		FILED						
1 2	Christopher W. Arledge (Bar No. 200767) carledge@onellp.com Peter R. Afrasiabi, Esq. (Bar No. 193336) pafrasiabi@onellp.com Ian H. Gibson, Esq. (Bar No. 273444) igibson@onellp.com ONE LLP	2012 JUN 25 PH 3: 02						
3	pafrasiabi@onellp.com Ian H. Gibson, Esq. (Bar No. 273444)	CENTRAL DIST. OF CALIF.						
4	TONE LLI	3 Y						
5	4000 MacArthur Blvd. West Tower, Suite 1100							
6	Newport Beach, CA 92660 Telephone: (949) 502-2870 Facsimile: (949) 258-5081							
7	Attorneys for Plaintiff, Will Loomis							
8	UNITED STATES I	DISTRICT COURT						
9	CENTRAL DISTRICT OF CALIFORNIA							
10								
11	WILL LOOMIS, an individual,	Case No. CV12-5525 RSWL(JEMx)						
12 13	Plaintiff,	COMPLAINT FOR COPYRIGHT INFRINGEMENT						
14	v	DEMAND FOR JURY TRIAL						
15	IESSICA CORNISH P/K/A IESSIE I an							
16	JESSICA CORNISH, P/K/A JESSIE J, an individual; UNIVERSAL MUSIC GROUP, INC., a Delaware corporation; LAVA RECORDS LLC, a limited liability company; UNIVERSAL REPUBLIC RECORDS, business form unknown; and							
17	RECORDS LLC, a limited liability company; UNIVERSAL REPUBLIC							
18	RECORDS, business form unknown; and DOES 1-10 INCLUSIVE,							
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20	Defendants.							
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		LAINT						
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Will Loomis, ("Loomis"), by and through his attorneys of record, complains against Jessica Cornish ("Jessie J"), Universal Music Group, Inc., Lava Records LLC, Universal Republic Records, and DOES 1 through 10 (collectively, "Defendants") as follows:

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JURISDICTION AND VENUE

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3.

This is a civil action against Defendants for their acts of copyright infringement in violation of the United States Copyright Act, 17 U.S.C. §§ 101 et seq. This Court has subject matter jurisdiction over the copyright infringement under 28 U.S.C. §

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1331, 17 U.S.C. § 501(a), and 28 U.S.C. § 1338(a).

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2. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and (c) and 28

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U.S.C. § 1400(a) in that the claim arises in this Judicial District, the Defendants may be found and transact business in this Judicial District, and the injury suffered by Plaintiff took

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place in this Judicial District. Defendants are subject to the general and specific personal

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jurisdiction of this Court because of their contacts with the State of California.

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direct sale of product in this state and judicial district, and perform or otherwise work in

On information and belief, Defendants all directly sell or benefit from the

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this state and judicial district.

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PARTIES

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Plaintiff Loomis is an individual residing in Montecito, California. 4.

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5. Plaintiff is informed and believes and, upon such, alleges that Jessica Cornish is an individual residing in the United Kingdom.

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6. Plaintiff is informed and believes and, upon such, alleges that Universal Music Group, Inc. is a Delaware corporation, with its principal place of business in Santa Monica,

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California.

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7. Plaintiff is informed and believes and, upon such, alleges that Lava Records is a Delaware limited liability company, with its principal place of business in New York,

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NY.

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- 8. Plaintiff is informed and believes and, upon such, alleges that Universal Republic Records is a business, form unknown, with its principal place of business in New York, NY.
- 9. DOES 1 through 10, inclusive, are unknown to Plaintiff, who therefore sues said Defendants by such fictitious names. Plaintiff will ask leave of Court to amend this Complaint and insert the true names and capacities of said Defendants when the same have been ascertained. Plaintiff is informed and believes and, upon such, alleges that each of the Defendants designated herein as a "DOE" is legally responsible in some manner for the events and happenings herein alleged, and that Plaintiff's damages as alleged herein were proximately caused by such Defendants.

STATEMENT OF FACTS

The Composition Forming the Subject Matter of This Dispute

- 10. Will Loomis is a rising star in the music business. After releasing their first EP, Loomis' band, Loomis and the Lust, quickly gained nationwide recognition. The group was named one of the "Top 25 New Bands in the World" by MTV Iggy, won an MTVU "Freshman" video award, and was bestowed OurStage.com/New Music Seminar's coveted title of "Artist on the Verge." In addition to the frequent touring, radio play, and social media outlets, the band's songs can be heard on popular TV shows, including NCIS LA and Blue Mountain State.
- 11. The song at issue, "Bright Red Chords," (hereinafter, the "Composition") is among Loomis' most popular. It was written in 2008 and rapidly gained popularity.
- 12. Loomis registered the Composition with the US Copyright Office on October 10, 2008 and was given Registration No. Pau003479101.

The Defendants and the Marketplace

13. The Defendants rank among today's most successful musicians, producers, and labels in the pop music category.

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singles and 2.5 million records worldwide—an incredible, meteoric rise to fame in a relatively young career.

15. Her release of "Domino" took place on or around August 16, 2011 and

Jessie J is a veritable pop music superstar. She has sold over 11 million

- 15. Her release of "Domino" took place on or around August 16, 2011 and was met with tremendous success. The single was number one on the UK Singles Chart, number 5 on Australia's ARIA Charts, and certified platinum in sales by the Recording Industry Association of American on February 7, 2012.
- 16. On information and belief, "Domino" was purportedly written by Jessie J, Dr. Luke, Claude Kelly, Max Martin, and Henry Russell Walter. Dr. Luke and Henry Russell Walter also purportedly produced the track.
- 17. On information and belief, defendants Lava Records LLC and Universal Republic Records signed Jessie J as part of a joint venture and remained the label of record at all times relevant to the infringement at issue.
- 18. On information and belief, defendant Universal Republic Records is owned by defendant Universal Music Group, Inc.
- 19. Despite their immense economic resources and sophistication on basic matters of intellectual property law, Defendants have, on information and belief, violated federal law by willfully infringing the copyrights of Loomis in his song "Bright Red Chords." Specifically, in or around August, 2011, Defendants reproduced and distributed "Domino," a song comprised of substantially similar compositional elements to the Composition, and a derivative thereof, without permission, consent, or license from Loomis, the rightsholder to the Composition.
- 20. Defendants' reproduction and distribution of the Composition, and derivative thereof, continues unabated to this very day.
- 21. In the marketplace, Defendants' infringing work carries tremendous monetary value. Defendants have sold millions of copies of their derivative work, which translates into significant ill-gotten commercial advantage and revenue generation for Defendants as a direct consequence of their infringing actions.

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Defendants' infringement of the Composition irreparably harmed the 22. exclusive nature of the work and substantial monetary value for its author.

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FIRST CLAIM FOR RELIEF

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(Copyright Infringement, 17 U.S.C. § 501)

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Plaintiff Loomis incorporates here by reference the allegations in paragraphs 1 23. through 24 above.

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24. Loomis is the owner of the copyrights to the Composition, which substantially consists of material wholly original with Plaintiff and which constitutes copyright subject matter under the laws of the United States. Loomis has complied in all respects with the Copyright Act and all of the laws of the United States governing copyrights. The Composition has been timely registered with the United States Copyright Office and

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received Registration No. Pau003479101.

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Defendants have directly, vicariously and/or contributorily infringed, and 25. unless enjoined, will continue to infringe Loomis' copyrights by reproducing and distributing and utilized the Composition for purposes of trade in violation of 17 U.S.C. § 501 et seq.

- 26. Defendants have willfully infringed, and unless enjoined, will continue to infringe Loomis' copyrights by knowingly reproducing, distributing and utilizing the Composition and a derivative thereof for purposes of trade.
- 27. These acts of infringement are willful because, inter alia, the Defendants are sophisticated professional in the music industry with full knowledge of the strictures of federal copyright law and the basic requirements for licensing the use of copyrighted content for commercial exploitation. Indeed, Defendants demand nothing less of entities who use their copyrighted content.
- 28. Defendants reproduced and distributed the infringing composition, "Domino," through numerous channels of trade internationally.

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- 29. Defendants have received substantial benefits in connection with the unauthorized reproduction, distribution and utilization of the Composition for purposes of trade, including chart-topping record sales, among other things.
- The actions of Defendants were and are continuing to be performed without 30. the permission, license or consent of Loomis.
- The wrongful acts of Defendants have caused, and are causing, great injury to 31. Plaintiff, of which damages cannot be accurately computed, and unless this Court restrains Defendants from further commission of said acts, Loomis will suffer irreparable injury, all of which it is without an adequate remedy at law. Accordingly, Plaintiff seeks a declaration that Defendants are infringing Loomis' copyrights and an order under 17 U.S.C. § 502 enjoining Defendants from any further infringement of Plaintiff's copyrights.
- As a result of the acts of Defendants alleged herein, Loomis has suffered and is suffering substantial damage to his business in the form of diversion of trade, loss of profits, injury to goodwill and reputation, and the dilution of the value of its rights, all of which are not yet fully ascertainable.
- Because of the willful nature of the copyright infringement, Plaintiff is entitled 33. to an award of statutory damages equal to \$150,000 per work infringed.
- 34. Plaintiff has identified at least one work infringed by Defendants, which occurred by way of reproduction and public distribution of the Composition through myriad sales channels.
- 35. The Composition infringed is eligible for statutory damages. Therefore, Loomis is entitled to an award of \$150,000 in statutory damages.
- 36. Alternatively, at Plaintiff's discretion, Loomis is entitled to actual damages in an amount to be proven at trial for the infringement of the Composition.
 - Plaintiff is also entitled to attorney's fees in prosecuting this action. 37.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests judgment against Defendants as follows:

- 1. The Defendants, their officers, agents, servants, employees, representatives, and attorneys, and all person in active concert or participation with them, be permanently enjoined from designing, copying, reproducing, displaying, promoting, advertising, distributing, or selling, or any other form of dealing or transaction in, any and all advertising and promotional materials, print media, signs, Internet websites, or any other media, either now known or hereafter devised, bearing any design or mark which infringe, contributorily infringe, or vicariously infringe upon Plaintiff's rights in the Composition.
- 2. Defendants be held liable to Plaintiff in statutory damages for copyright infringement, including willful infringement, in accordance with 17 U.S.C. §§ 504(a)(2) & (c) and for costs, interest and reasonable attorney's fees pursuant to 17 U.S.C. § 505.
- 3. An accounting be made for all profits, income, receipts or other benefit derived by Defendants from the reproduction, copying, display, promotion, distribution or sale of products and services, or other media, either now known or hereafter devised, that improperly or unlawfully infringes upon Plaintiff's copyrights pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).
- 4. Requiring Defendants to account for and pay over to Plaintiff all profits derived by Defendants from their acts of copyright infringement and to reimburse Plaintiff for all damages suffered by Plaintiff by reasons of Defendant's acts, pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).
- 5. Actual damages for copyright infringement pursuant to 17 U.S.C. §§ 504 (a)(1) & (b).
- 6. That Plaintiff be awarded any such other and further relief as the Court may deem just and appropriate.

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1	Dated: June 25, 2012	ONE LLP
2		By:
3		Christopher W. Arledge
4		Peter R. Afrasiabi, Esq. Ian H. Gibson, Esq.
5		Attorneys for Plaintiff, Will Loomis
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COMPLAINT

DEMAND FOR JURY TRIAL Plaintiff Will Loomis hereby demands trial by jury of all issues so triable under the law. Dated: June 25, 2012 **ONE LLP** By: Christopher W. Arledge Peter R. Afrasiabi, Esq. Ian H. Gibson, Esq. Attorneys for Plaintiff, Will Loomis 20741.1

COMPLAINT

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Ronald S. W. Lew and the assigned discovery Magistrate Judge is John E. McDermott.

The case number on all documents filed with the Court should read as follows:

CV12- 5525 RSWL (JEMx)

Pursuant to General Order 05-07 of the United States District Court for the Central

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ate Judge
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oval action is
ivision lfth St., Rm. 134 , CA 92501

Case 2:12-cv-05525-RSWL-JEM Document	1 Filed 06/25/12 Page 11 of 14 Page ID #:15
Name & Address: Christopher W. Arledge (Bar No. 200767) Peter R. Afrasiabi, Esq. (Bar No. 193336) Ian H. Gibson, Esq. (Bar No. 273444) ONE LLP, 4000 MacArthur Blvd., W Twr, Ste 1100 Newport Beach, CA 92660 Tel: 949-502-2870	
UNITED STATES I CENTRAL DISTRIC	
WILL LOOMIS, an individual,	CASE NUMBER
PLAINTIFF(S) V.	CV12-5525 RSWL(JEMx)
JESSICA CORNISH, P/K/A JESSIE J, an individual; UNIVERSAL MUSIC GROUP, INC., a Delaware corporation; [Continued on Attachment A Hereto] DEFENDANT(S).	SUMMONS
A lawsuit has been filed against you. Within 21 days after service of this summor must serve on the plaintiff an answer to the attached 2 counterclaim □ cross-claim or a motion under Rule 1 or motion must be served on the plaintiff's attorney, Ch 4000 MacArthur Blvd., West Tower, Suite 1100, Newpindgment by default will be entered against you for the repour answer or motion with the court.	2 of the Federal Rules of Civil Procedure. The answer ristopher W. Arledge of ONE LLP, whose address is ort Beach, CA 92660. If you fail to do so,
Dated: (0-25-12	By: Deputy Clerk (Seal of the Court)
[Use 60 days if the defendant is the United States or a United State 60 days by Rule 12(a)(3)].	's agency, or is an officer or employee of the United States. Allowe
CV-01A (12/07) SUM	MONS

ATTACHMENT A TO SUMMONS

JESSICA CORNISH, P/K/A JESSIE J, an individual; UNIVERSAL MUSIC GROUP, INC., a Delaware corporation; LAVA RECORDS LLC, a limited liability company; UNIVERSAL REPUBLIC RECORDS, business form unknown; and DOES 1-10 INCLUSIVE,

Defendant(s)

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself D) WILL LOOMIS, an individual,					DEFENDANTS JESSICA CORNISH, P/K/A JESSIE J, an individual; UNIVERSAL MUSIC GROUP, INC., a Delaware corporation; LAVA RECORDS LLC, a limited liability company; [Continued on Attachment A Hereto]								
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide some.)						Attorneys (Jf Knówn)							
ONE LLP, 4000 MacArthur Blvd., West Tower, Suite 1100, Newpor CA 92660; Tel: 949-502-2870; Fax: 949-258-5081					ort Beach,			-					
II. BASIS OF JURISDICTION (Place an X in one box only.) III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)													
O ! V.	S. Government Plaintiff	1 3	Federal Question (U.S. Government Not a Party)		Citizen of This	PTF DEF PTF DEF Chis State C1 C1 Incorporated or Principal Place C4 C4 of Business in this State							
☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)				Citizen of Anot	Citizen of Another State O 2 O 2 Incorporated and Principal Place O 5 O 5 of Business in Another State					Ð5			
					Citizen or Subj	ect of a Fo	eign Country	у 🗆 3		Foreign Nation		□6	C) 6
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CV12-5525 DSWI (IFM+)													

CA15-2252 K2MP(1FMX)

FOR OFFICE USE ONLY: Case Number:

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? Vivo Yes

If yes, list case number(s):									
VIII(b). RELATED CASES: Have If yes, list case number(s):	any cases been pre	viously filed in this court that	at are related to the present case? ☑ No ☐ Yes						
□ B. C	Arise from the same Call for determination For other reasons we	e or closely related transaction on of the same or substantial ould entail substantial duplic	ons, happenings, or events; or all y related or similar questions of law and fact; or cation of labor if heard by different judges; or at and one of the factors identified above in a, b or c also is present.						
IX. VENUE: (When completing the	following informati	ion, use an additional sheet i	f necessary.)						
(a) List the County in this District; C□ Check here if the government, its	California County of agencies or emplo	utside of this District; State byees is a named plaintiff. If	if other than California; or Foreign Country, in which EACH named plaintiff resides. this box is checked, go to item (b).						
County in this District:*			California County outside of this District; State, if other than California; or Foreign Country						
Los Angeles									
(b) List the County in this District; (☐ Check here if the government, its	California County o s agencies or emplo	utside of this District; State yees is a named defendant.	if other than California; or Foreign Country, in which EACH named defendant resides. If this box is checked, go to item (c).						
County in this District:*			California County outside of this District; State, if other than California; or Foreign Country						
			United Kingdom (Jessica Cornish); Delaware (Universal Music Group, Inc.); Delaware (Lava Records); New York (Universal Republic Records)						
(c) List the County in this District; C Note: In land condemnation ca			if other than California; or Foreign Country, in which EACH claim arose.						
County in this District:*			California County outside of this District; State, if other than California: or Foreign Country						
Los Angeles									
* Los Angeles, Orange, San Bernar Note: In land condemnation cases, use X. SIGNATURE OF ATTORNEY (0	e the location of the	entura, Santa Barbara, or e tract of iand involved	San Luis Obispo Counties Date June 25, 2012						
or other papers as required by law	. This form, approv	ved by the Judicial Conference	ormation contained derein neither replace nor supplement the filing and service of pleadings ce of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed ating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)						
Key to Statistical codes relating to So	cial Security Cases	:							
Nature of Suit Code	Abbreviation	Substantive Statement (of Cause of Action						
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))							
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)							
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))							
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))							
864	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.								
865	RSI	All claims for retirement U.S.C. (g))	(old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42						

CV-71 (05/08) CIVIL COVER SHEET Page 2 of 2