

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

v.

DOES 1-5, individually and together
d/b/a Universe IPTV; Universe TV;
World-Universeiptv.com; Uni-Update.com;
and Uni-Web.online,

Defendants.

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Civil Action No. 4:20-cv-2958

COMPLAINT

Plaintiff DISH Network L.L.C. (“DISH”) brings this suit against Does 1-5 individually and together d/b/a Universe IPTV; Universe TV; World-Universeiptv.com; Uni-Update.com; and Uni-Web.online, and states as follows:

Nature of the Action

1. DISH brings this suit for direct copyright infringement because Defendants are taking television channels exclusively licensed to DISH and are unlawfully retransmitting these channels over the Internet throughout the United States on Defendants’ Universe IPTV service (the “Universe Service”) to customers who purchase Defendants’ Universe Service subscriptions (“Universe Subscriptions”). Defendants demonstrated the willfulness of their copyright infringement by continuing to transmit channels exclusively licensed to DISH despite receiving numerous demands to cease.

Parties

2. Plaintiff DISH Network L.L.C. is a limited liability company organized under the laws of the State of Colorado, with its principal place of business located at 9601 South Meridian Blvd., Englewood, Colorado 80112.

3. Defendants Does 1-5 are individuals or entities doing business as Universe IPTV; Universe TV; World-Universeiptv.com; Uni-Update.com; and Uni-Web.online. Defendants transmit television channels to users of the Universe Service and distribute, sell, and promote Universe Subscriptions. Defendants own and operate the World-Universeiptv.com; Uni-Update.com; Uni-Web.online; Universe-ip.com; Universepro9.vip; Universeiptv.com; Universe-ip.world; Olink1.rocks; Olink2.rocks; Olink3.rocks; Olink4.rocks; Olink5.rocks; and Olink7.rocks domains and websites (collectively, the “Universe Domains”). Defendants are concealing their identities through the use of domain proxy services for the Universe Domains. Defendants claim they reside in Austria and they use a WhatsApp phone number including the +43 country code for Austria. DISH believes discovery will identify Does 1-5 and enable DISH to amend the complaint to list them by name.

Jurisdiction and Venue

4. DISH asserts claims under the Copyright Act, 17 U.S.C. § 101 *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

5. Personal jurisdiction is proper against Defendants under Rule 4(k)(2) of the Federal Rules of Civil Procedure. Does 1-5 transmit channels exclusively licensed to DISH to at least 1,000 Universe Service users located in the United States (“Service Users”), including in the State of Texas. Does 1-5 also have a reseller located in the United States, and offer to sell Universe Subscriptions to prospective resellers located in the United States. This Court’s exercise of jurisdiction over Defendants is consistent with the Constitution and laws of the United States, DISH’s claims arise under federal law, and Defendants are not subject to the jurisdiction of the courts of general jurisdiction of any state.

6. Venue is proper in this Court under 28 U.S.C. § 1391(b)(3) because Defendants are subject to personal jurisdiction in this district and under § 1391(c)(3) because Defendants are nonresidents that may be sued in any judicial district. Venue is also proper in this Court under 28 U.S.C. § 1400(a) because the case involves violations of the Copyright Act.

DISH's Copyrights

7. DISH is the fourth largest pay-television provider in the United States providing copyrighted programming to millions of subscribers nationwide. DISH is one of the largest providers of international television channels in the United States offering more than 400 channels in 27 different languages.

8. DISH contracts for and licenses rights for the international channels distributed on its platform from channel owners and their agents, including ARY Digital USA LLC; Asia TV USA Ltd.; B4U U.S.; Geo USA Holdings, Inc. d/b/a Geo USA LLC; Hum Network Limited; Impress Telefilm, Inc.; MBC FZ LLC; International Media Distribution (Luxembourg) S.A.R.L.; MSM Asia Limited; National Communications Services (SMC-PVT.) Limited; Soundview ATN LLC; Soundview Broadcasting LLC; Television Media Network (Pvt) Ltd; TV Today Network Ltd.; and World Span Media Consulting, Inc. (collectively, the “Networks”).

9. The Networks’ channels include Aaj Tak; Al Hayah 1; ART Cima; ARY Digital; ARY News; ATN Bangla; ATN News; B4U Movies; CBC; CBC Drama; Channel-i; Dunya TV; Express Entertainment; Express News; Future TV, Geo News; Geo TV; Hekayat; Hum Masala; Hum Sitaray; Hum TV; Hum World; India Today; LBC; LBCI (a/k/a LDC); MBC1; MBC Drama; MBC Kids (a/k/a MBC3); MBC Masr; Melody Aflam; Melody Classic; NTV Bangla; SAB; SET (a/k/a Sony SET); SET MAX; Zee Aflam; and Zee Alwan (collectively, the “Protected Channels”).

The Networks acquire copyrights in the works that air on their respective channels, including by producing the works and by assignment.

10. DISH entered into signed, written licensing agreements with the Networks granting DISH the exclusive right to distribute and publicly perform the Protected Channels and works that air on the Protected Channels in the United States by means including satellite, over-the-top (“OTT”), Internet protocol television (“IPTV”), and Internet. DISH’s exclusive rights were in effect at all relevant times and are currently in effect. Many of the works that aired on the Protected Channels and for which DISH holds exclusive distribution and public performance rights are registered with the United States Copyright Office. (*See* Exhibit 1.) A vast number of additional, unregistered copyrighted works in which DISH holds exclusive distribution and public performance rights also aired on the Protected Channels. (*See* Exhibit 2.)

11. Defendants are not authorized by DISH to transmit, distribute, or publicly perform the Protected Channels or works that air on those channels in the United States, and DISH has received no compensation from Defendants to do so.

Defendants’ Wrongful Conduct

12. Defendants distribute, sell, and promote Universe Subscriptions to consumers, including Service Users, and to resellers, including Universeonlinetv.co; Universeiptv.stream; Universeiptvs.com; Iptvuniverse.net; and Universe2iptv.com, with knowledge that these and other resellers distribute, sell, and promote Universe Subscriptions to Service Users.

13. Defendants promoted the Universe Service on their World-Universeiptv.com website, instructing consumers that “[t]here are more than 40,000 channels, films and series in every country in the world,” “we are constantly expanding the number of channels,” they have “[a]ll channels,” and “we continuously update our service.”

Universe Server

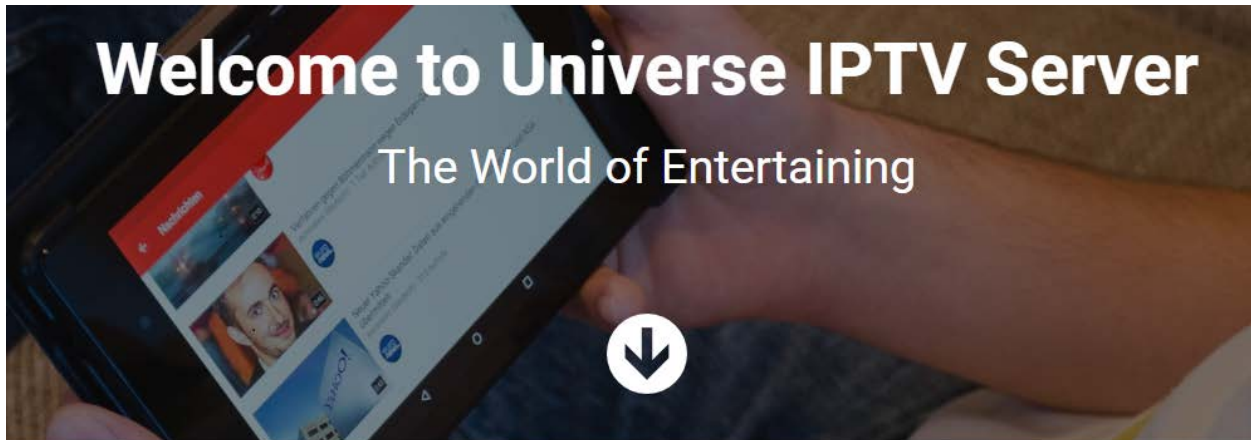
There are more than 40,000 channels, films and series in every country in the world. we are constantly expanding the number of channels. The server is very mature and unique and is supported by global servers. The prices are never comparable - Sender-logo - An electronic country directory - divided by country groups - A special application on the android - a special page to follow the explanations and developments for each new Note: There are no 18 channels All channels, Universe IPTV A world of entertainment Universe IPTV Get the entertainment you love at the time you want, with the service Universe IPTV is the best service in the areas of drama, which you need with over 40,000 channels at hand! Comedy and documentaries. Subscribe to the service and receive a bouquet of the latest movies, series, plays and TV programs as well as more than 5000 channels of total time, in which we continuously update our service Universe IPTV to ensure the comfort of our customers at all times and enhance the experience offer to enjoy the pictures anytime and on any device of the customer Get the

14. World-Universeiptv.com referred consumers and resellers of the Universe Service to Defendants' Uni-update.com website.

**txt or xls: Download Herunterladen for more information about the server and its applications
<http://uni-update.com>**

© All rights reserved. Universe IPTV
Kontaktinfo@world-universeiptv.com0049 171 3340784
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15. Defendants' Uni-Update.com website serves as a communication portal between Defendants, resellers of Universe Subscriptions, and Service Users. Uni-Update.com provides news and updates about the Universe Service. For example, Uni-Update.com states, "To see real-time updates to the server You can know it from the following link, and it appears automatically Any update or addition to the server Whether adding channels, movies, series, or series episodes it appears on the site automatically and instantly." Universe IPTV apps and channel lists are also available for download at Uni-Update.com.



*** Instant News page

02-05-2020

To see real-time updates to the server You can know it from the following link, and it appears automatically Any update or addition to the server Whether adding channels, movies, series, or series episodes It appears on the site automatically and instantly

<http://uni-update.com/new-site/index?#media>

16. Defendants also use Uni-Update.com to instruct Service Users to go to Defendants' Uni-Web.online website and "check user and password for your subscription," and "[i]f you are able to make a login, this means that you have a 100% original subscription to Universe IPTV Servers." Service Users can also "know the expiration date of your Subscri[p]tion from the same link."

22-02-2020

For all Resellers and Customers beware of some servers, Which they rename their server with a name similar to the name of our server here for example

universe sat or universe myhd

We note that these are swindlers who are not affiliated with us at all, and they are trying to deceive Resellers and Customers only they are only trying to trick Customers and Resellers by stealing the name of server However, the content they have is completely different and we do not guarantee anything about them also you can check user and password for your subscription from the following link

<http://uni-web.online/>

If you are able to make a login, this means that you have a 100% original subscription to Universe IPTV Servers.

Also you can know the expiration date of your Subscription from the same link

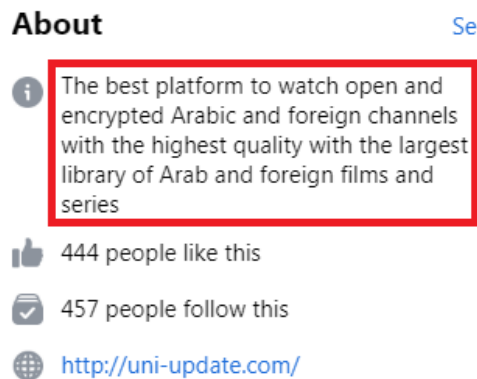
As for if you cannot enter, unfortunately this is with us, that you have undergone a swindling operation, and you should refer to the quorum person to recover The money you paid for it because it gave you another server and not the original Universe IPTV server Therefore, it is necessary to note on this very important issue so that no one falls victim to these swindlers

Universe IPTV Team

17. Uni-Update.com includes marks of MBC1, MBC Drama, MBC Kids/MBC3 and MBC Masr.



18. Defendants promote the Universe Service to consumers and resellers through posts on their Facebook page located at <https://www.facebook.com/unitvplus/> (“Unitvplus”). For example, the Unitvplus Facebook page describes the Universe Service as “[t]he best platform to watch open and encrypted Arabic and foreign channels with the largest library of Arab and foreign films and series.”



19. The Unitvplus Facebook page includes marks of CBC, CBC Drama, MBC1, and MBC Masr.



20. Defendants also promoted the Universe Service to consumers and resellers through their Facebook page located at <https://www.facebook.com/worlduniverseiptv/> (“Worlduniverseiptv”) and Instagram page located at <https://www.instagram.com/universe.i.p.t.v/> (“Universe.i.p.t.v”). For example, Defendants’ Worlduniverseiptv Facebook page described the Universe Service as allowing users to “[w]atch all live TV from the World and films on all your devices.”

21. Defendants’ Worlduniverseiptv Facebook page and Universe.i.p.t.v Instagram page posted the following image that contains marks of CBC, CBC Drama, Future TV, LBC, MBC1, MBC Drama, MBC Masr, and Melody Aflam.



22. Facebook, Inc. removed Defendants’ Worlduniverseiptv Facebook page and Universe.i.p.t.v Instagram page, on information and belief, for violations of Facebook’s terms of service related to copyright infringement. As a result, Defendants made a post on May 5, 2020 to their Unitvplus Facebook page directing consumers and retailers to their Twitter page located at

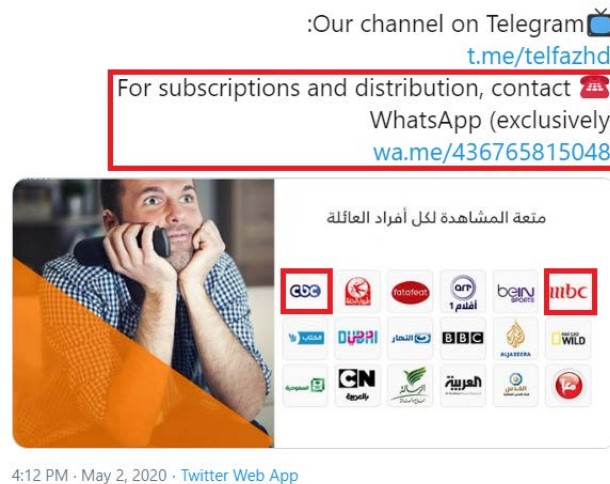
<https://twitter.com/telfazhd>; Instagram page located at <https://www.instagram.com/telfazhd>; and Telegram page located at <https://t.me/s/telfazhd> (each “Telfazhd”).



23. Defendants’ Telfazhd Instagram page promotes the Universe Service with the following images with one including marks of CBC, CBC Drama, MBC1, MBC Drama, MBC Kids/MBC3, and MBC Masr.



24. Defendants Telfazhd Twitter page promotes the Universe Service by directing consumers and resellers to contact them by WhatsApp “[f]or subscriptions and distribution,” and includes the same image from their Unitvplus Facebook page that includes marks of CBC, CBC Drama, MBC1, and MBC Masr.

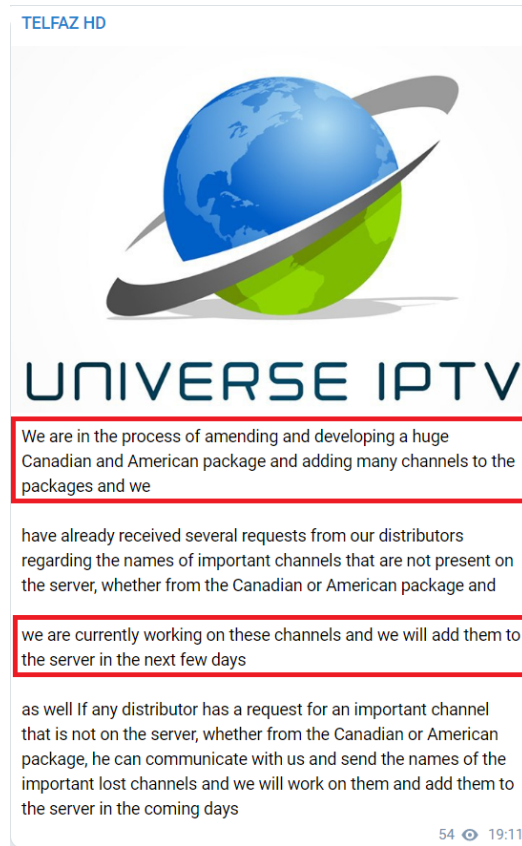


25. Defendants use their Universe Service to transmit the Protected Channels over the Internet to Service Users soon after the original authorized transmission. Defendants take broadcasts or streams of the Protected Channels, transfer them to one or more computer servers provided, controlled, and maintained by Defendants, and then transmit the Protected Channels to Service Users through OTT delivery.

26. As set forth in paragraphs 13 and 15, Defendants are directly responsible for the transmission of the channels on the Universe Service, including the Protected Channels, as shown by their claims that they are constantly expanding the number of channels, constantly updating their Universe Service, and updating the server transmitting the Protected Channels.

27. Defendants’ transmission of the channels on the Universe Service, including the Protected Channels, is shown by a post on Defendants’ Telfazhd Telegram page stating, “We are in the process of amending and developing a huge . . . American package and adding many channels

to the packages . . . and we are currently working on these channels and we will add them to the server in the next few days.”



28. Defendants transmit the Protected Channels to Service Users with the Universe-ip.com domain and its assigned computer server. Defendants previously transmitted the Protected Channels to Service Users with the Olink1.rocks; Olink2.rocks; Olink3.rocks; Olink4.rocks; Olink5.rocks; Olink7.rocks; Universepro9.vip; Universeiptv.com, and Universe-ip.world domains and their assigned computer servers.

29. Any member of the public with Internet access, including Service Users, can receive the Protected Channels from Defendants by simply: (1) purchasing a Universe Subscription; (2) (i) downloading a Universe IPTV app from Uni-Update.com to a compatible device such as a Smart TV, computer with a Windows or Mac operating system, Apple or Android device, or (ii) using an Internet browser at Uni-Web.online; (3) inserting the Universe Subscription user name and

password into the Universe IPTV app or at Uni-Web.online; and (4) selecting the Protected Channels.

30. Defendants' World-Universeiptv.com included a "BUY NOW" link that directed consumers to a shopping cart, where Defendants sold Universe Subscriptions for approximately \$70 for twelve months, \$40 for six months, and \$22 for three months of access to the channels. Defendants' Facebook, Instagram, Twitter, and Telegram pages also invited consumers and resellers to contact them through WhatsApp to purchase Universe Subscriptions.

31. In July 2020, DISH's investigator contacted Defendants through WhatsApp at +43 676 5815048 to inquire about becoming a reseller of Universe Subscriptions. Defendants responded that the price for one three month Universe Subscription was 20 Euro (approximately \$22) and the price for ten three month Universe Subscriptions was 200 Euro (approximately \$220) with payments to be made to their PayPal account h16am87@gmail.com. Defendants confirmed the Universe Service works in the United States, Defendants have more than 1,000 subscribers in the United States, and Defendants have one reseller in the United States. Defendants also stated they live in Austria.

32. Defendants have actual knowledge that the transmission of the Protected Channels on the Universe Service infringes DISH's copyrights. DISH and Networks sent at least 10 notices of infringement between August 27, 2019 and the filing of this Complaint, demanding that Defendants cease transmitting the Protected Channels identified in the notices. Defendants failed to respond to these notices.

33. DISH and Networks sent at least 14 additional notices to CDNs associated with the Universe Service from August 28, 2019 to the filing of this Complaint, requesting the removal of the Protected Channels. Upon information and belief, at least some of these notices were forwarded

to Defendants. Even when these CDNs removed the unauthorized content based on Defendants' copyright infringement, Defendants intentionally interfered with the takedown efforts by, for example, transmitting the Protected Channels from different CDNs or locations.

CLAIMS FOR RELIEF

Count I

Direct Copyright Infringement Under 17 U.S.C. § 501

34. DISH repeats and realleges the allegations in paragraphs 1-33.

35. DISH is a copyright owner under 17 U.S.C. § 106 because DISH holds the exclusive rights to distribute and publicly perform in the United States, by means including satellite, OTT, IPTV, and Internet, the programs that make up the Protected Channels.

36. The programs that make up the Protected Channels are original audiovisual works fixed in a tangible medium of expression, and are therefore copyrightable subject matter. DISH's copyrights in programs that aired on the Protected Channels arise under laws of nations other than the United States that are parties to copyright treaties with the United States, including the United Arab Emirates, Qatar, Egypt, Lebanon, Pakistan, India, and Bangladesh where the programs were authored and first published. Under 17 U.S.C. §§ 101, 411, the programs that make up the Protected Channels are non-United States works and, therefore, registration with the United States Copyright Office is not a prerequisite to filing a copyright infringement action with respect to these works.

37. Defendants directly infringe DISH's copyrights in violation of 17 U.S.C. § 501 by distributing and publicly performing programs that make up the Protected Channels to Service Users, including the works identified in Exhibits 1-2. The copyrighted programs were transmitted from computer servers controlled by Defendants to Service Users who accessed the programs using the Universe Service.

38. DISH has not authorized Defendants to distribute or publicly perform the programs that make up the Protected Channels in any manner.

39. The infringement of DISH's rights in each program constitutes a separate and distinct act of copyright infringement.

40. Defendants' actions are willful, malicious, intentional, purposeful, and in disregard of and with indifference to the rights of DISH.

41. Unless enjoined by the Court, Defendants will continue to engage in acts causing substantial and irreparable injury to DISH that includes damage to its reputation, loss of goodwill, and lost sales, for which there is no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, DISH prays for judgment against Defendants as follows:

A. For a grant of permanent injunctive relief under 17 U.S.C. § 502 restraining and enjoining Defendants, and any of their agents, servants, employees, attorneys, or other persons acting in active concert or participation with any of the foregoing that receives actual notice of the order (including, without limitation, resellers of the Universe Service), from:

1. transmitting, streaming, distributing, or publicly performing in the United States, with any Universe Subscription, Universe IPTV app, or any other device, application, service, or process, any of the Protected Channels or any of the programming that comprises any of the Protected Channels;

2. distributing, selling, providing, or promoting any product or service in the United States, including any Universe Subscription or Universe IPTV app, that comprises the whole or part of a network or service for the distribution or public performance of any of the Protected Channels or any of the programming that comprises any of the Protected Channels;

3. advertising, displaying, or marketing any Universe Subscription, Universe IPTV app, or other service in connection with the Protected Channels or the programming that comprises the Protected Channels; and

4. inducing or contributing to another's conduct that falls within 1, 2, or 3 above.

B. For 37 or more registered works, statutory damages as awarded by the Court up to \$150,000 per registered work infringed under 17 U.S.C. § 504(c), or the Defendants' profits attributable to the infringement of those registered works under 17 U.S.C. § 504(b).

C. For unregistered works, an award of Defendants' profits attributable to the infringement of each unregistered work under 17 U.S.C. § 504(b).

D. For DISH's attorneys' fees and costs under 17 U.S.C. § 505.

E. For impoundment and disposition of all infringing articles under 17 U.S.C. § 503.

F. For an order permanently transferring each domain name that Defendants used in connection with the infringement to DISH.

G. For pre- and post-judgment interest on all monetary relief, from the earliest date permitted by law at the maximum rate permitted by law.

H. For such additional relief as the Court deems just and equitable.

Dated: August 24, 2020

Respectfully submitted,

HAGAN NOLL & BOYLE LLC

By: /s/ Stephen M. Ferguson

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Counsel for Plaintiff DISH Network L.L.C.

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Civil Action No.

EXHIBIT NO. 1 TO COMPLAINT

Copyrighted works that aired on the Protected Channels and are registered or have registrations pending with the United States Copyright Office:

Title of Work	Date of First Publication	Protected Channel	Registration Number	Effective Date of Registration (Pending)
MBC fi Osbo'a (2020) (a/k/a/ MBC in a Week), Ep. #38	June 2, 2020	MBC1		(July 24, 2020)
MBC fi Osbo'a (2020) (a/k/a/ MBC in a Week), Ep. #45	July 10, 2020	MBC1	PA0002249932	July 24, 2020
Sabah Al kher ya Arab, Ep. #95	June 14, 2020	MBC1		(July 24, 2020)
Al Hekaya Ma' Amr Adib (2020), Ep. #92	June 15, 2020	MBC Masr		(July 24, 2020)
Yahdoth Fi Masr (2020), Ep. #69	June 16, 2020	MBC Masr		(July 24, 2020)
Yahdoth Fi Masr (2020), Ep. #70	June 17, 2020	MBC Masr		(July 24, 2020)

Tasali Ahla Alam (2020), Ep. #104	July 6, 2020	MBC Kids / MBC3	PA0002252710	July 24, 2020
Aladdin: Naam Toh Suna Hoga, Ep. #275	September 4, 2019	SAB	PA0002216084	September 17, 2019
Aladdin: Naam Toh Suna Hoga, Ep. #295	October 2, 2019	SAB	PA0002226635	October 30, 2019
Aladdin: Naam Toh Suna Hoga, Ep. #340	December 4, 2019	SAB	PA0002231802	December 13, 2019
Aladdin: Naam Toh Suna Hoga, Ep. #361	January 2, 2020	SAB	PA0002236572	January 28, 2020
Aladdin: Naam Toh Suna Hoga, Ep. #384	February 4, 2020	SAB	PA0002240622	March 2, 2020
Baalveer Returns, Ep. #40	November 4, 2019	SAB	PA0002227645	November 13, 2019
Baalveer Returns, Ep. #62	December 4, 2019	SAB	PA0002231805	December 13, 2020
Baalveer Returns, Ep. #83	January 2, 2020	SAB	PA0002236566	January 28, 2020
Baalveer Returns, Ep. #106	February 4, 2020	SAB	PA0002240623	March 2, 2020
Bhakharwadi, Ep. #149	September 5, 2019	SAB	PA0002216083	September 17, 2019
Bhakharwadi, Ep. #169	October 3, 2019	SAB	PA0002227117	November 11, 2019
Bhakharwadi, Ep. #191	November 4, 2019	SAB	PA0002227647	November 13, 2019
Jijaji Chhat Par Hai, Ep. #436	September 5, 2019	SAB	PA0002216121	September 17, 2019
Jijaji Chhat Par Hai, Ep. #456	October 3, 2019	SAB	PA0002226642	October 30, 2019
Jijaji Chhat Par Hai, Ep. #473	November 4, 2019	SAB	PA0002227664	November 13, 2019

Jijaji Chhat Par Hai, Ep. #495	December 4, 2019	SAB	PA0002231809	December 13, 2019
Jijaji Chhat Par Hai, Ep. #516	January 2, 2020	SAB	PA0002236561	January 28, 2020
Jijaji Chhat Par Hai, Ep. #539	February 4, 2020	SAB	PA0002240627	March 2, 2020
Taraak Mehta Ka Ooltah Chashmah, Ep. #2811	September 4, 2019	SAB	PA0002216112	September 17, 2019
Taraak Mehta Ka Ooltah Chashmah, Ep. #2832	October 4, 2019	SAB	PA0002226661	October 30, 2019
Taraak Mehta Ka Ooltah Chashmah, Ep. #2854	November 4, 2019	SAB	PA0002227666	November 13, 2019
Taraak Mehta Ka Ooltah Chashmah, Ep. #2876	December 4, 2019	SAB	PA0002231815	December 13, 2019
Taraak Mehta Ka Ooltah Chashmah, Ep. #2897	January 2, 2020	SAB	PA0002236569	January 28, 2020
Taraak Mehta Ka Ooltah Chashmah, Ep. #2920	February 4, 2020	SAB	PA0002240632	March 2, 2020
Tenali Rama, Ep. #565	September 2, 2019	SAB	PA0002216126	September 17, 2019
Tenali Rama, Ep. #588	October 3, 2019	SAB	PA0002226663	October 30, 2019
Tenali Rama, Ep. #610	November 4, 2019	SAB	PA0002227667	November 13, 2019
Tenali Rama, Ep. #632	December 4, 2019	SAB	PA0002231817	December 13, 2019
Tenali Rama, Ep. #652	January 1, 2020	SAB	PA0002236507	January 28, 2020
Tenali Rama, Ep. #678	February 6, 2020	SAB	PA0002239762	March 3, 2020

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

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DOES 1-5, individually and together
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Civil Action No.

EXHIBIT NO. 1 TO COMPLAINT

Examples of copyrighted works that aired on the Protected Channels and do not have registrations with the United States Copyright Office:

Title of Work	Protected Channel
Aaj Tak News	Aaj Tak
El Hayah el Yom	Al Hayah 1
Film Clip	ART Cima
Badnaam	ARY Digital
Balaa	ARY Digital
Bubbly Kya Chahti Hai	ARY Digital
Bulbulay	ARY Digital
Chadni Begum	ARY Digital
Do Biwiyan Aik Bechara	ARY Digital
Ghar Jamai	ARY Digital
Good Morning Pakistan	ARY Digital
Jeeto Pakistan	ARY Digital
Jhooti	ARY Digital
Khudparast	ARY Digital
Koi Chand Rakh	ARY Digital
Mera Dil Mera Dushman	ARY Digital

Meri Baji	ARY Digital
Ruswai	ARY Digital
Sitaron Ki Baat Hummayun Kay Saath	ARY Digital
Thora Sa Haq	ARY Digital
Zard Zamono Ka Sawera	ARY Digital
11 th Hour with Waseem Badami	ARY News
Off the Record with Kashif Abbasi	ARY News
Power Play	ARY News
Sar-e-Aam	ARY News
The Reporters	ARY News
Zimmedar Kaun	ARY News
ATN Business & Finance	ATN Bangla
ATN Rannaghor	ATN Bangla
Chotoder Prithibi	ATN Bangla
Onno Drishti	ATN Bangla
Progga Paromita	ATN Bangla
News Hour	ATN News
Flash	B4U Movies
Box Office	B4U Movies
I Like	B4U Movies
Bollywood Minute	B4U Movies
Insider	B4U Movies
Hona Al Asema, all episodes from June 20, 2018 to present	CBC
Rahim, all episodes from June 20, 2018 to present	CBC Drama
Desh Bideshe Ranna	Channel-i
Hridoye Mati O Manush	Channel-i
Khude Gaanraj	Channel-i
Tritiyo Matra	Channel-i
Mahaz	Dunya TV
Nuqta e Nazar	Dunya TV
Hasb-E-Haal	Dunya TV

Mazaaq Raat	Dunya TV
Voice of Dunya	Dunya TV
Satrungi – Rung Rahi Hai Zindagi	Express Entertainment
News Hour	Express News
Interviews	Future TV
Aaj Shazaib Khanzada Kay Saath	Geo News
Capital Talk	Geo News
Jirga	Geo News
Khabarnak	Geo News
Meray Mutabiq	Geo News
Naya Pakistan	Geo News
Report Card	Geo News
Adhoora Bandhan	Geo TV
Aik Thi Rania	Geo TV
Alif	Geo TV
Bedardi Saiyaan	Geo TV
Bharosa Piyar Tera	Geo TV
Dar Khuda Se	Geo TV
Deewangi	Geo TV
Dolly Darling	Geo TV
Ghar Titli Ka Par	Geo TV
Ghutan	Geo TV
Hari Hari Churian	Geo TV
Hina Ki Kushboo	Geo TV
Kahin Deep Jalay	Geo TV
Khaani	Geo TV
Khan	Geo TV
Khoob Seerat	Geo TV
Makafat	Geo TV
Malkin	Geo TV
Meher Posh	Geo TV
Mera Haq	Geo TV
Meray Mohsin	Geo TV
Mohabbat Na Kariyo	Geo TV

Munafiq	Geo TV
Muqaddar	Geo TV
Noor-e-Zindagi	Geo TV
Raaz-e-Ulfat	Geo TV
Ramz-e-Ishq	Geo TV
Rani	Geo TV
Sharukh Ki Saaliyan	Geo TV
Shayad	Geo TV
Silsilay	Geo TV
Tu Mera Junoon	Geo TV
Umm-e-Haniya	Geo TV
Zamani Manzil Kay Maskharay	Geo TV
Grimat Shaghaf	Hekayat
Flame on Hai	Hum Masala
Chaska Pakanay Ka	Hum Masala
Chef Hunt	Hum Masala
Dais Pardes Ke Khanay	Hum Masala
Easy Cooking	Hum Masala
Evening with Shireen	Hum Masala
Food Diaries	Hum Masala
Food Fantasy	Hum Masala
Hum Mart	Hum Masala
Hum Masala Cooking Show	Hum Masala
Kha Mere Manwa	Hum Masala
Lazzat	Hum Masala
Lively Weekends	Hum Masala
Masala Cooking Classes	Hum Masala
Masala Family Festival	Hum Masala
Masala Magazine	Hum Masala
Masala Morning	Hum Masala
Mehboob's Kitchen	Hum Masala
Parwaz Hai Junoon	Hum Masala
Ramzan Around the World	Hum Masala
Riwayati Mithaiyan	Hum Masala

South Asian Cuisine	Hum Masala
Tarka	Hum Masala
Wonderful Indonesia	Hum Masala
100 Din Ki Kahani	Hum Sitaray
Aasi	Hum Sitaray
Apne Bane Paraye	Hum Sitaray
Babul Ki Sahaliyan	Hum Sitaray
Bunty I Love You	Hum Sitaray
Digest Writer	Hum Sitaray
Dil Ka Darwaza	Hum Sitaray
Dil Main Baji Ghanti	Hum Sitaray
Dildarian	Hum Sitaray
Haya Kay Daman Main	Hum Sitaray
Hum Kay Tehray Ajnabi	Hum Sitaray
Jahan Ara Begum	Hum Sitaray
Kya Kahain Tujsay	Hum Sitaray
Larkian Muhalle Ki	Hum Sitaray
Main Bikhar Gayi	Hum Sitaray
Majboori	Hum Sitaray
Matae Jaan Hai Tuu	Hum Sitaray
Mujhe Sandal Kardo	Hum Sitaray
Neelum Kinaray	Hum Sitaray
Newsline	Hum Sitaray
Pakiza (Pakeeza)	Hum Sitaray
Sayaye Deewar	Hum Sitaray
Surkh Jora	Hum Sitaray
Tanhai	Hum Sitaray
Yeh Raha Dil	Hum Sitaray
Zameen Pe Chand	Hum Sitaray
Zindagi Tujh Ko Jiya	Hum Sitaray
Dil Ruba	Hum TV / Hum World
Kashf	Hum TV / Hum World
Mehboob Apke Qadmon Mein	Hum TV / Hum World
Pyar Ke Sadqay	Hum TV / Hum World

Rabba Mainu Maaf Kareen	Hum TV / Hum World
Sabaat	Hum TV / Hum World
Tarap	Hum TV / Hum World
Wafa Kar Chalay	Hum TV / Hum World
Ye Dil Mera	Hum TV / Hum World
News Today	India Today
Arabwood	LBC
Lahon w Bass	LBCI / LDC
Take Me Out	LBCI / LDC
Thawani	LBCI / LDC
Aahd Aldam	MBC1
Al Meerath	MBC1
Aldeeva	MBC1
Aldheeb Fel GleeB	MBC1
Amr Ikhla'a	MBC1
Doumouaa Farah	MBC1
Driven	MBC1
Etr Al Rouh	MBC1
Fee Kol Osbouaa Yawm Jomoaa	MBC1
Hamsa	MBC1
Hit Al Mawsim	MBC1
Kan Fi Kol Zaman	MBC1
Laffet Al Mamlakah	MBC1
Ma Fiya	MBC1
Mamlakat Eblees	MBC1
Mumg	MBC1
Om Algalayed	MBC1

Ostaz Wa Ra'ees Qesm	MBC1
Rayah Al Madam	MBC1
Rehla Lel Jaheem	MBC1
Takhareef	MBC1
Top Chef	MBC1
Waleedee Al Aziz	MBC1
Abu Al Banat	MBC Drama
Banat Al Shams	MBC Drama
Saherat Al Janoub	MBC Drama
I-Tech	MBC Kids / MBC3
Sawa Fe	MBC Kids / MBC3
Telescope	MBC Kids / MBC3
Alloaaba	MBC Masr
Barnamej al Heekaya	MBC Masr
El Haram	Melody Classic
Apnar Jiggasha	NTV Bangla
Chayer Adda	NTV Bangla
Ei Somoy	NTV Bangla
Ek Shobday Quran Shikhar Asor	NTV Bangla
Family Pack	NTV Bangla
Frankly Speaking	NTV Bangla
Glamour World	NTV Bangla
Golpogulo Amader	NTV Bangla
Johhon Kokhono	NTV Bangla
Moddh Rater Khabor	NTV Bangla
Rater Khabor	NTV Bangla

Rongin Pata	NTV Bangla
Scitech Watch	NTV Bangla
Shashtho Protidin	NTV Bangla
Shironam	NTV Bangla
Shondhar Khabor	NTV Bangla
Shuvo Shondha	NTV Bangla
Styles and Trends	NTV Bangla
Tel Plastics Rannaghor	NTV Bangla
Tifiner Fakey	NTV Bangla
Tera Kya Hoga Alia	SAB
Maddam Sir – Kuch Baat Hai Kyunki Jazbaat Hai	SAB
Beyhadh	SET / Sony SET
Chandragupta Maurya	SET / Sony SET
Crime Patrol	SET / Sony SET
Indian Idol	SET / Sony SET
India's Best Dancer	SET / Sony SET
Ishaaron Ishaaron Mein	SET / Sony SET
Kapil Sharma Show	SET / Sony SET
Kaun Banega Crorepati	SET / Sony SET
Ladies Special	SET / Sony SET
Mere Dad Ki Dulhan	SET / Sony SET
Mere Sai	SET / Sony SET
Mil Jate Hain Jo Bane Ek Dujе Ke Vaaste	SET / Sony SET
Patiala Babes	SET / Sony SET
Superstar Singer	SET / Sony SET
Tara From Satara	SET / Sony SET

Vighnaharta Ganesh	SET / Sony SET
Yeh Un Dinon Ki Baat Hai	SET / Sony SET
Extraa Shots Special	SET MAX
Ladies Vs Ricky Bahl	SET MAX
Gimme Chocolate	Zee Aflam
Qubool	Zee Alwan
Haramlek	Zee Alwan
Forsa Akhira	Zee Alwan
Psycho	Zee Alwan

CIVIL COVER SHEET

The 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, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

DISH Network L.L.C.

(b) County of Residence of First Listed Plaintiff Arapahoe, Colorado

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Stephen M. Ferguson, Hagan Noll & Boyle, LLC, Two Memorial City Plaza, 820 Gessner, Suite 940, Houston, Texas 77024
Telephone: 713-343-0478

DEFENDANTS

DOES 1-5, individually and together d/b/a Universe IPTV; Universe TV; World-Universeiptv.com; Uni-Update.com; and Uni-Web.online

County of Residence of First Listed Defendant Unknown

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | 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 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. 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 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
17 U.S.C. § 101 et seq. (Copyright Act)

Brief description of cause:

Copyright infringement arising from the unlawful retransmission of Plaintiff's television programming.

VII. REQUESTED IN COMPLAINT:
☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$150,000 per work

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

08/24/2020

SIGNATURE OF ATTORNEY OF RECORD

/s/ Stephen M. Ferguson

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket. **PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.