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Attorneys for Plaintiffs
SHOWTIME NETWORKS INC.,
HOME BOX OFFICE, INC.,
MAYWEATHER PROMOTIONS, LLC, and
TOP RANK, INC.

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

SHOWTIME NETWORKS INC.,
HOME BOX OFFICE, INC.,
MAYWEATHER PROMOTIONS, LLC
and TOP RANK, INC.

Plaintiffs,

v.

JOHN DOE 1 d/b/a boxinghd.net, JOHN
DOE 2 d/b/a sportship.org and d/b/a
"Carlo Magno", and JOHN DOES 3-10
inclusive,

Defendants.

CASE NO. 2:15-CV-03147

COMPLAINT FOR:

**(1) DIRECT FEDERAL
COPYRIGHT INFRINGEMENT (17
U.S.C. §§ 411(c), 501, *et seq.*);**

**(2) CONTRIBUTORY FEDERAL
COPYRIGHT INFRINGEMENT (17
U.S.C. §§ 411(c), 501, *et seq.*);**

**(3) VICARIOUS FEDERAL
COPYRIGHT INFRINGEMENT (17
U.S.C. §§ 411(c), 501, *et seq.*);**

1 Plaintiffs Showtime Networks Inc., Home Box Office, Inc., Mayweather
 2 Promotions, LLC and Top Rank, Inc. (collectively, "Plaintiffs"), complaining of
 3 defendants John Doe 1 d/b/a boxinghd.net, John Doe 2 d/b/a sportship.org and d/b/a
 4 "Carlo Magno", and John Does 3 through 10 inclusive (collectively, "Defendants"),
 5 allege as follows:

6 **JURISDICTION AND VENUE**

7 1. This lawsuit arises from Defendants' anticipated knowing and
 8 intentional violation of the federal Copyright Act (17 U.S.C. §§ 101, *et seq.*).

9 2. This Court has subject matter jurisdiction pursuant to 17 U.S.C. §§
 10 411(c) and 501, and pursuant to 28 U.S.C. § 1331, and § 1338(a).

11 3. Venue in this district is proper pursuant to 28 U.S.C. § 1391.

12 4. Plaintiffs are informed and believe and on that basis allege that personal
 13 jurisdiction in this District is proper because each Defendant, without consent or
 14 permission of Plaintiffs, is offering and intends to distribute over the Internet
 15 copyrighted works for which Plaintiffs will jointly own certain exclusive rights
 16 granted by the Copyright Act when those works are fixed in a tangible medium of
 17 expression simultaneously with their first transmission. On information and belief,
 18 such unlawful distribution is expected to occur in every jurisdiction in the United
 19 States, including this one.

20 5. In addition, Plaintiffs are also informed and believe and on that basis
 21 allege that Defendants are deliberately exploiting the California market for profit and
 22 have entered into one or more contracts with California companies for services that
 23 are necessary to keep the websites at issue in this complaint operating.

24 **THE PARTIES**

25 6. Plaintiff Showtime Networks Inc. ("Showtime") is a company
 26 organized and existing under the laws of Delaware, having its principal place of
 27 business at 1633 Broadway, 16th Floor, New York, New York 10019.

28 7. Plaintiff Home Box Office, Inc. ("HBO") is a company organized and

1 existing under the laws of Delaware, having its principal place of business at 1100
2 Avenue of the Americas, New York, New York 10036.

3 8. Plaintiff Mayweather Promotions, LLC (“Mayweather”) is a limited
4 liability company organized and existing under the laws of Nevada, having its
5 principal place of business at 4616 West Sahara Avenue, #290, Las Vegas, Nevada
6 89102.

7 9. Plaintiff Top Rank, Inc. (“Top Rank”) is a corporation organized and
8 existing under the laws of Nevada, having its principal place of business at 748 Pilot
9 Road, Las Vegas, Nevada 89119.

10 10. Plaintiffs are currently unaware of the identities of Defendants John
11 Doe 1 d/b/a boxinghd.net and John Doe 2 d/b/a sportship.org and d/b/a “Carlo
12 Magno”, and John Does 3-10, who are, on information and believe, assisting
13 Defendants John Doe 1 and John Doe 2 in the unauthorized live Internet stream of
14 the Coverage (as defined in Paragraph 13, *infra*), and therefore sue these Defendants
15 by such fictitious acronyms.

16 **PLAINTIFFS’ RIGHTS AND DEFENDANTS’ UNLAWFUL CONDUCT**

17 11. This action relates to the coverage of the long-awaited championship
18 boxing match between the legendary boxers Floyd Mayweather, Jr. and Manny
19 Pacquiao, which will occur on Saturday, May 2, 2015, at the MGM Grand Garden
20 Arena in Las Vegas, Nevada (the “Fight”).

21 12. The Fight will be fixed as an audiovisual recording by a single
22 authorized camera and production crew at the same time it is being transmitted live
23 to consumers throughout the world via licensed pay per view access.

24 13. In the United States, the live transmission and/or performance will be
25 jointly produced exclusively by plaintiffs HBO and Showtime. The live
26 transmission and/or performance of the Fight and the preceding undercard bouts are
27 referred to in this Complaint as the “Coverage.”

28 14. Plaintiffs will be joint authors and joint owners of the copyright in the

1 Coverage and as such have the exclusive rights to, among other things, reproduce
2 and transmit the Coverage within the United States and elsewhere.

3 15. Plaintiffs intend to register the copyright in the Coverage, as joint
4 authors, within three months after May 2, 2015.

5 16. Consumers in the United States will be able to purchase licensed live
6 pay-per-view television access to the Coverage through authorized pay-per-view
7 providers beginning at approximately 9:00 p.m. Eastern Time on May 2, 2015 with
8 two undercard bouts and then the Fight itself, continuing until the Fight's
9 conclusion.

10 17. Consumers in the United States can purchase live pay-per-view
11 television access to the Coverage from authorized pay-per-view providers in the
12 range of \$89.00 - \$100.00.

13 18. There are no authorized online streams of the Coverage for delivery to
14 United States audiences.

15 19. The Defendants are seeking to benefit from this high profile, live Fight
16 by infringing the rights of Plaintiffs.

17 20. Plaintiffs have become aware that Defendants are using the websites
18 <boxinghd.net> and <sportship.org> to advertise an unauthorized live Internet
19 stream of the Coverage in California and elsewhere.

20 ///

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24 ///

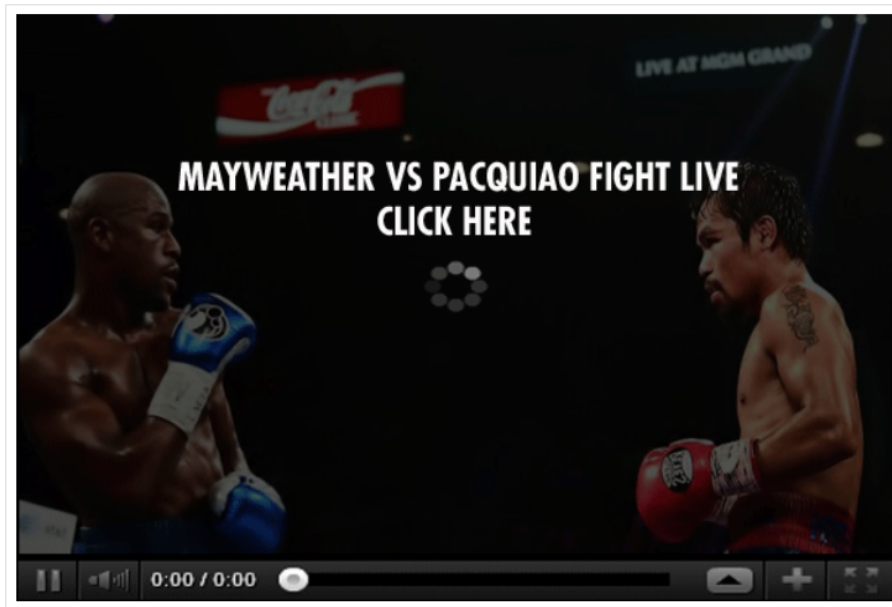
25 ///

26 ///

27 ///

28 ///

21. As of the date of this writing, the home page of <boxinghd.net> bears the title “Watch Mayweather vs Pacquiao Online Free” and features the embedded graphic shown below:



The home page also states: “[I]f you can’t afford to buy tickets then simply watch Mayweather vs Pacquiao here. We will provide with nothing but the freshest and the most reliable high quality live links.” A true and correct printout of the entire home page of <boxinghd.net>, printed on April 21, 2015, is attached as **Exhibit A**.

22. The <boxinghd.net> home page also includes a tab for “Mayweather vs Pacquiao Live Streaming.” See **Exhibit A**. Clicking on this tab takes the user to the page <boxinghd.net/mayweather-vs-pacquiao-live-streaming>, bearing the same title as the tab, and including, among other things, the following question and answer: “Where to Watch Mayweather vs. Pacquiao Live Streaming? . . . The fight . . . will be aired via a joint pay per view by HBO and Showtime. However, there are lots of alternatives that you can watch the fight live. . . . [Y]ou can watch it live at

1 home via live streaming. You can watch the full fight via live stream in this website.
2 The live streaming will commence when the fight starts.” A true and correct
3 printout of this page, printed on April 22, 2015, is attached as **Exhibit B**.

4 23. As of April 22, 2015, the < boxinghd.net/mayweather-vs-pacquiao-
5 live-streaming > page included a “thoughts” section with comments from visitors to
6 the site, including the following: “Hello, nice to see such site being put up just for us
7 to at least see Pacquiao fight again. Got one slot already for the free live streaming.
8 Thanks a lot.” See **Exhibit B**.

9 24. Clicking on the video screen or the “Start Watching!” link on the home
10 page takes the user to the page <boxinghd.net/maypac>, which includes an
11 embedded video screen and the title “MAYWEATHER VS PACQUIAO LIVE
12 STREAMING ONLINE.” A true and correct printout of this page, printed on April
13 22, 2015, is attached as **Exhibit C**.

14 25. The <boxinghd.net/maypac> page also includes footers which read
15 “Proudly Powered By: Free PPV Online” and “© 2015 Mayweather vs. Pacquiao
16 Live Streaming. All Rights Reserved.” See **Exhibit C**. Both the title
17 “MAYWEATHER VS PACQUIAO LIVE STREAMING ONLINE” and the “©
18 2015 Mayweather vs. Pacquiao Live Streaming” portion of the footer are
19 hyperlinks.

20 ///

21 ///

22 ///

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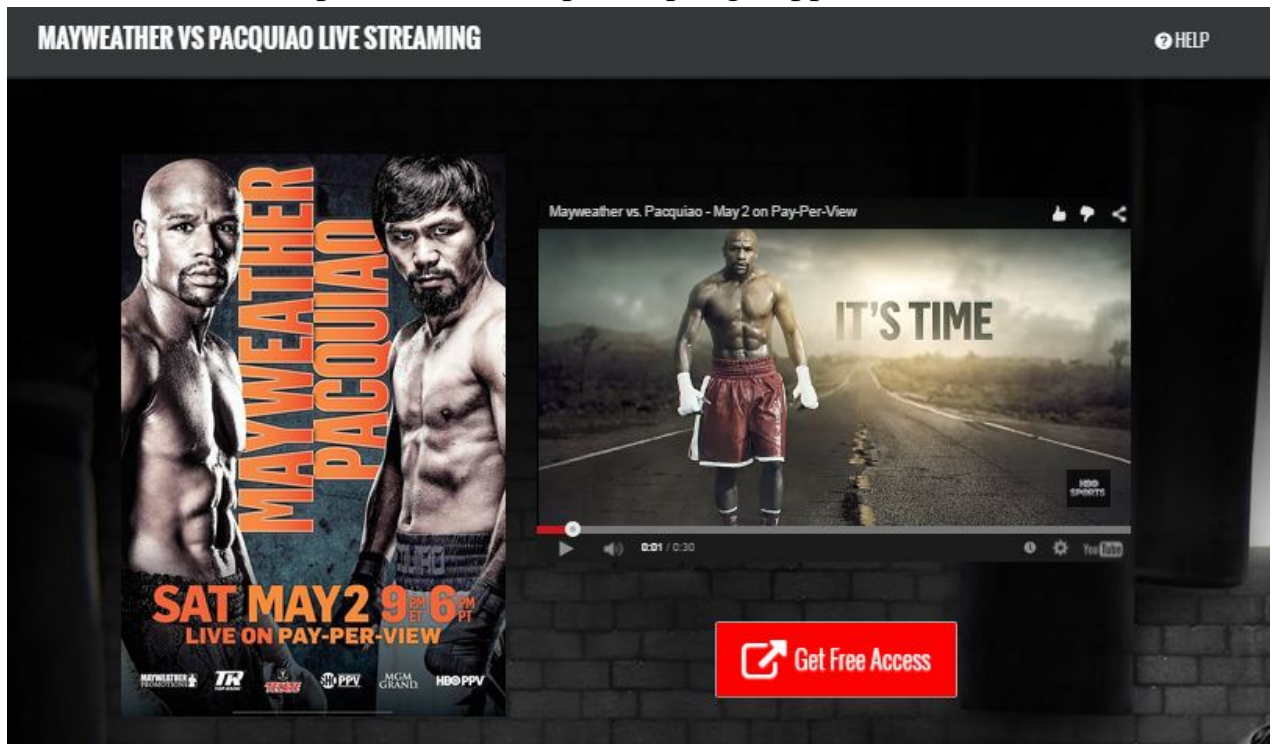
27 ///

28 ///

26. Clicking on either hyperlink takes the user to the site <sportship.org>, which appeared as shown below as of April 21, 2015:



27. As of April 22, 2015, <sportship.org> appeared as shown below:



1 True and correct printouts of this page, printed on April 21 and April 22, 2015, are
2 attached as **Exhibit D**.

3 28. In order to gain access to the stream, users must click through one or
4 more “offers” that promote the goods and services of third parties. Plaintiffs are
5 informed and believe that Defendants use these advertisements to monetize their
6 websites.

7 29. As of April 22, 2015, the <sportship.org> page included a comments
8 section with the following comments: “I go for Mayweather. I want to see the fight
9 online. Thanks for the free access. #ExcitedHere” and “I am excited to watch the
10 fight for free! Thanks for the link.” See **Exhibit D**.

11 30. In sum, the *only* content on Defendants’ websites promotes and/or
12 monetizes their intention to infringe Plaintiffs’ rights by streaming the Coverage
13 without authorization.

14 31. Plaintiffs are informed and believe and on that basis allege that
15 Defendants John Doe 1 and John Doe 2 jointly own and/or operate both
16 <boxinghd.net> and <sportship.org>, and that Defendants John Does 3-10 are
17 assisting Defendants John Doe 1 and John Doe 2 in the unauthorized live Internet
18 stream of the Coverage.

19 32. Plaintiffs have not authorized anyone to stream the Coverage on
20 <boxinghd.net> or on <sportship.org>.

21 33. Plaintiffs are informed and believe and on that basis allege that
22 Defendants intend to acquire the infringing stream from one or more third parties
23 who intend to stream the Coverage without authorization.

24 34. Plaintiffs are informed and believe and on that basis allege that
25 Defendants know or have reason to know that one or more third parties will obtain
26 the infringing stream from their websites and will redistribute it through other
27 websites.

28 35. Plaintiffs are informed and believe and on that basis allege that

1 Defendants have a long history of promoting infringing streams of copyrighted
2 broadcasts of boxing matches. Archives of <boxinghd.net> reveal that Defendants
3 have promoted streams of several other fights, including but not limited to the May
4 4, 2013 fight between Floyd Mayweather, Jr. and Robert Guerrero and the July 12,
5 2014 fight between Erislandy Lara and Canelo Alvarez. Neither of these fights were
6 authorized to be streamed live on <boxinghd.net> or anywhere else in the United
7 States.

8 36. Defendants' anticipated infringement will cause Plaintiffs severe and
9 irreparable harm.

10 37. In distributing the Coverage and/or aiding the distribution of the
11 Coverage through unauthorized channels, Defendants will unlawfully usurp the
12 benefits of the exclusive rights of reproduction, public performance and distribution,
13 among other rights, conveyed to Plaintiffs by the Copyright Act.

14 38. Defendants' anticipated unlawful distribution will impair the
15 marketability and profitability of the Coverage, and interfere with Plaintiffs' own
16 authorized distribution of the Coverage, because Defendants will provide consumers
17 with an opportunity to view the Coverage in its entirety for free rather than paying
18 for the Coverage provided through Plaintiffs' authorized channels. This is
19 especially true where, as here, the work at issue is *live* Coverage of a *one-time live*
20 *sporting event whose outcome is unknown*.

21 39. Defendants' unauthorized stream also threatens to irreparably harm
22 Plaintiffs' relationships with consumers, as well as with Plaintiffs' authorized
23 television carriers, who rely on consumer purchases of access to the Coverage.

24 40. Plaintiffs' relationships with their authorized pay-per-view providers
25 and with consumers depend on Plaintiffs' ability to control when, where and under
26 what conditions the Coverage is distributed. Defendants, through their anticipated
27 infringing conduct, undermine those relationships.

28 41. Defendants' infringing stream also threatens to damage Plaintiffs'

1 reputation with consumers, as Plaintiffs cannot exercise any quality control over
2 Defendants' stream, which may be of inferior quality, subject to technical problems,
3 and may suffer from other quality problems that consumers will mistakenly
4 associate with Plaintiffs.

5 42. In sum, Defendants' anticipated infringement not only denies Plaintiffs
6 the benefits of their exclusive rights in the Coverage granted by the Copyright Act,
7 but it threatens to irreparably harm Plaintiffs' valuable relationships with their
8 authorized television carriers and with consumers.

9 43. These harms cannot be adequately compensated by monetary damages.

10 44. Defendants have taken steps to conceal their true identities, locations
11 and contact information from Plaintiffs and from the public. Neither
12 <boxinghd.com> nor <sportship.org> contains any contact information for
13 Defendants.

14 45. Defendants have also concealed their true identities and locations in the
15 public Whois database, which contains (unverified) name and contact information
16 used to register Defendants' Internet domain names.

17 46. The registrant information for <boxinghd.net> is concealed by a
18 privacy protection service that prevents Plaintiffs from learning what name and
19 address information Defendants used to register the domain name. The privacy
20 protection service, which is located in Panama, replaces Defendants' contact
21 information with its own name and address, and provides an anonymous email
22 address that does not belong to Defendants, but on information and belief, relays
23 email messages to an email address owned and controlled by Defendants.

24 47. The registrant information for <sportship.org> includes the unverified
25 name "Carlo Magno", an incomplete (and likely misleading) postal address and an
26 invalid phone number, along with the email address analouintegral@gmail.com.

27 48. Plaintiffs retained a private investigator who has tried diligently to
28 locate additional information about Defendants' identities or locations but has been

1 unsuccessful.

2 49. The only other contact information that Plaintiffs have located that
3 relates to Defendants is based on a link titled “DMCA” in the footer the of
4 <sportship.org> website. Clicking on that link directs users to submit claims of
5 copyright infringement to the email address dmca@gotlinks.co.

6 50. GotLinks.co is a website that appears to be operated by a third party
7 called CPAlead, LLC (“CPAlead”), which claims to help its customers monetize
8 their websites through social media sharing and driving user traffic from one
9 customer’s site to another’s.

10 51. Plaintiffs do not currently have reason to believe that CPAlead is
11 involved in, or even necessarily aware of, Defendants’ infringing conduct.

12 52. Plaintiffs served Defendants with an Advance Notice of Potential
13 Infringement pursuant to 37 C.F.R. § 201.22 on April 25, 2015 (the “Notice”). A
14 true and correct copy of the Notice is attached hereto as **Exhibit E**.

15 53. In the Notice, Plaintiffs advised Defendants of Plaintiffs’ rights and
16 demanded that Defendants: 1) remove all references to streaming the Coverage; and
17 2) provide written assurance that they would not stream the Coverage. *See* **Exhibit**
18 **E**.

19 54. Plaintiffs gave Defendants forty-eight hours to comply with these
20 demands. *See* **Exhibit E**.

21 55. Plaintiffs served the Notice on Defendants by email to the anonymous
22 “privacy protection” email address that is publicly available for <boxinghd.net> and
23 the analouintegral@gmail.com email address used to register <sportship.org>.
24 Plaintiffs also sent the Notice via international overnight delivery to Defendants care
25 of the Panamanian privacy protection service used to mask the registrant
26 information for <boxinghd.net>.

27 56. Out of an abundance of caution, Plaintiffs also served the Notice on
28 Defendants care of CPAlead by email and by overnight delivery.

58. As of the date of this filing, Plaintiffs have not received any response to the Notice from any of Defendants. Both <boxinghd.net> and <sportship.org> continue to advertise and promote the infringing streams.

60. Defendants' anticipated stream of the Coverage will infringe, without limitation, Plaintiffs' exclusive rights of reproduction, distribution and public performance conveyed by the Copyright Act and will cause Plaintiffs to suffer immediate and irreparable damage.

FIRST CAUSE OF ACTION

[17 U.S.C. §§ 411(c) & 501, *et seq.*]

63. At all relevant times, Plaintiffs have jointly owned the exclusive rights to, among other things, reproduce and distribute the Coverage in the United States, including transmitting the Coverage simultaneously as the undercard bouts and the Fight occur live and the Coverage is fixed in a tangible medium of expression.

1 65. Plaintiffs intend to register the copyright in the Coverage within three
2 months after May 2, 2015.

3 66. Plaintiffs are informed and believe and on that basis allege that
4 Defendants received the Notice more than forty-eight hours prior to the
5 commencement of the Coverage.

6 67. If not immediately enjoined and restrained, Defendants will willfully,
7 intentionally and knowingly reproduce, distribute and otherwise exploit the
8 Coverage without Plaintiffs' authorization, consent or approval and in violation of
9 Plaintiffs' rights under the Copyright Act.

10 68. Plaintiffs are informed and believe and on that basis allege that
11 Defendants, and each of them, are fully aware of Plaintiffs' rights, and Defendants
12 intend to infringe Plaintiffs' rights willfully, knowingly and with wanton disregard.

13 69. In the absence of immediate, preliminary and permanent injunctive
14 relief, Defendants' conduct will cause Plaintiffs irreparable harm for which there is
15 no adequate remedy at law, and will also damage Plaintiffs in an amount which
16 cannot be accurately computed at this time.

17 **SECOND CAUSE OF ACTION**

18 **(Contributory Federal Copyright Infringement – Against All Defendants)**

19 **[17 U.S.C. §§ 411(c) & 501, *et seq.*]**

20 70. Plaintiffs refer to, repeat and reallege all allegations contained in
21 Paragraphs 1 through 69 of this Complaint and incorporate them by reference as
22 though set forth in full.

23 71. At all relevant times, Plaintiffs have jointly owned the exclusive rights
24 to, among other things, reproduce and distribute the Coverage in the United States,
25 including transmitting the Coverage simultaneously as the undercard bouts and the
26 Fight occur live and the Coverage is fixed in a tangible medium of expression.

27 72. Plaintiffs will own the copyright in the Coverage immediately upon its
28 fixation in a tangible medium of expression.

1 73. Plaintiffs intend to register the copyright in the Coverage within three
2 months after May 2, 2015.

3 74. Plaintiffs are informed and believe and on that basis allege that
4 Defendants received the Notice more than forty-eight hours prior to the
5 commencement of the Coverage.

6 75. Plaintiffs are informed and believe and on that basis allege that
7 Defendants will materially contribute to direct infringement of their rights in the
8 Coverage by others, including without limitation third parties from whom
9 Defendants acquire the infringing stream and third parties who use other websites to
10 redistribute the infringing stream from Defendants' websites. Each such violation of
11 Plaintiffs' rights constitutes a separate and distinct act of copyright infringement.

12 76. Defendants will be liable as contributory infringers for each such act of
13 copyright infringement. Defendants have knowledge of this infringement, including
14 without limitation because Plaintiffs notified them that streaming the Coverage
15 infringes their rights.

16 77. Despite being on actual notice that their conduct will infringe
17 Plaintiffs' rights, Defendants continue to represent to Plaintiffs and to the public that
18 they intend to cause, enable, induce, facilitate and materially contribute to the
19 infringement by providing their users with unauthorized and infringing streams of
20 the Coverage.

21 78. Through the conduct described above, Defendants will be
22 contributorily liable for the infringement described herein.

23 79. Plaintiffs are informed and believe and on that basis allege that
24 Defendants, and each of them, are fully aware of Plaintiffs' rights, and intend to
25 infringe Plaintiffs' rights willfully, knowingly and with wanton disregard.

26 80. In the absence of immediate, preliminary and permanent injunctive
27 relief, Defendants' conduct will cause Plaintiffs irreparable harm for which there is
28 no adequate remedy at law, and will also damage Plaintiffs in an amount which

1 cannot be accurately computed at this time but will be proven at trial.

2 **THIRD CAUSE OF ACTION**

3 **(Vicarious Federal Copyright Infringement – Against All Defendants)**

4 **[17 U.S.C. §§ 411(c) & 501, *et seq.*]**

5 81. Plaintiffs refer to, repeat and reallege all allegations contained in
6 Paragraphs 1 through 80 of this Complaint and incorporate them by reference as
7 though set forth in full.

8 82. At all relevant times, Plaintiffs have jointly owned the exclusive rights
9 to, among other things, reproduce and distribute the Coverage in the United States,
10 including transmitting the Coverage simultaneously as the undercard bouts, and the
11 Fight occur live and the Coverage is fixed in a tangible medium of expression.

12 83. Plaintiffs will own the copyright in the Coverage immediately upon its
13 fixation in a tangible medium of expression.

14 84. Plaintiffs intend to register the copyright in the Coverage within three
15 months after May 2, 2015.

16 85. Plaintiffs are informed and believe and on that basis allege that
17 Defendants received the Notice more than forty-eight hours prior to the
18 commencement of the Coverage.

19 86. Plaintiffs are informed and believe and on that basis allege that third
20 parties will use Defendants' websites to directly infringe Plaintiffs' rights in the
21 Coverage, including without limitation by using other websites to redistribute the
22 infringing stream from Defendants' websites. Each such violation of Plaintiffs'
23 rights constitutes a separate and distinct act of copyright infringement.

24 87. Defendants will be liable as vicarious infringers for the copyright
25 infringement committed via their websites. At all relevant times, Defendants (i)
26 have had the right and ability to control and/or supervise the infringing conduct of
27 third parties who will redistribute the infringing stream, and on information and
28 belief (ii) have had a direct financial interest in and will benefit financially from,

1 such infringing conduct, including without limitation because they have monetized
2 <sportship.org>.

3 88. Plaintiffs are informed and believe and on that basis allege that
4 Defendants and each of them have the right and ability to supervise this infringing
5 conduct because, among other things, Defendants operate the websites and exercise
6 direct control over the content that is made available through the websites, and the
7 conditions under which such content can be accessed.

8 89. Through the conduct described above, Defendants will be vicariously
9 liable for the infringement described herein.

10 90. Plaintiffs are informed and believe and on that basis allege that
11 Defendants, and each of them, are fully aware of Plaintiffs' rights, and intend to
12 infringe Plaintiffs' rights willfully, knowingly, and with wanton disregard.

13 91. In the absence of immediate, preliminary and permanent injunctive
14 relief, Defendants' conduct will cause Plaintiffs irreparable harm for which there is
15 no adequate remedy at law, and will also damage Plaintiffs in an amount which
16 cannot be accurately computed at this time but will be proven at trial.

17 **REQUEST FOR RELIEF**

18 WHEREFORE, Plaintiffs request that the Court:

19 1. Enter judgment for Plaintiffs and enter a temporary restraining order,
20 preliminary injunction and permanent injunction:

- 21 a. Prohibiting Defendants and each of them, including without limitation
- 22 their agents, servants, employees, officers, attorneys, successors,
- 23 licensees, partners, and assigns and all those acting in active concert or
- 24 participation with any of them, including any and all service providers
- 25 from:
- 26 i. hosting, linking to, distributing, reproducing, performing, selling,
- 27 offering for sale, making available for download, streaming or
- 28 making any other use of the Coverage or any portion thereof;

- 1 ii. taking any action that induces, causes or materially contributes to
2 the direct infringement of Plaintiffs' rights in the Coverage by any
3 third party, including without limitation hosting, linking to,
4 distributing, reproducing, performing, selling, offering for sale,
5 making available for download, streaming or making any other
6 use of the Coverage or any portion thereof;
- 7 iii. otherwise infringing Plaintiffs' rights in any manner, whether
8 directly, contributorily, vicariously or in any other way; and
- 9 iv. transferring or performing any function that results in the transfer
10 of the registration of the domain names <boxinghd.net> or
11 <sportship.org> to any other registrant or registrar.
- 12 b. Ordering that upon receipt of the Court's order, beginning no later than
13 8:45 p.m. Eastern Time on May 2, 2015 and continuing until no earlier
14 than 6:00 a.m. Eastern Time on May 3, 2015, all service providers
15 whose services will enable or facilitate Defendants' anticipated
16 infringement are ordered to suspend all services with respect to
17 Defendants' Infringing Websites, including all registrars, hosts, name
18 servers, site acceleration providers, providers of video delivery
19 resources, and providers of computer and network resources through
20 which video transits; and
- 21 c. Prohibiting Defendants and each of them, including without limitation
22 their agents, servants, employees, officers, attorneys, successors,
23 licensees, partners, and assigns and all those acting in active concert or
24 participation with any of them, from effecting assignments or transfers,
25 forming new entities or associations or utilizing any other device for the
26 purpose of circumventing or otherwise avoiding the prohibitions set
27 forth herein.
- 28

1 2. That the Court award Plaintiffs actual damages, profits and/or statutory
2 damages pursuant to 17 U.S.C. § 504, at the election of Plaintiffs.

3 3. That the Court award Plaintiffs their costs of suit incurred herein, including
4 their attorneys' fees and investigators' fees incurred by Plaintiffs in investigating
5 Defendants' unlawful conduct, as provided by applicable law.

6 4. That the Court retain jurisdiction of this action for the purpose of enabling
7 Plaintiffs to apply to the Court at any time for such further orders and interpretation
8 or execution of any order entered in this action, for the modification of any such
9 order, for the enforcement or compliance therewith and for the punishment of any
10 violations thereof.

11 5. That the Court grant Plaintiffs such other and further relief as it deems just
12 and equitable.

13 DATED: April 28, 2015

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON
LLP

15
16 By: /s/ Dennis L. Wilson
17 DENNIS L. WILSON

18 Attorneys for Plaintiffs
19 SHOWTIME NETWORKS INC.,
20 HOME BOX OFFICE, INC.,
21 MAYWEATHER PROMOTIONS, LLC, and
22 TOP RANK, INC.
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EXHIBIT A

Watch Mayweather vs Pacquiao Online Free



[Mayweather vs Pacquiao Live Streaming](#)

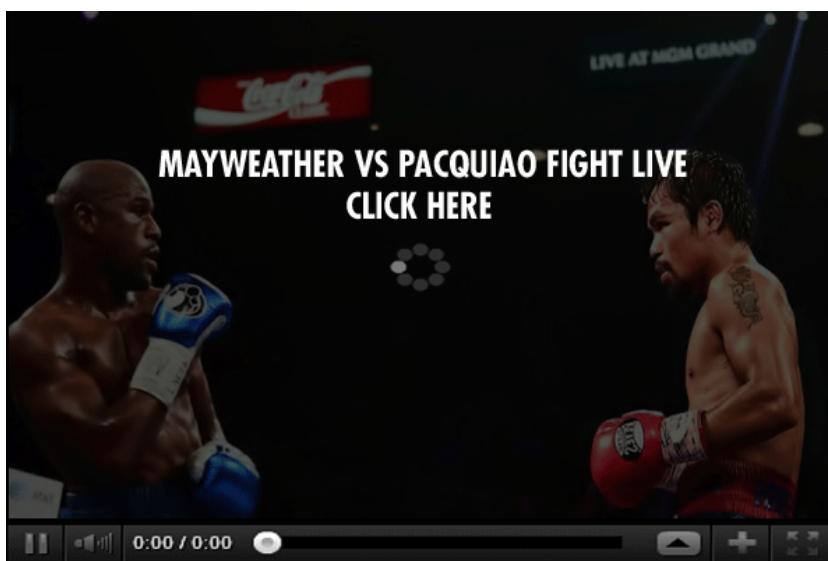
[Tale of the Tape](#)

[Mayweather vs Pacquiao Replay](#)

[Buy Mayweather Pacquiao Tickets](#)

LINK

BoxingHD.net is dedicated in providing boxing fans all around the globe everything about **Mayweather vs Pacquiao** tickets, live streaming links during fight day, and fight updates; from the training camp, the weigh in, and most especially the fight in itself at its respective venues.



MAYWEATHER –

PACQUIAO POLL

Who will win?

- ☐ Mayweather by KO
- ☐ Mayweather by UD
- ☐ Pacquiao by KO
- ☐ Pacquiao by UD
- ☐ Draw

[View Results](#)

RECENT COMMENTS

- Nancy on [Mayweather vs Pacquiao Live Streaming](#)
- Mike Peterson on [Mayweather vs Pacquiao Live Streaming](#)

Mayweather vs Pacquiao Live Streaming - Mayweather vs Pacquiao live streaming, watch the boxing fight for free & buy tickets here



For those who wants to watch the fight live in person at the venue in MGM Grand, Las Vegas, Nevada we can provide you with the best deals for Mayweather vs Pacquiao Tickets that you need. We have everything that you need from the cheapest to the most expensive one.

Now if you can't afford to buy tickets then simply watch Mayweather vs Pacquiao here. We will provide with nothing but the freshest and the most reliable high quality live links that will showcase

Posted on [July 13, 2014](#) | [Leave a reply](#)

- Mike Craig on [Mayweather vs Pacquiao Live Streaming](#)
- Drake Nelson on [Mayweather vs Pacquiao Live Streaming](#)
- Anthoney on [Mayweather vs Pacquiao Live Streaming](#)

RECENT POSTS

- [Welcome to Boxing HD](#)

ARCHIVES

- [July 2014](#)

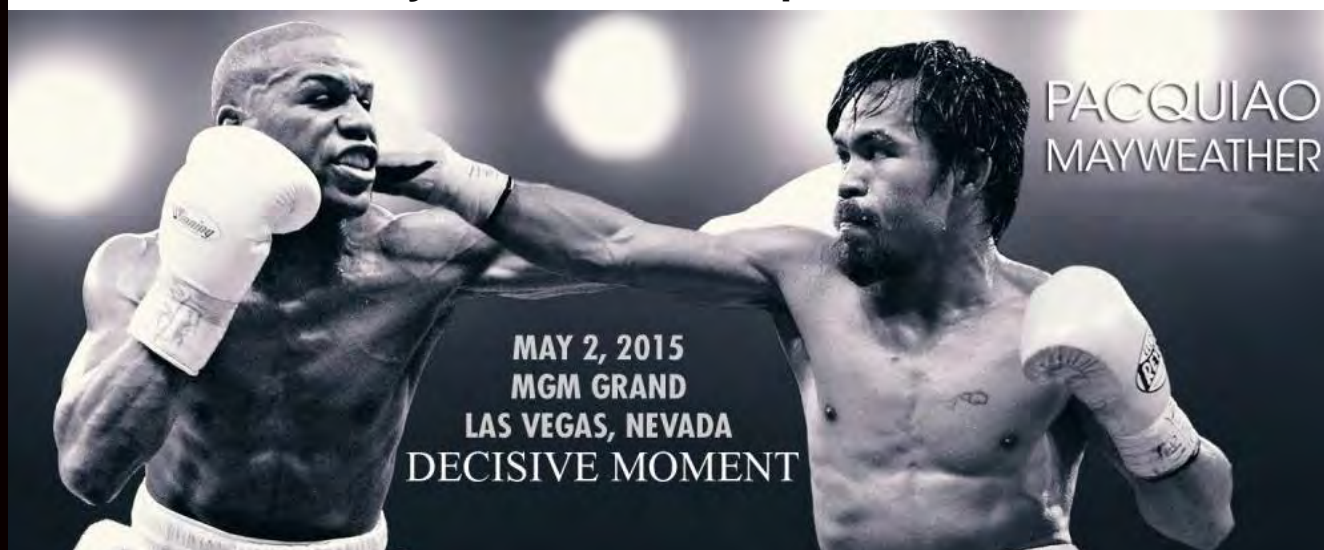
CATEGORIES

- [Boxing](#)

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EXHIBIT B

Watch Mayweather vs Pacquiao Online Free


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[Tale of the Tape](#)
[Mayweather vs Pacquiao Replay](#)
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Mayweather vs Pacquiao Live Streaming



The wait is over. Finally after roughly more or less five years of fans wanting to see the fight, it is now official Floyd "Money" Mayweather going head to head with Manny "Pacman" Pacquiao. This might be the biggest fight in boxing history for the last 30 years, or perhaps of all time. In terms of magnitude



MAYWEATHER –

PACQUIAO POLL

Who will win?

- Mayweather by KO
- Mayweather by UD
- Pacquiao by KO
- Pacquiao by UD
- Draw

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- Nancy on [Mayweather vs Pacquiao Live Streaming](#)
- Mike Peterson on [Mayweather vs Pacquiao Live Streaming](#)

there is no fight greater than this especially now that we are on the age of technology where news gets spread in a matter of seconds. The Pound for pound king dubbed as TBE or the “The Best Ever”, the undefeated 5 weight division champion Floyd “Money Mayweather” will be taking on his greatest challenge. One of the biggest name in boxing and the only one who has achieved 8 championship belts in 10 division, Manny Pacquiao, will try what 47 boxers did, that is to defeat Mayweather. Will he be successful? or will he be the 48th person who will fail? This is one hell of a boxing match, we all need to watch wherever you are in the world.

The fight is going to take place this coming May 2nd. It is the closest date to the Mexican Holiday called “Cinco de Mayo”. Mexicans as we all know are big boxing fans, and that is going to help a lot as far as revenue is concern. There are many Mexicans who will root for Pacquiao but there are also those who loves Mayweather. The venue for the fight is none other than Las Vegas, Mayweather’s home town, particularly on MGM Grand Hotel and Casino.

According to the odds, Mayweather is highly favored to win but with Pacquiao as his opponent anything can happen. Others believe that if the fight goes the distance, it will be Mayweather who will win by UD or majority one. The only way for Pacquiao to win is to score a knock out or a tehcnical knockout. Why is this so? Well, simple Mayweather is the no.1 P4P king and he is the A side on this fight, thus if Pacquiao’s effort is not that convincing, decision will most likely be on the former’s favor. That is what makes this exciting, since Pacquiao, as we all know is an aggressive fighter and will definitely do everything humanly possible to give all his best to win for the most important fight of his life. This is great defense against offensive fire power, who will win? That is up to us to witness come May the 2nd.

When it comes to pay per view buys, this fight is predicted to be breaking records previously set by Mayweather and Canelo. It has been rumored to guarantee \$250 Million in total for both fighters. The fight has been waited for so long that it has

- Mike Craig on [Mayweather vs Pacquiao Live Streaming](#)
- Drake Nelson on [Mayweather vs Pacquiao Live Streaming](#)
- Anthoney on [Mayweather vs Pacquiao Live Streaming](#)

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promoted itself, and thus requires a relatively expensive pay-per-view price, as well as the tickets. It has been said that ppv will be as high as \$100 and tickets will start at around \$4000. That is quite an expensive one that casual fans should think twice before buying. Well, for those who can't buy the ticket, nor be able to watch on pay-per-view, there is always a way to watch it online, and that is via this website with our version of Mayweather vs Pacquiao Live Streaming. Everything will be covered from start to finish, from undercard to main event, from weigh in to post fight press conference. We have everything made specially for fans around the globe. We know, you would not want to miss a fight like this.

Where to Watch Mayweather vs Pacquiao Live Streaming?

This has been a common question for all the boxing fans especially if they are far from the place of the event or they don't have the money to buy tickets or pay-per-view coverage, so, where can you watch Mayweather vs Pacquiao Live streaming on May 2nd? The fight is sponsored by both Top Rank and Mayweather Promotions and will be aired via a joint pay per view by HBO and Showtime. However, there are lots of alternatives that you can watch the fight live.



Watch Mayweather vs Pacquiao fight inside the ring this coming May 2, 2015. You can watch live in MGM Grand, Las Vegas or you can watch it live at home via live streaming. You can watch the full fight via live stream in this website. The live streaming will commence when the fight starts.

6 THOUGHTS ON "MAYWEATHER VS PACQUIAO LIVE STREAMING"



Timmy Brower on [May 1, 2015 at 10:34 am](#) said:

Never had problem watching this fight via the link provided. So smooth, no lag or delay. Its like watching it on a premium satellite coverage but its FREE.. gracias!

Reply ↓



Anthoney
on [May 1, 2015 at 11:44 am](#)
said:

yeah the same here! its really good

Reply ↓



Drake Nelson on [May 1, 2015 at 6:28 pm](#) said:

I am just a bit curious since I have already one slot for the Mayweather – Pacquiao Live Streaming. Can I still avail another one slot for my friend? He is on the same building as mine with the same internet connection? Is that possible?

Reply ↓



Mike Craig on [May 1, 2015 at 8:25 pm](#) said:

Hello, nice to see such site being put up just for us to at least see Pacquiao fight again. Got one slot already for the free

Mayweather vs Pacquiao Live Streaming | Watch Mayweather vs Pacquiao Online Free

live streaming. Thanks a lot.

Reply ↓



Mike Peterson on [May 2, 2015 at 7:57 am](#) said:

thank you

Reply ↓



Nancy on [May 2, 2015 at 9:30 am](#) said:

wow I can watch this for free... you rock
admin

Reply ↓

Leave a Reply

Your email address will not be published. Required fields are marked *

Name *

Email *

Website

Comment

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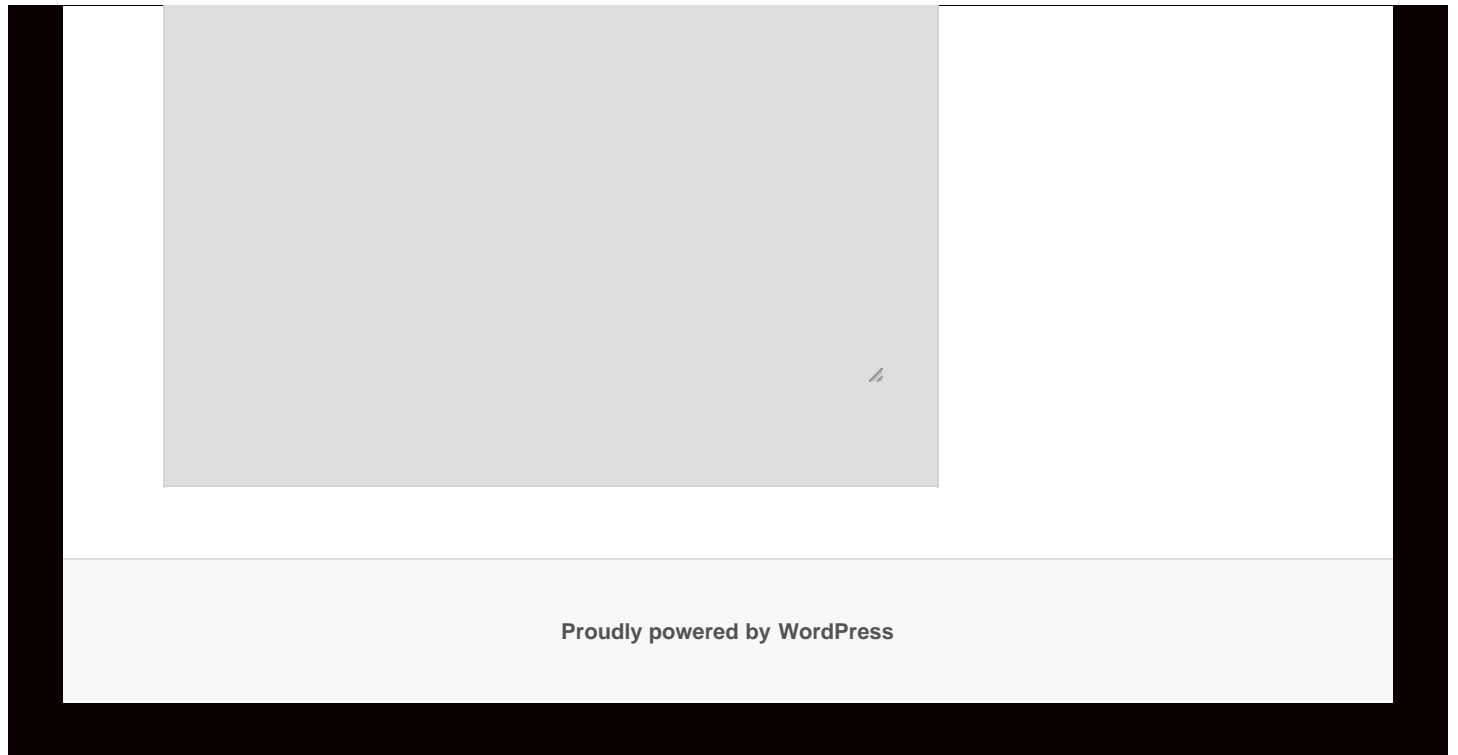
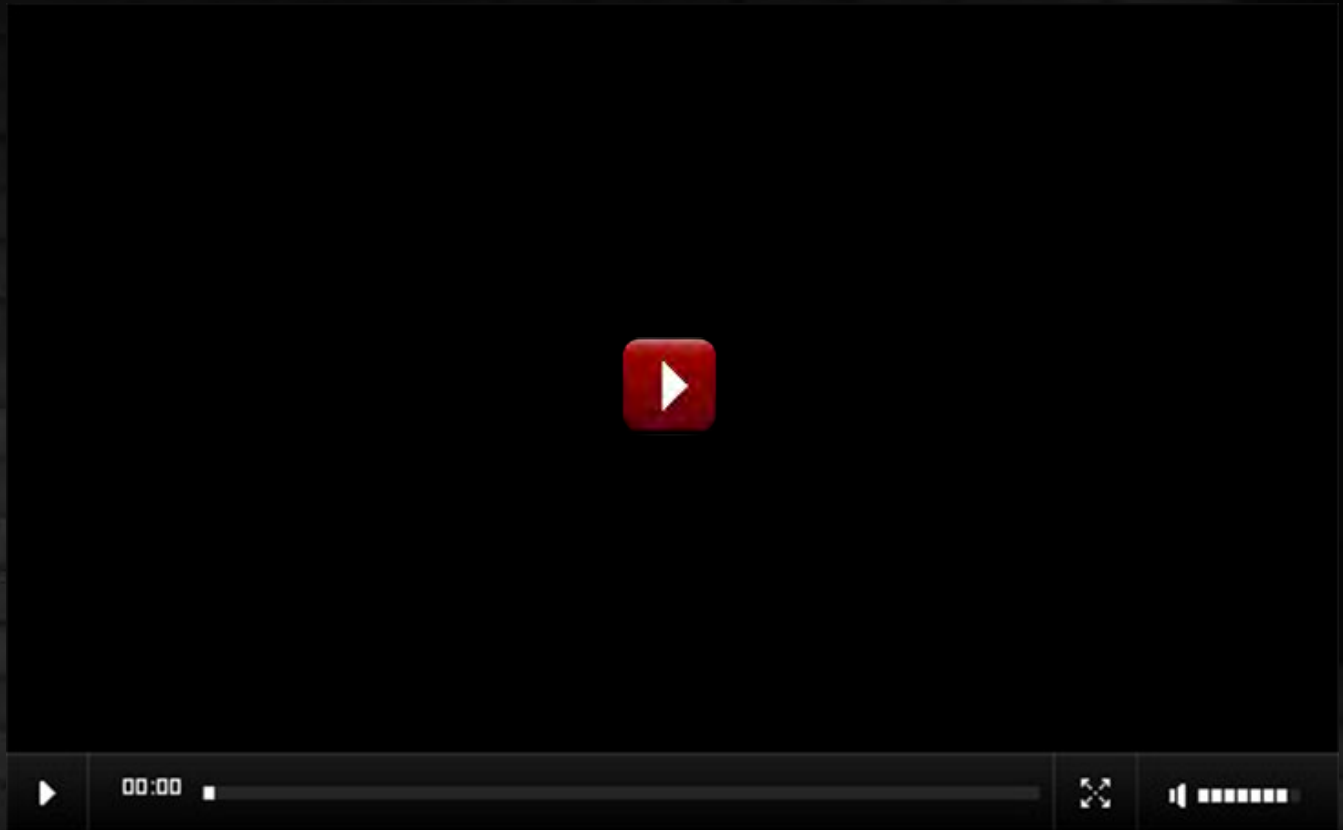


EXHIBIT C

Mayweather vs Pacquiao Live Streaming

MAYWEATHER VS PACQUIAO LIVE STREAMING ONLINE



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Mayweather vs Pacquiao Live Streaming

GAME HIGHLIGHTS



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EXHIBIT D

Watch Mayweather vs Pacquiao Live Streaming

MAYWEATHER VS PACQUIAO LIVE STREAMING


TIME LEFT

GET RESERVATION



Watch Mayweather vs Pacquiao Live Streaming

MAYWEATHER VS PACQUIAO LIVE STREAMING




MAYWEATHER VS PACQUIAO

SAT MAY 2 9 PM ET 6 PM PT

LIVE ON PAY-PER-VIEW

Now Available on TR, PPV, MGM GRAND, HBO PPV

Mayweather vs. Pacquiao - May 2 on Pay-Per-View



0:30 / 0:30

YouTube

[Get Free Access](#)

2 Comments

Recommend Share

Join the discussion...

Marue Johnson · 12 hours ago

I go for Mayweather. I want to see the fight online. Thanks for the free access. #ExcitedHere

Jemuel P. · 14 hours ago

I am excited to watch the fight for free! Thanks for the link.

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Maypac

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EXHIBIT E



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DELIVERY**

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direct fax 310 388 6097
DWilson@kilpatricktownsend.com

April 25, 2015

Whoisguard, Inc.
Attn: boxinghd.net
P.O. Box 0823-03411
Republic of Panama

Email: A1F561CB2D5C4ED39BDC437BC057FD6A.PROTECT@WHOISGUARD.COM

Re: **ADVANCE NOTICE OF POTENTIAL INFRINGEMENT
MAY 2, 2015 COVERAGE OF MAYWEATHER V. PACQUIAO
CHAMPIONSHIP BOXING MATCH**

Pursuant to Title 17 U.S.C. Sec. 411(c)(with reference to Sec. 411(b) of the United States Copyright Act as authority) and Section 201.22 of the Copyright Office's regulations, 37 C.F.R. § 201.22, this will serve as notice to you that Showtime Networks Inc., Home Box Office, Inc., Mayweather Productions, LLC and Top Rank, Inc. (collectively the "Owners") jointly own the exclusive rights to, among other things, reproduce and transmit the live transmission of the 2015 Mayweather v. Pacquiao championship boxing match, including the pre-show and the undercard bouts, (the "**Coverage**") in the United States. Consumers will be able to purchase live pay-per-view television access to the Coverage, which will begin at 8:00 p.m. Eastern Time on **Saturday, May 2, 2015** with the Fight pre-show, immediately followed at approximately 9:00 p.m. Eastern Time by two undercard bouts and then the Fight itself, continuing until the Fight's conclusion.

The Owners will be the joint authors of the Coverage, and will jointly own the copyright in the Coverage after its fixation. The Owners intend to register their copyright in the Coverage within three months after its fixation on May 2, 2015.

The Owners have become aware that you are advertising an unauthorized Internet "stream" of the Coverage within the United States on the websites <boxinghd.net> and <sportship.org>. Any such stream, and any other performance, telecast, exhibition, transmission, reproduction, distribution, exploitation or other use of the Coverage on <boxinghd.net>, <sportship.org> or any other website and/or through any service that you provide or to which you provide access would infringe the Owners' exclusive rights under the United States Copyright Act (the "Infringing Activities"). The Owners object to your Infringing Activities.

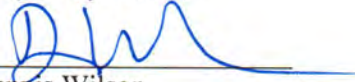
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SEATTLE SHANGHAI SILICON VALLEY STOCKHOLM TOKYO WALNUT CREEK WASHINGTON WINSTON-SALEM

April 25, 2015
Page 2

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The Owners hereby demand that you remove all references to the Infringing Activities from all websites, social media accounts and any other content that you own, operate or control. To avoid further enforcement action you must also confirm in writing within forty-eight (48) hours that you will not stream the Coverage or otherwise engage in any of the Infringing Activities. Please send your written confirmation to DWilson@kilpatricktownsend.com. The Owners jointly and severally reserve all of their rights and remedies at law and equity.

Very Truly Yours,



Dennis Wilson
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DWilson@kilpatricktownsend.com

Attorneys for Showtime Networks Inc.,
Home Box Office, Inc., Mayweather
Productions, LLC and Top Rank, Inc.

cc: Showtime Networks Inc.
Home Box Office, Inc.
Mayweather Productions, LLC
Top Rank, Inc.



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VIA EMAIL

April 25, 2015

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cc: Showtime Networks Inc.
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Mayweather Productions, LLC
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VIA OVERNIGHT DELIVERY

April 25, 2015

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DWilson@kilpatricktownsend.com

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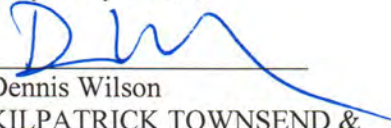
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