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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA

12

13 DISNEY ENTERPRISES, INC., a
Delaware corporation; UNIVERSAL
14 CITY STUDIOS PRODUCTIONS
LLLP, a Delaware limited liability
15 limited partnership,

16 Plaintiffs,

17

v.

18 66STAGE.COM, a business entity of
unknown form; and NASRI FAICAL, an
19 individual, d/b/a 66STAGE.COM,

20 Defendants.

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CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

FILED

CASE NO. CV 08-08482 RGK (FFMx)

**FIRST AMENDED COMPLAINT
FOR:**

**(1) UNITED STATES COPYRIGHT
INFRINGEMENT (17 U.S.C. §§ 101,
ET SEQ.)**

**(2) JAPANESE COPYRIGHT
INFRINGEMENT (ACT NO. 48 OF
1970)**

1 Plaintiffs Disney Enterprises, Inc. and Universal City Studios Productions
2 LLLP (collectively, "Plaintiffs") for their First Amended Complaint against
3 defendants 66stage.com and Nasri Faical d/b/a 66stage.com (collectively,
4 "Defendants") allege as follows:
5

6 **NATURE OF THE ACTION**

7 1. This is a civil action for damages and for injunctive and related relief
8 against Defendants for violations of the United States Copyright Act of 1976, 17
9 U.S.C. §§ 101, *et seq.*, and violations of the Copyright Act of Japan, Act No. 48 of
10 1970. This action arises out of Defendants' infringement of copyrights in
11 numerous motion pictures and other audiovisual works to which Plaintiffs own or
12 control copyright and/or exclusive distribution rights ("Plaintiffs' copyrighted
13 works").

14 2. Defendants own and operate the website www.66stage.com
15 ("66stage" or the "Website"), whose purpose is to promote, facilitate, aid and abet,
16 and profit from the infringement of Plaintiffs' copyrighted works. 66stage is a for-
17 profit "one-stop-shop" for infringing copies of Plaintiffs' copyrighted works.
18 Specifically, Defendants post, organize, search for, identify, collect and index links
19 to infringing material that is available on third-party websites (including, for
20 example, the third party website Megavideo.com). Plaintiffs are informed and
21 believe, and based thereon allege, that Defendants profit from their misconduct by
22 displaying advertisements adjacent to the infringing content (including Plaintiff's
23 copyrighted works) that plays on their site. Defendants' conduct constitutes
24 copyright infringement.

25 3. As alleged in detail below, by virtue of their conduct, Defendants
26 violate the United States Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.*, and the
27 Copyright Act of Japan, Act No. 48 of 1970.
28

1 **THE PARTIES**

2 4. Plaintiff Disney Enterprises, Inc. (“Disney”) is a corporation duly
3 incorporated under the laws of the State of Delaware with its principal place of
4 business located in Burbank, California.

5 5. Plaintiff Universal City Studios Productions LLLP (“UCSP”) is a
6 limited liability limited partnership duly organized under the laws of the State of
7 Delaware with its principal place of business located in Universal City, California.

8 6. Defendants own and/or operate a website, www.66stage.com, at the
9 Internet Protocol address 213.175.195.133. On information and belief, Defendants
10 engage in and profit from infringing activity in this judicial district.

11 7. Defendant 66stage.com is a business entity of unknown form.

12 8. Defendant Nasri Faical d/b/a 66stage.com (“Faical”), previously sued
13 as DOE 1, is an individual. On information and belief, Defendant Faical is a
14 citizen of Morocco and is currently domiciled in Japan.

15
16 **JURISDICTION AND VENUE**

17 9. The Court has subject matter jurisdiction over this action under 28
18 U.S.C. §§ 1331 (federal question), under 1338(a) (any act of Congress relating to
19 copyright), under the United States Copyright Act, 17 U.S.C. §§ 101, *et seq.*, and
20 under 28 U.S.C. § 1332 (diversity of citizenship) in that there is complete diversity
21 of citizenship between the parties and the amount in controversy, exclusive of
22 interests and costs, exceeds the sum of \$75,000. This Court has supplemental
23 jurisdiction over the Japanese claims pursuant to 28 U.S.C. § 1367, as all claims
24 herein form part of the same case or controversy. Convenience, fairness, and the
25 full and efficient resolution of disputes favor the exercise of supplemental
26 jurisdiction.

27 10. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b)
28 and (c) and 1400(a), and because Defendants, by their infringing activities,

1 intentionally and knowingly caused the damages and other harmful effects
2 complained of herein, which are suffered in the United States and in California,
3 where Plaintiffs have their principle places of business and which is the heart of
4 the television and motion picture industry.

5 11. This Court has personal jurisdiction over Defendants because
6 Defendants have purposefully directed their activities at the United States and at
7 California. Specifically, Plaintiffs allege that (a) each of the Defendants or their
8 respective agents are doing or have been doing business continuously in the State
9 of California and this district, (b) a substantial part of the wrongful acts committed
10 by Defendants, and each of them, have occurred in interstate commerce, in the
11 State of California, and in the Central District of California, and (c) Defendants
12 know that the damages and other harmful effects of Defendants' infringing
13 activities occur in the United States and primarily in California, where Plaintiffs
14 have their principle places of business and which is the heart of the television and
15 motion picture industry.

16
17 **BACKGROUND FACTS**

18 **Plaintiffs' Copyrighted Works**

19 12. Plaintiffs and certain of their affiliates are producers, distributors,
20 and/or exclusive licensees of motion pictures and television programs in the United
21 States. Plaintiffs are, among other things, engaged in the business of developing,
22 producing, distributing, and/or licensing to others, the right to copy, distribute,
23 transmit, and exhibit copyrighted motion pictures, television programs and/or other
24 audiovisual works.

25 13. Plaintiffs, either directly or through their affiliates or licensees,
26 distribute their copyrighted works in various forms including, without limitation,
27 for exhibition in theaters, through television broadcasts, over the Internet, and
28 through cable and direct-to-home satellite services (including basic, premium,

1 “pay-per-view,” and “video on demand” (“VOD”) television services). In
2 addition, Plaintiffs distribute their motion pictures and television programs on
3 digital versatile discs (“DVDs”) and other formats, including next generation and
4 high definition discs, by selling them directly or indirectly to the home viewing
5 market or licensing them to others to do so. Plaintiffs also distribute their
6 copyrighted works, among other ways, through Internet-based streaming and
7 download services and other media or license others to do so. Plaintiffs also offer
8 streaming video clips of many of their popular television shows and other
9 copyrighted works through their own websites (such as disney.go.com) or through
10 licensees.

11 14. Each Plaintiff or its predecessor-in-interest is the owner or exclusive
12 licensee of United States copyrights in a substantial number of motion pictures
13 and/or television programs. Attached hereto as Exhibit A and incorporated herein
14 by reference is an illustrative schedule of some of the motion pictures in which
15 Plaintiffs are the owners or exclusive licensees.

16 15. By way of illustration, Plaintiffs are the owners or exclusive licensees
17 of United States copyrights in the following motion pictures: Plaintiff Disney
18 (*Finding Nemo*) and Plaintiff UCSP (*Atonement*).

19 16. Plaintiffs have registered with the United States Copyright Office
20 their copyrights in the works identified in Paragraph 15 above and in Exhibit A.

21 17. Plaintiffs and certain of their affiliates have invested (and continue to
22 invest) substantial sums of money and effort each year to develop, produce, and
23 distribute motion pictures and/or television programs protected under copyright
24 and other laws. Defendants’ actions, as described below, infringe Plaintiffs’
25 exclusive rights under the United States Copyright Act and the Copyright Act of
26 Japan and other laws and diminish the economic value of such rights.

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1 **Defendants' Unlawful Activities**

2 18. As alleged hereinabove, Defendants operate a website called 66stage,
3 located at www.66stage.com. The primary purpose of 66stage is to disseminate to
4 its users content that has been unlawfully reproduced, distributed, publicly
5 performed, publicly displayed, and/or publicly transmitted that is available on
6 third-party Internet websites. 66stage facilitates the ability of its users to have
7 access, on demand, to copyrighted movies and other audiovisual works that have
8 been unlawfully reproduced, distributed, publicly performed, publicly displayed,
9 and/or publicly transmitted in violation of Plaintiffs' copyrights.

10 19. Defendants' website is a one-stop shop for infringing material.
11 Specifically, Defendants' 66stage website provides links to infringing content
12 available on third-party websites. Defendants make such infringing content easily
13 accessible to users by creating and maintaining an index of links to the infringing
14 content available on third-party sites. Most, if not all, of the content indexed on
15 and available via 66stage's website is infringing, unauthorized copyrighted
16 content, including Plaintiffs' copyrighted works.

17 20. The home page (www.66stage.com) features an index of links to
18 infringing motion pictures, including under the category "Popular Movies This
19 Week" and organized by the third party hosting website (*e.g.*, Megavideo.com).
20 The 66stage website contains links to thousands of motion pictures and television
21 programs, including hundreds of motion pictures released during 2008 and 2009.
22 Among these titles are works that are currently being exhibited in movie theaters
23 (*e.g.*, *Earth and Land of the Lost*).

24 21. To watch an infringing copy of a work using Defendants' 66stage
25 website, the user clicks on the title of a particular infringing work from 66stage's
26 index. The 66stage website then immediately displays a window that "streams"
27 the work to the viewer on a video player framed by a 66stage webpage.

28

1 22. Plaintiffs are informed and believe, and based thereon allege, that
2 Defendants manage their website by identifying, selecting, posting, and organizing
3 links to third-party websites containing infringing content. Defendants exercise
4 control over the selection and organization of the links to infringing content
5 available on their website. Defendants explicitly represent that “new working
6 Movies and TV Shows are added on a daily basis.”

7 23. Most, if not all, of the content available for streaming through 66stage
8 is infringing copyrighted video content, including Plaintiffs’ copyrighted works.
9 Furthermore, Defendants know and intend that the links on their 66stage website
10 consist of links to unauthorized infringing copies of copyrighted works, including
11 Plaintiffs’ copyrighted works. The fundamental purpose of 66stage is to further
12 the illegal dissemination and to contribute to, and aid and abet the illegal
13 dissemination of infringing works.

14 24. By virtue of the conduct alleged hereinabove, Defendants knowingly
15 promote, participate in, facilitate, assist, enable, materially contribute to,
16 encourage, and induce copyright infringement, thereby secondarily infringing and
17 aiding and abetting the infringement of the copyrights in Plaintiffs’ copyrighted
18 works, including but not limited to those listed in Exhibit A attached to this First
19 Amended Complaint.

20 25. No Plaintiff has granted any license, permission, authorization, or
21 consent to Defendants to use or exploit any of Plaintiffs’ copyrighted works.
22 Instead, in violation of Plaintiffs’ rights under copyright law, Defendants have
23 willfully, intentionally, and knowingly facilitated, enabled, induced, materially
24 contributed to, and aided and abetted infringing uses thereof.

25 26. Defendants’ conduct causes substantial harm to Plaintiffs and to their
26 intellectual property. Among other things, Defendants’ conduct interferes with the
27 continued growth and development of numerous emerging legitimate services
28

1 offering consumers a means to obtain and view copies of audiovisual works on the
2 Internet and through other channels of distribution.

3
4 **FIRST CLAIM FOR RELIEF**
5 **(Contributory Copyright Infringement**
6 **Under The United States Copyright Act)**

7 **17 U.S.C. §§ 101, *et seq.***

8 27. Plaintiffs incorporate by reference each and every allegation set forth
9 in Paragraphs 1 through 26, inclusive, as though fully set forth herein.

10 28. Plaintiffs own the United States copyrights or the pertinent exclusive
11 rights, including without limitation the reproduction, distribution, public
12 performance, and public display rights, in and to the copyrighted works listed in
13 Paragraph 15 and in Exhibit A, as well as many other motion pictures and other
14 audiovisual works.

15 29. Plaintiffs (or their predecessors) have obtained copyright registration
16 and/or preregistration certificates for each work listed in Exhibit A. In doing so,
17 Plaintiffs have complied in all respects with 17 U.S.C. §§ 101, *et seq.*, the statutory
18 deposit and registration requirements thereof, and all other laws governing federal
19 copyrights.

20 30. By virtue of the availability of infringing copies of Plaintiffs'
21 copyrighted works on third-party websites, Plaintiffs' exclusive rights of
22 reproduction, distribution, public performance, and public display have been
23 infringed in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

24 31. Plaintiffs are informed and believe, and based thereon allege, that
25 Defendants know or have reason to know of the aforesaid infringement of
26 Plaintiffs' copyrighted works, and Defendants materially contribute to and further
27 such infringement. The infringement of Plaintiffs' copyrighted works on 66stage
28 is open and notorious. Furthermore, the purpose and function of 66stage is the

1 illegal dissemination of Plaintiffs' copyrighted works. Plaintiffs' copyrighted
2 works are well-known and recognizable, and even a cursory review of the 66stage
3 website reveals that it provides access to numerous infringing copies of Plaintiffs'
4 copyrighted motions pictures.

5 32. By enabling, causing, facilitating, materially contributing to, and
6 encouraging the unauthorized reproduction, distribution, public performance, and
7 public display, of unauthorized copying of Plaintiffs' copyrighted works (including
8 the works listed in Exhibit A) in the manner described above, with full knowledge
9 of the illegality of such conduct, Defendants contribute to and induce a vast
10 number of copyright infringements, including infringements of Plaintiffs'
11 copyrighted works, in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

12 33. The unauthorized reproduction, distribution, public performance, and
13 public display of Plaintiffs' copyrighted works that Defendants enable, cause,
14 materially contribute to, and encourage through the acts described above are
15 without Plaintiffs' consent and are not otherwise permissible under the Copyright
16 Act.

17 34. Plaintiffs are informed and believe, and based thereon allege, that the
18 foregoing acts of infringement by Defendants have been willful, intentional, and
19 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive
20 rights under copyright.

21 35. As a direct and proximate result of Defendants' infringement of
22 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have
23 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their
24 actual damages plus Defendants' profits from infringement of Plaintiffs'
25 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,
26 Plaintiffs are entitled to the maximum statutory damages as permitted by federal
27 copyright law.

28

1 36. Defendants' acts have caused and continue to cause substantial
2 irreparable harm to Plaintiffs. Unless Defendants are enjoined from engaging in
3 their wrongful conduct, Plaintiffs will suffer further irreparable injury and harm,
4 for which they have no adequate remedy at law.

5 37. Plaintiffs are entitled to their attorneys' fees and full costs pursuant to
6 17 U.S.C. § 505.

7
8 **SECOND CLAIM FOR RELIEF**
9 **(Inducement of Copyright Infringement**
10 **Under The United States Copyright Act)**
11 **17 U.S.C. §§ 101, et seq.**

12 38. Plaintiffs incorporate by reference each and every allegation set forth
13 in Paragraphs 1 through 26 and 29 through 31, inclusive, as though fully set forth
14 herein.

15 39. Defendants are liable under the Copyright Act for inducing and
16 encouraging the acts of direct copyright infringement hereinabove alleged.
17 Defendants operate the 66stage website with the object of promoting the use of the
18 website to infringe Plaintiffs' copyrights, evidenced by Defendants' clear
19 expression and/or other affirmative steps taken to foster infringement.

20 40. Defendants' unlawful objective to promote infringement is
21 demonstrated by numerous indicia including, without limitation, their operation of
22 a website that is almost exclusively devoted to the infringement of copyrighted
23 works and that takes affirmative steps to build a vast virtual library of links to such
24 infringing works, by satisfying a source of demand for copyright infringement, by
25 failing to develop or employ any tools or other mechanisms to diminish
26 infringement on Defendants' site, and by incorporating a business model which
27 uses infringing content to attract a high volume of visitors to the site for the
28 purpose of selling advertising.

1 41. Defendants' acts constitute inducement of copyright infringement in
2 violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

3 42. Plaintiffs are informed and believe, and based thereon allege, that the
4 foregoing acts of infringement by Defendants have been willful, intentional, and
5 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive
6 rights under copyright.

7 43. As a direct and proximate result of Defendants' infringement of
8 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have
9 sustained and will continue to sustain actual damage. Plaintiffs are entitled to their
10 actual damages plus Defendants' profits from infringement of Plaintiffs'
11 copyrighted works, as will be proven at trial. Alternatively, at Plaintiffs' election,
12 Plaintiffs are entitled to the maximum statutory damages as permitted by federal
13 copyright law.

14 44. Defendants' acts have caused and continue to cause substantial
15 irreparable harm to Plaintiffs. Unless Defendants are enjoined from engaging in
16 their wrongful conduct, Plaintiffs will suffer further irreparable injury and harm,
17 for which they have no adequate remedy at law.

18 45. Plaintiffs are entitled to their attorneys' fees and full costs pursuant to
19 17 U.S.C. § 505.

20
21 **THIRD CLAIM FOR RELIEF**

22 **(Aiding And Abetting Copyright Infringement**

23 **Under The Copyright Act of Japan)**

24 **Act No. 48 of 1970**

25 46. Plaintiffs incorporate by reference each and every allegation set forth
26 in Paragraphs 1 through 26, 29 through 31, inclusive, as though fully set forth
27 herein.

28

1 47. Pursuant to the Berne Convention for the Protection of Literary and
2 Artistic Works (“Berne Convention”), to which Japan is a signatory and member,
3 Japanese law establishes that all the dispositions of the Copyright Act of Japan are
4 applicable to creative works published in foreign countries, whatever the
5 nationality of their authors is, so long as the author’s nation of origin is a signatory
6 to the Berne Convention.

7 48. Plaintiffs are citizens and nationals of the United States and the
8 United States is a signatory to the Berne Convention.

9 49. Under the principle of national treatment, therefore, the copyright
10 protection granted to the creative works of Plaintiffs is the same as that which
11 Japanese law would grant to the creative works of a Japanese author, under Article
12 6.3 of the Copyright Act of Japan.

13 50. Pursuant to the Berne Convention, national treatment for foreign
14 works is given without any formality. The Berne Convention states that the
15 enjoyment and the exercise of rights will not be subordinated to any formality and
16 are independent of the existence of protection in the country of origin of the work.
17 As a consequence, Plaintiffs’ copyrighted works, set forth in Paragraph 15 above
18 and in Exhibit A, obtain national treatment without any formality.

19 51. Defendants are liable under the Copyright Act of Japan for aiding and
20 abetting the unlawful public transmission in Japan of Plaintiffs’ copyrighted works.
21 Defendants’ conduct violates Plaintiffs’ rights under Article 23 of the Copyright
22 Act, which, *inter alia*, entitles Plaintiffs to control the Internet transmission of their
23 copyrighted works, including the right to make available their copyrighted works
24 for public transmission.

25 52. Plaintiffs are informed and believe, and based thereon allege, that
26 Defendants know or have reason to know of the aforesaid infringement of
27 Plaintiffs’ copyrighted works, and Defendants knowingly aid and abet such
28 infringement. The infringement of Plaintiffs’ copyrighted works on 66stage is

1 open and notorious. Furthermore, the purpose and function of 66stage is to aid and
2 abet the illegal public transmission of Plaintiffs' copyrighted works. Plaintiffs'
3 copyrighted works are well-known and recognizable, and even a cursory review of
4 the 66stage website reveals that it provides access to numerous infringing copies of
5 Plaintiffs' copyrighted motions pictures.

6 53. All of Defendants' acts alleged herein were undertaken without the
7 permission, license or consent of Plaintiffs.

8 54. Plaintiffs are informed and believe, and based thereon allege, that the
9 foregoing acts of infringement by Defendants have been willful, intentional, and
10 purposeful, in disregard of and indifference to Plaintiffs' copyrights and exclusive
11 rights under copyright.

12 55. As a direct and proximate result of Defendants' infringement of
13 Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs have
14 sustained and will continue to sustain actual damage. Plaintiffs are entitled to
15 damages under Article 709 of the Civil Code of Japan (Act No. 89 of 1896).

16 56. Defendants' acts have caused and continue to cause substantial
17 irreparable harm to Plaintiffs. Unless Defendants are enjoined from engaging in
18 their wrongful conduct, Plaintiffs will suffer further irreparable injury and harm,
19 for which they have no adequate remedy at law. Plaintiffs seek an order under the
20 Copyright Act of Japan, Article 112(1), that Defendants discontinue and prevent
21 current and future infringement of Plaintiffs' copyrighted works.

22
23 **PRAYER FOR RELIEF**

24 **WHEREFORE**, Plaintiffs pray that this Court enter judgment in their favor
25 and against Defendants, as follows:

26 (a) adjudge and declare that Defendants' activities constitute contributory
27 copyright infringement, inducement of copyright infringement, and aiding and
28 abetting copyright infringement, respectively;

1 (b) preliminary and permanently enjoin, pursuant to 17 U.S.C. § 502,
2 Defendants and their officers, agents, servants, employees, attorneys, successors,
3 licensees, partners, and assigns, and all those acting directly or indirectly in concert
4 or participation with any of them, from contributorily infringing by any means
5 and/or inducing copyright infringement by any means of the exclusive rights of
6 Plaintiffs and their affiliates under the Copyright Act, including, but not limited to,
7 any of Plaintiffs' and Plaintiffs' affiliates' rights in any of the copyrighted works
8 listed in Exhibit A;

9 (c) preliminary and permanently enjoin, pursuant to Japan's Article
10 112(1), Defendants and their officers, agents, servants, employees, attorneys,
11 successors, licensees, partners, and assigns, and all those acting directly or
12 indirectly in concert or participation with any of them, from aiding and abetting
13 infringement by any means the exclusive rights of Plaintiffs and their affiliates
14 under the Copyright Act of Japan, including, but not limited to, any of Plaintiffs'
15 and Plaintiffs' affiliates' rights in any of the copyrighted works listed in Exhibit A;

16 (d) award damages that Plaintiffs have sustained or will sustain by reason
17 of Defendants' copyright infringement and all profits derived by Defendants from
18 such conduct, or in lieu thereof, should Plaintiffs so elect, such statutory damages
19 as the Court shall deem proper as provided in 17 U.S.C. § 504(c), including
20 damages for willful infringement for each act of copyright infringement;

21 (e) award damages under Article 709 of the Civil Code of Japan (Act No.
22 89 of 1896);

23 (f) award Plaintiffs' costs and reasonable attorneys' fees in accordance
24 with 17 U.S.C. § 505;

25 (g) award Plaintiffs pre-judgment and post-judgment interest according to
26 law; and

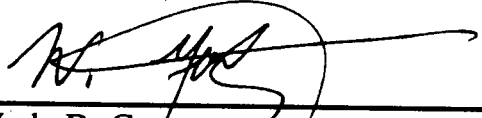
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(h) award Plaintiffs such further and additional relief as the Court may deem just and proper.

DATED: August 4, 2009

ROBERT H. ROTSTEIN
WADE B. GENTZ
ERIC S. BOORSTIN
MITCHELL SILBERBERG & KNUPP LLP

By: 

Wade B. Gentz
Attorneys for Plaintiffs

EXHIBIT A

Exhibit A

Title	Owner	Reg. No.
<i>Finding Nemo</i>	Disney Enterprises, Inc. & Pixar Animation Studios	PA1-146-502
<i>Mulan</i>	Disney Enterprises, Inc.	PA 799-025
<i>Pirates Of The Caribbean: At World's End</i>	Disney Enterprises, Inc.	PA1-334-112
<i>Atonement</i>	Universal City Studios LLLP	PA1-588-644
<i>Baby Mama</i>	Universal City Studios Productions LLLP	PA 1-597-649
<i>Definitely, Maybe</i>	Universal City Studios Productions LLLP	PA1-594-772
<i>Forgetting Sarah Marshall</i>	Universal City Studios Productions LLLP	PA1-597-647
<i>Mamma Mia!</i>	Internationale Filmproduktion; Universal City Studios LLLP	PA1-602-737

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

DISNEY ENTERPRISES, INC., a Delaware corporation;
UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, a
Delaware limited liability limited partnership,

PLAINTIFFS,

v.

66STAGE.COM, a business entity of unknown form; and NASRI
FAICAL, an individual, d/b/a 66STAGE.COM,

DEFENDANTS.

CASE NUMBER

CV 08-08482 RGK (FFMx)

SUMMONS

TO: DEFENDANT(S): THE ABOVE NAMED DEFENDANTS

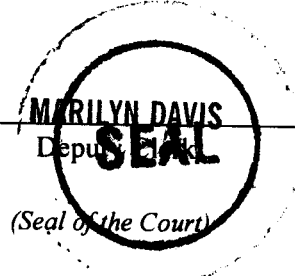
A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint FIRST amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Wade B. Gentz, Mitchell Silberberg & Knupp LLP, whose address is 11377 West Olympic Boulevard Los Angeles, California 90064. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: - 4 AUG 2009

By: _____



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].