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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Venice PI, LLC,)	Case No.: 1:18-cv-192-LEK-KSC
Headhunter LLC,)	(Copyright)
MON LLC,)	
Millennium Funding, Inc.,)	SECOND AMENDED
TBV Productions, LLC)	COMPLAINT; EXHIBITS 1-6;
Cook Productions, LLC,)	DECLARATION OF WAYMOND
Glacier Films 1, LLC,)	NGAI; DECLARATION OF
Colossal Movie Productions, LLC,)	DANIEL ARHEIDT;
Clear Skies Nevada, LLC)	DECLARATION OF JAMES
Bodyguard Productions, Inc.,)	SOSA; DECLARATION OF
I.T. Productions, LLC,)	COUNSEL; DECLARATION OF
Cobbler Nevada, LLC, and)	MICHEAL DANLEY
Justice Everywhere Productions,)	
Inc.,)	
)	(1) COPYRIGHT
Plaintiffs,)	INFRINGEMENT
vs.)	(2) CONTRIBUTORY
)	COPYRIGHT
)	INFRINGEMENT
Galbatross Technologies, LLP,)	
Himanshu Saxena,)	
Gaurav Jaggi,)	
DOE 5 d/b/a show-)	
box.en.uptodown.com/android,)	
Rajat Kulshrestha,)	
Ipathy Srinivas Rao, and)	
Monitu Bansal,)	

Defendants.

)
)
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)

SECOND AMENDED COMPLAINT

Plaintiffs Venice PI, LLC, Headhunter LLC, MON LLC, Millennium Funding, Inc., TBV Productions, Inc., Cook Productions, LLC, Glacier Films 1, LLC, Colossal Movie Productions, LLC, Clear Skies Nevada, LLC, Bodyguard Productions, Inc., I.T. Productions, LLC, Cobbler Nevada, LLC, and Justice Everywhere Productions, Inc., (collectively “Plaintiffs”) file this Second Amended Complaint against Defendants Galbatross Technologies, LLP, Himanshu Saxena, Gaurav Jaggi, DOE 5 d/b/a show-box.en.uptodown.com/android, Rajat Kulshrestha, Ipathy Srinivas Rao and Monitu Bansal (collectively “Defendants”) and allege as follows:

I. NATURE OF THE ACTION

1. Plaintiffs bring this action to stop the massive piracy of their motion pictures brought on by the software application Show Box app (hereafter: the “Show Box app”). The Defendants misleadingly promote the Show Box app as a legitimate means for viewing content to the public, who eagerly install the Show Box app to watch copyright protected content, thereby leading to profit for the Defendants. These Defendants have placed hundreds of individuals in Hawaii if not thousands of

individuals in the United States in legal peril for copyright infringement while they hide behind anonymous domain registrations, false identities and addresses, and enjoy the gains from their illicit enterprise.

2. To halt Defendants' illegal activities, Plaintiffs bring this action under 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 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 they 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 State; (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. 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

8. The Plaintiffs are owners of the copyrights for the motion pictures (hereafter: "Works"), respectively, as shown in Exhibit "1" and listed below.

OWNER	MOTION PICTURE	Copyright Certificate Number

Venice PI, LLC	<i>Once Upon a Time in Venice</i>	PA2039391
Headhunter LLC	<i>The Family Man</i>	PA2039392
MON LLC	<i>Singularity</i>	PAu3848900
Millennium Funding, Inc.	<i>London Has Fallen</i>	PA1982831
Millennium Funding, Inc.	<i>Criminal</i>	PA01984029
Millennium Funding, Inc.	<i>Mechanic: Resurrection</i>	PA1998057
Millennium Funding, Inc.	<i>Boyka: Undisputed</i>	PA 2031176
TBV Productions, LLC	<i>I Feel Pretty</i>	Pau3896491
Cook Productions, LLC.	<i>Mr. Church</i>	PA2002851
Glacier Films 1, LLC	<i>American Heist</i>	PA0001398023
Colossal Movie Productions, LLC	<i>Colossal</i>	Pau003806054

Clear Skies Nevada, LLC	<i>Good Kill</i>	Pau003762377
Bodyguard Productions, Inc.	<i>The Hitman's Bodyguard</i>	PAu3844508
I.T. Productions, LLC	<i>I.T.</i>	Pau00380112
Cobbler Nevada, LLC	<i>The Cobbler</i>	Pau003744688
Justice Everywhere Productions, Inc.	<i>Vengeance: a Love Story</i>	PAu003835145

B. The Defendants

9. The Defendants distribute copies of the Show Box app and promote it for the infringing purpose of “watching free movies”, including Plaintiffs’ copyright protected Works.

Defendants Galbatross Technologies, LLP, Himanshu Saxena and Gaurav Jaggi

10. Previously identified as DOE 2, Defendant Galbatross Technologies, LLP (hereafter: “Galbatross”) is, upon information and belief, a partnership organized under the laws of India.

11. Defendant Galbatross operates a website <http://www.galbatross.com/> at which it advertises itself as “a high revenue generating internet machine” providing “Search Engine Optimization (SEO)” and “Content Marketing” as well as other services.

12. Previously identified as DOES 3-4, Defendants Himanshu Saxena and Gaurav Jaggi are individuals who, upon information and belief, reside in New Delhi, India and are partners in Galbatross Technologies, LLP.

13. Defendant Himanshu Saxena is the owner of at least 40 other domain names, including “showboxpro.net”. *See* Exhibit “2”.

14. Defendant Galbatross, Himanshu Saxena and Gaurav Jaggi (hereafter sometimes collectively referred to as the “Galbatross Defendants”) operate an interactive website <http://showboxappdownload.co> as of at least May 15, 2018.

15. The website [http:// showboxappdownload.co](http://showboxappdownload.co) was hosted by the provider Digital Ocean, Inc.

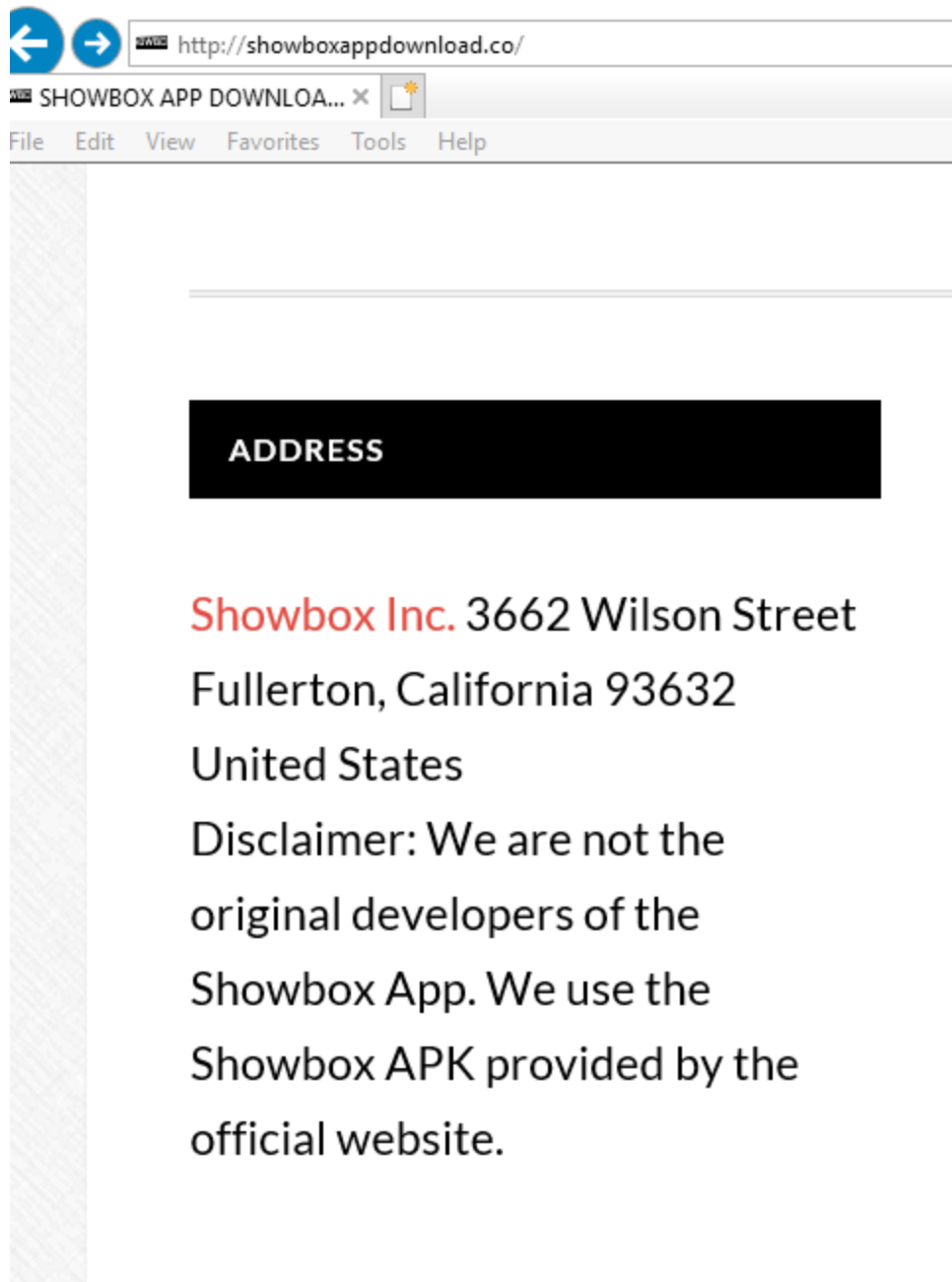
16. Digital Ocean, Inc. has indicated that the Galbatross Defendants operate the website showbox.co. Specifically, Defendants Himanshu Saxena and Gaurav Jaggi made payments for hosting services for the website from February 1, 2017 through September 1, 2018. *See* Exhibit “3”.

17. Digital Ocean, Inc. has indicated that the Galbatross Defendants located the website [http:// showboxappdownload.co](http://showboxappdownload.co) on the same virtual private server as website showbox.co. *See* Exhibit “4”.

18. Defendant Himanshu Saxena has admitted that Defendants Galbatross, Gaurav Jaggi and he owned, hosted and were involved with showboxappdownload.co in an email communication. *See* Exhibit “5”.

19. Despite multiple notifications from Plaintiffs concerning the infringing nature of their website, the Galbatross Defendants, upon information and belief, have continued to operate their interactive website <http://showboxappdownload.co>. *Id.*

20. On their website showboxappdownload.co, the Galbatross Defendants falsely and fraudulently hold themselves out as a corporation Showbox Inc. with its principal place of business at 3662 Wilson Street, Fullerton, California 93632.

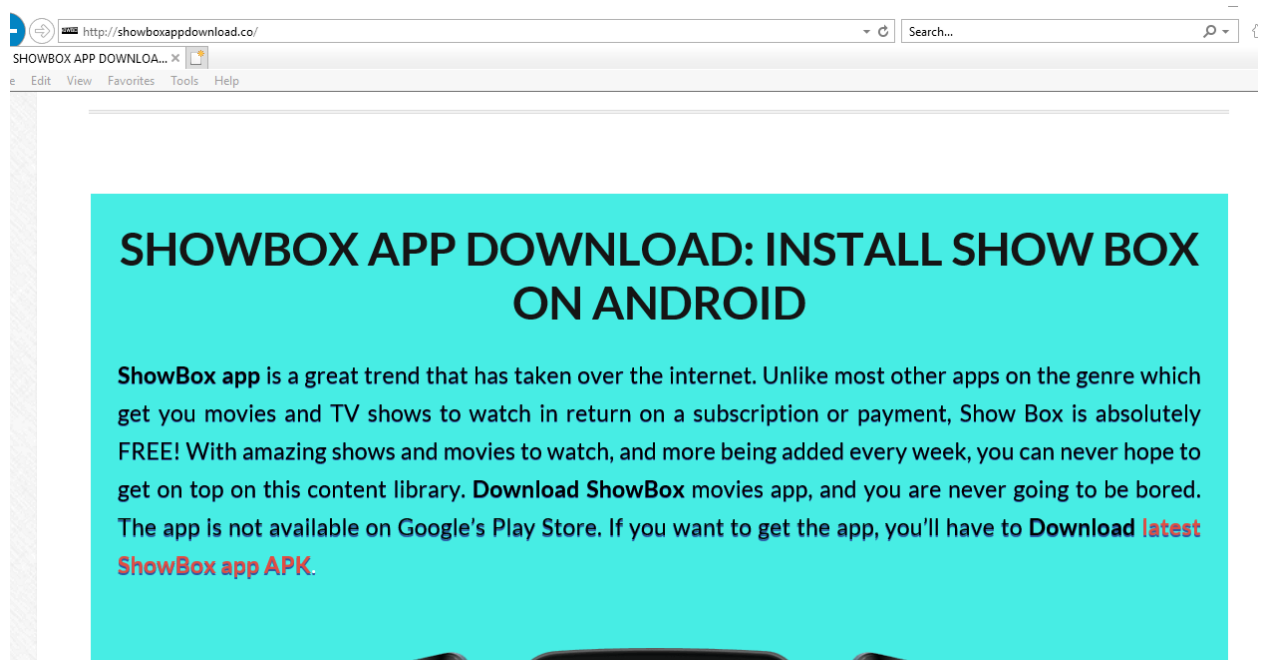


21. Upon information and belief, the address “3662 Wilson Street Fullerton, California 93632” does not exist.

22. Upon information and belief, “Showbox, Inc.” is not a corporation organized under any state or territory of the United States, and likely does not exist at least not in the manner held out by the Galbatross Defendants.

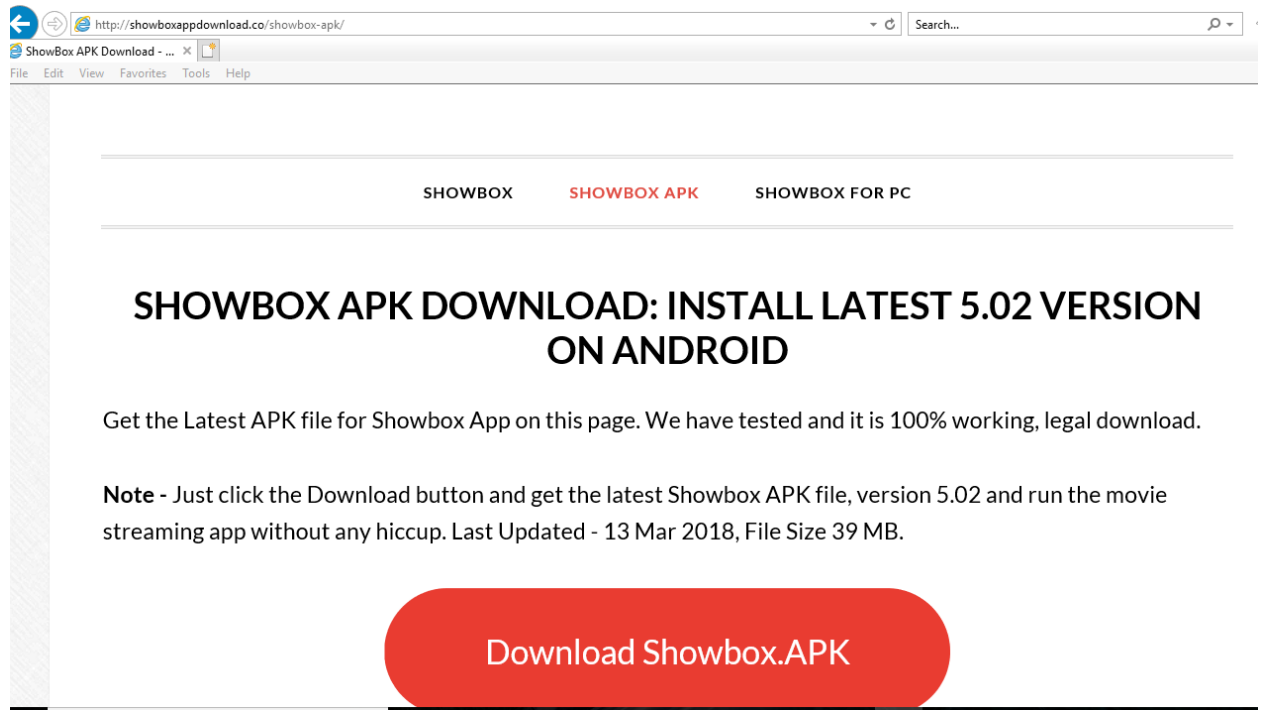
23. On their website, the Galbatross Defendants describe the Show Box app as “Unlike most other apps on the genre which get you movies and TV shows to watch in return on a subscription or payment, Show Box is absolutely FREE!”

24. On their website, the Galbatross Defendants state, “The app is not available on Google’s Play Store. If you want to get the app, you’ll have to Download latest ShowBox app APK.”



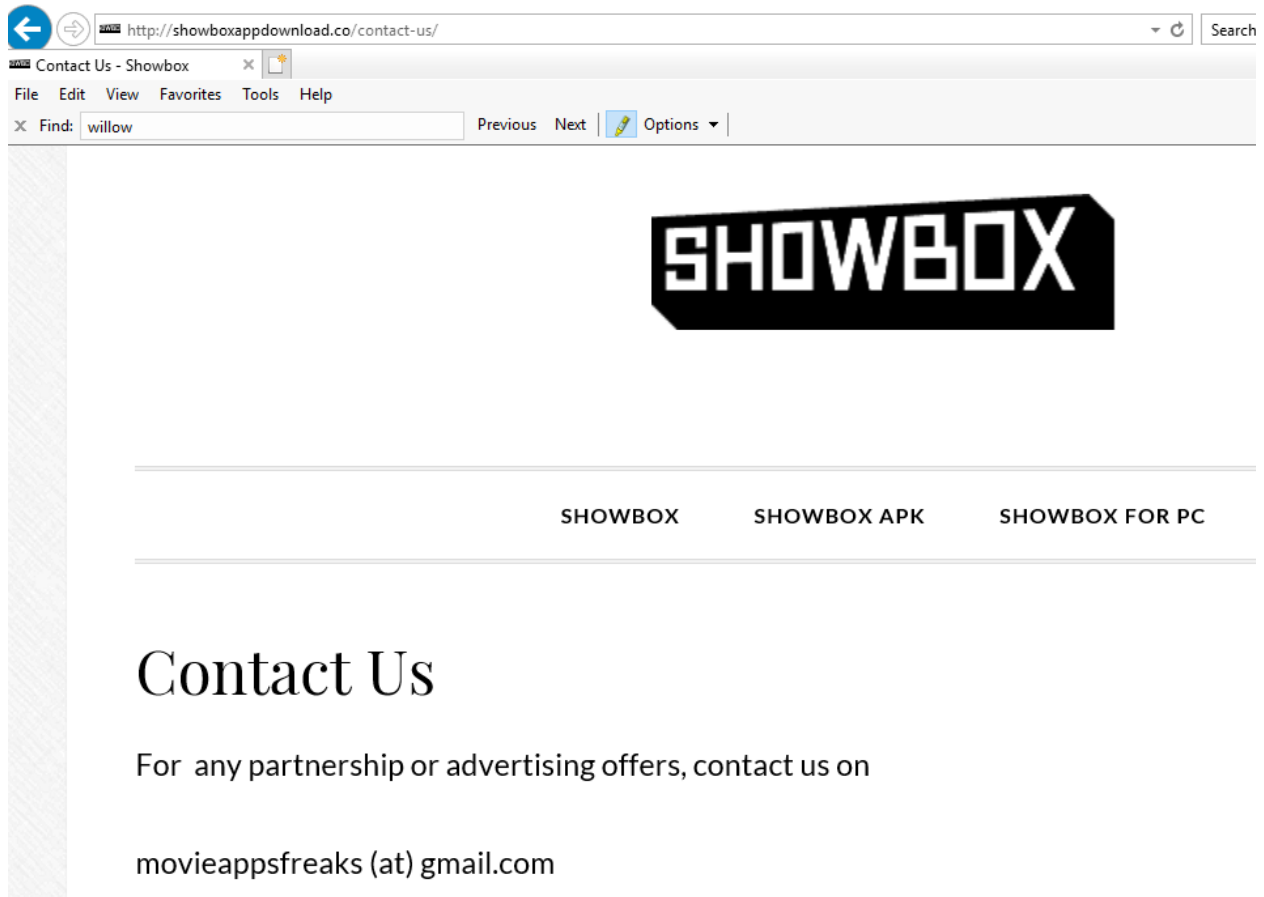
25. Clicking on “latest ShowBox app APK” words directs a user to the website <http://showboxappdownload.co/showbox-apk/> where the Galbatross

Defendants state, “We have tested [the Show Box app] and it is 100% working, legal download,” and includes a link “DOWNLOAD Showbox.APK”.



26. Clicking on the link “DOWNLOAD Showbox.APK” leads to a website <http://apkadvisor.com/showbox-apk/> where a version of the Show Box app can be downloaded.

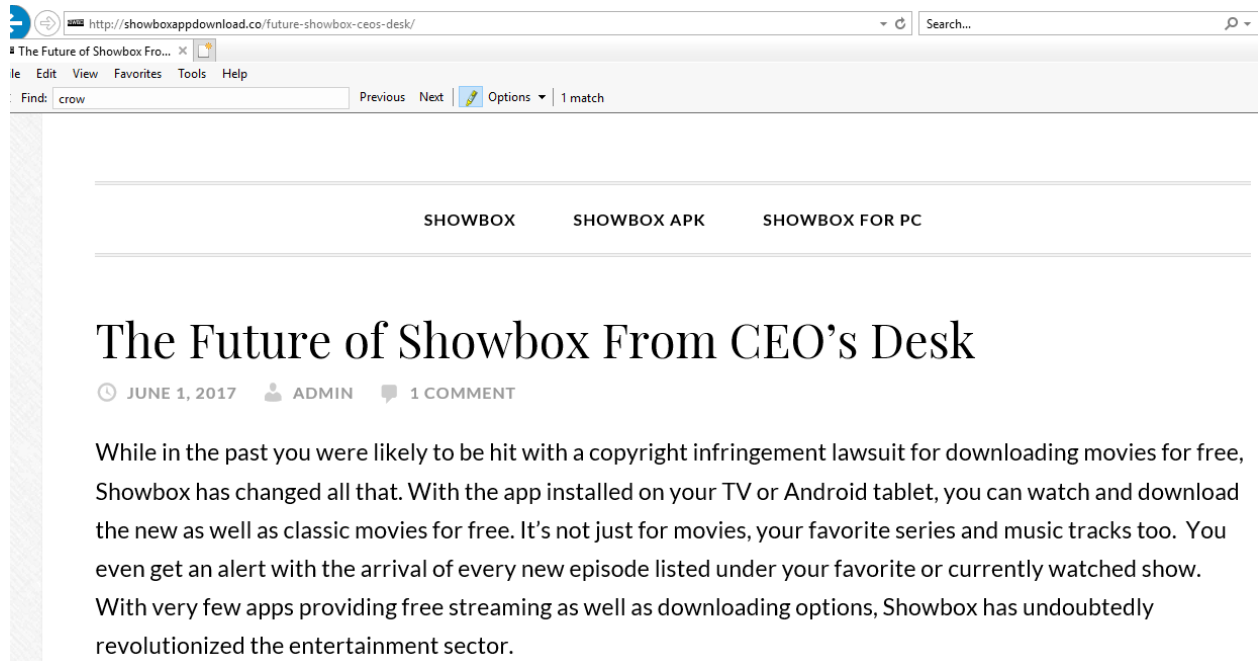
27. The Galbatross Defendants use the email address movieappsfreaks@gmail.com to solicit and receive solicitations for partnership or advertising offers.



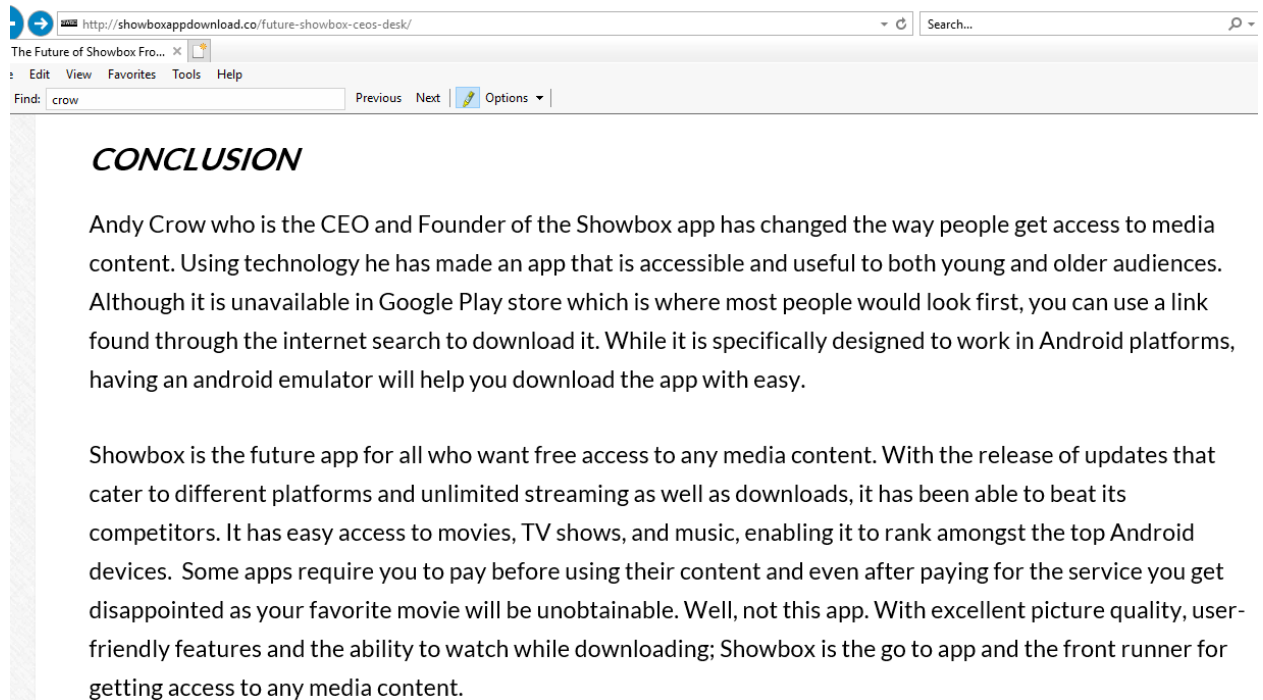
28. The subscriber information associated with the email address movieappsfreaks@gmail.com includes a recovery address of jags@galbatross.com which is an email address belonging to the Galbatross Defendants.

29. The Galbatross Defendants include a description of a person on their website who refers to himself as Andy Crow and holds himself out as the Chief Executive Officer (CEO) and founder of the Showbox app on the website showboxappdownload.co. Upon information, this person Andy Crow does not exist at least to the extent described on the Galbatross Defendants' website.

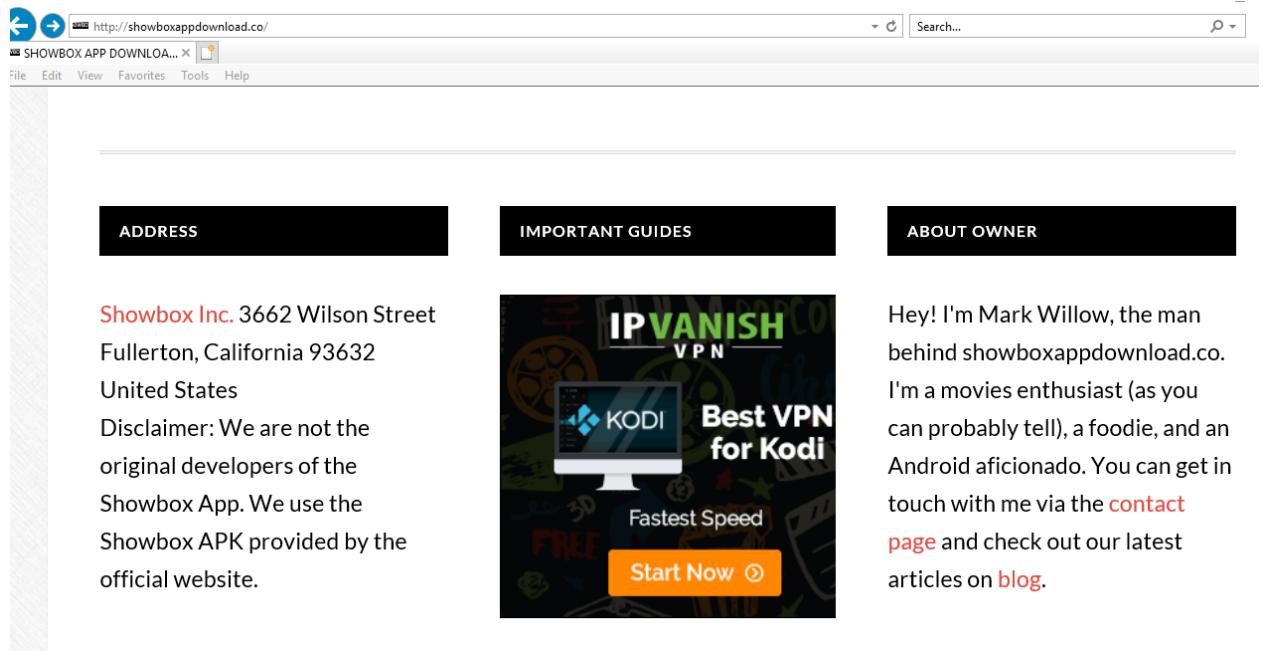
30. On the website <http://showboxappdownload.co/future-showbox-ceos-desk/>, the Galbatross Defendants state, “While in the past you were likely to be hit with a copyright infringement lawsuit for downloading movies for free, Showbox has changed all that. With the app you can watch and download...movies for free.”



31. On the same website, the Galbatross Defendants also state that “he has made an app...” Upon information and belief, the app referred to here is the Show Box app.



32. The Galbatross Defendants include on their website a description of a person identified as Mark Willow and held out as the owner and the man behind showboxappdownload.co. Upon information and belief, this person Mark Willow does not exist at least to the extent described on the Galbatross Defendants' website.

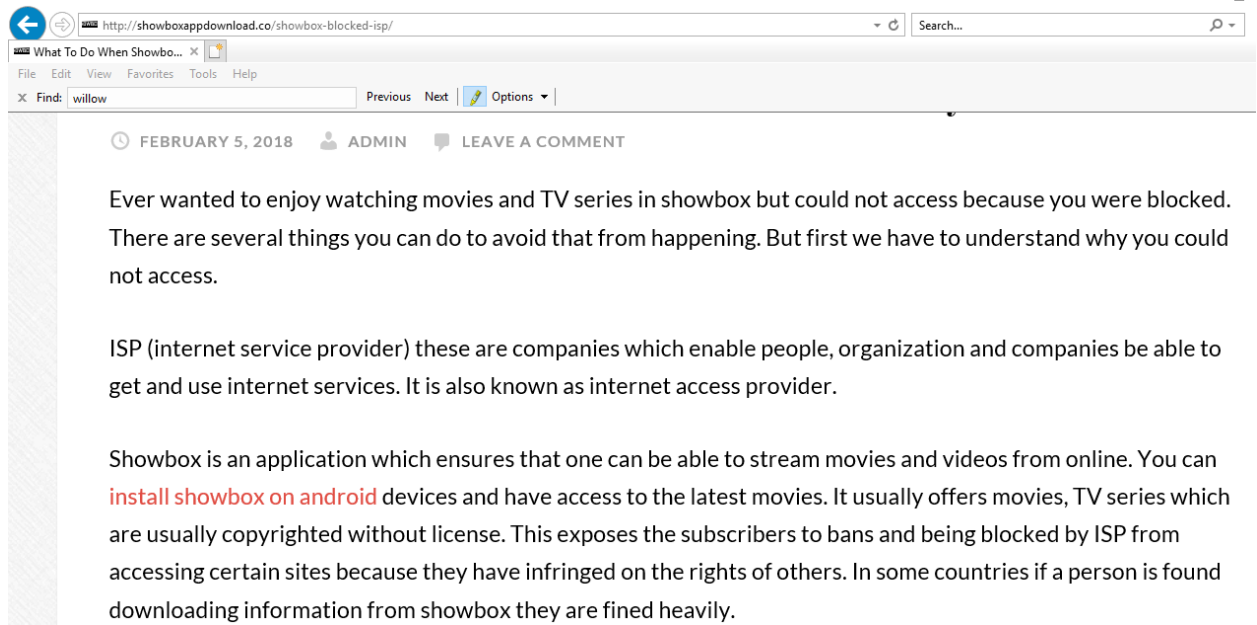


33. Upon information and belief, the Galbatross Defendants falsely and fraudulently describe themselves as a US located corporation run by individuals with American sounding names in order to deceive Americans who visit their website into believing that the Show Box app is a legitimate platform for watching copyright protected content.

34. The Galbatross Defendants include a blog at the website <http://showboxappdownload.co/showbox-blocked-isp/>.

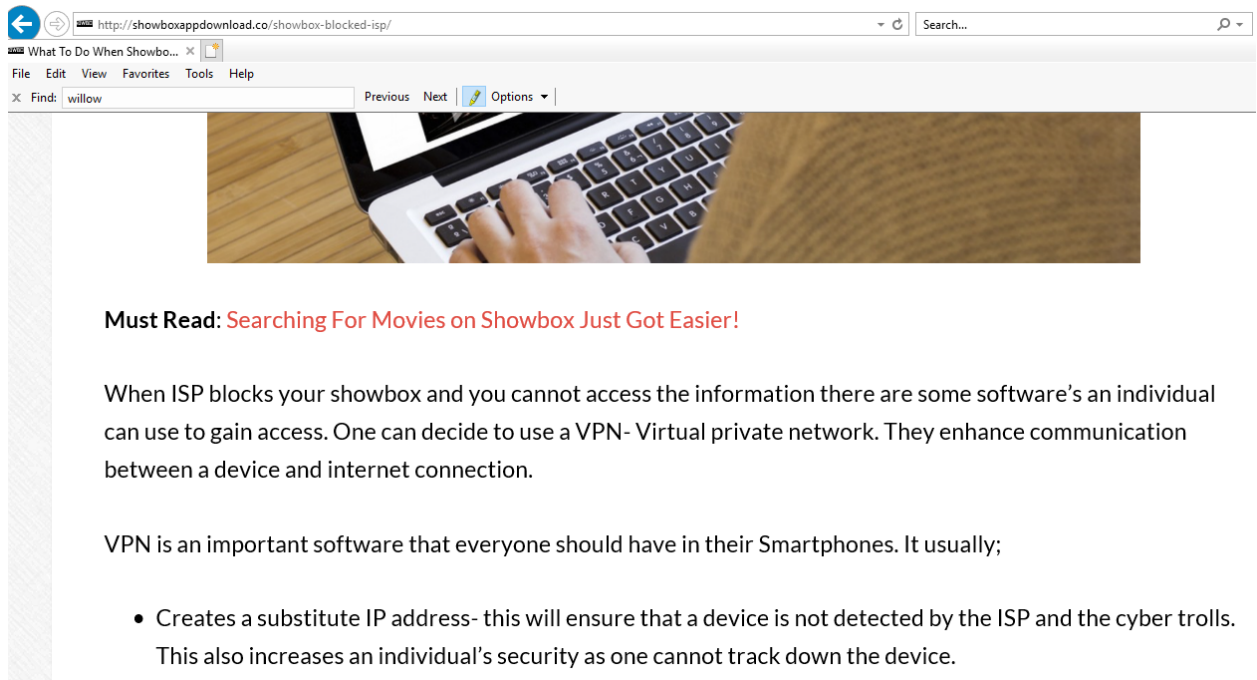
35. This blog includes an article dated February 5, 2018 and entitled, "What To Do When Showbox is Blocked By ISP?" In this article, the Galbatross Defendants describe the Show Box app as "It usually offers movies, TV series which are usually copyrighted without license. This exposes the subscribers to bans

and being blocked by ISP from accessing certain sites because they have infringed on the rights of others.”

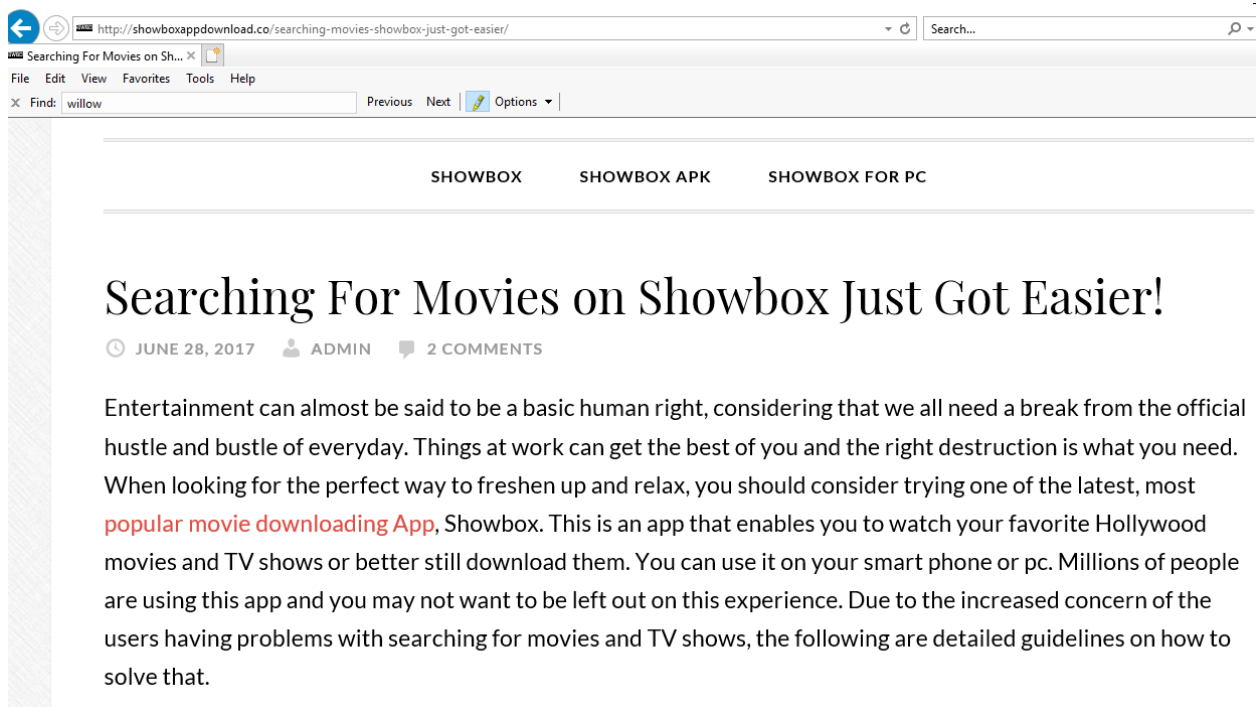


36. Upon information and belief, the Galbatross Defendants content marketing business includes arranging for advertisements to be shown while users operate the Show Box app.

37. The Galbatross Defendants even encourage Show Box users to install a Virtual Private Network (VPN) on their devices “to ensure that a device is not detected by the ISP and the cyber trolls” on their Blog at <http://showboxappdownload.co/showbox-blocked-isp/>.

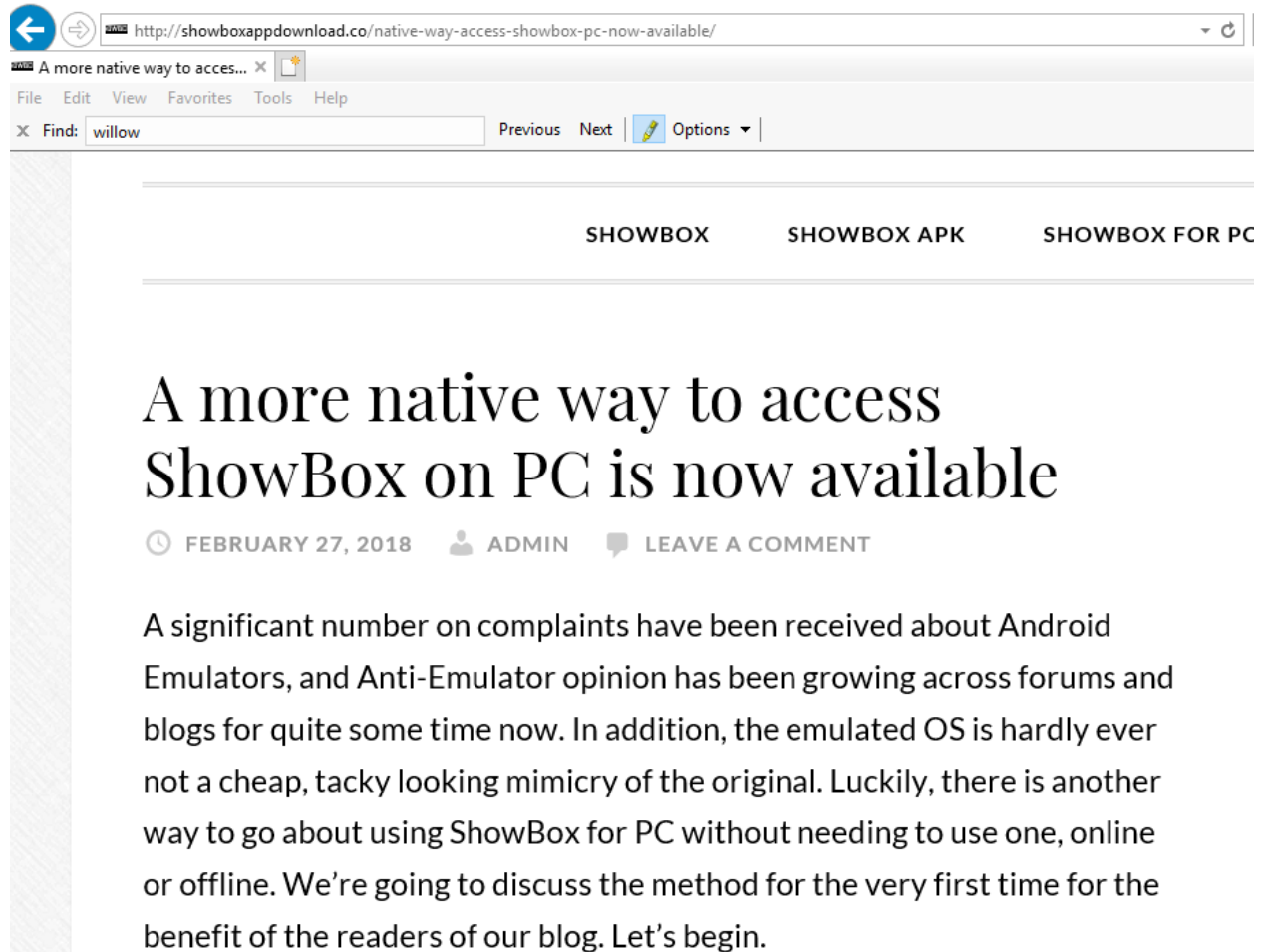


38. The Galbatross Defendants use their website(s) to announce software updates to the Show Box app and advertise the availability of infringing content.



39. The Galbatross Defendants use their website

<http://showboxappdownload.co/native-way-access-showbox-pc-now-available/> to announce to users new approaches to installing the Show Box app on their devices.



40. The Show Box app includes numerous advertisements that, upon information and belief, provides financial compensation to Defendants.

41. The Galbatross Defendants use the email address movieappsfreaks@gmail.com to solicit and receive solicitations for partnership or advertising offers.

Defendant Rajat Kulshrestha

42. Defendant Rajat Kulshrestha is a resident of Kanpur, India.

43. Defendant Rajat Kulshrestha operates an interactive website <http://show-box.one> as of Sept. 24, 2018.

44. On the website, Defendant Rajat Kulshrestha describes the Show Box app as “Showbox app lets you to [sic] watch unlimited free movies online”.

45. Defendant Rajat Kulshrestha states on the website, “Showbox is a freemium service which lets you to [sic] enjoy movies and TV shows for free.”

46. Defendant Rajat Kulshrestha’s website includes a Blog at <https://show-box.one/blog/> which includes links to articles which titles such as “Top 5 Comedy Movies on Showbox 2018”, “Top 5 Action Movies on ShowBox to Watch 2018”, and “Top 15 Movies to Watch Online in 2018”.

47. Clicking on the article link with the title “Top 15 Movies to Watch Online in 2018” redirects to the website <https://show-box.one/top-movies-to-watch-online/>, where a screenshot of Plaintiff TBV Production LLC’s copyright protected motion picture “*I Feel Pretty*” is shown as number 8.

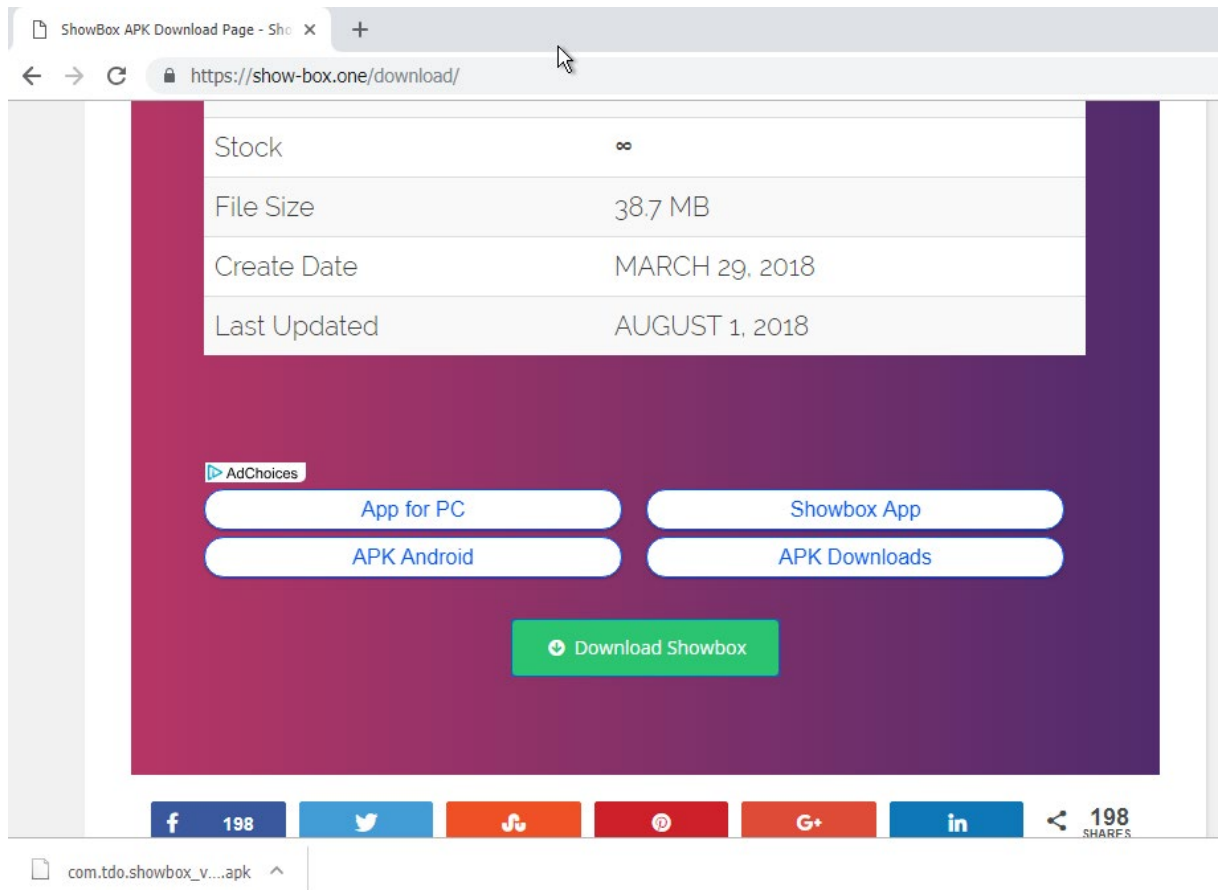
8. I feel pretty

Written and directed by Abby Kohn and Marc Silverstein, this movie has its star, Amy Schumer playing the role of Renee Bennett, a New York resident who seems to struggle with her insecurities on a regular basis. However, one fine morning, she gets to find herself beautiful, and all of a sudden is boosted up with the confidence of living her life fearlessly. Yet, this film is all about what she does when she realises that her appearance did never change actually.



48. As of October 19, 2018, the website show-box.one included a link “Download ShowBox APK 5.11”. Clicking on this link directs a user to the website <https://show-box.one/download/>.

49. By clicking on the link “Download Showbox” a user can successfully install the Show Box app on a device.



50. The website <http://show-box.one> is registered anonymously by the registry domain whois.namecheap.com and the registrar NameCheap, Inc.

51. NameCheap, Inc. has indicated that Defendant Rajat Kulshrestha is the Registrant Contact, Administrative Contact, Technical Contact and Billing Contact for the website show-box.one as of Sept. 24, 2018.

52. Defendant Rajat Kulshrestha also operated or currently operates a website under the Social Media site “Indi Blogger”. In this website Defendant Rajat Kulshrestha included a link to what he described as “Best Movie Streaming Sites 2015: Top 10 Websites To Watch Movies Online For Free”. Exhibit “6”.

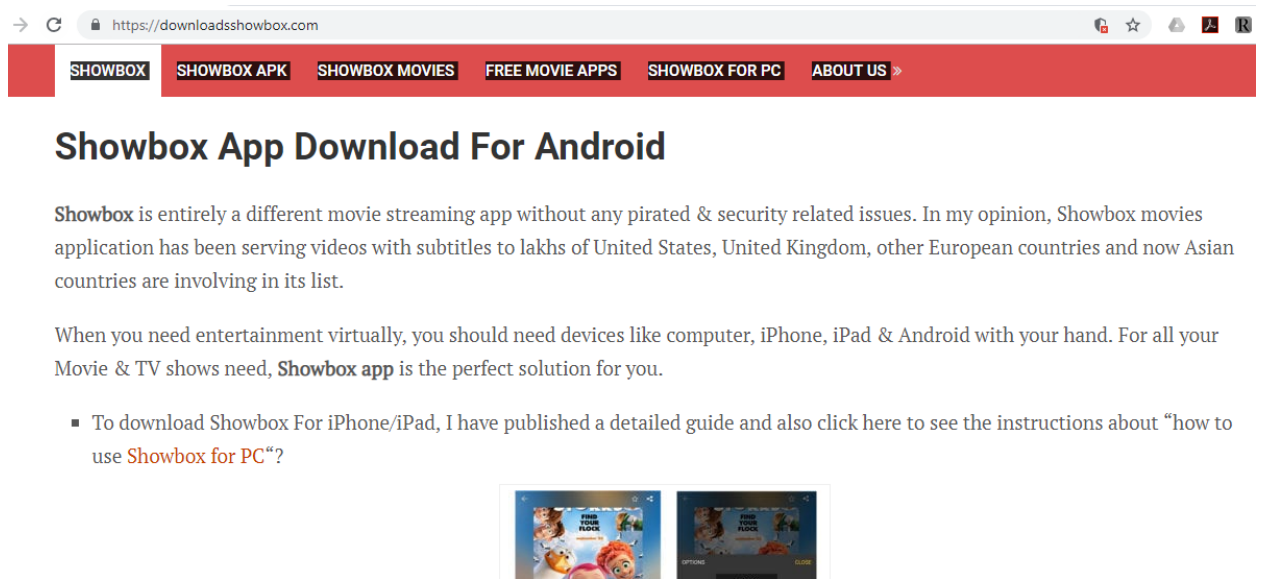
53. Defendant Rajat Kulshrestha also is the owner of the domain for the website frackmanthemovie.com where the motion picture *FRACKMAN* is advertised. This website features SHOWBOX as one of their partners and includes a link to the website show-box.one.

Defendant Ipathy Srinivas Rao

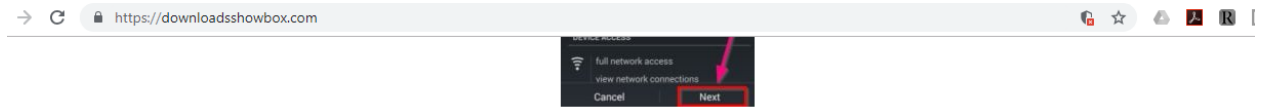
54. Upon information and belief, Defendant Ipathy Srinivas Rao is a resident of Kadapa, India.

55. Defendant Ipathy Srinivas Rao operates an interactive website downloadshowbox.com as of Nov. 6, 2018.

56. On the website downloadshowbox.com, Defendant Ipathy Srinivas Rao describes the Show Box app as “a movie streaming app without any pirated & security related issues”.



57. Defendant Ipathy Srinivas Rao explains how to use the Show Box app to watch copyright protected content and further describes it as a “free movies application”



5) Now, you can directly open the application to start watching or else you can find a shortcut on the Menu screen to open it whenever you need it.

Procedure To Watch Any Movie or TV Show Using Showbox

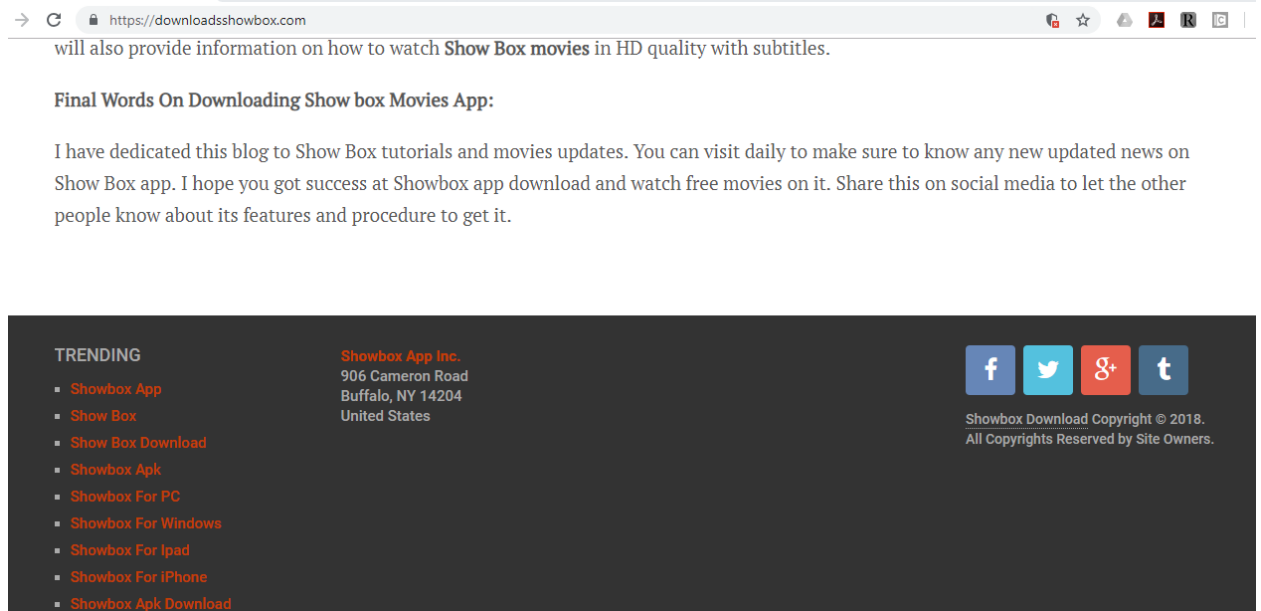
1. Open Show Box application on any device like Android, iPhone, iPad, PC & Mac; it takes some time to load the data of movies from servers. If it asks for updating the application, you can update it or else click on **Remind me later**.
2. You can **search** the film or TV shows you would like to stream directly for free or else arrange the movies according to Genre, Year, and IMDB rating.
3. Once you search for a movie on it, you have three options to select the quality: 360p, 480p, and 720p. Select any of them according to your internet speed and click on **Watch Now**.
4. **Download** option is available for any movie or TV show.
5. Updated content is kept in a separate tab in the menu bar for making an easy way to find new updates stuff.
6. Before watching any movie, you can look at IMDB rating, look at the trailer and its storyline.

Other Useful Information on Show Box app

1) Is Showbox app free?

Answer: Yes, It is a free movies application can be downloaded to Android, iPhone, iPad, Windows PC/Laptop, and Mac Computers.

58. On the website downloadsshowbox.com Defendant Ipathy Srinivas Rao falsely and fraudulently holds itself out as a corporation Showbox App Inc. with its principal place of business at 906 Cameron Road, Buffalo, NY 14204.

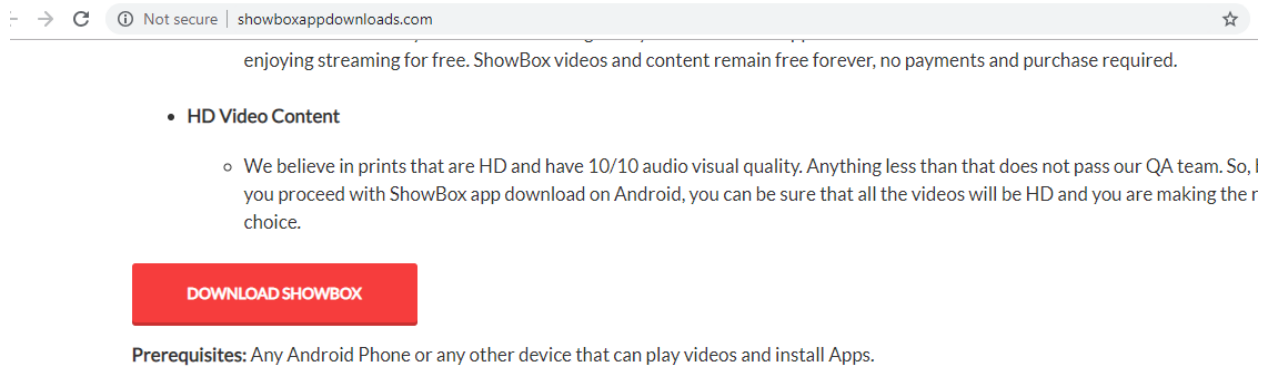


59. Upon information and belief, the address “906 Cameron Road, Buffalo, NY 14204” does not exist.

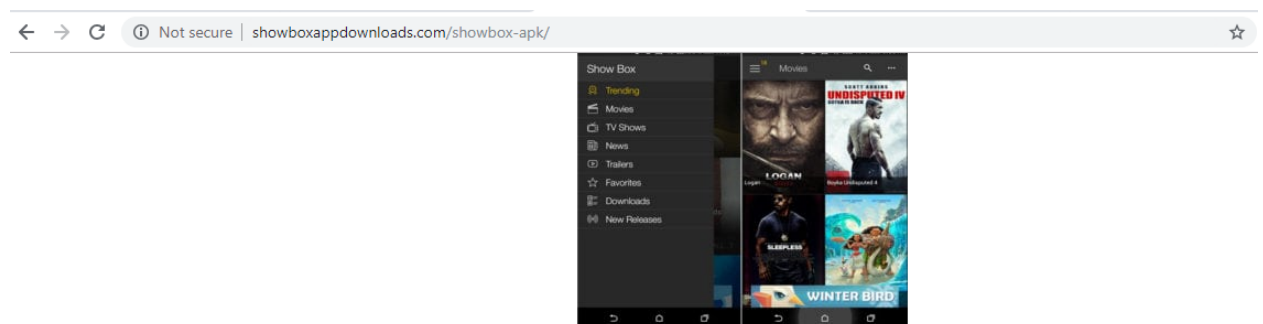
60. Upon information and belief, “Showbox App Inc.” is not a corporation organized under any state or territory of the United States, and likely does not exist at least not in the manner held out by Defendant Ipathy Srinivas Rao.

61. Upon information and belief, Defendant Ipathy Srinivas Rao fraudulently describes itself as a US located corporation in order to deceive Americans who visit the website into believing that the Show Box app is a legitimate platform for watching copyright protected content.

62. Defendant Ipathy Srinivas Rao’s website includes the link “DOWNLOAD SHOWBOX”.



63. Pressing the link DOWNLOAD SHOWBOX directs a user to the website <http://showboxappdownloads.com/showbox-apk/> where Defendant Ipathy Srinivas Rao includes an example display of the Show Box operating which shows title art of Plaintiff Millennium Funding, Inc.’s copyright protected motion picture *Undisputed IV* and a link “DOWNLOAD SHOWBOX 5.11”.



If you want to watch videos on your phone in High-Resolution Display, Show Box is the best app for that.

Showbox Apk Download

Since the app is not kept available on Google Play, the users need to get this via sideloading. So, in this article, you’re going to learn how to the Show Box app on an Android device.

The current version is Showbox apk 5.11 with Music streaming. We always recommend, using the latest updated version of the Show Box. we all know, there are so many problems with this Showbox Application. So, there is always a chance for improvement in the updated vers

- [Download Showbox 5.11](#)

64. Clicking on the link “DOWNLOAD SHOWBOX 5.11” automatically begins downloading of the Show Box app.

Defendant Monitu Bansal

65. Upon information and belief, Defendant Monitu Bansal is an individual who is a resident of Noida, India.

66. Defendant Monitu Bansal operated an interactive website showbox.software as of Aug. 31, 2018.

67. Defendant Monitu Bansal used the nameserver Cloudflare for operating the website showbox.software.

68. Defendant Monitu Bansal used the email address reportsbbstats@gmail.com when registering for nameserver service with Cloudflare.

69. Defendant Monitu Bansal registered the name “Monitu Bansal” as subscriber information with Google for the email address reportsbbstats@gmail.com.

70. On the website showbox.software, Defendant Monitu Bansal describes the Show Box app as “a free movie streaming app” which “delivers high quality video in...movies and TV shows...without needing any subscription.”

71. On the website showbox.software, Defendant Monitu Bansal describes the Show Box app as including features such as “Find the best content from all

around the world, the latest movies, popular TV shows...” and “You do not buy any subscription from ShowBox to stream media content on your device...”.

72. Defendant Monitu Bansal’s website showbox.software includes links to download the Show Box app for iOS, PC and Android operating systems.

73. As of November 13, 2018, Defendant Monitu Bansal’s website showbox.software redirects to showbox.red.

74. The website showbox.red describes the Show Box app as “lets you read reviews about the latest movies and TV shows on your phone...and this is the app every movie enthusiast should have in their smart phone because it is absolutely free.”

75. The website showbox.red also includes links to download the Show Box app for iOS, PC and Android operating systems.

76. Upon information and belief, the website showbox.red is also owned by Defendant Monitu Bansal.

77. Upon information and belief, Defendant Monitu Bansal also owns the domain mobdro.software where he promotes and distributes the software application Mobrdo for the purpose of infringing copyright protected motion pictures.

https://mobdro.software/download/

START NOW

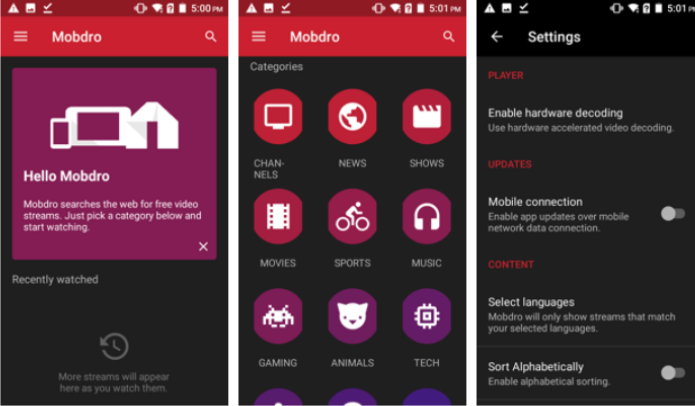
3 Easy Steps:

- 1) Click 'Start Now'
- 2) Download on our website!
- 3) Get access to your inbox

My Inbox Helper

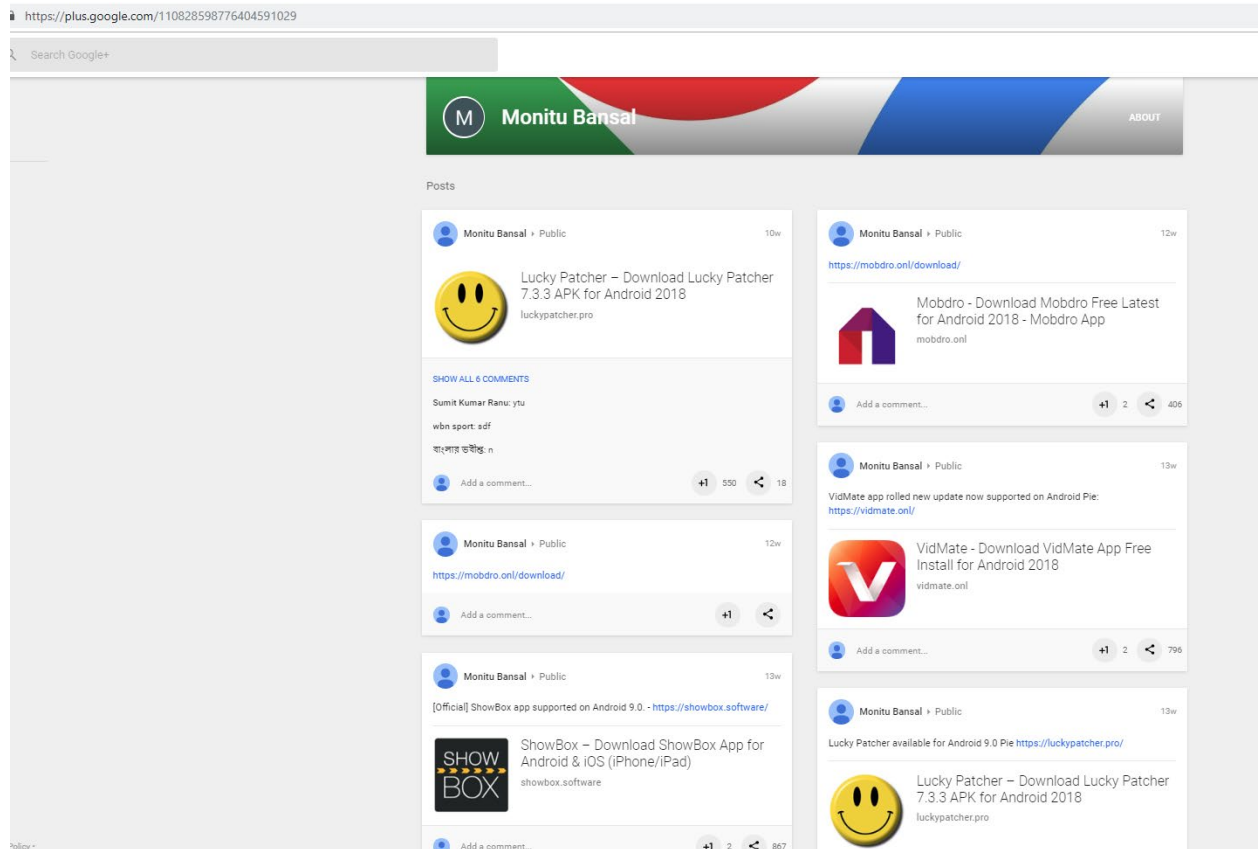
Mobdro is an android app that allows you to watch your favourite movie and TV shows in HD quality. Wide range of channel library, compatible with all devices and screens, for free.

Note: Since Mobdro is a third-party app your Android device might block the installation so make sure you're allowing apps installation from third-party sources. *If already not, navigate to Settings >> Security >> Device Administration >> Toggle "Unknown Sources".*



- Wide range of exclusive content in different languages.
- No subscription required.
- Change resolution during video play.
- High-speed, lightweight and consumes less bandwidth.
- Supports offline mode.

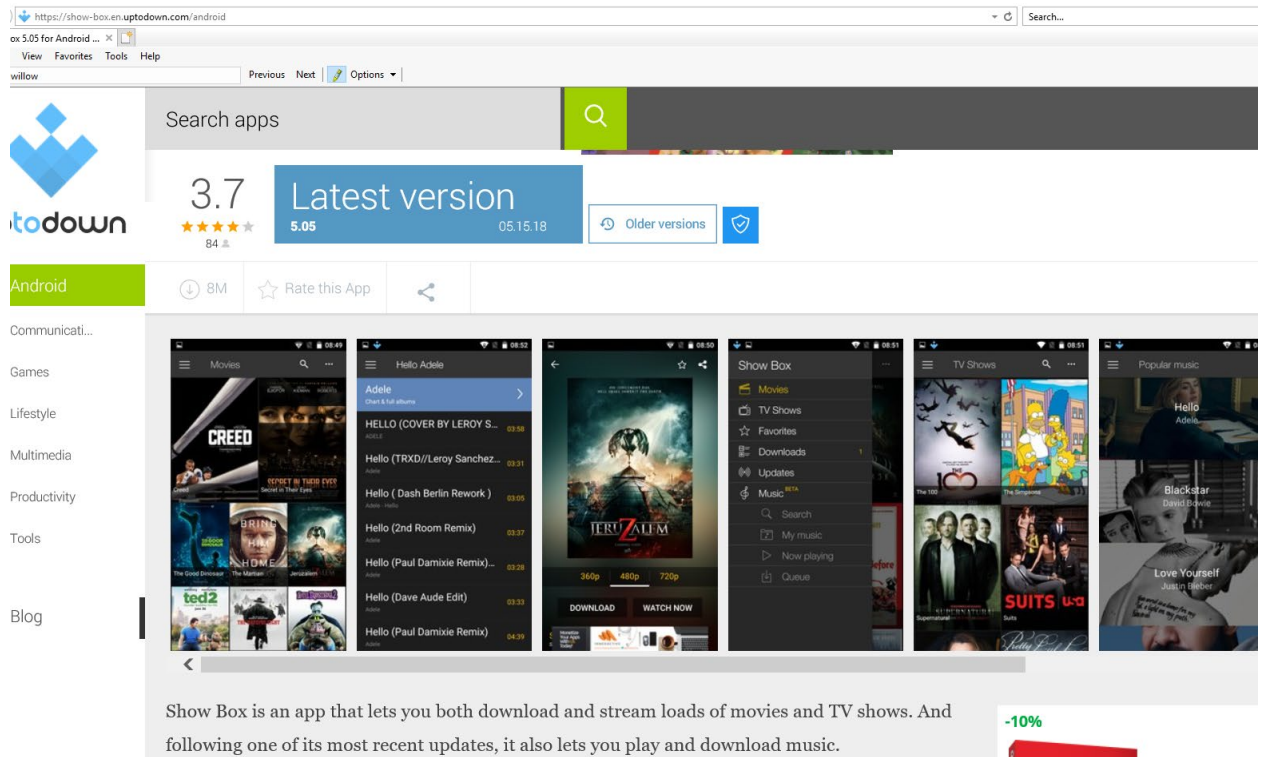
78. Defendant Monitu Bansal maintains a publicly viewable social media website at Google Plus at the website <https://plus.google.com/110828598776404591029> as of Nov. 13, 2018. Here he promotes the Show Box app at website address showbox.software and the streaming app mobdro at the website address <https://mobdro.onl/download/> which redirects to mobdro.software upon being clicked as well as numerous other dubious software applications.



79. Defendant DOE 5 d/b/a show-box.en.uptodown.com/android

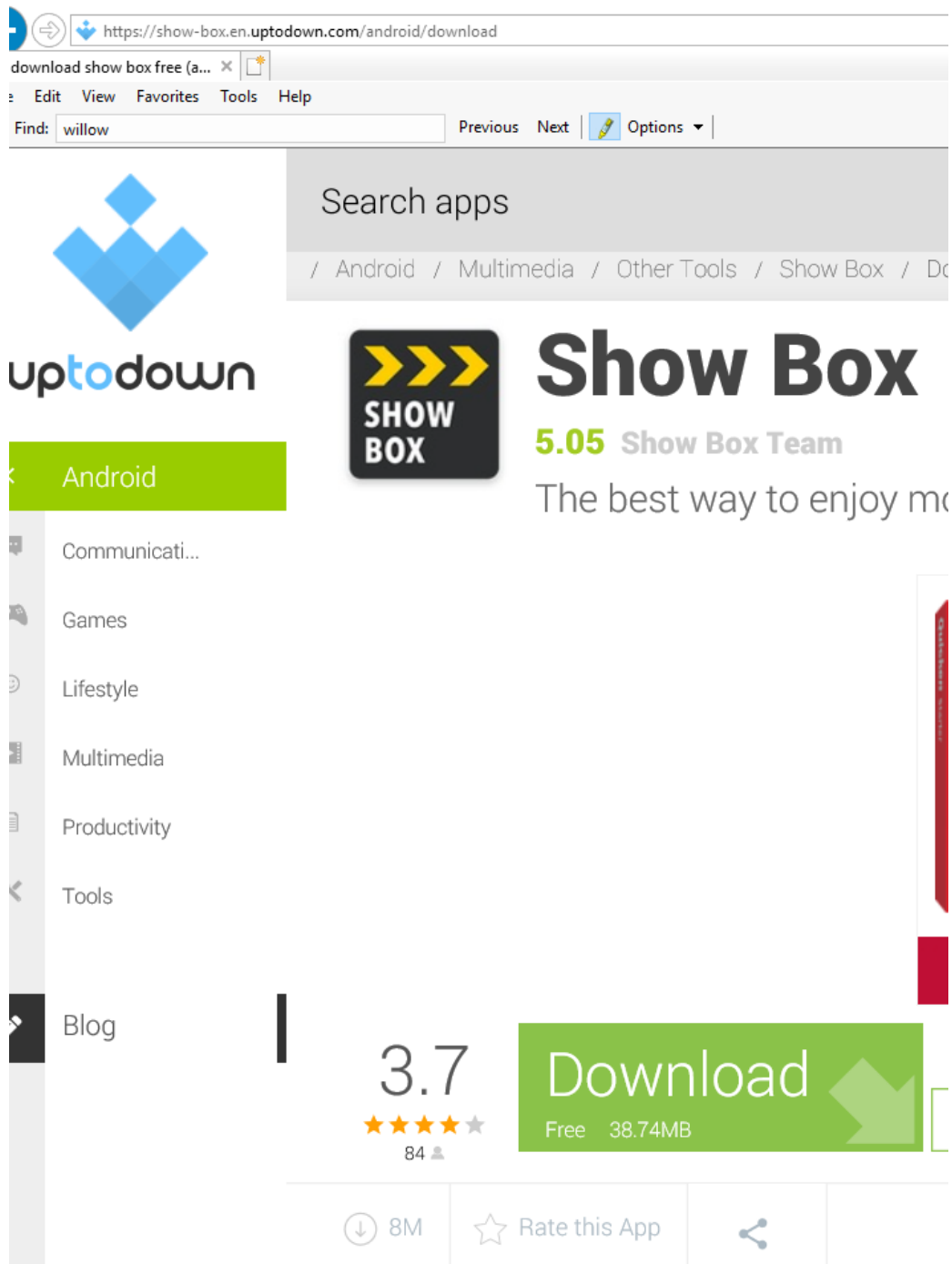
80. Defendant DOE 5 placed the Show Box app on the android application oriented website and a description promoting the Show Box app as a tool for infringing Copyright protected content as recently as November 11, 2018.

81. On the website Defendant DOE 5 describes the Show Box app as “an app that lets you both download and stream loads of movies and TV shows. And following one of its most recent updates, it also lets you play and download music.”



82. Clicking on the link “Latest version” on the website leads to a website <https://show-box.en.uptodown.com/android/download>.

83. The website <https://show-box.en.uptodown.com/android/download> includes a green “Download” button, which begins download of an installation file for the Show Box app when clicked.



84. Defendants have gone to great lengths to conceal themselves from the public, including by using multiple false identities and addresses associated with their operations and purposely-deceptive contact information for their websites.

85. The Show Box app users in Hawaii are motivated to download and use the Show Box app for its infringing purpose because of the promotions of Defendants of the Show Box app as an application for infringing copyright protected Works, including Plaintiffs.

86. Defendants benefit financially from the infringement of the Works by the Hawaii users of the Show Box app.

IV. JOINDER

87. 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 for streaming and distributing Plaintiffs' Works; and (b) that there are common questions of law and fact.

88. 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 distribution of 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

89. The Plaintiffs are the owners of the copyright in the Works, respectively. The Works are the subjects of copyright registrations, and this action is brought pursuant to 17 U.S.C. § 411. *See* Exhibit “1”.

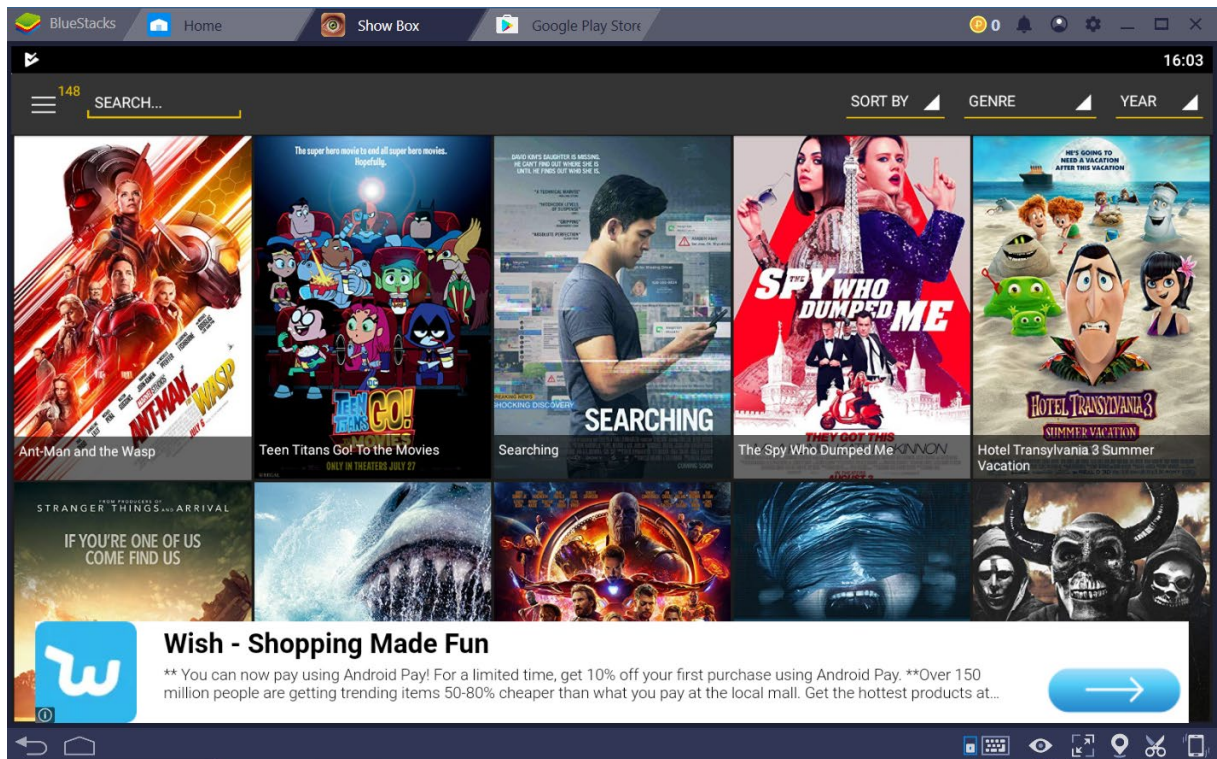
90. Each of the Works are motion pictures currently offered for sale in commerce.

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

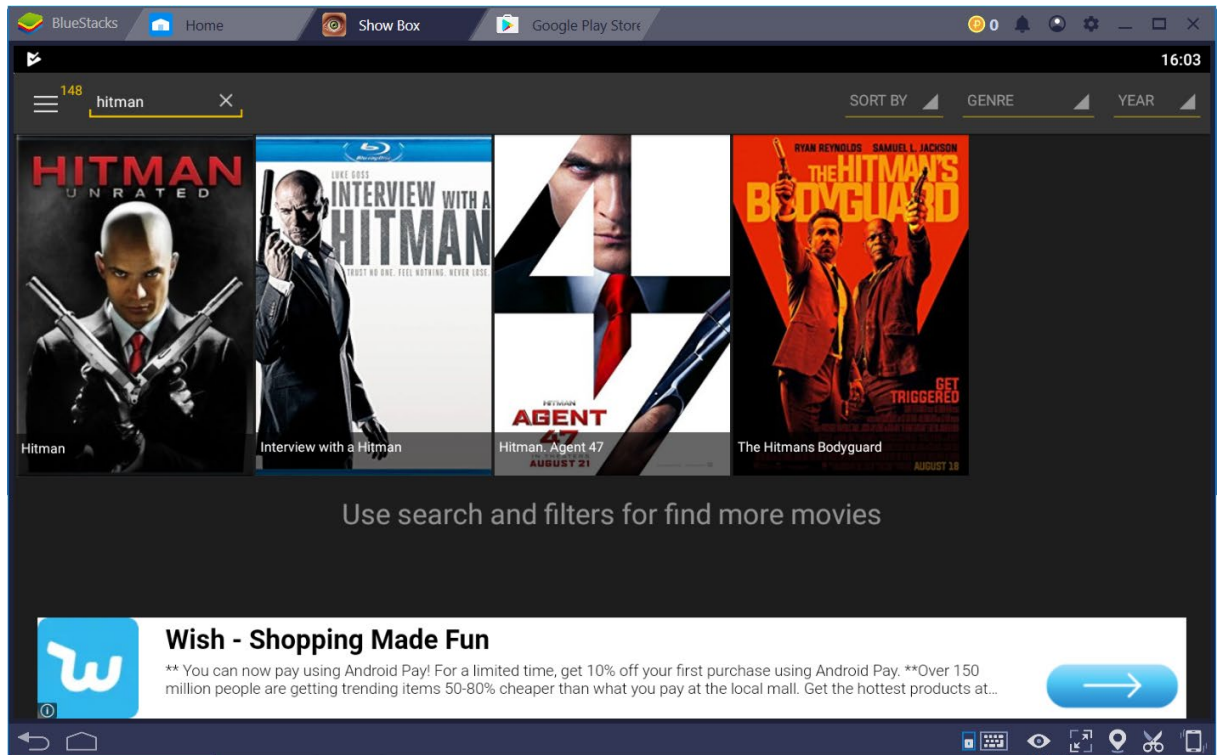
92. Defendants also had notice of Plaintiffs’ rights through general publication and advertising associated with the motion picture, and packaging and copies, each of which bore a proper copyright notice.

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

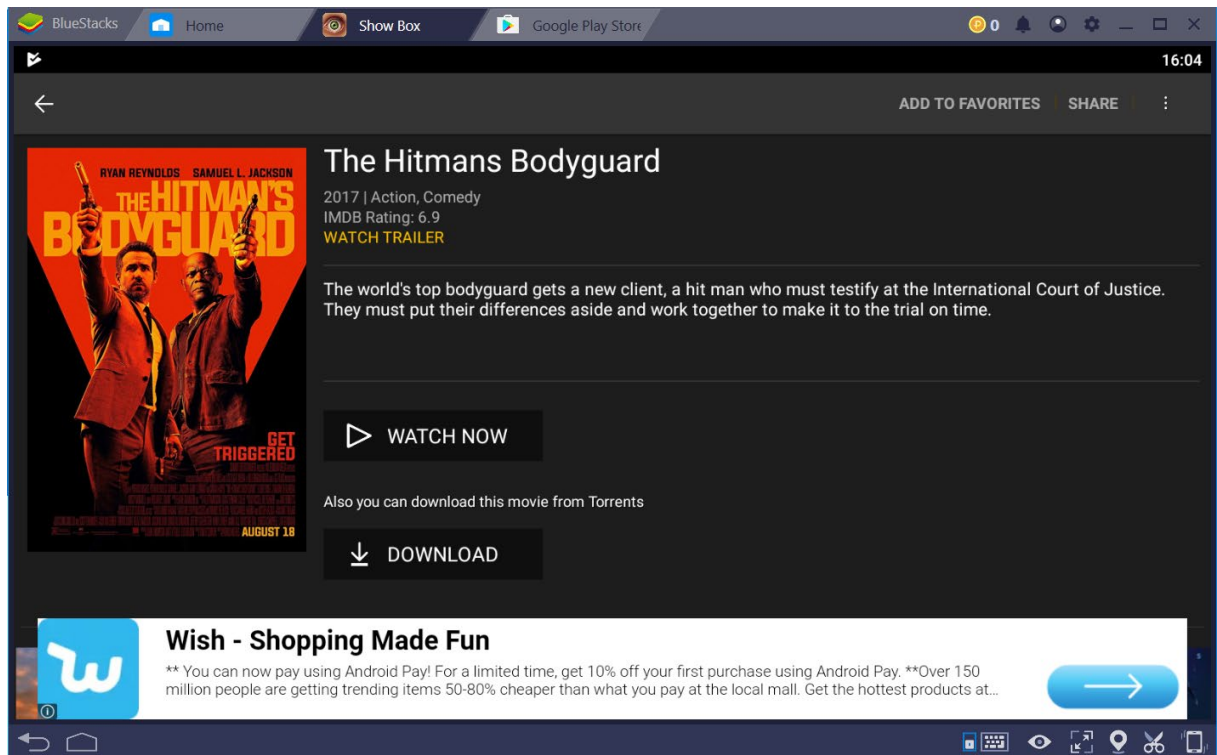
93. The Show Box app provides an interface so that users can easily copy copyright protected content. The home interface includes a search bar where a user can enter words associated with a copyright protected motion picture they wish to copy, title art of popular movies, and advertisement banners.



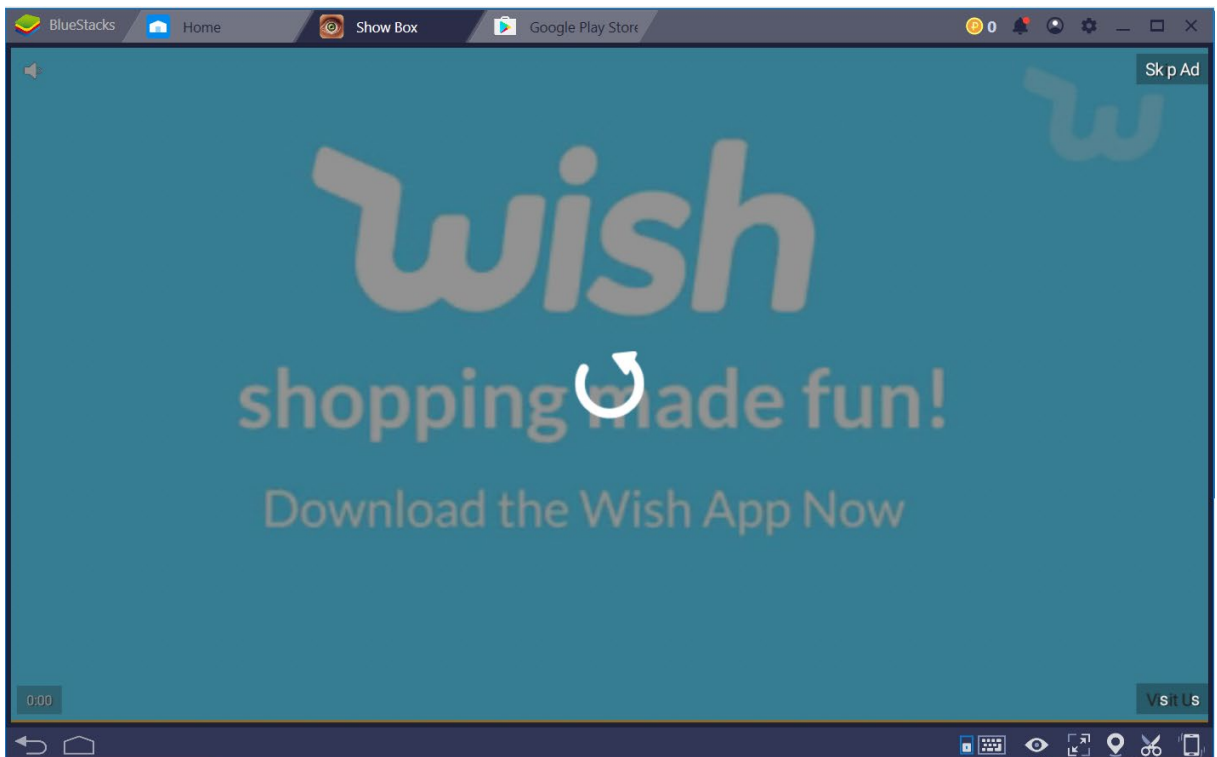
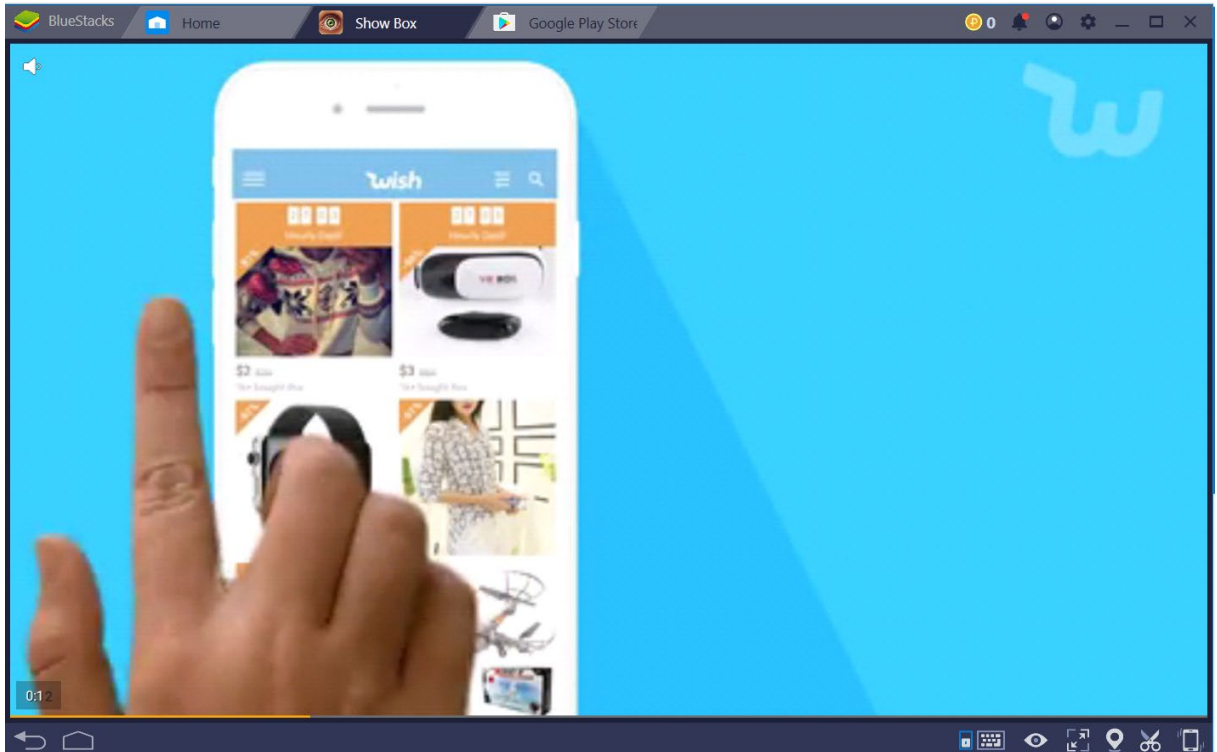
94. Simply entering a title associated with a motion picture automatically returns a narrowed selection of motion pictures along with the advertisement banner.



95. Upon choosing a title from the narrowed selection, the Show Box app provides two options for copying the content: “WATCH NOW” and “DOWNLOAD” along with the advertisement banner.

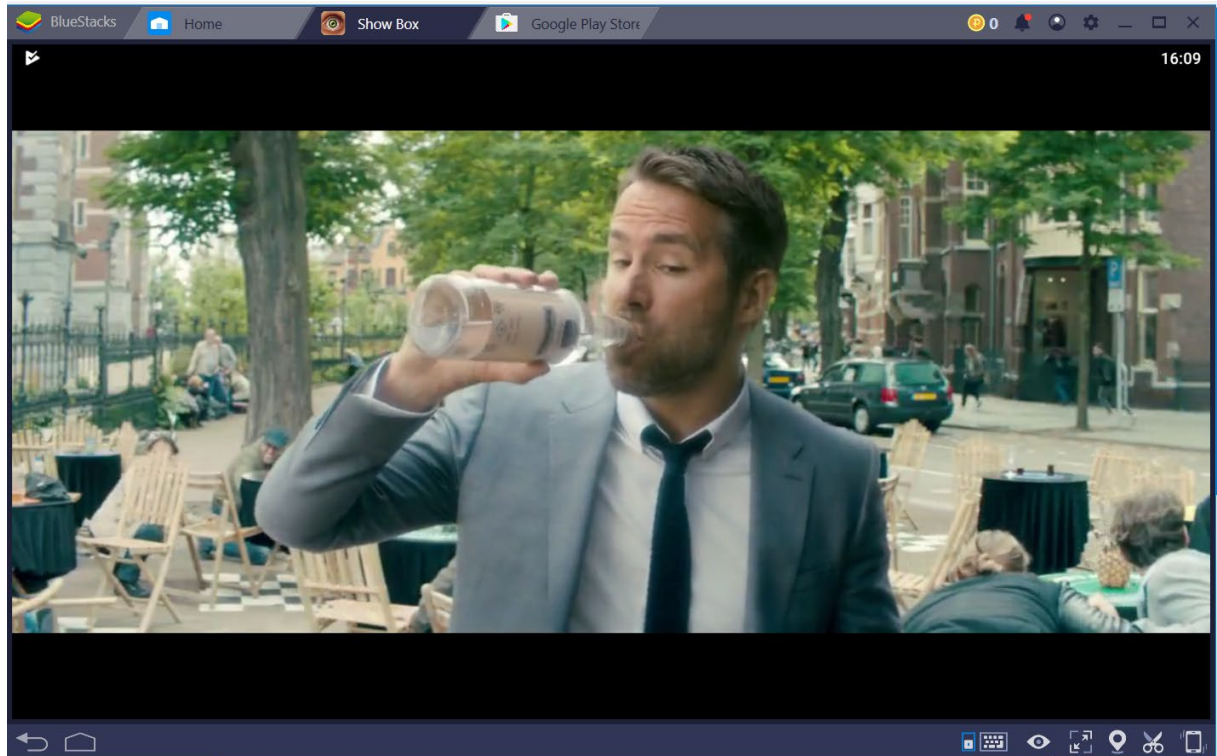


96. After selection “WATCH NOW”, the Show Box app first reproduces a short advertisement for a product. Upon information and belief, these product advertisements were placed by the Galbatross Defendants through their solicitation of partners on their website showboxappdownload.co.



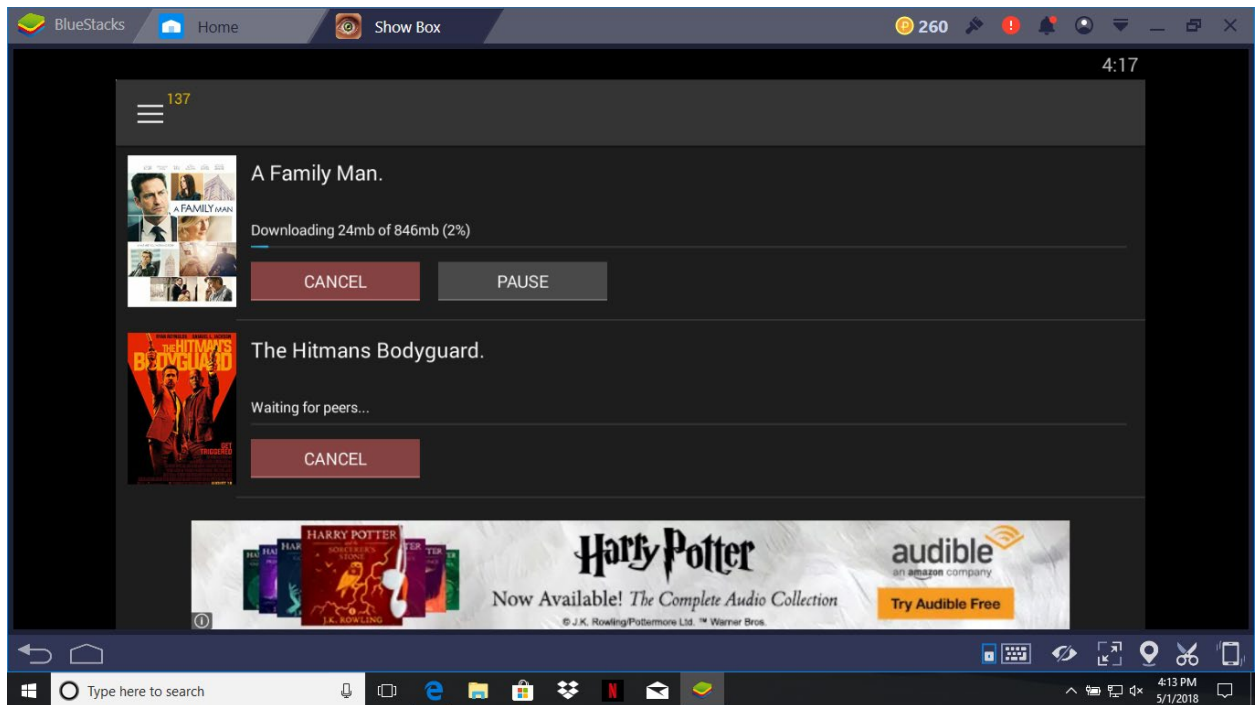
97. After the advertisement concludes, the Show Box app reproduces a complete copy of the selected motion picture – in the below case *The Hitman's*

Bodyguard.



98. 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'.

99. When the user chooses the DOWNLOAD button, 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.



100. Above the DOWNLOAD button is written, “Also, you can download this movie from Torrents”. 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.

101. 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 button, the user begins receiving different piece of the copyrighted Works from peers.

102. 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.

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

104. Defendants advertise the Show Box app for being used for infringing Copyright protected Works, including Plaintiffs.

105. Defendants' 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.

106. Defendants promote 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.

107. Defendants urge the Show Box app users to stream or download infringing content.

108. The commercial value of Defendants' Show Box app business depends on high-volume use of unauthorized content through the Show Box app. Defendants promise the Show Box users reliable and convenient access to all the content they can stream and download and users install the Show Box app on their devices based on Defendants' apparent success in delivering infringing content to their customers.

109. The Show Box app includes numerous advertisements that, upon information and belief, provides financial compensation to Defendants.

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

110. James Sosa, a Hawaii resident, downloaded the Show Box app to his Dell tablet while in Hawaii.

111. James Sosa used the download function and/or Watch Now function of the Show Box app to reproduce at least a portion of Plaintiff MON, LLC's motion picture *Singularity* on November 19, 2017 while in Hawaii.

112. Kazzandra Pokini, a Hawaii resident, used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the motion picture of Plaintiff Headhunter, LLC's motion picture *A Family Guy* and Plaintiff Millennium Funding, Inc.'s motion pictures *Mechanic: Resurrection* on or around July 1, 2017 while in Hawaii.

113. An individual at Internet Protocol (IP) address 72.235.194.7 in Hawaii installed the Show Box app on his device and used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the motion picture *Once Upon a Time in Venice* on July 5, 2017 while in Hawaii.

114. An individual at Internet Protocol (IP) address 70.212.133.24 in Hawaii installed the Show Box app on his device and used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the motion picture *Once Upon a Time in Venice* on July 16, 2017 while in Hawaii.

115. Chenie A. Horcajo, a resident of Hawaii, installed the Show Box app on his tablet device and used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the Plaintiff Bodyguard Productions, Inc.'s motion picture *The Hitman's Bodyguard* on or around Dec. 13, 2017 while in Hawaii.

116. Keith Norton, a resident of Hawaii, installed the Show Box app on his device and used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the Plaintiff Bodyguard Productions, Inc.'s motion picture *The Hitman's Bodyguard* on or around Aug. 28, 2017 while in Hawaii.

117. Margaret Burrows, a resident of Hawaii, installed the Show Box app on her device and used the download and/or Watch Now function of the Show Box app to reproduce at least a portion of the Plaintiff Millennium Funding, Inc.'s motion picture *London Has Fallen* on or around Aug. 8, 2016 while in Hawaii.

**VI. FIRST CLAIM FOR RELIEF
(Contributory Copyright Infringement based upon Inducement of Streaming)**

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

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

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

Plaintiffs' exclusive rights under the Copyright Act.

121. 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, the Show Box app 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 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 users click on a link for the content.

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

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

124. 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.

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

**VII. SECOND CLAIM FOR RELIEF
(Contributory Copyright Infringement based upon Inducement of
Torrenting)**

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

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

128. Defendants have actual knowledge of third parties' infringement of Plaintiffs' exclusive rights under the Copyright Act.

129. 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 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 Show Box app users.

130. Once the Show Box app user 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.

131. 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 Show Box app users click on a link for the content.

132. Defendants induce the aforementioned acts of infringement by supplying the Show Box app 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 their Show Box app for blatant copyright infringement.

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

134. 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.

135. 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)**

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

137. 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.

138. 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 and promote the use of the Show Box app to connect customers to unauthorized online sources that stream and download 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 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 the content, and they actively and directly cause the content to be streamed and/or distributed when Show Box app users click on a link for the content.

139. 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 Show Box app users and infringing operators of the streaming and Torrent services, and by actively encouraging, promoting, and contributing to the use of their Show Box app for blatant copyright infringement.

140. 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.

141. 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.

142. 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.

143. 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.

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

145. IX. FOURTH CLAIM FOR RELIEF
146. (Copyright Infringement)

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

148. Plaintiffs are the owners of the title art of the motion pictures which each contains an original work of authorship.

149. Defendants' Show Box app reproduces the title art of Plaintiffs' motion pictures when users enter search terms associated with their motion pictures.

150. The Plaintiffs did not authorize, permit, or provide consent to the Defendants to copy, reproduce, redistribute, perform, or display the title art.

151. Defendants did not have a license to display Plaintiffs' title art in the Show Box app.

152. Plaintiff TBV Productions, LLC is the owner in the copyright in the motion picture *I Feel Pretty*.

153. Defendant Rajat Kulshrestha displays a screenshot of the motion picture *I Feel Pretty* on his website show-box.one.

154. Plaintiff TBV Productions, LLC did not authorize, permit, or provide consent to Defendant Rajat Kulshres to copy, reproduce, redistribute, perform, or display any portions of the motion picture *I Feel Pretty* on his website show-box.one.

155. Defendant Rajat Kulshres did not have a license to display any portions of Plaintiff TBV Productions, LLC's motion picture *I Feel Pretty* on his website show-box.one.

156. Plaintiff Millennium Funding, Inc. is the owner of the title art associated with the motion picture "*Boyka Undisputed IV*" a/k/a "*Undisputed 4*".

157. Defendant Ipathy Srinivas displays title art of the motion picture *Undisputed 4* on the website showboxappdownloads.com/showbox-apk/.

158. Plaintiff Millennium Funding, Inc. did not authorize, permit, or provide consent to Defendant Ipathy Srinivas to copy, reproduce, redistribute, perform, or display the title art associated with the motion picture *Undisputed 4* on the website showboxappdownloads.com/showbox-apk/.

159. Defendant Ipathy Srinivas did not have a license to displays title art of the motion picture *Undisputed 4* on the website showboxappdownloads.com/showbox-apk/.

160. As a result of the foregoing, each Defendant violated the Plaintiffs' exclusive right to: (A) Reproduce the Work in copies, in violation of 17 U.S.C. §§ 106(1) and 501; (B) Redistribute copies of the Work to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501; (C) Perform the copyrighted Work, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the Work's images; and, (D) Display the copyrighted Work, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the Work non-sequentially and transmitting said display of the Work by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publicly" display.)

161. 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 infringe and/or 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 Defendants' websites immediately remove all versions of the software application Show Box, including but not limited to: ShowBox 5.02 .APK, ShowBox 5.01 .APK, ShowBox 5.0 .APK, ShowBox 4.96 .APK, ShowBox 4.95 .APK, ShowBox 4.94 .APK, ShowBox 4.93 .APK, ShowBox 4.92 .APK, ShowBox 4.91 .APK, ShowBox 4.69 .APK 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;

(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, November 16, 2018.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs