

I. NATURE OF THE ACTION

1. Plaintiffs bring this action to stop the massive piracy of their motion pictures brought on by the software applications Show Box app and Popcorn Time.

2. To halt Defendants' illegal activities, Plaintiffs bring this action under: (a) the United States Copyright Act of 1976, as amended, 17 U.S.C. §§ 101, et seq. (the "Copyright Act") and allege that Defendants are liable for direct and contributory copyright infringement in violation of 17 U.S.C. §§ 106 and 501.

II. JURISDICTION AND VENUE

3. This Court has subject matter jurisdiction over this action pursuant to 17 U.S.C. §§ 101, et. seq., (the Copyright Act), 28 U.S.C. § 1331 (federal question), and 28 U.S.C. § 1338 (patents, copyrights, trademarks, and unfair competition).

4. Defendants solicit, transact, or are doing business within this jurisdiction, and have committed unlawful and tortious acts both within and outside this jurisdiction with the full knowledge that their acts would cause injury in this jurisdiction.

5. Defendants cause harm to Plaintiffs' business within this District by diverting customers in this District to unauthorized Internet-based content distribution services through, at least, their websites and the Show Box app and Popcorn Time software applications they promoted and distribute.

6. In the alternative, the Court has jurisdiction pursuant to Fed. R. Civ. P.

4(k)(2), the so-called federal long-arm statute, for at least the following reasons: (1) Plaintiffs' claims arise under federal copyright law; (2) the Defendants purposely directed their electronic activity into the United States and target and attract a substantial number of users in the United States and, more particularly, this District; (3) Defendants do so with the manifest intent of engaging in business or other interactions with the United States; (4) the Defendants are not subject to jurisdiction in any state's courts of general jurisdiction; and (5) exercising jurisdiction is consistent with the United States Constitution and laws.

7. Defendant Aptoide uses many United States based sources for its activities such as the domain registrar Enom, Inc., the registrant agent Whois Privacy Protection, Inc., and, upon information and belief, the name server provider Amazon Web Services.

8. Defendant Aptoide's website is located on the ".com" top level domain operated by the U.S. Company Verisign, Inc. and subject to the laws of the United States.

9. Defendant Aptoide promotes overwhelmingly if not exclusively motion pictures produced by United States companies on its websites for the Show Box app and Popcorn Time.

10. Defendant Aptoide provides an English language version of its website with a United States flag.

11. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) - (c) because: (a) all or a substantial part of the events or omissions giving rise to the claims occurred in this District; and (c)(3) any of the Defendants not a resident of the United States may be sued in this District.

III. PARTIES

A. The Plaintiffs

12. The Plaintiffs are owners of the copyrights for the motion pictures (hereafter: “Works”), respectively, as shown and listed below. Exhibits “1” and “2”. Plaintiffs produced and marketed these Works at great expense. Plaintiffs are currently selling the Works to consumers in Hawaii, throughout the United States, and in interstate commerce generally through various distributors, retailers and distribution channels.

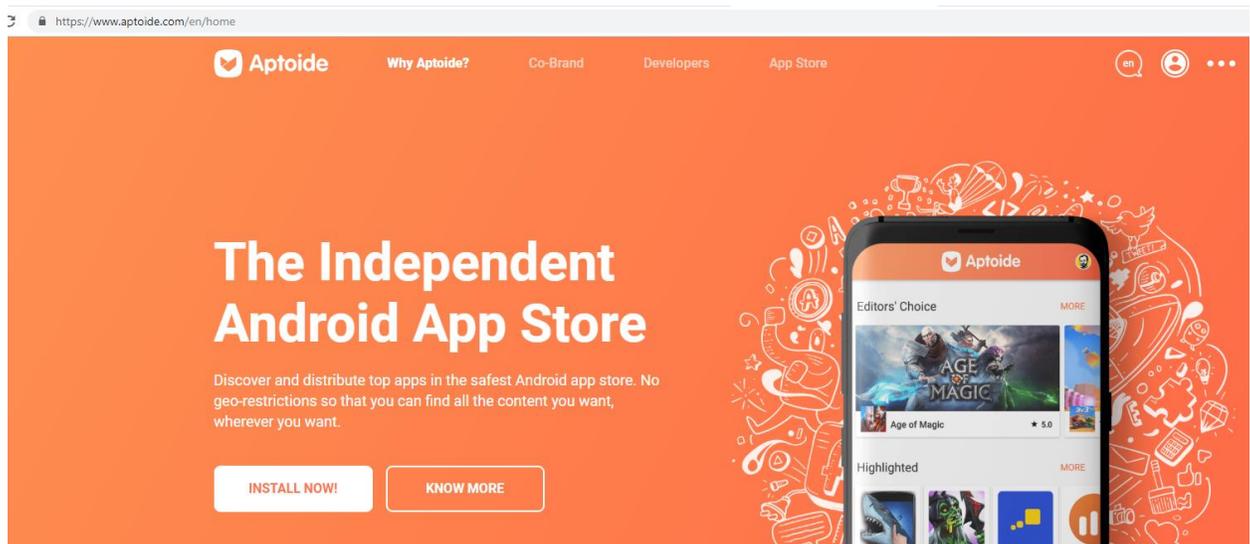
OWNER	MOTION PICTURE	Copyright Certificate Number
TBV Productions, LLC	<i>I Feel Pretty</i>	Pau3896491
Hunter Killer Productions, Inc.	<i>Hunter Killer</i>	PA2136168

B. The Defendants

13. Defendant Aptoide is, upon information and belief, a *Sociedade Anônima* – a legal alter-ego entity analogous to a Corporation – organized under the laws of Portugal.

14. Upon information and belief, Defendant Aptoide has a principal place of business in Horta das Figueiras, Evora, Portugal.

15. Defendant Aptoide operates the website www.aptoide.com where it promotes its “Independent Android App Store” called “Aptoide” where users can “Discover and distribute top apps in the safest Android app store. No geo-restrictions so that you can find all the content you want, wherever you want.”



16. Defendant Aptoide states that because its app store Aptoide includes user generated content Defendant Aptoide takes “extra measures to ensure it’s consistent quality over time.”

Aptoide has been growing its user base steadily for the past four years - as a result, it has seen a **huge increase in the number and diversity of apps**. Since it's an open social platform with user uploaded content, we must take extra measures to ensure it's consistent **quality** over time.

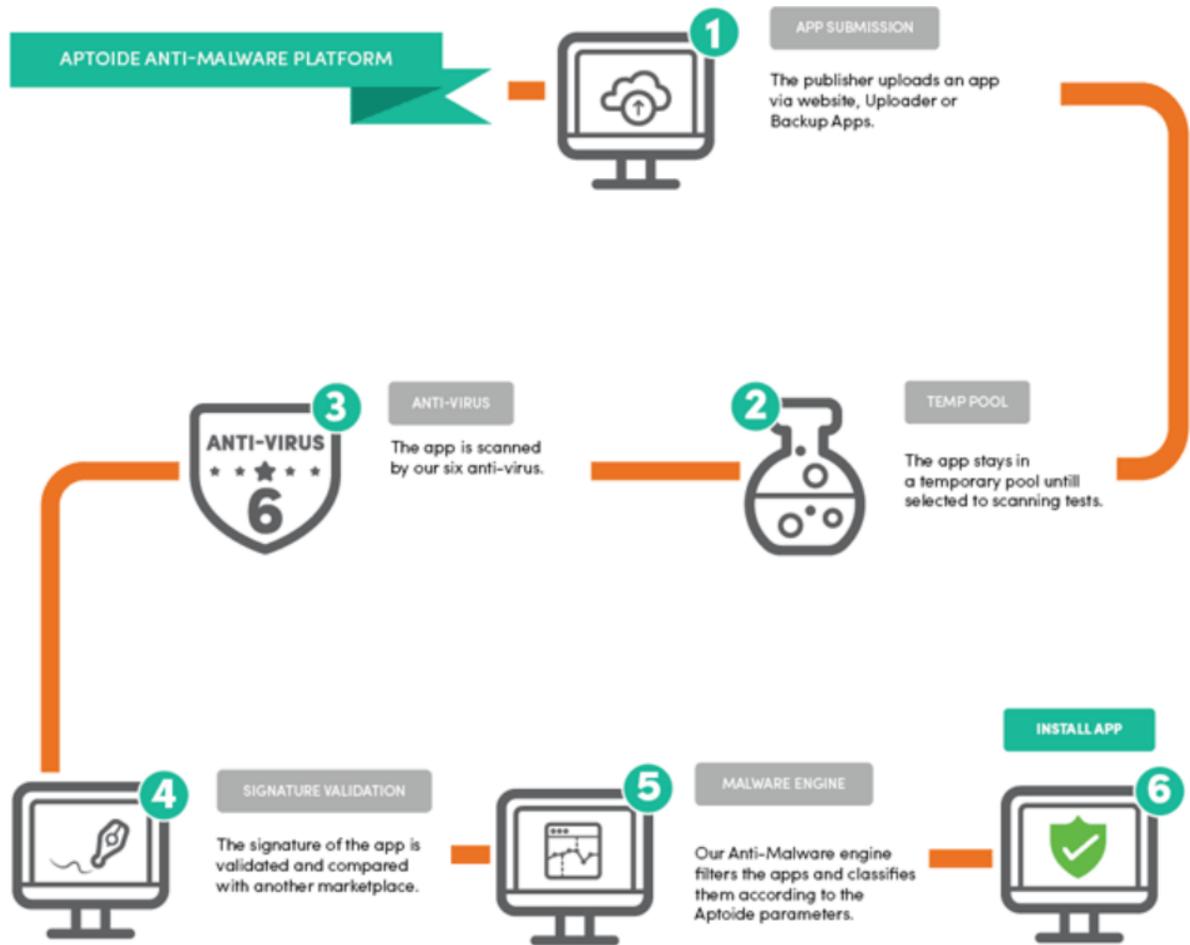
We won't lie to you. It's a challenge. There are malicious users who try to upload malware disguised as popular apps all the time. There's annoying adware as well. That's precisely why we have an anti-malware system that constantly scans and filters the content on every Aptoide store. Our system is always updating and improving ensuring the best experience for the Aptoide community.

Our in-house security expert Diogo Pires is the man behind this system, "some marketplaces do not employ comprehensive means to counteract the high injection flow of unwanted applications" he says. "Aptoide has made the protection of its users one of its key concerns - That's why we have developers continuously developing and upgrading Aptoide Anti-Malware System".

But still, how can you be sure it's safe? Here's the **number one** measure to make yourself safe: **Our Trusted Badge**.



17. Defendant Aptoide maintains an approach in which it adds an endorsement badge “TRUSTED” to apps verified by a system referred to as “Aptoide Sentinel”.

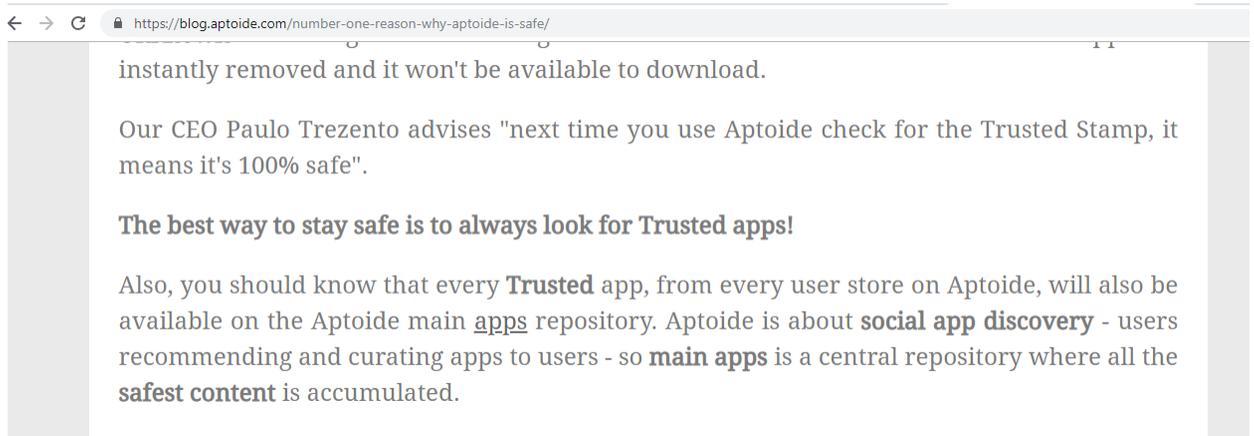


18. According to Defendant Aptoide, the Aptoide Sentinel process includes *inter alia*: scanning apps for viruses; comparing the app signature to that of the app in another marketplace; and filtering the app and classifying it according to Aptoide parameters.

19. Defendant Aptoide further maintains that it performs a rescanning mechanism to rescan apps multiple times thereafter.

There's a **rescanning scheme** that ensures that an app is scanned at least 3 times within **48 hours** of its upload, at least 4 times within **a week** and at least 5 times within **a month**. In addition, we also keep rescanning all the apps in Aptoide **over and over**, even if they've been in the stores for months or even years, meaning that an application is **rescanned several times** to ensure its **safe to use** by Aptoide users and to soften the work of manually testing applications.

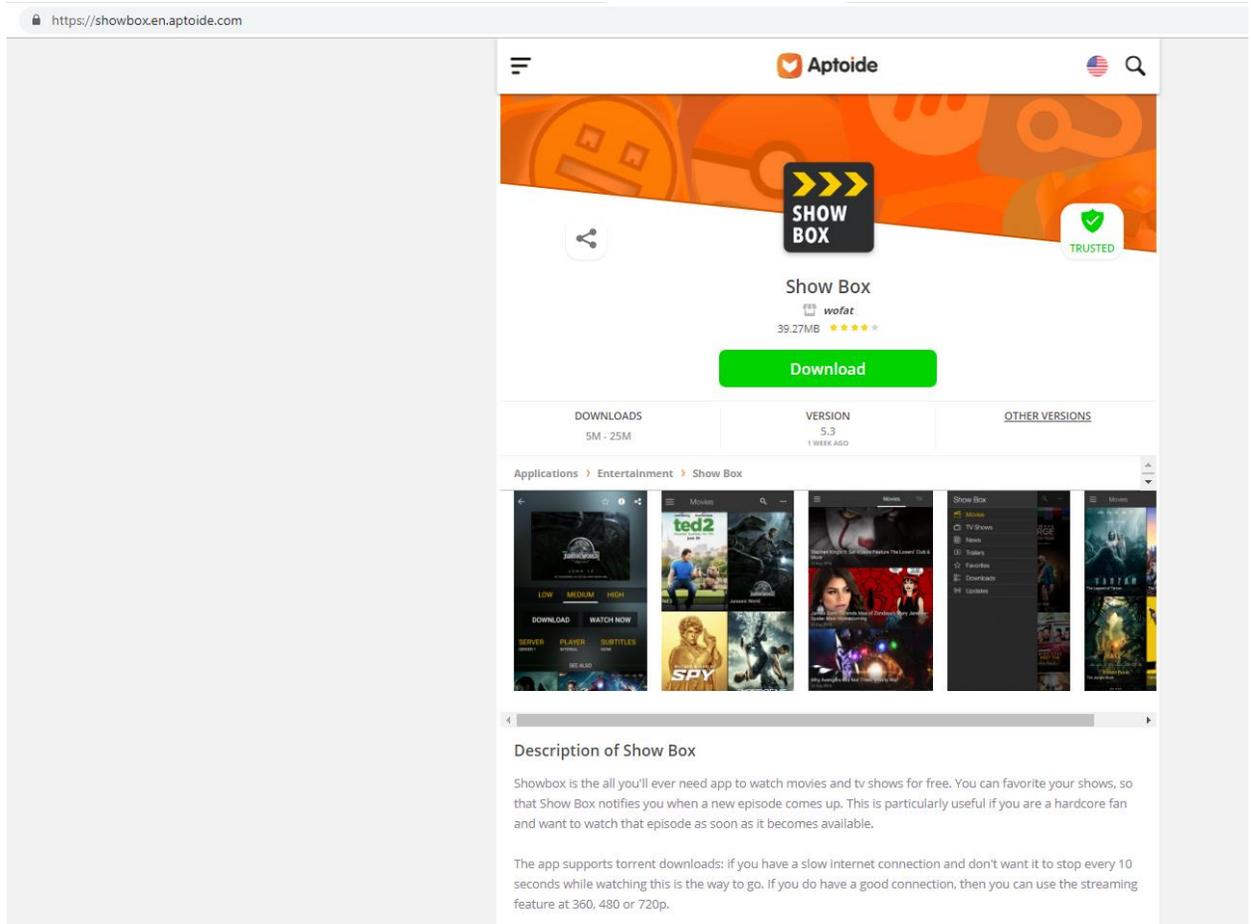
20. The Chief Executive Officer of Defendant Aptoide himself advises users that the “Trusted Stamp” means that the app on Aptoide is “100% safe.”



21. Defendant Aptoide promotes and distributes the Show Box app at the website showbox.en.aptoide.com (“Show Box website”). At the Show Box website Defendant Aptoide states that the Show Box app has been downloaded between 5-25 million times.

22. On the Show Box website, the Show Box app is described as, “all you’ll ever need to watch movies and tv shows for free” and “The app supports torrent downloads...”

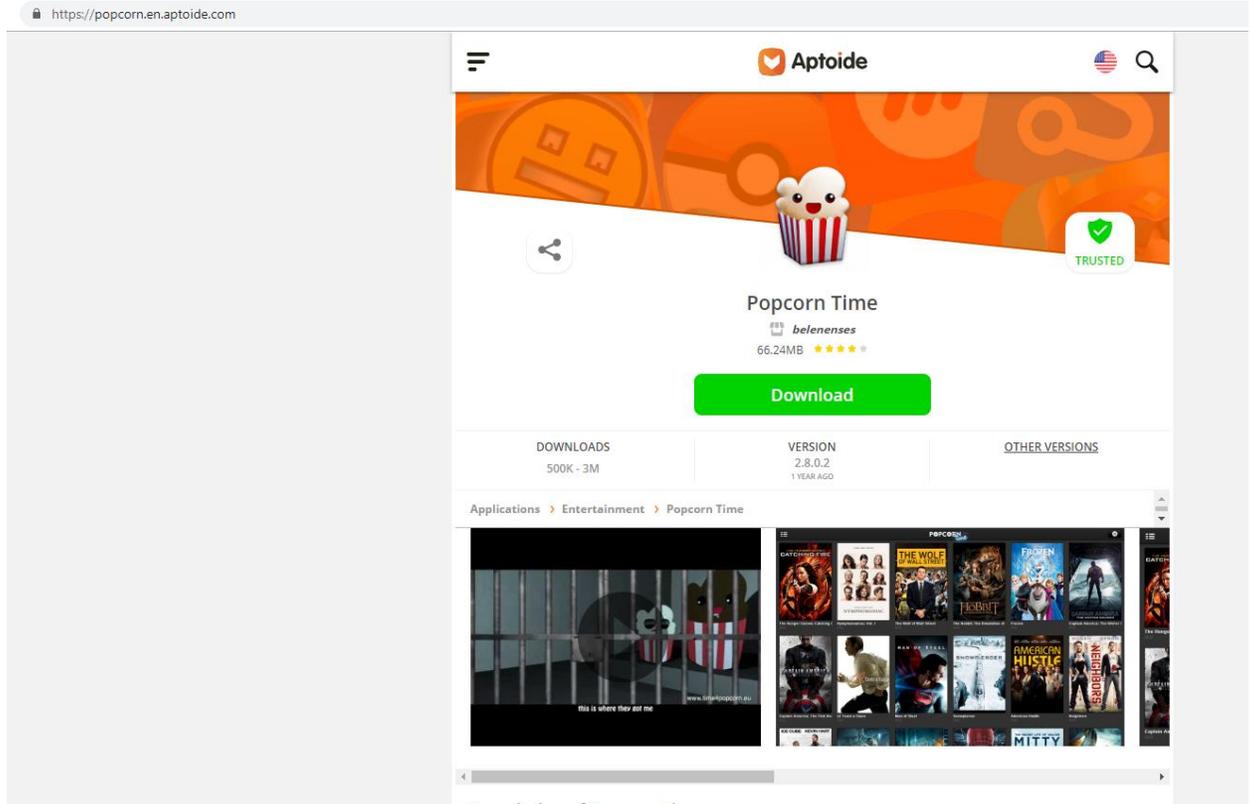
23. On the Show Box website, Defendant Aptoide gives the Show Box app the endorsement “TRUSTED”.



24. Defendant Aptoide promotes and distributes Popcorn Time at the website popcorntime.en.aptoide.com (“Popcorn Time website”). At the Popcorn Time website Defendant Aptoide states that Popcorn Time has been downloaded between 500,000 - 3 million times.

25. On the Popcorn Time website, Popcorn Time is described as, “watch the latest TV shows and movies anytime, anywhere” and “The legendary app lets you stream and watch movies and TV shows for free...”

26. On the Popcorn Time website, Defendant Aptoide gives Popcorn Time the endorsement “TRUSTED”.



27. Upon information and belief, Defendant Aptoide subjected the Show Box app and Popcorn Time to its Aptoide Sentinel process.

28. Because Defendant Aptoide subjected the Show Box app and Popcorn Time to the Aptoide Sentinel process, Defendant Aptoide – as opposed to a third party user – installed Popcorn Time and the Show Box app in the Aptoide store.

29. Defendant's website aptoide.com is registered anonymously by the domain registrar Enom, Inc.

30. As of April 1, 2019, Defendant Aptoide does not have an agent designated to receive notifications of claimed infringement as required by 17 U.S.C. § 512(c)(2).

The screenshot shows the DMCA Designated Agent Directory search interface. At the top, there is a search bar with the text 'aptoide' and a 'Search' button. Below the search bar, there is a checkbox labeled 'Include Terminated Service Provider Designations'. The search results section is titled 'Search Results' and shows 'Show 10 entries'. The results table has columns for 'Service Provider', 'Matching Alternate Names', and 'Status'. The table is currently empty, with a message 'No Service Provider found for your search' displayed in the center. Below the table, it says 'Showing 0 to 0 of 0 entries' and has 'Previous' and 'Next' navigation links. A red link labeled 'Explanation of Status Field' is located below the search results section.

31. On Feb. 27, 2019, Plaintiff TBV Productions, Inc. notified Enom, Inc., via counsel, regarding the allegations of infringement associated with the Show Box app promoted and distributed on the website showbox.en.aptoide.com and requested identification information of the registrant of the website aptoide.com.

32. On Feb. 28, 2019, Enom informed Plaintiff TBV Productions, Inc. that Enom would first be notifying the registrant and account holder of the domain aptoide.com before complying with the request. Exhibit “3”.

33. Approximately two days later, one or more unnamed employees at Aptoide viewed the LinkedIn profile of counsel for Plaintiff TBV Productions, Inc.

34. On Mar. 26, 2019, Enom informed Plaintiff TBV Productions, Inc. that Paulo Trezentos was the registrant and account holder.

35. Upon information and belief, Paulo Trezentos is the Chief Executive Officer of Enom.

36. On March 18, 2019, Plaintiff TBV Productions, Inc., via counsel, sent an email to Defendant Aptoide via the email address abuse.report@aptoide.com

informing Aptoide of the infringing nature of the Show Box app and requesting identification information of the individual who places the Show Box app available for download at the Show Box website. Exhibit “4”.

37. As of April 1, 2019, Defendant Aptoide continues to promote and distribute the Show Box app at the Show Box website.

38. The Show Box app and Popcorn Time users in Hawaii are motivated to download these applications from the websites of Defendant Aptoide and use them for their infringing purpose because of the promotions of Defendant Aptoide as applications for infringing copyright protected Works, including those of Plaintiffs.

39. Defendants John Does 1-10 are individuals who design and/or maintain the server framework for Popcorn Time and the Show Box app. The true names and capacities, whether individual, corporate, associate or otherwise, of Defendants John Does 1-10 are unknown to Plaintiffs who therefore sues said Defendants by such fictitious names.

40. Defendants benefit financially from the infringement of the Works by the United States and Hawaii based users of Popcorn Time and the Show Box app.

IV. JOINDER

41. Pursuant to Fed. R. Civ. P. 20(a)(1), each of the Plaintiffs are properly joined because, as set forth in detail above and below, the Plaintiffs assert: (a) a right

to relief arising out of the same transaction, occurrence, or series or transactions, namely the distribution of and use of the Show Box app and Popcorn Time for streaming and distributing Plaintiffs' Works; and (b) that there are common questions of law and fact.

42. Pursuant to Fed. R. Civ. P. 20(a)(2), each of the Defendants was properly joined because, as set forth in more detail below, the Plaintiffs assert: (a) a right to relief arising out of the same transaction, occurrence, or series or transactions, namely the promotion and distribution of Popcorn Time and the Show Box app for streaming and distributing Plaintiffs' Works; and (b) there are common questions of law and fact.

V. FACTUAL BACKGROUND

A. The Plaintiffs Own the Copyrights to the Works

43. The Plaintiffs are the owners of the copyrights in the Works, respectively. The Works are the subjects of copyright registrations, and this action is brought pursuant to 17 U.S.C. § 411. Exhibits "1" and "2".

44. Plaintiff TBV Productions, LLC is a California limited liability company having its principal office in Los Angeles, California. The Plaintiff TBV Productions, LLC is an affiliate of Voltage Pictures, a production company with a notable catalog of major award winning motion pictures, such as, for example, *Dallas Buyers Club*, by independent film makers. See www.voltagepictures.com.

45. Plaintiffs Hunter Killer Productions, Inc. is a corporation registered under the laws of the State of Nevada having principal offices in Los Angeles, California. The Plaintiffs Hunter Killer Productions is an affiliate of Millennium Media, a production company and distributor of a notable catalog of major motion pictures, including. *See* www.millenniumfilms.com.

46. Due to Plaintiffs' production and marketing efforts, there is consumer demand for viewing the Works.

47. Each of the Works are motion pictures currently offered for sale in commerce.

48. Defendants had notice of Plaintiffs' rights through at least the credits indicated in the content of the motion pictures which bore proper copyright notices.

49. Defendants also had notice of Plaintiffs' rights through general publication and advertising associated with the motion picture, and packaging and copies, each of which bore a proper copyright notice.

B. The Defendants' Show Box app intentionally induce users' Infringements of the Plaintiffs' Copyrights

50. The Show Box app provides an interface so that users can easily copy copyright protected content. The home interface includes a search bar where a user can enter words associated with a copyright protected motion picture they wish to copy, title art of popular movies, and advertisement banners.

51. Defendants had notice of Plaintiffs' rights through at least the credits indicated in the content of the motion pictures which bore proper copyright notices.

52. Defendants also had notice of Plaintiffs' rights through general publication and advertising associated with the motion picture, and packaging and copies, each of which bore a proper copyright notice.

B. Defendant Aptoide promotes and distributes the Show Box app which intentionally induces users' Infringements of the Plaintiffs' Copyrights

53. The Show Box app provides an interface so that users can easily copy copyright protected content. The home interface includes a search bar where a user can enter words associated with a copyright protected motion picture they wish to copy and title art of popular movies.

54. Simply entering a title associated with a motion picture automatically returns a narrowed selection of motion pictures.

55. Upon choosing a title from the narrowed selection, the Show Box app provides two options for copying the content: "WATCH NOW" and a download icon for downloading the motion picture.



56. After selecting “WATCH NOW”, the Show Box app reproduces a complete copy of the selected motion picture – in the below cases Plaintiffs’ motion pictures *I Feel Pretty* and *Hunter Killer*.



57. Upon information and belief, the Show Box app is using one or more addons for streaming infringing content, including Plaintiffs' Works. These addons are designed and maintained for the overarching purpose of scouring the Internet for illegal sources of copyrighted content and returning links to that content. When Show Box app users click the "WATCH NOW" button, the user receives

unauthorized streams of popular motion pictures, including Plaintiffs’.

58. When the user chooses the download icon next to WATCH NOW, the Show Box app automatically begins searching for peers that are sharing a torrent file associated with the selected motion picture. The interface even allows the user to copy multiple motion pictures at the same time.

59. The Show Box app is using the BitTorrent client application protocol to automatically search Torrent sites and find peers to allow users to download copyright protected content, including Plaintiffs’ Works.

60. Torrent sites are websites that index torrent files that are currently being made available for copying and distribution by peers using the BitTorrent protocol. When Show Box app users click the download icon, the user begins receiving different piece of the copyrighted Works from peers.

61. Once a Show Box app user has downloaded the full file, the BitTorrent Client reassembles the pieces and the Show Box app user is able to view the movie while distributing the torrent file, here the copyrighted Works.

62. Neither Defendants nor their Show Box app have a license from Plaintiffs to stream and/or download copies of Plaintiffs’ Works.

63. Defendant Aptoide advertises the Show Box app for being used for infringing Copyright protected Works, including Plaintiffs.

64. Users use the Show Box app for its intended and unquestionably

infringing purposes, most notably to obtain immediate, unrestricted, and unauthorized access to unauthorized copies of Plaintiffs' Copyrighted Works as promoted by Defendant Aptoide.

65. Defendant Aptoide promotes the use of the Show Box app user for overwhelmingly, if not exclusively, infringing purposes, and that is how the users use the Show Box app.

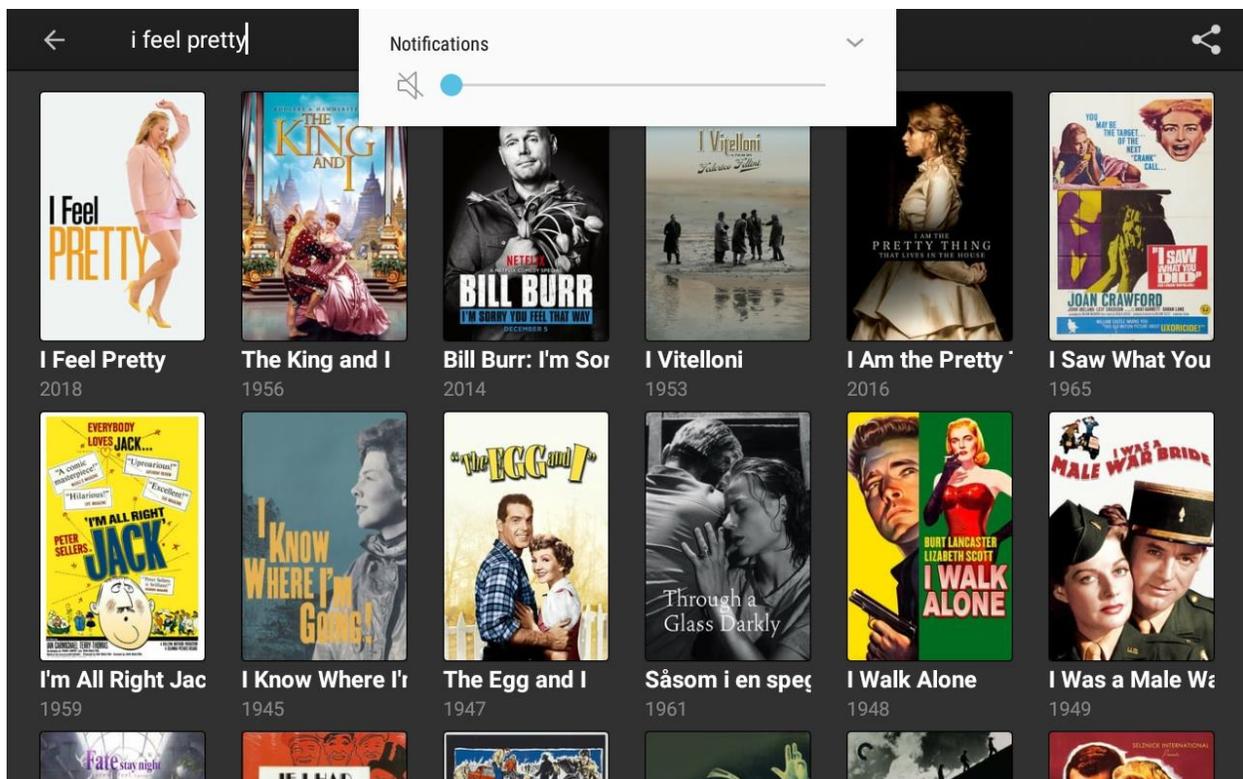
66. Defendant Aptoide benefits from the availability of free Copyright protected content via the Show Box app. Namely, more users install the Aptoide application on their devices in order to obtain Show Box.

C. The Defendant Aptoide promotes and distributes Popcorn Time, which intentionally induce users' Infringements of the Plaintiffs' Copyrights

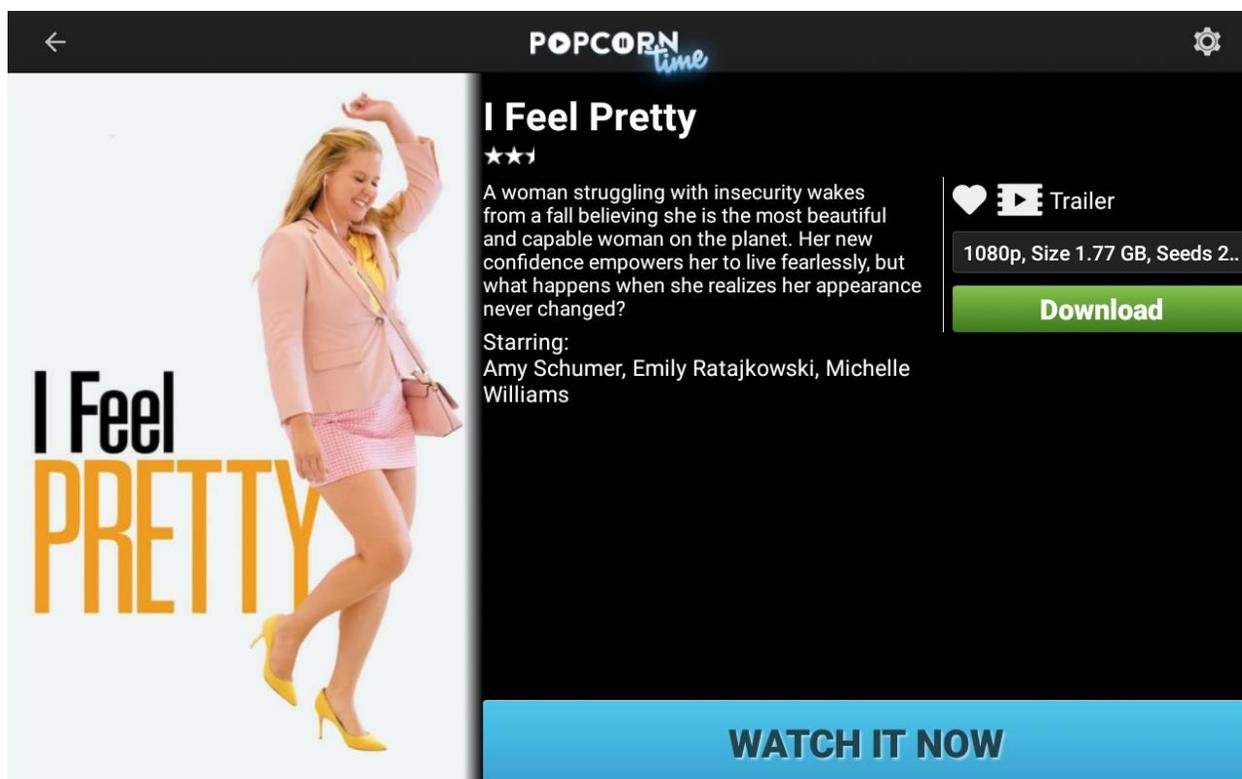
67. Popcorn Time has been referred to in the news media as "Netflix for pirates". <http://fortune.com/2016/02/26/popcorn-time-netflix-pirates/> [accessed on Dec. 24, 2018].

68. Popcorn Time provides an interface so that users can easily copy and share copies of copyright protected content, including Plaintiffs'.

69. The home interface of Popcorn Time includes a collection of title art of popular motion pictures and a search bar where a user can enter words associated with a copyright protected motion picture they wish to copy



70. Upon choosing a title, Popcorn Time provides two options for copying the content: "WATCH IT NOW" and "DOWNLOAD".



71. After selection “WATCH IT NOW”, Popcorn Time reproduces a complete copy of the selected motion picture – in the below case *I Feel Pretty*.



72. Upon information and belief, Popcorn Time is using one or more addons for streaming infringing content, including Plaintiffs' Works similarly to the Show Box app when Popcorn Time users click the "WATCH IT NOW" button.

73. When the user chooses DOWNLOAD, Popcorn Time automatically begins searching for peers that are sharing a torrent file associated with the selected motion picture similarly to the Show Box app.

74. Defendant Aptoide promotes the use of the Show Box app user for overwhelmingly, if not exclusively, infringing purposes, and that is how the users use the Show Box app.

75. Defendant Aptoide benefits from the availability of free Copyright protected content via Popcorn Time. Namely, more users install the Aptoide

application on their devices in order to obtain Popcorn Time.

76. Defendant Aptoide does not have a license from Plaintiffs to stream and/or download copies of Plaintiffs' Works.

77. JOHN DOES 1-10 associated with the Popcorn Time and Show Box app do not have a license from Plaintiffs to stream and/or download copies of Plaintiffs' Works.

C. The Defendants induce Infringements of Plaintiffs' Copyrights in their Works.

78. Defendant Aptoide promotes Popcorn Time and the Show Box app overwhelmingly, if not exclusively, for purposes of infringing Copyright protected content, including Plaintiffs'.

79. Defendant Aptoide advertise Popcorn Time and Show Box app as legitimate distribution channels.

80. Defendant Aptoide adds its endorsement badge "TRUSTED" to Popcorn Time and Show Box app on its website.

81. Aptoide users download and install Popcorn Time and Show Box app and use it exactly as promoted by Defendant Aptoide – to infringe Copyright protected content, including Plaintiffs'.

82. Plaintiffs' investigator has recorded incidents of BitTorrent transactions in which Plaintiffs' motion pictures were being shared. Plaintiffs'

investigator has recorded numerous incidents of such sharing in Hawaii. Exhibit “5”.

**VI. FIRST CLAIM FOR RELIEF
(Intentional Inducement of Streaming)**

83. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

84. Plaintiffs are the copyright owners of the Works which each contains an original work of authorship.

85. Defendants had actual knowledge of third parties’ infringement of Plaintiffs’ exclusive rights under the Copyright Act.

86. Defendants intentionally induce the infringement of Plaintiffs’ exclusive rights under the Copyright Act, including infringement of Plaintiffs’ exclusive right to publicly perform their Copyrighted Works. As intended and encouraged by Defendants, each of the Show Box app and Popcorn Time connects customers to unauthorized online sources that stream Plaintiffs’ Copyrighted Works. The operators of these source repositories directly infringe Plaintiffs’ public performance rights by providing unauthorized streams of the works to the public, including to Show Box app and Popcorn Time users. These operators, or others operating in concert with them, control the facilities and equipment used to store and stream the content, and they actively and directly cause the content to be streamed

when Show Box app and Popcorn Time users click on a link for the content.

87. Defendants induce the aforementioned acts of infringement by supplying the Show Box app and Popcorn Time that facilitates, enables, and creates direct links between users and the infringing operators of the streaming services, and by actively inducing, encouraging and promoting the use of the Show Box app and Popcorn Time for blatant copyright infringement.

88. Defendants' intentional inducement of the infringement of Plaintiffs' rights in each of their Copyrighted Works constitutes a separate and distinct act of infringement.

89. Defendants' inducement of the infringement of Plaintiffs' Copyrighted Works is willful, intentional, and purposeful, and in disregard of and with indifference to the rights of the Plaintiffs.

90. Defendants' actions are a direct and proximate cause of the infringements of Plaintiffs' Works.

VII. SECOND CLAIM FOR RELIEF (Intentional Inducement of Torrenting)

91. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

92. Plaintiffs are the copyright owners of the Works which each contains an original work of authorship.

93. Defendants have actual knowledge of third parties' infringement of

Plaintiffs' exclusive rights under the Copyright Act.

94. Defendants intentionally induce the infringement of Plaintiffs' exclusive rights under the Copyright Act, including infringement of Plaintiffs' exclusive right to distribute copies of Copyrighted Works. As intended and encouraged by Defendants, the Show Box app and Popcorn Time connects users to Torrent sources and/or sites that deliver copies of Plaintiffs' Copyrighted Works. The operators of these Torrent sources directly infringe Plaintiffs' exclusive rights by providing unauthorized copies of the works to the public, including to the Show Box app and Popcorn Time users.

95. Once the user of the Show Box app and Popcorn Time has obtained a complete copy of the Plaintiffs' Copyrighted Works, that particular user also becomes another Torrent source that delivers copies of Plaintiffs' Copyrighted Works.

96. These operators, or others operating in concert with them, control the facilities and equipment used to store and distribute the content, and they actively and directly cause the content to be distributed when users click on a link for the content.

97. Defendants induce the aforementioned acts of infringement by supplying the Show Box app and Popcorn Time that facilitates, enables, and creates direct links between their users and the infringing Torrent sources, and by actively

inducing, encouraging and promoting the use of Popcorn Time and the Show Box app for blatant copyright infringement.

98. Defendants intentional inducement of the infringement of Plaintiffs' rights in each of their Copyrighted Works constitutes a separate and distinct act of infringement.

99. Defendants inducement of the infringement of Plaintiffs' Copyrighted Works is willful, intentional, and purposeful, and in disregard of and with indifference to the rights of the Plaintiffs.

100. Defendants' actions are a direct and proximate cause of the infringements of Plaintiffs' Works.

**VIII. THIRD CLAIM FOR RELIEF
(Contributory Copyright Infringement based upon Material
Contribution)**

101. Plaintiffs re-allege and incorporate by reference the allegations contained in each of the foregoing paragraphs.

102. Defendants have actual or constructive knowledge of infringement of Plaintiffs' exclusive rights under the Copyright Act. Defendants knowingly and materially contribute to such infringing activity.

103. Defendants knowingly and materially contribute to the infringement of Plaintiffs' exclusive rights under the Copyright Act, including infringement of Plaintiffs' exclusive right to publicly perform and distribute their works. Defendants design, distribute and promote the use of the Show Box app and Popcorn Time to

connect customers to unauthorized online sources that stream and allow downloading of copies of Plaintiffs' Copyrighted Works. The operators of these source repositories directly infringe Plaintiffs' public performance rights by providing unauthorized streams and/or copies of the Works to the public, including to Popcorn Time and Show Box app users. The operators, or others operating in concert with them, control the facilities and equipment used to store and stream or deliver copies of the content, and they actively and directly cause the content to be streamed and/or distributed when users click on a link for the content.

104. Defendants knowingly and materially contribute to the aforementioned acts of infringement by supplying the software application that facilitate, encourage, enable, and create direct links between users and infringing operators of the streaming and Torrent services, and by actively encouraging, promoting, and contributing to the use of Popcorn Time and the Show Box app for blatant copyright infringement.

105. Defendants knowing and material contribution to the infringement of Plaintiffs' rights in each of their Copyrighted Works constitutes a separate and distinct act of infringement.

106. Defendants knowing and material contribution to the infringement of Plaintiffs' Copyrighted Works is willful, intentional, and purposeful, and in disregard of and with indifference to the rights of Plaintiffs.

107. As a direct and proximate result of the infringement to which

Defendants knowingly and materially contribute, Plaintiffs are entitled to damages and Defendants' profits in amounts to be proven at trial.

108. Defendants obtained a direct financial interest, financial advantage, and/or economic consideration from the infringements in Hawaii as a result of their infringing actions in the United States.

109. Defendants' actions are a direct and proximate cause of the infringements of Plaintiffs' Works.

110. Each of the Defendants' infringements was committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, the Plaintiffs respectfully requests that this Court:

(A) enter temporary, preliminary and permanent injunctions enjoining each Defendant from continuing to contribute to infringement of the Plaintiffs' copyrighted Works;

(B) Entry of an Order pursuant to 28 U.S.C §1651(a), The All Writs Act, that, the operators of the Defendant Aptoide's websites immediately remove all versions of the software application Show Box and Popcorn Time from their website;

(C) Entry of an Order pursuant to 28 U.S.C §1651(a), The All Writs Act, that, upon Plaintiffs' request, those in privity with Defendants and those with notice of the injunction, including any Internet search engines, Web hosts, domain-name registrars, and domain name registries and/or their administrators that are provided

with notice of the injunction, cease facilitating access to any or all domain names and websites through which Defendants engage in the distribution and promotion of the Show Box app and Popcorn Time;

(D) award the Plaintiffs' actual damages and Defendants' profits in such amount as may be found; alternatively, at Plaintiffs' election, for maximum statutory damages per Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) award the Plaintiffs their reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

(F) grant the Plaintiffs any and all other and further relief that this Court deems just and proper.

DATED: Kailua-Kona, Hawaii, April 4, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs