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ARISTA RECORDS LLC; ATLANTIC  
RECORDING CORPORATION; BMG MUSIC;  
CAPITOL RECORDS, INC.; ELEKTRA  
ENTERTAINMENT GROUP INC.;  
INTERSCOPE RECORDS; LAFACE  
RECORDS LLC; PRIORITY RECORDS LLC;  
SONY BMG MUSIC ENTERTAINMENT;  
UMG RECORDINGS, INC.; VIRGIN  
RECORDS AMERICA, INC.; and WARNER  
BROS. RECORDS INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

**ARISTA RECORDS LLC, a Delaware  
limited liability company; ATLANTIC  
RECORDING CORPORATION, a  
Delaware corporation; BMG MUSIC, a  
New York general partnership; CAPITOL  
RECORDS, INC., a Delaware corporation;  
ELEKTRA ENTERTAINMENT GROUP  
INC., a Delaware corporation;  
INTERSCOPE RECORDS, a California  
general partnership; LAFACE RECORDS  
LLC, a Delaware limited liability company;  
PRIORITY RECORDS LLC, a California  
limited liability company; SONY BMG  
MUSIC ENTERTAINMENT, a Delaware  
general partnership; UMG RECORDINGS,  
INC., a Delaware corporation; VIRGIN  
RECORDS AMERICA, INC., a California  
corporation; and WARNER BROS.  
RECORDS INC., a Delaware corporation,**

Plaintiffs,

v.

**DOES 1 – 17** Defendants.

PAGE 1 – COMPLAINT FOR COPYRIGHT  
INFRINGEMENT

CV No. \_\_\_\_\_

COMPLAINT FOR COPYRIGHT  
INFRINGEMENT

Copyright Infringement Action  
(17 U.S.C. § 501 *et seq.*)

## JURISDICTION AND VENUE

1. This is a civil action seeking damages and injunctive relief for copyright infringement under the copyright laws of the United States (17 U.S.C. § 101 *et seq.*).
2. This Court has jurisdiction under 17 U.S.C. § 101 *et seq.*; 28 U.S.C. § 1331 (federal question); and 28 U.S.C. § 1338(a) (copyright).
3. Venue in this District is proper. See 28 U.S.C. §§ 1391(b), 1400(a). Although the true identity of each Defendant is unknown to Plaintiffs at this time, on information and belief, each Defendant may be found in this District and/or a substantial part of the acts of infringement complained of herein occurred in this District. On information and belief, personal jurisdiction in this District is proper because each Defendant, without consent or permission of the copyright owner, disseminated over the Internet copyrighted works owned and/or controlled by Plaintiffs. On information and belief, such illegal dissemination occurred in every jurisdiction in the United States, including this one. In addition, each Defendant contracted with an Internet Service Provider (“ISP”) found in this District to provide each Defendant with the access to the Internet which facilitated Defendants’ infringing activities.

## PARTIES

4. Plaintiff Arista Records LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

5. Plaintiff Atlantic Recording Corporation is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

6. Plaintiff BMG Musio is a general partnership duly organized and existing under the laws of the State of New York, with its principal place of business in the State of New York.

7. Plaintiff Capitol Records, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

8. Plaintiff Elektra Entertainment Group Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

9. Plaintiff Interscope Records is a California general partnership, with its principal place of business in the State of California.

10. Plaintiff LaFace Records LLC is a limited liability company duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of New York.

11. Plaintiff Priority Records LLC is a limited liability company with its principal place of business in the State of California.

12. Plaintiff SONY BMG MUSIC ENTERTAINMENT is a Delaware general partnership, with its principal place of business in the State of New York.

13. Plaintiff UMG Recordings, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in the State of California.

