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6 **FARREN MUSIC AMERICA**

FILED
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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES**

10 **CV11-06422** JHN (E)

11 FARREN MUSIC AMERICA, a Limited
12 Liability Company dba GLOBAL CREATIVE
GROUP,

13 Plaintiff,

14 vs.

15 VIACOM INTERNATIONAL, INC., a
16 Delaware corporation; BUNIM/MURRAY
17 PRODUCTIONS, a California Limited
18 Liability Company; and DOES 1 through 10,
inclusive,

19 Defendants.

Case No.;

COMPLAINT FOR DAMAGES FOR:

- 1. **COPYRIGHT INFRINGEMENT;**
- 2. **UNJUST ENRICHMENT; and**
- 3. **INJUNCTIVE RELIEF**

JURY TRIAL DEMANDED

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21
22 **COMES NOW**, Plaintiff FARREN MUSIC AMERICA, a Limited Liability Company dba
23 GLOBAL CREATIVE GROUP ("GCG"), alleges against Defendants VIACOM INTERNATIONAL,
24 INC., a Delaware corporation, (hereinafter referred to as "VIACOM"); BUNIM/MURRAY
25 PRODUCTIONS, a California Limited Liability Company (hereinafter "BMP"); and DOES 1
26 through 10, inclusive, as follows:

27 ///

28 ///

LEE & FIELDS
A PROFESSIONAL CORPORATION
3731 Wilshire Blvd., Ste. 940
Los Angeles, CA 90010
(213) 380-5858

COMPLAINT FOR DAMAGES AND INJUNCTION

THE PARTIES

1
2 1. Plaintiff GCG is an Arizona Corporation with a main place of business at 4757 East
3 Greenway Road, Suite 107B – PMB180, Phoenix, Arizona 85032. GCG is in the business of
4 producing and distributing media content, and the copyright holder of the materials that Defendants
5 misappropriated for its own commercial benefit absent express consent from GCG.

6 2. Defendant VIACOM, upon information and belief, is a Delaware Corporation,
7 headquartered at 1515 Broadway, New York, NY 10036. MTV NETWORKS (hereinafter referred to
8 as “MTVN”) is a division of VIACOM that operates a portfolio of cable television networks,
9 including MTV. MTV is the television channel responsible for airing the infringing television show
10 “The Real World: New Orleans.”

11 3. Defendant BMP, upon knowledge and belief, is a California Limited Liability
12 Company, headquartered at 6007 Sepulveda Blvd., Van Nuys, CA 91411. BMP is in the business of
13 producing and distributing media content. BMP is the creator and producer of “The Real World,”
14 which airs on MTV (a channel of co-defendant VIACOM and its division MTVN).

15 4. At present, the true names and capacities, whether individual, corporate, or otherwise of
16 Defendants DOES 1 through 10 are unknown to Plaintiff and Plaintiff therefore sues these individuals
17 by their fictitious names and capacities in place of their legal names, but asks leave to amend with
18 their legal names if and when Plaintiff identifies them.

19 5. Upon information and belief, DOES 1-10 have acted or failed to act in concert with
20 Defendants as alleged herein, and are responsible in some manner for the injuries and damages
21 suffered by Plaintiff. All references to "DEFENDANTS" shall be deemed to include Defendants and
22 DOES 1-10.

23 6. At all times mentioned herein, unless otherwise stated, each Defendant was the agent,
24 employee, servant, or representative of each of the remaining Defendants, and in doing the acts
25 alleged herein, was acting within the course and scope of that agency, employment, service, and
26 representation, and with the knowledge, ratification, approval, authorization, and consent of each of
27 the other Defendants, and/or their officers and/or managing agents.

28 ////

JURISDICTION AND VENUE

1
2 7. This court has jurisdiction over this action pursuant to the Copyright Act of 1976, Title
3 17, United States Code, § 101, et seq. and also Title 15, United States Code, § 1051, et seq. and also
4 Title 18, United States Code § 1964, et seq.

5 8. Jurisdiction of the subject matter is conferred on this court by 28 United States Code §§
6 1331 and 1338.

7 9. Venue is proper under 28 United States Code § 1391

8 10. This Court has personal jurisdiction over Defendants (and all DOE defendants) since
9 defendant BMP is a California LLC headquartered in this district and defendant VIACOM and its
10 division MTVN conduct business within the district of this Court. Defendant's misconduct occurred
11 in this judicial district, and others, as a result of MTVN's broadcasting Plaintiff's copyrighted
12 material over the airways of this specific district (and others). Because Defendants aired Plaintiff's
13 property without proper authority and, in addition, failed to compensate Plaintiff for the same,
14 Plaintiff has suffered, and continues to suffer harm in this district (as well as others).

GENERAL ALLEGATIONS

15
16 11. GCG provides visual entertainment titled "Shadow Dancers" that is specifically catered
17 to the service and hospitality industry. The company provides select hardware, downloadable and
18 DVD video visuals, as well as custom content for various professional needs. Plaintiff's products are
19 used by a variety of persons and businesses, including VJs, DJs, bar and club owners, party planners,
20 retailers, nightlife establishments, and others. GCG's products may be purchased through various
21 standard media outlets, such as Amazon.com, retail stores, Best Buy and others.

22 12. GCG owns and administers the copyrights of said products and has invested substantial
23 money, time, effort, and creative talent to protect and properly develop its copyrighted materials.

24 13. Defendant BMP produces a variety of reality television programs that are shown
25 nationally on various cable channels. BMP is responsible for creating and producing the television
26 series "The Real World," which airs on co-defendant's channel MTV.

27
28

1 14. VIACOM is a media conglomerate with many divisions and subsidiaries, including
2 MTVN. MTVN is a division of VIACOM that operates various cable television networks, including
3 MTV, which airs “The Real World.”

4 15. On or about July 14, 2010 and July 21, 2010, Episodes 3 and 4, respectively, of “The
5 Real World: New Orleans” aired on MTV. “Shadow Dancers” Volumes 2, 4, 6 and VJ World
6 Revolutions are shown at various times throughout the aforementioned episodes. Both episodes
7 contained clear images of “Shadow Dancers” in the background of scenes in bars/clubs and on the
8 streets of New Orleans.

9 16. Subsequently thereafter, Plaintiff became aware that Defendants, including DOE
10 defendants, unlawfully incorporated images of its products, namely “Shadow Dancers” Volumes 2, 4,
11 and 6 and VJ World Revolutions, in episodes 3 and 4 of “The Real World: New Orleans.”
12 Defendants’ unauthorized use of Plaintiff’s creative work materially enhanced Defendants’ program
13 to the detriment of Plaintiff and Plaintiff’s brand. Such display was conducted without Defendants’
14 obtaining a public performance license or any permission from the copyright holder, GCG.

15 17. On or about September 28, 2010 counsel for Plaintiff sent a letter to the legal
16 department of MTVN describing Defendants’ infringement of Plaintiff’s copyrights and discussing
17 the ramifications of such infringement. Said letter also included a demand for reasonable
18 compensation for aforementioned and previous unlawful use of Plaintiff’s copyrights as well as
19 offered Defendants a license to use “Shadow Dancers.” Plaintiff made it clear to Defendants that
20 GCG, at the time of said letter, was “willing to settle this matter short of litigation and grant an
21 unlimited use license to MTVN to use any ‘Shadow Dancers’ material in their shows for the next five
22 (5) years at the rate of \$100,000.00.”

23 18. On or about November 1, 2010, Plaintiff received a letter from MTVN stating it had
24 forward claims concerning “The Real World” to BMP. In addition, MTVN stated it felt that its use of
25 “Shadow Dancers” was *de minimis* and/or constituted fair use of Plaintiff’s copyrighted materials.

26 19. At no point in time have Defendants acquired a public performance license or otherwise
27 obtained any authorization for the public display of images from Plaintiff’s products.

28 ///

1 20. Upon information and belief, by virtue of the foregoing described facts, Defendants
2 have made substantial profits and saved significantly on advertising costs—profits and savings to
3 which they are not entitled—as a result of using Plaintiff’s copyrighted products without a license.

4 **FIRST CAUSE OF ACTION**

5 **(Copyright Infringement against All Defendants and Does 1 – 10)**

6 21. Plaintiff incorporates, as though fully set forth herein, paragraphs 1 through 20 of this
7 Complaint.

8 22. The copyright for “Shadow Dancers Vol. 2” was filed with the Copyright Office on
9 February 6, 2009 and has a Copyright Registration Number of PA 1-621-672.

10 23. Plaintiff is the sole author and creator of all other audiovisual work known as “Shadow
11 Dancers” as protected under the Copyright Act, 17 U.S.C. § 101 et seq.

12 24. On or about July 14, 2010 and July 21, 2010, Episodes 3 and 4, respectively, of “The
13 Real World: New Orleans” aired on MTV. Shadow Dancers are clearly shown in the background of
14 scenes in a bar/club and on the streets of New Orleans in the aforementioned episodes, as well as in
15 trailers/promotional material for the show.

16 25. In violation of 17 U.S.C.A. § 106, Defendants have willfully infringed upon Plaintiff’s
17 copyrighted work by publicly reproducing, adapting, distributing, and/or displaying Plaintiff’s work
18 without consent, approval, or license.

19 26. Defendants, at no time, attempted to contact Plaintiff in order to acquire a license to
20 publicly perform and/or display Plaintiff’s copyrighted work during Episodes 3 and 4 of “The Real
21 World: New Orleans.” As a result of said failure, Defendants have improperly received a commercial
22 benefit to their reputations and names at the expense of Plaintiff’s time, money, and effort invested in
23 creating “Shadow Dancers.”

24 27. As a direct and proximate result of the infringements by Defendants, Plaintiff is entitled
25 to actual damages in an amount yet to be determined. Alternatively, Plaintiff is entitled to maximum
26 statutory damages of \$150,000 for each copyright infringed, or in such other amount as may be
27 proper under 17 U.S.C. § 504 (c).

28

1 28. Defendants' infringement of Plaintiff's copyright has yielded Defendants profits in an
2 amount to be determined.

3 29. Plaintiff, GCG, is further entitled to its attorney's fees and full costs pursuant to 17
4 United States Code § 505.

5 30. As a result of Defendants' conduct, Plaintiff has sustained and will continue to sustain,
6 substantial, immediate, and irreparable injury, for which there is no adequate remedy at law. Plaintiff
7 is informed and believes, and on that basis avers, that unless enjoined and restrained by this Court,
8 Defendants will continue to infringe its rights in its products. Plaintiff is entitled to preliminary and
9 permanent injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

10 **SECOND CAUSE OF ACTION**

11 **(Unjust Enrichment against All Defendants and Does 1-10)**

12 31. Plaintiff incorporates, as though fully set forth herein, paragraphs 1 through 30 of this
13 Complaint.

14 32. Defendants unlawfully used, Plaintiff's copyrighted work entitled "Shadow Dancers,"
15 in two episodes of "The Real World: New Orleans," without authorization, obtaining a license, or
16 otherwise compensating Plaintiff for said use.

17 33. Plaintiff has invested massive amounts of capital, labor, and time over at least the last
18 seven (7) years to create the aforementioned products and systems.

19 34. Defendants have failed to pay for the full value of the services received.

20 35. Accordingly, Defendants have been unjustly enriched in an amount to be proven at
21 trial.

22 36. Plaintiff has been unjustly deprived of potential licensing and other revenue as a
23 proximate result of Defendants' actions in an amount to be proven at trial.

24 **THIRD CAUSE OF ACTION**

25 **(Injunctive Relief against All Defendants and Does 1-10)**

26 37. Plaintiff incorporates, as though fully set forth herein, paragraphs 1 through 36 of this
27 Complaint.

28

1 38. Plaintiff also requests injunctive relief against Defendants. Specifically, Plaintiff seeks
2 permanent and final injunctions on such terms as it may deem reasonable to prevent or restrain future
3 infringement of said copyrights.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff requests the following relief:

6 a. On the first count for relief, damages in an amount to be determined at trial, which upon
7 information and belief, exceed the sum of \$25,000;

8 b. On the second count for relief, damages in an amount to be determined at trial, equal to
9 the amount that Defendants have been unjustly enriched;

10 c. On the third count for relief, immediate and permanently enjoining Defendants, their
11 officers, directors, agents, servants, employees, representatives, attorneys, related companies,
12 successors, assigns, and all others in active convert or participation with them from copying and
13 republishing any of Plaintiff's copyrighted material without consent or otherwise infringing Plaintiff's
14 copyrights in any manner;

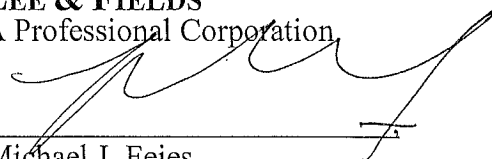
15 d. The costs and disbursement of this action including reasonable attorney's fees together
16 with such other and further relief that this Court may deem just and proper.

17
18 **DEMAND FOR JURY TRIAL**

19 Plaintiff respectfully demands a trial by jury in this action.

20 Dated: August 2, 2011

LEE & FIELDS
A Professional Corporation



Michael J. Fejes
Attorney for Plaintiff,
FARREN MUSIC AMERICA,
a California Limited Liability Company

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

<p>I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) FARREN MUSIC AMERICA, a Limited Liability Company dba GLOBAL CREATIVE GROUP,</p>	<p>DEFENDANTS VIACOM INTERNATIONAL, INC., a Delaware corporation; BUNIM/MURRAY PRODUCTIONS, a California Limited Liability Company; and DOES 1 through 10, inclusive,</p>
<p>(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) LEE & FIELDS, APC - (213)380-5858 3731 Wilshire Blvd. Ste 940 Los Angeles, CA. 90010</p>	<p>Attorneys (If Known)</p>

<p>II. BASIS OF JURISDICTION (Place an X in one box only.)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)</p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify): 6 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ Exceeds \$25,000.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 Title 17, United States Code, § 101- Copyright Infringement

VII. NATURE OF SUIT (Place an X in one box only.)

<p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Act</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Info. Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>	<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p> <p>REAL PROPERTY</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Fed. Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury-Med Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury-Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus- Alien Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>TORTS</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p> <p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 444 Welfare</p> <p><input type="checkbox"/> 445 American with Disabilities - Employment</p> <p><input type="checkbox"/> 446 American with Disabilities - Other</p> <p><input type="checkbox"/> 440 Other Civil Rights</p>	<p>PRISONER PETITIONS</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus/Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p>TORRENTURE/PENALTY</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. & Truck</p> <p><input type="checkbox"/> 650 Airline Regs</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p>	<p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p>PROPERTY RIGHTS</p> <p><input checked="" type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>
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CV11-06422

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): CV 11-06419

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
New York	

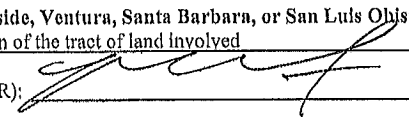
- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):

 Date 8/4/11

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g)).
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Jacqueline Nguyen and the assigned discovery Magistrate Judge is Charles Eick.

The case number on all documents filed with the Court should read as follows:

CV11- 6422 JHN (Ex)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

AO 440 (Rev. 12/09) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

FARREN MUSIC AMERICA, a Limited Liability Company dba GLOBAL CREATIVE GROUP,

Plaintiff

v.

VIACOM INTERNATIONAL, INC., a Delaware corporation; BUNIM/MURRAY PRODUCTIONS, et al

Defendant SEE ATTACHED

CV11-06422 JHN (LX) Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

A lawsuit has been filed against you.

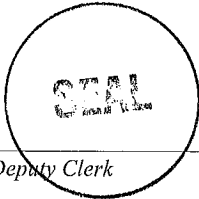
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Edward Y. Lee
LEE & FIELDS, APC
3731 Wilshire Blvd., Ste 940
Los Angeles, CA. 90010

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Date: AUG - 4 2011

CLERK OF COURT JULIE PRADO



Signature of Clerk or Deputy Clerk

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UNITED STATES DISTRICT COURT

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FARREN MUSIC AMERICA, a Limited Liability Company dba GLOBAL CREATIVE GROUP,

Plaintiff

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Defendant SEE ATTACHED

CV11-06422 JHN (EX)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

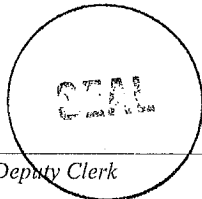
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Edward Y. Lee
LEE & FIELDS, APC
3731 Wilshire Blvd., Ste 940
Los Angeles, CA. 90010

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CLERK OF COURT JULIE PRADO



Date: AUG - 4 2011

Signature of Clerk or Deputy Clerk