

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

APRESS MEDIA, LLC; CENGAGE
LEARNING, INC.; ELSEVIER INC.;
HACHETTE BOOK GROUP, INC.;
HARPERCOLLINS PUBLISHERS LLC;
JOHN WILEY & SONS, INC.; MCGRAW
HILL LLC; BEDFORD, FREEMAN &
WORTH PUBLISHING GROUP, LLC
D/B/A MACMILLAN LEARNING;
MACMILLAN PUBLISHING GROUP, LLC;
PEARSON EDUCATION, INC.; PENGUIN
RANDOM HOUSE LLC; SIMON AND
SCHUSTER, LLC; and TAYLOR &
FRANCIS GROUP LLC,

Plaintiffs,

v.

WELIB and DOES 1-10,

Defendants.

No. 1:26-cv-05064-VM-VF

STATEMENT OF DAMAGES

Pursuant to Local Rule 55.2 and the Default Judgment Procedures of United States District Judge Victor Marrero, Plaintiffs Apress Media, LLC; Cengage Learning, Inc.; Elsevier Inc.; Hachette Book Group, Inc.; HarperCollins Publishers LLC; John Wiley & Sons, Inc.; Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning; Macmillan Publishing Group, LLC; McGraw Hill LLC; Pearson Education, Inc.; Penguin Random House LLC; Simon and Schuster, LLC; and Taylor & Francis Group LLC (collectively, “Plaintiffs” or “Publishers”) respectfully submit this Statement of Damages in support of their Motion for Default Judgment against Defendants WeLib and Does 1-10 (“Defendants”).

Plaintiffs bring a claim for relief for copyright infringement pursuant to 17 U.S.C. § 101 *et seq.* against Defendants. Complaint, ECF No. 1 (“Compl.”) ¶¶ 63-74 & Prayer for Relief ¶ C. Plaintiffs seek maximum statutory damages in the amount of \$150,000 per infringed work for

Defendants' willful infringement. Compl. ¶72; 17 U.S.C. § 504(c)(2); *see also* Memorandum in Support of Plaintiffs' Motion for Default Judgment.

Plaintiff Apress Media, LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Exhibit A to Complaint: Works in Suit, ECF No. 1-1 ("Compl. Ex. A").

Plaintiff Cengage Learning, Inc. seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Elsevier Inc. seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Hachette Book Group, Inc. seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff HarperCollins Publishers LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff John Wiley & Sons, Inc. seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted

literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Macmillan Publishing Group, LLC d/b/a Macmillan Publishers seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff McGraw Hill LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Pearson Education, Inc. seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Penguin Random House LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Simon and Schuster, LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff Taylor & Francis Group LLC seeks maximum statutory damages for Defendants' willful infringement of 10 copyrighted literary works in the amount of \$1,500,000 (\$150,000 x 10 literary works). 17 U.S.C. § 106(1), (3); *id.* § 504(c)(2); Compl. Ex. A.

Plaintiff	Amount
Apress Media, LLC	\$1,500,000
Cengage Learning, Inc.	\$1,500,000
Elsevier Inc.	\$1,500,000

Hachette Book Group, Inc.	\$1,500,000
HarperCollins Publishers LLC	\$1,500,000
John Wiley & Sons, Inc.	\$1,500,000
Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning	\$1,500,000
Macmillan Publishing Group, LLC	\$1,500,000
McGraw Hill LLC	\$1,500,000
Pearson Education, Inc.	\$1,500,000
Penguin Random House LLC	\$1,500,000
Simon and Schuster, LLC	\$1,500,000
Taylor & Francis Group LLC	\$1,500,000
Total:	\$19,500,000

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 12, 2026 in Washington, D.C.

Dated: October 12, 2026

/s/Keith Howell

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