Zeisler, P.C., 10 Middle Street, 15th FL., Bridgeport, CT, 203-368-4234 Robins Kaplan LLP, 301 Lexington Ave., Suite 3400, New York, NY 212-980-7400</small>	<b>ATTORNEYS (If Known)</b>	
<b>PARTY (Check One Box Only)</b> <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	<b>PARTY (Check One Box Only)</b> <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input checked="" type="checkbox"/> Other <input type="checkbox"/> Trustee	
<b>CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED)</b> Violation of Connecticut Common Law Misappropriation/Right of Publicity Infringement of Trademark in Violation of the Lanham Act, 15 U.S.C §1114 False Advertising in Violation of §43(a) of the Lanham Act, 15 U.S.C §1125(a)(1)(B) Dilution of Violation of §43(c) of the Lanham Act, 15 U.S.C §1125(c)		
<b>NATURE OF SUIT</b>  (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)		
<b>FRBP 7001(1) – Recovery of Money/Property</b> <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input checked="" type="checkbox"/> 14-Recovery of money/property - other  <b>FRBP 7001(2) – Validity, Priority or Extent of Lien</b> <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property  <b>FRBP 7001(3) – Approval of Sale of Property</b> <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h)  <b>FRBP 7001(4) – Objection/Revocation of Discharge</b> <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e)  <b>FRBP 7001(5) – Revocation of Confirmation</b> <input type="checkbox"/> 51-Revocation of confirmation  <b>FRBP 7001(6) – Dischargeability</b> <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny  (continued next column)	<b>FRBP 7001(6) – Dischargeability (continued)</b> <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other  <b>FRBP 7001(7) – Injunctive Relief</b> <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input checked="" type="checkbox"/> 72-Injunctive relief – other  <b>FRBP 7001(8) Subordination of Claim or Interest</b> <input type="checkbox"/> 81-Subordination of claim or interest  <b>FRBP 7001(9) Declaratory Judgment</b> <input type="checkbox"/> 91-Declaratory judgment  <b>FRBP 7001(10) Determination of Removed Action</b> <input type="checkbox"/> 01-Determination of removed claim or cause  <b>Other</b> <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input checked="" type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)	
<input checked="" type="checkbox"/> Check if this case involves a substantive issue of state law	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23	
<input type="checkbox"/> Check if a jury trial is demanded in complaint	Demand \$ 2,000,000.00	
Other Relief Sought  Injunctive		

B1040 (FORM 1040) (12/15)

BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES		
NAME OF DEBTOR Curtis James Jackson, III		BANKRUPTCY CASE NO. 15-21233
DISTRICT IN WHICH CASE IS PENDING Connecticut	DIVISION OFFICE Hartford	NAME OF JUDGE Nevins
RELATED ADVERSARY PROCEEDING (IF ANY)		
PLAINTIFF	DEFENDANT	ADVERSARY PROCEEDING NO.
DISTRICT IN WHICH ADVERSARY IS PENDING	DIVISION OFFICE	NAME OF JUDGE
SIGNATURE OF ATTORNEY (OR PLAINTIFF)  /s/ James Berman		
DATE 12/23/2015	PRINT NAME OF ATTORNEY (OR PLAINTIFF) James Berman	

### INSTRUCTIONS

The filing of a bankruptcy case creates an “estate” under the jurisdiction of the bankruptcy court which consists of all of the property of the debtor, wherever that property is located. Because the bankruptcy estate is so extensive and the jurisdiction of the court so broad, there may be lawsuits over the property or property rights of the estate. There also may be lawsuits concerning the debtor’s discharge. If such a lawsuit is filed in a bankruptcy court, it is called an adversary proceeding.

A party filing an adversary proceeding must also must complete and file Form 1040, the Adversary Proceeding Cover Sheet, unless the party files the adversary proceeding electronically through the court’s Case Management/Electronic Case Filing system (CM/ECF). (CM/ECF captures the information on Form 1040 as part of the filing process.) When completed, the cover sheet summarizes basic information on the adversary proceeding. The clerk of court needs the information to process the adversary proceeding and prepare required statistical reports on court activity.

The cover sheet and the information contained on it do not replace or supplement the filing and service of pleadings or other papers as required by law, the Bankruptcy Rules, or the local rules of court. The cover sheet, which is largely self-explanatory, must be completed by the plaintiff’s attorney (or by the plaintiff if the plaintiff is not represented by an attorney). A separate cover sheet must be submitted to the clerk for each complaint filed.

**Plaintiffs and Defendants.** Give the names of the plaintiffs and defendants exactly as they appear on the complaint.

**Attorneys.** Give the names and addresses of the attorneys, if known.

**Party.** Check the most appropriate box in the first column for the plaintiffs and the second column for the defendants.

**Demand.** Enter the dollar amount being demanded in the complaint.

**Signature.** This cover sheet must be signed by the attorney of record in the box on the second page of the form. If the plaintiff is represented by a law firm, a member of the firm must sign. If the plaintiff is pro se, that is, not represented by an attorney, the plaintiff must sign.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF CONNECTICUT**

In re

Case No. 15-21233

CURTIS JAMES JACKSON, III,

Chapter 11

Debtor,

Jointly Administered

----- X

CURTIS JAMES JACKSON, III,

Plaintiff,

Adv. Proc. No. \_\_\_\_\_

-against-

WILLIAM LEONARD ROBERTS, II,

Defendant.

----- X

Plaintiff Curtis Jackson, III (“Plaintiff or “Jackson”), by and through undersigned counsel, hereby brings this Complaint against Defendant William Leonard Roberts, II (“Defendant” or “Roberts”) and alleges as follows:

**NATURE OF THE ACTION**

1. This action arises from Defendant’s unauthorized and willful use of Jackson’s stage name and registered trademark, “50 Cent,” and Defendant’s extensive use of Jackson’s voice and identity for commercial purposes in association with Defendant’s promotion of Defendant’s new album.

2. Specifically, Defendant released over the Internet a free “mixtape” using Jackson’s trademark and Jackson’s classic hit song, “In Da Club,” in what is a recorded commercial advertisement to promote and sell Defendant’s recent album, *Black Market* (“the Album”).

### **THE PARTIES**

3. Plaintiff Jackson is a resident of the State of Connecticut. Jackson is a Grammy-award winning rap music artist, investor, entrepreneur, and philanthropist whose stage name is “50 Cent.” As an internationally recognized hip-hop artist, Jackson’s images, name and identity, have substantial commercial value.

4. Upon information and belief, Defendant Roberts is a resident of the State of Georgia. Defendant is an American rapper better known by his stage name “Rick Ross,” “Rick Rozay,” “Rick Ro\$\$,” and “Renzel.” Defendant is the founder and CEO of the record label Maybach Music Group.

### **JURISDICTION AND VENUE**

5. On July 13, 2015, Jackson filed a voluntary petition for relief under Chapter 11 of Title 11, United States Code (the “Bankruptcy Code”), in the District of Connecticut. No trustee has been appointed. Under section 323 and section 1107 of the Bankruptcy Code, Jackson is the representative of Debtor’s estate and has the capacity to bring this action.

6. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1338(a), 1338(b) as well as pursuant to 15 U.S.C. § 1121. This Court has supplemental jurisdiction over the asserted state tort claims pursuant to 28 U.S.C. § 1367.

7. This Court also has jurisdiction over the action pursuant to diversity of citizenship provisions contained in 28 U.S.C. § 1332(a) as the amount in controversy exceeds \$75,000, exclusive of interest and costs. Jackson and Defendants do not share any common citizenship.

8. Jackson is a resident of the State of Connecticut.

9. On information and belief, Defendant is domiciled in the State of Georgia.

10. There is complete diversity of citizenship among the parties within the meaning of 28 U.S.C. § 1332.

11. This Court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. § 1334(b). This adversary proceeding arises in and relates to Case No. 015-21233 pending in the Bankruptcy Court.

12. This action is a proceeding in which the Bankruptcy Court may enter a final judgment.

13. Venue of this adversary proceeding is proper in this district pursuant to 28 U.S.C. § 1409(a).

## **FACTUAL BACKGROUND**

### **Jackson's Career**

14. Jackson is a preeminent hip-hop artist known for his hard-knocks success story and vast musical talent. Jackson has sold more than 30 million albums worldwide.

15. In 2003, Jackson released his chart-topping debut album, *Get Rich or Die Tryin'*, which gained platinum status many times over and has sold more than 8 million copies.

16. Jackson has leveraged his musical achievements into a popular record label, "G-Unit Records," a clothing line, "G-Unit Clothing Company," and several other lucrative ventures and

has created and steered the “50 Cent” brand to among the most recognized and respected in the entertainment world.

17. Additionally, Jackson has experienced great success as an actor and producer. He filmed “Spy” with Melissa McCarthy and Jude Law, and “Southpaw” with Jake Gyllenhaal, and in 2005, Jackson founded the production company, G-Unit Films and Television Inc.

18. Jackson also gained popularity when he partnered with Glacéau, the leader in healthy beverages, to create his signature drink, Formula 50.

19. In addition to the great artistic talent Jackson has given the world, he has also given back by donating over one million dollars through his charitable foundation, The G-Unity Foundation, Inc., which provides grants to nonprofit organizations that focus on improving the quality of life to low-income and underserved communities.

#### **Jackson’s “50 CENT” Trademark**

20. At least as early as 1999, Jackson has been performing under the stage name “50 Cent” and has been using the name “50 Cent” as part of other business ventures.

21. On January 20, 2004, Jackson was issued United States Trademark Registration Number 2,807,302 for the mark 50 CENT (“the Mark”) for use in connection with promoting the goods and/or services or others through the issuance of pre-recorded phonograph records, compact discs, audio and video cassettes, and DVDs featuring music.

22. The 50 CENT trademark is, and, at all relevant times was, a strong, famous and distinctive mark. Jackson has used the Mark in interstate commerce throughout the United States for over fifteen years to promote a wide variety of goods and services.

23. Because of Jackson’s extensive and continuous use of the 50 CENT trademark, the Mark has come to identify not only Jackson’s goods and services, but Jackson’s persona.

Through Jackson's widespread use of the Mark, Jackson has distinguished himself from others and the Mark has come to embody and symbolize significant goodwill belonging exclusively to Jackson.

24. Throughout the many years that Jackson has used the Mark, Jackson has spent significant sums in advertising and promoting his services under the Mark, including advertising through the Internet, television, radio, print advertising and live appearances. Accordingly, Jackson has developed an enormously valuable interest in his name, likeness, and persona.

25. As a result of the popularity Jackson has established through the Mark, Jackson is frequently offered financially lucrative deals to license the use of his name, likeness and trademark. However, to prevent any diminution or confusion of the public's opinion of him, Jackson is selective in his endorsement deals to only products of high quality.

#### **Jackson's Signature Song "In Da Club"**

26. Among the songs on Jackson's influential multi-platinum album, *Get Rich or Die Tryin'*, is Jackson's seminal recording, "In Da Club." "In Da Club" is an iconic song that enhanced Jackson's fame and fueled the celebrity status he holds today. Fans identify Jackson with "In Da Club," a recording which peaked as a single at number one on the Billboard Hot 100 list. Further, "In Da Club" was Jackson's first number one single on the Billboard Hot 100 and the song led to his Grammy nomination at the 46th Grammy Awards, where he was nominated for Best Male Rap Solo Performance and Best Rap Song.

27. "In Da Club's" music video won Best Rap Video and Best New Artist at the 2003 MTV Video Music Awards. The hit was also listed at number 13 in Rolling Stone's "Best Songs of the Decade" and in 2010, it was ranked 448th in Rolling Stone's 500 Greatest Songs of All

Time. “In Da Club” was later certified as double platinum in the U.S. and Australia, meaning that the song sold at least 2,000,000 copies in the respective regions.

28. Literally millions of fans worldwide identify Jackson with his performance and voice as it is embodied on his signature song, “In Da Club.”

### **Defendant’s Unauthorized Acts**

29. Defendant William Leonard Roberts, II, more popularly known by his stage name, Rick Ross, is an American rapper who has been signed to Def Jam records affiliate Slip-n-Slide Records since 2006.

30. In or about November 2015, Defendant Roberts began promoting and advertising, through various media outlets, his eighth studio album, *Black Market*, which was released on December 4, 2015.

31. In preparation for the sale of *Black Market*, Defendant released, on November 26, 2015, to the world, a free mixtape, which can be easily downloaded over the Internet. The mixtape, titled *Renzel Remixes*, consists of two discs, each with thirteen recordings. The release of *Renzel Remixes* has already generated significant publicity and interest from the media and the consuming public.

32. The most prominent of the songs featured on *Renzel Remixes* is Defendant’s reworking of Jackson’s recording of “In Da Club” in which Defendant used a substantial portion of Jackson’s voice and performance. Further, Defendant named the track and promoted it as “In Da Club Ft. 50 Cent” (“the Remix”). The “Ft.” in the title stands for “featuring” which represents to the public that Jackson is featured on the Remix. Defendant altered the original version of “In Da Club” by removing some but not all of Jackson’s lyrics and performance, and then adding Defendant’s own lyrics and performance. Defendant’s unlawful use of Jackson’s registered



trademark is apparent on disc one of the Remix. Defendant publicized images of the Remix in various news and social media outlets including on Defendant's Instagram and Twitter page in which the song title, "In Da Club Ft. 50 Cent" is deliberately portrayed. (See Exhibit 1, Instagram Photo and Exhibit 2, Twitter Reference)

33. Defendant's Remix not only uses Jackson's name and performance to attract listeners, but it also is a blatant commercial advertisement for *Black Market*. At least six times, throughout the Remix, Defendant delivers the following "hook" as a commercial message promoting the sale of *Black Market*:

"Only on the Black Market, December 4th  
The Album is out."

34. Defendant, without Jackson's, or, upon information and belief, any copyright owners' knowledge or permission, used a significant piece of Jackson's "In Da Club" recording and composition, including approximately forty-five seconds of Jackson's vocal performance, on the three minute Remix, as well as Jackson's trademarked name to promote and publicize *Black Market*.

35. Being that Jackson's name, song, and persona is prominently recognized worldwide, Defendant unlawfully used Jackson's name and identity solely to advertise his own album release. Defendant's act was willful and done with pure commercial intent. See, e.g., Defendant's phone interview with "The FADER" in which he described *Renzel Remixes*' purpose as that being to "keep up momentum" ahead of *Black Market*. (See Exhibit 3, FADER article)

36. Following the release of the Remix, Defendant knowingly and intentionally took steps to exacerbate and perpetuate his unauthorized use of Jackson's name and voice by promoting The Remix on his social media outlets including Instagram and Twitter, where he has well over 3 million followers on each account.

**FIRST CLAIM FOR RELIEF**

**Violation of Connecticut Common Law Misappropriation/Right of Publicity**

37. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 36 inclusive, of this Complaint as though fully set forth herein.

38. Jackson's distinct and readily identifiable voice and stage name, "50 Cent," is known worldwide and closely associated with Jackson. As such, Defendant's unauthorized use of Jackson's voice and stage name in the In Da Club Remix invoked Jackson's identity in the minds of the public.

39. Jackson is informed and believes and based thereon alleges that Roberts knew or should have known that he was prohibited from using Jackson's stage name and recording of "In Da Club" without a license or permission.

40. Defendant's usurpation of Jackson's identity has caused and will continue to cause irreparable harm to Jackson that cannot be fully compensated by money.

41. Based upon information and belief, Roberts has wrongfully and in bad faith misappropriated Jackson's name, voice, and persona as well as the commercial advantages attendant thereto in violation of Jackson's rights under the common law of the State of Connecticut. Defendant has used Jackson's name in conjunction with his widely identifiable performance and voice in the Remix purely for commercial purposes.

42. Defendant's willful and unlawful use of Jackson's identity in the commercial promotion of the Album has damaged Jackson in an amount that is presently unknown, but which exceeds \$2,000,000. As a result of Defendant's wrongful conduct, Jackson is entitled to injunctive relief and monetary damages according to proof at trial.

**SECOND CLAIM FOR RELIEF**

**Infringement of Trademark in Violation of the Lanham Act, 15 U.S.C. § 1114**

43. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 42, inclusive, of this Complaint as though fully set forth herein.

44. The 50 CENT trademark is valid and legally enforceable.

45. Jackson owns the 50 CENT trademark.

46. Through years of usage, the Mark has acquired distinctiveness in the marketplace, such that those in the relevant channels of distribution readily associate the 50 CENT mark with Jackson and Jackson's goods and services.

47. Defendant's use of the Mark, or the colorable imitation thereof, in connection with the distribution of the Remix and with the offering for sale and advertising of Defendant's album, *Black Market*, has caused, and is likely to continue to cause, confusion in the minds of consumers about whether Jackson has authorized or endorsed the Remix and *Black Market* and about whether Jackson is affiliated with or endorses such recording.

48. Defendant intends to use the Mark to capitalize on Jackson's name and reputation for the purpose of selling the Album.

49. Defendant's unauthorized use of the Mark infringes upon Jackson's trademark rights under 15 U.S.C. § 1114(1).

50. Defendant's trademark infringement has damaged Jackson and caused him irreparable harm, which will continue unless Defendant's unlawful conduct is enjoined by this Court.

**THIRD CLAIM FOR RELIEF**

**False Advertising in Violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a)(1)(B)**

51. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 50, inclusive, of this Complaint as though fully set forth herein.

52. Jackson is an internationally recognized rapper and performer. “In Da Club” is famously associated with Jackson and immediately conjures Jackson’s identity and persona in the minds of the public.

53. Jackson is informed and believes, and based thereon alleges that Defendant intentionally used Jackson’s stage name, identity and persona in Defendant’s commercial promotion of *Black Market* to confuse the public into thinking that Jackson sponsors, endorses, and is associated with Defendant and *Black Market*.

54. Defendant’s unauthorized use of Jackson’s identity, including the use of Jackson’s trademark and voice in Defendant’s commercial, constitutes a false or misleading representation of fact that deceptively implies Jackson’s endorsement of Defendant’s album and is a willful violation of Section 15 U.S.C. §1125(a)(1)(B).

55. Defendant’s false and misleading representations of fact concerning the nature, characteristics and qualities of Robert’s goods, services, and commercial activities are material and likely to influence the decisions of those purchasing Defendant’s goods and services, specifically *Black Market*, as well as the decisions of those purchasing Jackson’s goods and services.

56. Upon information and belief, Jackson alleges that Defendant is engaging in a false and misleading promotional advertising campaign willfully and with full knowledge of its false and misleading nature and of its likeliness to deceive.

57. As a direct and proximate result of Defendant’s intentional and willful violation of 15 U.S.C. §1125(a)(1)(B), Jackson has suffered and will continue to suffer injury, loss and damages

in an amount according to proof at trial and Jackson is entitled to recover damages, attorney's fees and costs, and to disgorgement of Defendant's unlawful gains and profits.

58. In addition, Jackson is entitled to injunctive relief. Defendant's misconduct has caused and, unless restrained and enjoined by this Court, will continue to cause substantial, immediate and irreparable injury to Jackson's businesses and reputation for which he is without an adequate remedy at law.

#### **FOURTH CLAIM FOR RELIEF**

##### **Dilution in Violation of Section 43(c) of the Lanham Act, 15 U.S.C. §1125(c)**

59. Plaintiff realleges and incorporates by reference herein paragraphs 1 through 58, inclusive, of this Complaint as though fully set forth herein

60. The 50 CENT trademark is a strong and distinctive mark that has been in use for over fifteen years and has achieved enormous and widespread public recognition, and is thus "famous" within the meaning of Section 43(c) of the Lanham Act.

61. Defendant's unauthorized use of the Mark in connection with the commercial advertisement of *Black Market* has caused or is likely to cause dilution by the blurring or tarnishment of the 50 CENT trademark.

62. Defendant deliberately intended to trade on the recognition of the prominent 50 CENT trademark by using Jackson's stage name in the title of the Remix and blatantly promoting the Remix through various media outlets.

63. Jackson has been damaged by Defendant's unauthorized acts which constitute a violation of Section 43(c) of the Lanham Act, 15 U.S.C. §1125(c) and unless immediately restrained, will continue to injure Jackson, causing damage to his name, identity, and persona as well as irreparable injury to the goodwill and reputation associated with the Mark.

64. In light of the willful violation of Section 43(c) of the Lanham Act, 15 U.S.C. §1125(c), Jackson is entitled to injunctive relief prohibiting Defendant from using the Mark, and to recover all damages, including attorneys' fees, that Jackson has sustained and will sustain, and all gains, profits and advantages obtained by Defendant as a result of Defendant's infringing acts.

**PRAYER FOR RELIEF**

WHEREFORE, Jackson prays for judgment in its favor and against Roberts as follows:

1. For a preliminary and permanent injunction enjoining Defendant from any further acts of false advertising and unfair competition, including but not limited to, the use by the Defendant of any trademarks or work product created or produced by Jackson;
2. For an award of actual and punitive damages in an amount according to proof at trial;
3. For an accounting to Jackson for any and all profits derived by Roberts from the unlawful acts complained of herein, and for disgorgement of those profits;
4. For reasonable attorneys' fees;
5. For costs of this lawsuit;
6. For such other relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Jackson hereby demands a trial by jury.

Dated: New York, New York.  
December 23, 2015

Respectfully submitted,

By: /s/ James Berman  
**ZEISLER & ZEISLER, P.C.**  
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