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9 *Attorneys for Plaintiff TRILLER FIGHT CLUB II LLC*

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

12 TRILLER FIGHT CLUB II LLC, a  
 13 Delaware limited liability company,

14 Plaintiff,

15 vs.

16  
 17 ROBIUL AWAL, an individual; ROBIUL  
 ISLAM, an individual;  
 18 ONLINE2LIVESTREAM.US, an  
 19 unknown business entity; and DOES 1  
 through 10, inclusive,  
 20

21 Defendants.

CASE NO.:

**COMPLAINT FOR:**

1. **COPYRIGHT  
INFRINGEMENT**
2. **VIOLATION OF THE  
FEDERAL  
COMMUNICATIONS ACT:  
47 U.S.C. § 605**
3. **VIOLATION OF THE  
FEDERAL  
COMMUNICATIONS ACT:  
47 U.S.C. § 553**
4. **CONVERSION**
5. **VIOLATION OF THE  
COMPUTER FRAUD AND  
ABUSE ACT:  
18 U.S.C. § 1030**
6. **VICARIOUS COPYRIGHT  
INFRINGEMENT**
7. **FALSE ADVERTISING  
15 U.S.C. §1125(a)**

**JURY TRIAL DEMANDED**

1  
2 Plaintiff Triller Fight Club II LLC, a Delaware limited liability company  
3 (“Plaintiff” or “Triller”) hereby complains against Defendants Robiul Awal, an  
4 individual (“Awal”), Robiul Islam (“Islam”), Online2Livestream.us  
5 (“Online2Livestream”), and Does 1 through 10, inclusive (collectively, the  
6 “Defendants”), and alleges as follows:

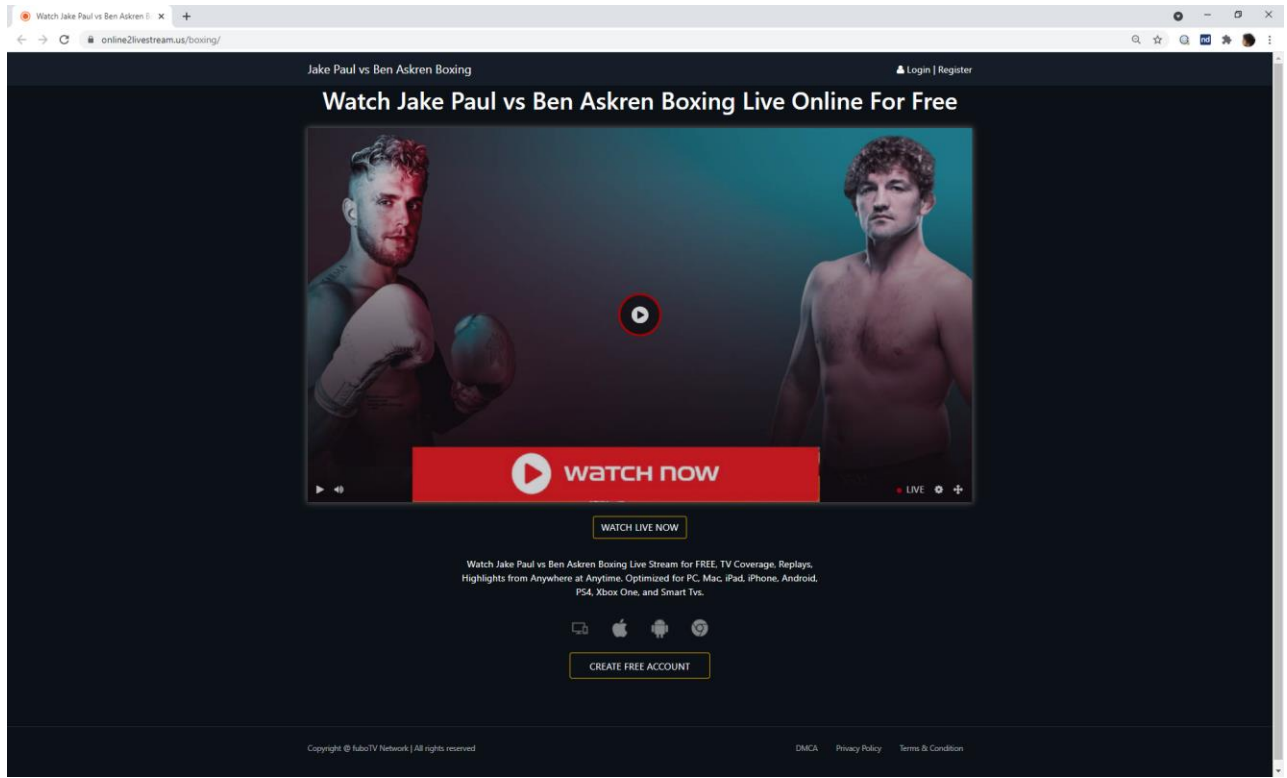
7 **NATURE OF THIS ACTION**

8 1. Plaintiff is the copyright owner and publisher of the Triller Fight Club  
9 broadcast of the “Jake Paul vs. Ben Askren” boxing event, including all undercard  
10 bouts and the entire television broadcast, exhibited via closed circuit television and via  
11 encrypted satellite signal (hereinafter referred to as the “Broadcast”). The Broadcast  
12 originated via satellite uplink and, beginning April 17, 2021, was subsequently re-  
13 transmitted to cable systems and satellite companies via satellite signal and/or  
14 retransmitted via satellite signal to licensed content distributors such as Plaintiff’s  
15 authorized online platforms. Plaintiff institutes this action to obtain remedy for—and  
16 to permanently hinder—the blatantly unlawful infringement and rampant theft of its  
17 copyrighted work by the Defendants.

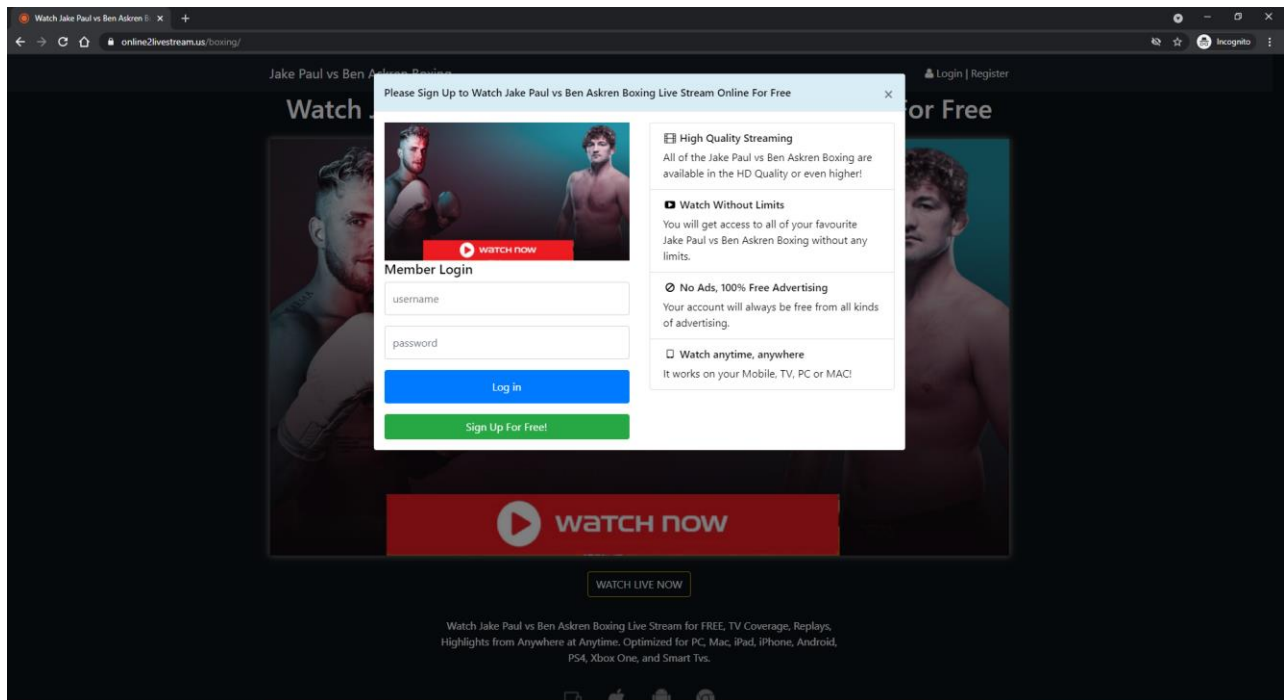
18 2. Defendants, and each of them, own and operate various torrent and  
19 streaming websites including, but not limited to, <https://online2livestream.us> (the  
20 “Website”). Upon information and belief, Defendants, and each of them, acted  
21 knowingly, willfully, unlawfully and with blatant disregard to Plaintiff’s copyright in  
22 the Broadcast by using various torrent and streaming websites, including the Website,  
23 to unlawfully upload, distribute, and publicly display, without authorization, the  
24 Broadcast to the users of the Website. As shown in the screenshot below, the  
25 Broadcast was uploaded to the Website at: <https://online2livestream.us/boxing/>.  
26 Defendants did not have authorization to upload, distribute, or publicly display the  
27 Broadcast to the users of the Website

28 ///

1 ///

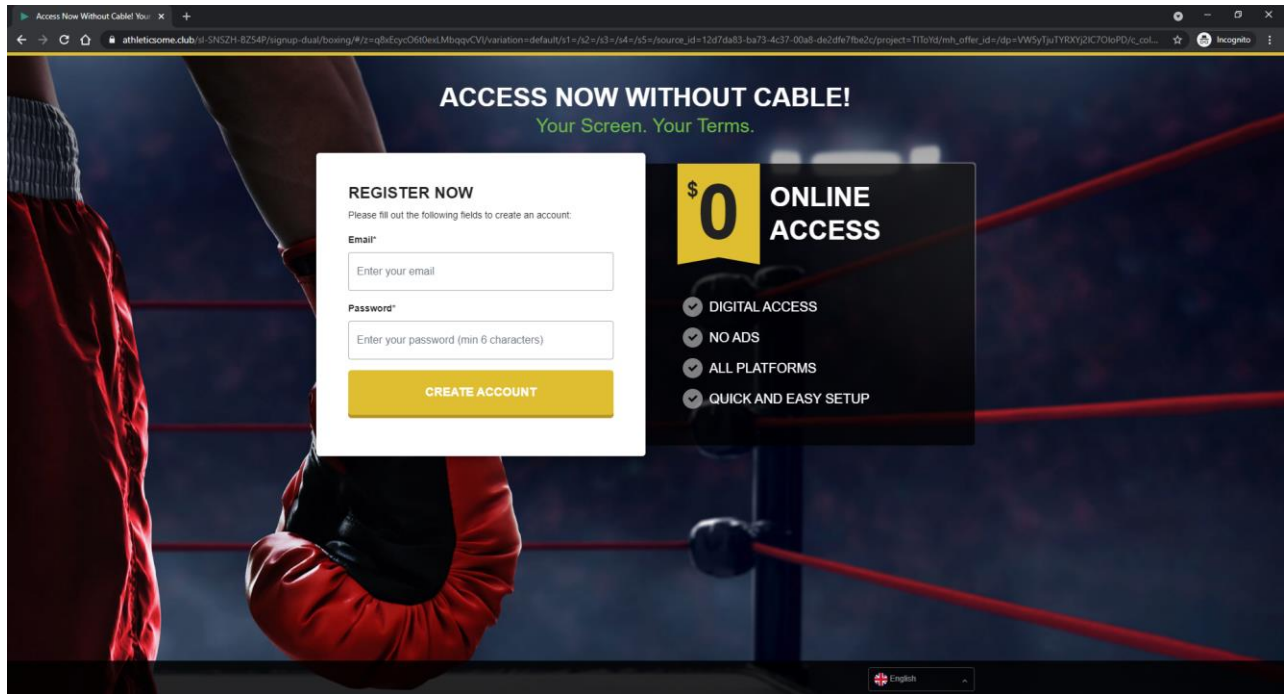


15 3. The website redirect subsequently changed. Today, upon clicking on the

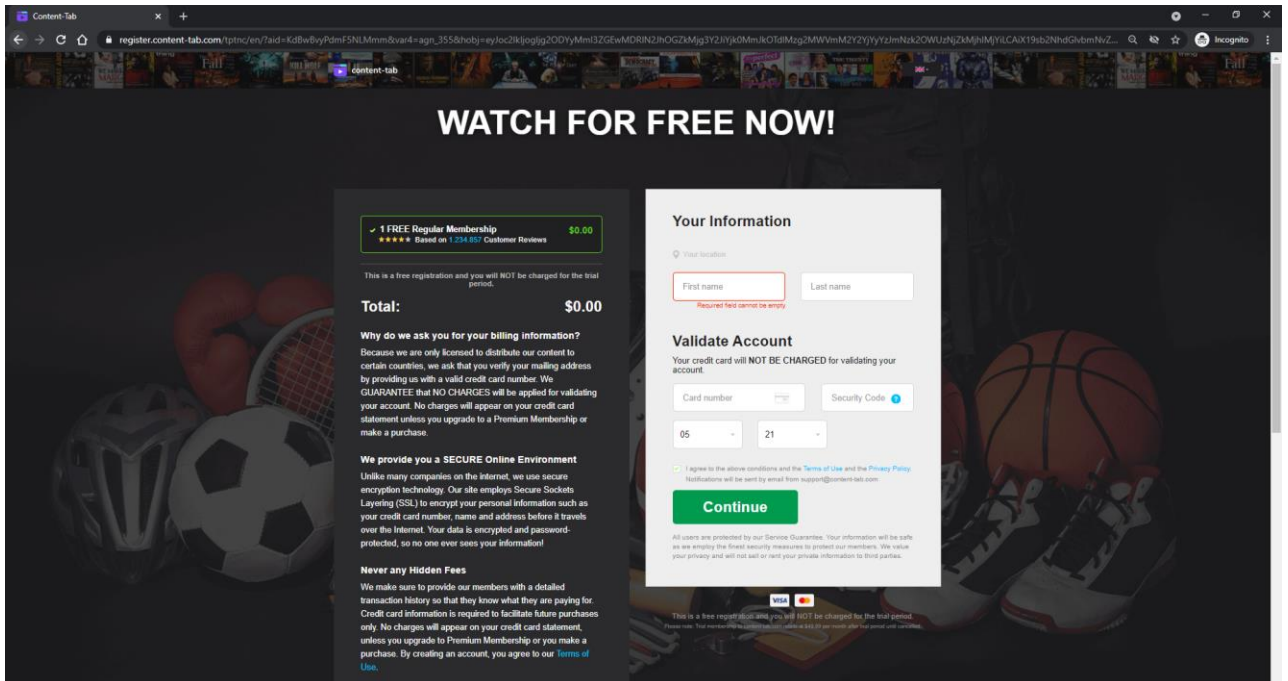


28 link, a user is directed to a log-in screen:

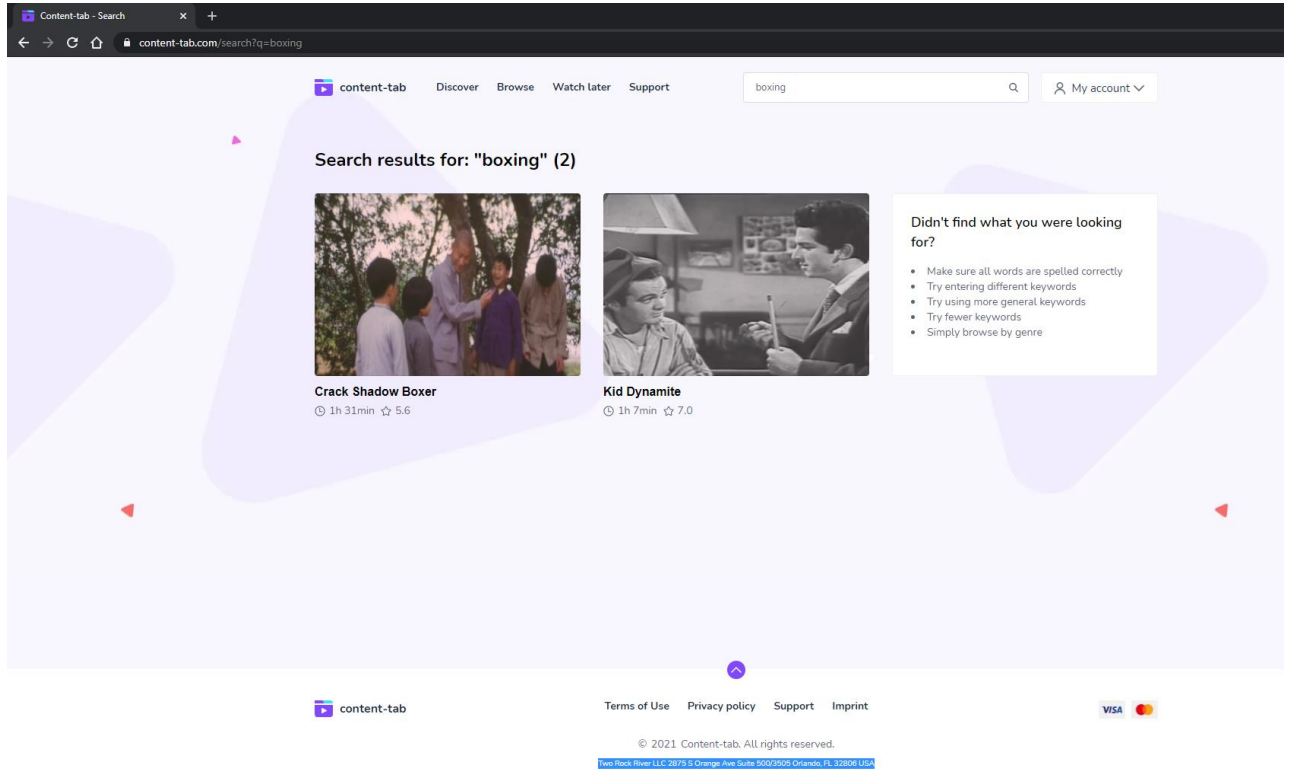
1 4. After this screen a user sets up an account to register on a totally different  
2 website:



14 5. Upon entering any user name and password, the user is routed to another  
15 totally different website asking for credit card information as shown below:



27 6. Finally, after adding billing information, the user is directed to a website  
28 that allows the user to watch movies online.



7. However, the user, at no time, is able to view a live sporting event of any kind.

**JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction pursuant to 17 U.S.C. § 101, *et seq.* and 28 U.S.C. § 1331, which states that district courts shall have original jurisdiction over all civil actions arising under the Constitution, laws, or treaties of the United States. This Court also has subject matter jurisdiction pursuant to 28 U.S.C. § 1338(a), which states that district courts shall have original jurisdiction of any civil action relating to, among other things, copyrights.

9. This Court has specific personal jurisdiction over Defendants as a result of Defendants’ contacts with this District.

10. Venue is proper in this District pursuant to 28 U.S.C § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claims occurred in this district.

**PARTIES**

1           11. Plaintiff is a corporation incorporated under the laws of Delaware and  
2 having its principal place of business in the State of California.

3           12. Plaintiff is engaged in the business of distributing its copyrighted  
4 materials as defined in 17 U.S.C. § 101, and offering such content, including the  
5 Broadcast, for purchase on a Pay-Per-View basis to its paying customers over the  
6 internet or via cable or satellite TV. Plaintiff invests substantial money, time, and  
7 effort in advertising, promoting, selling, and licensing programming such as the  
8 Broadcast.

9           13. Plaintiff owns the copyrights to the Broadcast. As the exclusive owner  
10 of the Copyright in its programing, including but not limited to the Broadcast, Plaintiff  
11 possesses the exclusive rights to, *inter alia*, exhibit, distribute, disseminate and  
12 perform the Broadcast publicly.

13           14. Upon information and belief, Defendant Online2Livestream is an  
14 unknown business entity that owns, operates, or otherwise controls the Website for the  
15 purpose of permitting, encouraging, facilitating, and inducing the sharing of videos  
16 and live programing of audiovisual materials between users of the Website. Those  
17 materials include programming owned and/or controlled by Plaintiff, including the  
18 Broadcast, which was offered by Defendant Online2Livestream via the Website.

19           15. Upon information and belief, Defendant Awal is an individual who owns,  
20 operates, or otherwise controls the Website for the purpose of permitting, encouraging,  
21 facilitating, and inducing the sharing of videos and live programing of audiovisual  
22 materials between users of the Website. Those materials include programming owned  
23 and/or controlled by Plaintiff, including the Broadcast, which was unlawfully offered  
24 by Defendant Awal thro via the Website.

25           16. Upon information and belief, Defendant Islam is an individual who owns,  
26 operates, or otherwise controls the Website for the purpose of permitting, encouraging,  
27 facilitating, and inducing the sharing of videos and live programing of audiovisual  
28 materials between users of the Website. Those materials include programming owned

1 and/or controlled by Plaintiff, including the Broadcast, which was unlawfully offered  
2 by Defendant Islam via the Website.

3 17. Upon information and belief, Defendant Online2Livestream is an  
4 unknown business entity that owns and operates the Website for the purpose of  
5 permitting, encouraging, facilitating, and inducing the sharing of videos and live  
6 programing of audiovisual materials between users of the Website. Those materials  
7 include programming owned and/or controlled by Plaintiff, including the Broadcast,  
8 which was unlawfully offered by Defendant Online2Livestream via the Website.

9 18. Plaintiff is informed and believes, and thereon alleges, that the actions  
10 and omissions that serve as the basis for this complaint were undertaken jointly and  
11 with the consent, conspiracy, cooperation, and joint participation of all Defendants.

12 19. Plaintiff is informed and believes, and thereon alleges, that at all times  
13 mentioned herein, each Defendant was the agent, joint venture, and/or employee of  
14 each and every other Defendant, and in doing the things alleged in this complaint, each  
15 Defendant was acting within the course and scope of such agency, joint venture, and/or  
16 employment and with the permission and consent of each of the other Defendants.

17 20. The true names and capacities, whether individual, corporate, associate,  
18 or otherwise, of Defendants named herein as Does 1 through 10, inclusive, and each  
19 of them, are unknown to Plaintiff at this time. Plaintiff therefore sues said Defendants,  
20 and each of them, by such fictitious names. Plaintiff will advise the Court and seek  
21 leave to amend this Complaint when the true names and capacities of each such  
22 Defendant has been ascertained. Plaintiff is informed and believes, and based thereon  
23 alleges, that each such Defendant designated as a Doe Defendant is responsible in  
24 some manner for the events and happenings referred to herein or as hereinafter  
25 specifically alleged.

26 **ALTER EGO ALLEGATIONS**

27 21. Upon information and belief, at all relevant times, there existed a unity of  
28 interest between Defendants such that any individuality or separateness between them

1 has ceased. Defendant Online2LiveStream is the alter ego of Defendants Awal and  
2 Islam in that:

- 3 a. Defendant Online2Livestream is, and at all relevant times was, a mere  
4 shell, instrumentality, and conduit through which Defendants Awal  
5 and Islam carried on business in the name of Defendant  
6 Online2LiveStream, while exercising complete control and  
7 dominance over Defendant Online2LiveStream, its business and  
8 assets, to such an extent that any individuality or separateness between  
9 Defendant Online2LiveStream, on the one hand, and Defendants  
10 Awal and Islam, on the other, did not exist.
- 11 b. Defendant Online2LiveStream was conceived, intended, and used by  
12 Defendants Awal and Islam as a device to avoid liability and for the  
13 purpose of substituting an undercapitalized entity—namely,  
14 Defendant Online2LiveStream—in the place of Defendants Awal and  
15 Islam. Defendant Online2LiveStream is, and at all times herein  
16 mentioned was, so inadequately capitalized that, compared with the  
17 business done by Defendants Awal and Islam and the risks of loss, its  
18 capitalization was illusory and trifling. In addition, many assets of  
19 Defendant Online2LiveStream were transferred without adequate  
20 consideration to Defendants Awal and Islam.
- 21 c. Defendants Awal and Islam diverted assets from Defendant  
22 Online2LiveStream to themselves to suit their own conveniences in  
23 carrying out business matters which were and should have been the  
24 domain of Defendant Online2LiveStream.
- 25 d. Defendant Online2LiveStream are, and at all times herein mentioned  
26 were, controlled, dominated, and operated by Defendants Awal and  
27 Islam as their alter ego, in that the activities and business of Defendant  
28 Online2LiveStream were carried out without annual meetings, and



1 without keeping records or minutes of any proceedings, or  
2 maintaining written resolutions.

3 22. Adherence to the fiction of the separate existence of Defendant  
4 Online2LiveStream, on the one hand, and Defendants Awal and Islam, on the other,  
5 would permit an abuse of the corporate privilege and would sanction fraud, promote  
6 injustice, and otherwise aid in the commission of unlawful conduct. This is true  
7 because, as Plaintiff is informed and believes, at all relevant times, Defendants were  
8 commingling assets in a manner that allowed Defendants to utilize and freely transfer  
9 those assets amongst themselves. The commingling of assets and unlawful business  
10 conduct, as alleged more fully herein, by Defendants was intended, among other  
11 things, to allow Defendants Awal and Islam to avoid liability to Plaintiff and others.

12 **COUNT ONE**

13 **(Copyright Infringement Against All Defendants)**

14 23. Plaintiff hereby realleges, and by this reference incorporates herein, each  
15 and every allegation of preceding and subsequent paragraphs as though fully set forth  
16 herein.

17 24. Plaintiff is the owner of the copyrights to the Broadcast, including all  
18 undercard bouts and the entire television Broadcast. Plaintiff's rights include, but are  
19 not limited to, all moving images and other audio/video content which were  
20 broadcasted via encrypted satellite signal. The Broadcast originated via satellite  
21 uplink and was subsequently retransmitted to cable systems and satellite companies  
22 via satellite signal and/or retransmitted via satellite signal to licensed content  
23 distributors such as Plaintiff's authorized, online platforms.

24 25. As the copyright holder to the rights of the Broadcast, Plaintiff has the  
25 exclusive right to copy, publicly perform and distribute it.

26 26. Defendants, and each of them, failed to obtain the proper authority or  
27 license from Plaintiff to copy, publicly perform or distribute the Broadcast.

28 27. Upon information and belief, Defendants illegally copied, uploaded,

1 publicly performed and distributed the Broadcast via the internet with full knowledge  
2 that the Broadcast could only be obtained by purchasing a license from Plaintiff.

3 28. Defendants, and each of them, have utilized various torrent and  
4 streaming websites, including the Website, to upload, distribute, and publicly display  
5 the Broadcast to the users of such website in direct violation of the exclusive rights  
6 owned by Plaintiff.

7 29. Specifically, upon information and belief, the Defendants, and each of  
8 them, obtained the Broadcast through internet websites, cable and/or satellite Pay-Per-  
9 View purchase intended for private, non-commercial viewing, and subsequently  
10 illegally re-transmitted the Broadcast and publicly exhibited the Broadcast by illegally  
11 copying and uploading the Broadcast to the Website for other users to also illegally  
12 view, download, access, share, and distribute.

13 30. Defendants, and each of them, have infringed on Plaintiff's copyright in  
14 the Broadcast by reproducing, adapting distributing, uploading, copying, and publicly  
15 displaying the copyrighted works without Plaintiff's authorization in violation of the  
16 Copyright Act, 17 U.S.C. § 501, and have recouped profits from the Website through  
17 users' payments to the Defendants or through advertising revenue generated through  
18 the websites.

19 31. Defendants' acts of infringement were willful, in blatant disregard of, and  
20 committed with indifference to Plaintiff's rights.

21 32. By reason of Defendants' conduct as described herein, Defendants, and  
22 each of them, willfully violated 17 U.S.C. § 501.

23 33. Due to Defendants' acts of copyright infringement as alleged herein,  
24 Defendants have obtained direct and indirect profits Defendants would not otherwise  
25 have realized but for Defendants' infringement of the Broadcast. As such, Plaintiff  
26 is entitled to disgorgement of Defendants' profits directly and indirectly attributable  
27 to Defendants' infringement of the Broadcast, in an amount to be established at trial.

28 34. Plaintiff is further entitled to its attorney's fees and full costs pursuant to

1 17 U.S.C. § 505.

2 ///

3 **COUNT TWO**

4 **(Violation of the Federal Communications Act: 47 U.S.C. § 605 Against All**  
5 **Defendants)**

6 35. Plaintiff hereby realleges, and by this reference incorporates herein, each  
7 and every allegation of preceding and subsequent paragraphs as though fully set forth  
8 herein.

9 36. Plaintiff is the owner of the Broadcast, including all undercard matches  
10 and the entire television broadcast, aired via closed circuit television and via encrypted  
11 satellite signal.

12 37. The Broadcast was available for non-commercial, private viewing  
13 through Plaintiff, its authorized online vendors, as well as through Pay-Per-View  
14 purchase through authorized satellite TV providers. Defendants, in a calculated effort  
15 to use Plaintiff's Broadcast for their own commercial benefit, obtained access to  
16 Plaintiff's Broadcast by purchasing the programming and subsequently copying the  
17 Broadcast and uploading it to torrent and streaming websites, including the Website.

18 38. In order to purchase and view the Broadcast through a satellite TV  
19 provider intended for private, non-commercial viewing, an individual purchaser was  
20 subject to the copyright language contained therein which expressly stated that the  
21 "unauthorized reproduction or distribution of the copyrighted work is illegal."

22 39. Upon information and belief, with full knowledge that the Broadcast was  
23 not to be received, distributed, reproduced and or publicly exhibited by individuals  
24 unauthorized to do so, Defendants, without authorization from Plaintiff, unlawfully  
25 intercepted, received and/or de-scrambled Plaintiff's satellite signal for purposes of  
26 direct commercial advantage and subsequently divulged the Broadcast to the public  
27 by copying and distributing said Broadcast to the users of the Website in exchange for  
28 payments to aid, encourage, support, or otherwise endorse Defendants' infringing

1 conduct.

2 40. Upon information and belief, Plaintiff alleges that Defendants effected  
3 unauthorized interception and receipt of Plaintiff's Broadcast via Defendants' satellite  
4 TV service by ordering programming for residential use and subsequently copying,  
5 uploading, distributing and publicly displaying the Broadcast without authorization,  
6 or by such other means which are unknown to Plaintiff and known only to Defendants.

7 41. 47 U.S.C. § 605(a) prohibits the unauthorized reception and publication  
8 or use of communications such as the Broadcast for which Plaintiff had the distribution  
9 rights thereto.

10 42. By reason of Defendants' conduct as described herein, Defendants, and  
11 each of them, willfully violated 47 U.S.C. § 605(a)

12 43. As a proximate result of Defendants' willful violations of 47 U.S.C. §  
13 605(a), Plaintiff is entitled to damages, in the discretion of this Court, under 47 U.S.C.  
14 § 605(a), Plaintiff is entitled to damages, in the discretion of this Court, under 47  
15 U.S.C. § 605(e)(3)(C)(i)(II) and (ii) of up to the maximum amount of \$110,000.00 as  
16 to *each* violation.

17 44. Pursuant to 47 U.S.C. § 605, Plaintiff is also entitled to an award of full  
18 costs, interest and reasonable attorney's fees.

19 **COUNT THREE**

20 **(Violations of the Federal Communications Act: 47 U.S.C. § 553 Against All**  
21 **Defendants)**

22 45. Plaintiff hereby realleges, and by this reference incorporates herein, each  
23 and every allegation of preceding and subsequent paragraphs as though fully set forth  
24 herein.

25 46. Upon information and belief, Defendants willfully and unlawfully  
26 accessed, received, and subsequently re-transmitted the Broadcast over a cable TV or  
27 internet system while knowing that they were unauthorized to do so.

28 47. 47 U.S.C. § 553 prohibits the unauthorized reception of any

1 communications service offered over a cable system such as the transmission of the  
2 Broadcast for which Plaintiff holds the copyright ownership thereto.

3 48. Upon information and belief, the Defendants knowingly, willfully and  
4 unlawfully accessed, received and subsequently re-transmitted the Broadcast when it  
5 was offered via a cable TV or internet subscription without the authorization from  
6 Plaintiff and without paying Plaintiff the appropriate Pay-Per-View fee.

7 49. By reason of Defendants' conduct as described herein, Defendants, and  
8 each of them, willfully violated 47 U.S.C. § 553.

9 50. As a proximate result of Defendants' willful violations of 47 U.S.C. §  
10 553, Plaintiff is entitled to damages in an amount, in the discretion of this Court, of up  
11 to the maximum amount of \$60,000.00 as to each violation, plus the recovery of full  
12 costs, interest and reasonable attorney's fees, in the discretion of this Court.

13 **COUNT FOUR**

14 **(Conversion Against All Defendants)**

15 51. Plaintiff hereby realleges, and by this reference incorporates herein, each  
16 and every allegation of preceding and subsequent paragraphs as though fully set forth  
17 herein.

18 52. Plaintiff, at all relevant times, owned, possessed, and had the right to  
19 possess the copyrights to the Broadcast.

20 53. By virtue of Defendants' conduct as set forth herein, Defendants, and  
21 each of them, knowingly and intentionally substantially interfered with Plaintiff's  
22 property by unlawfully converting it for their own commercial use, benefit, and private  
23 financial gain.

24 54. Defendants' acts of conversion were done without Plaintiff's consent and  
25 with the objective of depriving Plaintiff of its copyright ownership for Defendants'  
26 direct commercial benefit, advantage and private financial gain.

27 55. As a proximate result of Defendants' wrongful conversion of the  
28 Broadcast, Plaintiff suffered damages in an amount subject to proof at trial.

**COUNT FIVE**

**(Violations of the Computer Fraud and Abuse Act: 18 U.S.C. § 1030 Against All Defendants)**

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2  
3  
4 56. Plaintiff hereby realleges, and by this reference incorporates herein, each  
5 and every allegation of preceding and subsequent paragraphs as though fully set forth  
6 herein.

7 57. Upon information and belief, Defendants, and each of them, without  
8 authorization or by exceeding the scope of granted authorization, accessed a protected  
9 computer containing Plaintiff’s live internet streams of the Broadcast, and knowingly  
10 and with the intent to defraud, unlawfully copied, distributed, and publicly displayed  
11 the Broadcast.

12 58. Upon information and belief, as a proximate result of Defendants’  
13 unlawful and fraudulent conduct as set forth herein, Defendants, and each of them,  
14 obtained the valuable copyrighted Broadcast and subsequently uploading, distributing,  
15 and publicly displaying the Broadcast using the Website.

**COUNT SIX**

**(Vicarious Copyright Infringement Against All Defendants)**

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17  
18 59. Plaintiff hereby realleges, and by this reference incorporates herein, each  
19 and every allegation of preceding and subsequent paragraphs as though fully set forth  
20 herein.

21 60. Plaintiff is the owner of the copyrights to the Broadcast, including all  
22 undercard bouts and the entire television Broadcast. Plaintiff’s rights include, but are  
23 not limited to, all moving images and other audio/video content which were  
24 broadcasted via encrypted satellite signal. The Broadcast originated via satellite  
25 uplink and was subsequently retransmitted to cable systems and satellite companies  
26 via satellite signal and/or retransmitted via satellite signal to licensed content  
27 distributors such as Plaintiff’s authorized, online platforms.

28 61. Upon information and belief, Defendants, and each of them, directly

1 infringed on Plaintiff's Broadcast by illegally uploading the Broadcast and/or portions  
2 thereof via the internet on the websites such as the Website in direct violation of  
3 Plaintiff's exclusive copyright.

4 62. Upon information and belief, Defendants encouraged online users to  
5 copy, share, download, distribute, and share content, including the Broadcast, on the  
6 Website, and defendants facilitated, participated in and induced users to engage in the  
7 unauthorized reproduction, adaptation, public display and public performance of  
8 programming containing Plaintiff's copyrighted Broadcast.

9 63. Defendants had the right and ability to control and prevent the users on  
10 the Website from directly accessing and infringing on Plaintiff's Broadcast which was  
11 copied, uploaded, and distributed by Defendants, and each of them.

12 64. Defendants derived a financial benefit from such users' activities on the  
13 Website by directing such users to external and/or shareable payment links, such as  
14 PayPal links, whereby users could remit direct payments to Defendants in order to  
15 compensate, fund and endorse each respective Defendants' infringement of Plaintiff's  
16 Broadcast.

17 65. By reason of Defendants' conduct as described herein, Defendants, and  
18 each of them, willfully violated 17 U.S.C. § 501.

19 66. Due to Defendants' acts of copyright infringement as alleged herein,  
20 Defendants have obtained direct and indirect profits Defendants would not otherwise  
21 have realized but for Defendants' infringement of the Broadcast. As such, Plaintiff  
22 is entitled to disgorgement of Defendants' profits directly and indirectly attributable  
23 to Defendants' infringement of the Broadcast, in an amount to be established at trial.

24 67. Plaintiff is further entitled to its attorney's fees and full costs pursuant to  
25 17 U.S.C. § 505.

26 **COUNT SEVEN**

27 **(Federal False Advertising 15 U.S.C. §1125(a))**

28 68. Plaintiff hereby realleges, and by this reference incorporates herein, each

1 and every allegation of preceding and subsequent paragraphs as though fully set forth  
2 herein.

3 69. Plaintiff has rights in the marks TRILLER, TRILLER FIGHT CLUB, and  
4 JAKE PAUL v. BEN ARSKEN.

5 70. Defendants used images and marks of the Plaintiff to convey an  
6 impression of providing access to a boxing match in its online advertisement.

7 71. Presently, Defendants do not provide access to a boxing match. Rather  
8 Defendants provide access to an online movie club. Defendants' statement, "Please  
9 sign up to watch Jake Paul v. Ben Arksen steaming online for free" is literally false.

10 72. Consumers viewing Defendants' online advertisements are likely to be  
11 confused into thinking they are obtaining lawful access to a boxing match. In fact,  
12 purchases receive access to a movie club.

13 73. Purchasers use a credit card to make a purchase which travels through  
14 wires as a part of interstate commerce.

15 74. Defendants misleading the public as to the lawful way to obtain Plaintiff's  
16 service has injured Plaintiff.

17  
18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of  
20 them, as follows:

21 **AS TO COUNT ONE:**

- 22 1. That Defendants, Defendants' employees, representatives, and agents be  
23 enjoined from copying, uploading, distributing, selling, or otherwise  
24 infringing on Plaintiff's copyright in the Broadcast;
- 25 2. That Plaintiff be awarded all profits of Defendants plus all losses of  
26 Plaintiff, the exact sum to be proven at the time of trial; and
- 27 3. That an order be issued requiring Defendants, and each of them, to  
28 account to Plaintiff for profits attributable to their use of Plaintiff's



1 copyright, in accordance with proof.

2 AS TO COUNT TWO:

3 4. For statutory penalties in an amount, in the discretion of this Court, of up  
4 to the maximum amount of \$110,000.00 for each of the Defendants'  
5 willful violations of 47 U.S.C. § 605(a).

6 AS TO COUNT THREE:

7 5. For statutory penalties in an amount, in the discretion of this Court, of up  
8 to the maximum amount of \$60,000.00 for each of the Defendants' willful  
9 violations of 47 U.S.C. § 553; and

10 6. For Attorney's fees, interest, and costs of suit pursuant to 17 U.S.C. §  
11 505; 47 U.S.C. §§ 605(e)(3)(B)(iii) or 553(c)(2)(c).

12 AS TO COUNT FOUR:

13 7. For damages within this Court's jurisdiction in an amount according to  
14 proof at trial; and

15 8. For punitive damages in an amount appropriate to punish Defendants and  
16 deter others from engaging in similar misconduct.

17 AS TO COUNT FIVE:

18 9. For damages within this Court's jurisdiction in an amount according to  
19 proof at trial; and

20 10. Injunctive relief enjoining from copying, uploading, distributing, selling,  
21 or otherwise infringing on Plaintiff's copyright in the Broadcast.

22 AS TO COUNT SIX:

23 11. That Defendants, Defendants' employees, representatives, and agents be  
24 enjoined from copying, uploading, distributing, selling, or otherwise  
25 infringing on Plaintiff's copyright in the Broadcast;

26 12. That Plaintiff be awarded all profits of Defendants plus all losses of  
27 Plaintiff, the exact sum to be proven at the time of trial; and

28 13. That an order be issued requiring Defendants, and each of them, to

1 account to Plaintiff for profits attributable to their use of Plaintiff's  
2 copyright, in accordance with proof.

3 AS TO COUNT SEVEN:

4 14. An injunction preventing Plaintiff from operating any false or misleading  
5 website in the future.

6 15. Disgorgement of revenue obtained by deceiving consumers in a sum to  
7 be determined at trial.

8 16. Loss of Plaintiff's revenue from Defendants selling of an inaccurately  
9 labeled product in a sum to be determined at trial.

10 AS TO ALL COUNTS:

11 17. For pre-judgment and post-judgment interest on all damages awarded;

12 18. For attorneys' fees and costs of suit incurred herein according to proof;  
13 and

14 19. For such other and further relief as the Court may deem just and proper.

15

16 Dated: May 27, 2021

NOVIAN & NOVIAN, LLP  
Attorneys at Law

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18 By: /s/ Farhad Novian  
19 FARHAD NOVIAN  
20 MICHAEL O'BRIEN  
ALEXANDER BRENDON GURA

21 *Attorneys for Plaintiff TRILLER FIGHT*  
22 *CLUB II LLC*

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