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PRINCE ROGERS NELSON

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

KAYE SCHOLER_{LLP}

PRINCE ROGERS NELSON, an individual,

Plaintiff,

v.

DAN CHODERA, an individual;
KARINA JINDROVA, an individual;
DOE 1 (aka PURPLEHOUSE2); DOE 2 (aka DABANG319); DOE 3(aka PURPLEKISSTWO); DOE 4 (aka WORLDOFBOOTLEG); DOE 5 (aka FUNKYEXPERIENCEFOUR); DOE 6 (aka NPRUNIVERSE); DOE 7 (aka PSPMUSICBLOG); DOE 8 (aka THEULTIMATE BOOTLEGEXPERIENCE); and DOES 9-20).

Defendants.

Case No.

PLAINTIFF PRINCE ROGERS NELSON'S COMPLAINT

(1) Direct Copyright Infringement

(2) Unauthorized Fixation

(3) Contributory Copyright Infringement & Bootlegging

DEMAND FOR JURY TRIAL

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COMPLAINT

For his Complaint, Plaintiff Prince Rogers Nelson (“Prince”) alleges as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2) in that a substantial part of the events or omissions giving raise to the claim occurred in this district.

THE PARTIES AND THEIR CONDUCT

Prince

3. Prince, doing business as Controversy Music, is the owner of more than 600 copyright registrations for various musical compositions. Prince often puts on live performances of musical works.

Defendants Generally

4. The Defendants in this case engage in massive infringement and bootlegging of Prince’s material. For example, in just one of the many takedown notices sent to Google with respect to Doe 2 (aka DaBang319), Prince identified 363 separate infringing links to file sharing services, with each link often containing copies of bootlegged performances of multiple separate musical compositions. Thus, each Defendant is responsible for up to thousands of separate acts of infringement and bootlegging.

5. The Defendants rely on either Google’s Blogger platform or Facebook, or both, to accomplish their unlawful activity. Blogger is a service provided by Google that allows individuals to create personal blogs. Defendants, rather than publishing lawful content to their blogs, typically publish posts that list all the songs performed at a certain Prince live show and then provide a link to a file sharing service where unauthorized copies of the performance can be downloaded.

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1 Defendants use their Facebook accounts to post similar unlawful content directly to
2 their Facebook accounts or to direct users to their blogs, or both.

3 6. The true names and capacities of Does 1-20 are unknown to Prince. As to
4 Does 1-8, their true names are unknown because these Does operate Google
5 Blogger accounts and/or Facebook accounts under pseudonyms. These blogs and
6 Facebook accounts are used to facilitate copyright infringement and distribution of
7 bootlegged copies of Prince’s live performances.

8 7. On information and belief, Does 9-20 act in concert with the other
9 Defendants in this case with respect to the unlawful activity alleged herein. Indeed,
10 Defendants constitute an interconnected network of bootleg distribution, which is
11 able to broadly disseminate unauthorized copies of Prince’s musical compositions
12 and live performances. On information and belief, some or all of the Defendants
13 directly communicate with each other to obtain and distribute the unlawful material
14 described in this Complaint.

15 8. On information and belief, each of the Defendants was the agent, servant,
16 employee, joint venturer and/or co-conspirator of each of the other Defendants. On
17 information and belief, each of the acts alleged to have been done by each
18 Defendant was done in that Defendant’s capacity as the agent, servant, employee,
19 joint venturer and/or co-conspirator of the other Defendants.

20 9. Each of the Defendants has purposefully directed his activities in
21 California, consummated transactions with residents of California and purposefully
22 availed himself of the privilege of conducting activities of California, thereby
23 invoking the benefits and protections of its laws.

24 10. In particular, Defendants use Facebook and Google’s Blogger forum to
25 conduct the infringing activity alleged herein, which services are widely known to
26 be headquartered in California and in this judicial district. Thus, Defendants have
27 consummated transactions with residents of California and purposefully availed
28 themselves of the privilege of conducting activities in California.

1 11. Moreover, by using these services, the Defendants have expressly
2 invoked the benefits and protections of California's laws. Indeed, Facebook's terms
3 and conditions state "You will resolve any claim, cause of action or dispute (claim)
4 you have with us arising out of or relating to this Statement or Facebook
5 exclusively in the U.S. District Court for the Northern District of California or a
6 state court located in San Mateo County, and you agree to submit to the personal
7 jurisdiction of such courts for the purpose of litigating all such claims. The laws of
8 the State of California will govern this Statement, as well as any claim that might
9 arise between you and us, without regard to conflict of law provisions."

10 12. Similarly, the terms and conditions governing Google's Blogger service
11 state that "The laws of California, U.S.A., excluding California's conflict of laws
12 rules, will apply to any disputes arising out of or relating to these terms or the
13 Services. All claims arising out of or relating to these terms or the Services will be
14 litigated exclusively in the federal or state courts of Santa Clara County, California,
15 USA, and you and Google consent to personal jurisdiction in those courts."

16 13. In addition to conducting their infringing activities in California, the
17 Defendants have aimed the harm caused by their activities to this state. On
18 information and belief, a substantial portion of the recipients of the infringing files
19 are located in California, and California residents constitute a substantial portion of
20 the fan-base of these infringing blogs and Facebook accounts. Thus, Defendants
21 committed intentional acts of infringement, expressly aimed at California, causing
22 harm that Defendants know is likely to be suffered in California.

23 14. Moreover, the claims in this case directly arise out of and relate to the
24 Defendants' activities in California, and the exercise of jurisdiction comports with
25 fair play and substantial justice.

26 15. Further, to the extent that any Defendant resides outside of the United
27 States, such Defendant has intentionally targeted the harm of their conduct to the
28 United States. In particular, Defendants are well aware that Prince is a citizen and

1 resident of United States and would thus suffer harm from their unlawful activities
 2 here in the United States. Moreover, a substantial portion of people interested in
 3 downloading unauthorized Prince material are in the United States, and Defendants
 4 directly target their unlawful content to such people. Thus, while foreign
 5 Defendants are subject to jurisdiction in California for the reasons described above,
 6 in the alternative, they are subject to jurisdiction in the United States as a whole
 7 pursuant to Federal Rule of Civil Procedure 4(k)(2).

8 16. Finally, as alleged more specifically below, Defendants Chodera and
 9 Jindrova have expressly consented to this Court's jurisdiction.

10 **Doe 1 - PurpleHouse2**

11 17. PurpleHouse2 maintained a blog at PurpleHouse2.blogspot.co.uk and
 12 several other mirror blogs on the Blogger platform. He also maintained a Facebook
 13 account at www.facebook.com/pages/Prince-Purple-House. The Facebook account
 14 directed users to his blogs and his blogs directed users to file sharing services to
 15 obtain unauthorized copies of bootlegged Prince performances. For example, one
 16 blog post contained a link to download bootleg recordings of the following musical
 17 compositions:

18 COMPOSITION	19 REGISTRATION NUMBER
20 Endorphinmachine	PAu001731960
21 Bambi	PA0000523663
22 Let's Go Crazy Reloaded	PA0000224634

23
 24 **Doe 2 - DaBang319**

25 18. DaBang319 maintained a blog at Dabang319.blogspot.com. He also
 26 maintained a Facebook account at www.facebook.com/DaBang319. The Facebook
 27 account directed users to his blog and the blog directed users to file sharing services
 28

1 to obtain unauthorized copies of bootlegged Prince performances. For example,
 2 one blog post contained a link to download bootleg recordings of the following
 3 musical compositions:

COMPOSITION	REGISTRATION NUMBER
Days of Wild	PAu001989947
1999	PAu000440507 / PA0000157921
Something in the Water (Does Not Compute)	PA0000157928
Let's Go Crazy	PA0000217248
She's Always in My Hair	PAu000722566
Nothing Compares 2 U	PA0000261000
Satisfied	PA0000427521
Housequake	PA0000339606
When Doves Cry	PA0000225932 / PA0000220373 / PAu000609914
Sign O' the Times	PA0000322108
Most Beautiful Girl in the World	PA0000692506
Hot Thing	PA0000339611
I Would Die 4 U	PA0000247244 / PA0000241298 / PA0000217252 / PAu000613662
Let's Work	PA0000130921
U Got the Look	PA0000339613
Purple Rain	PAu000613664 / PA0000217254

26 **Doe 3 - PurpleKissTwo**

27 19. PurpleKissTwo maintains a blog at PurpleKissTwo.blogspot.com. The
 28 blog is used to direct users to file sharing services to obtain unauthorized copies of

1 bootlegged Prince performances. For example, one blog post contained a link to
 2 download bootleg recordings of Prince's March 24, 2011, Charlotte, North Carolina
 3 performance at which the following musical compositions were performed.

COMPOSITION	REGISTRATION NUMBER
When Doves Cry	PA0000225932 / PA0000220373 / PAu000609914
Darling Nikki	PAu000613661 / PA0000217251
Sign O' the Times	PA0000322108
Most Beautiful Girl in the World	PA0000732864 / PAu001832359 / PA0000692506
Uptown	PA0000724137
Raspberry Beret	PA0000270334 / PA0000252652 / PA0000255668 / PAu000705005
Cream	PA0000543529 / PA0000549273 PAu001547996
Cool	PAu000302976
Let's Work	PA0000130921
U Got the Look	PA0000339613
Nothing Compares 2 U	PA0000261000
Take Me With U	PA0000217249
Anotherloverholenyohead	PA0000291374
Controversy	PA0000130927
Shhh	PAu001805925
Elixer	PA0001695093

20. After counsel for Prince began issuing Digital Millennium Copyright Act
 28 ("DMCA") notices to Google and to file sharing services used by PurpleKissTwo,

1 rather than using file sharing services, PurpleKissTwo began posting live
 2 performance set lists on his blog with the instruction “U know what 2 do now.”
 3 Clicking “do” leads to the email address gettoffte@gmail.com. On information and
 4 belief, this email account is used to distribute bootleg recordings. One such post
 5 contains the set list for Prince’s April 24, 2002, Oakland performance at which the
 6 following musical compositions were performed:

COMPOSITION	REGISTRATION NUMBER
Rainbow Children	PA0001074922
Muse 2 The Pharaoh	PA0001074923
Mellow	PA0001074928
1+1+1=3	PA0001074929
Strange Relationship	PA0000339615
When You Were Mine	PA0000724137
Family Name	PA0001074933
Take Me With U	PA0000217249
Raspberry Beret	PAu000705005 / PA0000255668 / PA0000252652 / PA0000270334
Everlasting Now	PA0001074934
Adore	PA0000339619
Do Me Baby	PA0000130925
Girls and Boys	PA0000291369
Joy in Repetition	PA0000498333 / PA0000502599
Free	PA0000157929 / PAu000440514
Starfish And Coffee	PA0000339609
Sometimes It Snows in April	PA0000291375
Condition of the Heart	PA0000255665 / PAu000705004

Diamonds and Pearls	PA0000549272 / PAu001547993 / PA0000585432
Beautiful Ones	PA0000217250 / PAu000613659
Most Beautiful Girl in The World	PA0000692506 / PA0000732864 / PAu001832359
Purple Rain	PA0000217254 / PAu000613664 / PA0000238407 /
How Come U Don't Call Me Anymore	PA0000157922
Nothing Compares 2 U	PA0000261000
Anna Stesia	PAu001081255 / PA0000377935

Doe 4 - WorldOfBootleg

21. WorldOfBootleg maintains a blog at WorldOfBootleg.blogspot.com. The blog is used to direct users to file sharing services to obtain unauthorized copies of bootlegged Prince performances. For example, one blog post contained a link to download bootleg recordings of Prince's April 10, 1983, Chicago performance at which the following musical compositions were performed:

COMPOSITION	REGISTRATION NUMBER
Controversy	PA0000130927
Let's Work	PA0000130921
Do Me, Baby	PA0000130925
Free	PA0000157929 / PAu000440514
Something in the Water	PAu000440513 / PA0000157928
How Come U Don't Call Me Anymore?	PA0000157922

Lady Cab Driver	PA0000157930 / PAu000440515
Little Red Corvette	PA0000157923 / PAu000440508 / PA0000174670
Sexuality	PA0000130926
Let's Pretend We're Married	PAu000440510 / PA0000157925 / PA0000202417
International Lover	PAu000440517 / PA0000157932
1999	PAu000440507 / PA0000157921 / PA0000165680

Doe 5 - FunkyExperienceFour

22. FunkyExperienceFour maintains a blog at FunkyExperienceFour.blogspot.com. The blog is used to direct users to file sharing services to obtain unauthorized copies of bootlegged Prince performances. For example, one blog post contains a link to download bootleg recordings of Prince's December 2013 Mohegan Sun Arena performance at which the following musical compositions were performed:

COMPOSITION	REGISTRATION NUMBER
Days of Wild	PAu001989947
1999	PAu000440507 / PA0000157921
Something in the Water (Does Not Compute)	PA0000157928
Let's Go Crazy	PA0000217248
She's Always in My Hair	PAu000722566
Nothing Compares 2 U	PA0000261000
Satisfied	PA0000427521
Housequake	PA0000339606

When Doves Cry	PA0000225932 / PA0000220373 / PAu000609914
Sign O' the Times	PA0000322108
Most Beautiful Girl in the World	PA0000692506
Hot Thing	PA0000339611
I Would Die 4 u	PA0000247244 / PA0000241298 / PA0000217252 / PAu000613662
Let's Work	PA0000130921
U Got the Look	PA0000339613
Purple Rain	PAu000613664 / PA0000217254

Doe 6 - NPRUniverse

23. NPRUniverse maintains a blog at NPRUniverse.blogspot.com. The blog is used to direct users to file sharing services to obtain unauthorized copies of bootlegged Prince performances. For example, one blog post contained a link to download bootleg recordings of Prince's performance of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
Let's Go Crazy	PA0000217248 / PAu000613658 / PA0000224634 / PA0000243437
Take Me With U	PA0000217249
Darling Nikki	PA0000217251 / PAu000613661
Joy in Repetition	PA0000498333 / PA0000502599
When Doves Cry	PA0000220373 / PAu000609914 / PA0000225932 / PA0000224949
Computer Blue	PA0000217247 / PAu000645373 / PAu000662613 / PAu000613660

1	I Would Die 4 U	PA0000217252 / PA0000241298 /
2		PA0000247244 / PAu000613662
3	God	PAu000617271
4	Purple Rain	PA0000217254 / PAu000613664 /
5		PA0000238407 /
6	When You Were Mine	PA0000724137
7	Bambi	PA0000523663 / PAu001541679 /
8		PAu001475738
9	And God Created Woman	PA0000608655 / PAu001640802
10	3 Chains o' Gold	PAu001640803 / PA0000608654
11	Anna Stesia	PAu001081255 / PA0000377935
12	Still Would Stand All Time	PA0000498326 / PA0000502605
13	Adore	PA0000339619
14	Little Red Corvette	PA0000157923 / PAu000440508 /
15		PA0000174670
16	Housequake	PAu000952526 / PAu000952525 /
17		PA0000339606
18	The Ballad of Dorothy Parker	PA0000339607
19	Free	PA0000157929 / PAu000440514
20	Starfish And Coffee	PA0000339609
21	Sometimes It Snows in April	PA0000291375
22	How Come U Don't Call Me	PA0000157922
23	Anymore?	

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26 **Doe 7 - PSPMusicBlog**

27 24. PSPMusicBlog maintained a blog at PSPMusicBlog.blogspot.com.
28 PSPMusicBlog also maintains a Facebook account at

1 www.facebook.com/PRINCEsoloPrince. The Facebook account directed users to
 2 his blog and the blog directed users to file sharing services to obtain unauthorized
 3 copies of bootlegged Prince performances. For example, one blog post contained a
 4 link to download bootleg recordings of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
She's Always in My Hair	PAu000722566 / PA0000259277
Dreamer	PA0001695103
Bambi	PA0000523663 / PAu001541679 / PAu001475738
Let's Go Crazy	PA0000217248 / PAu000613658 / PA0000224634 / PA0000243437
Diamonds and Pearls	PA0000549272 / PAu001547993 / PA0000585432
Beautiful Ones	PA0000217250 / PAu000613659
Endorphinmachine	PAu001731960
Take Me With U	PA0000217249
Raspberry Beret	PAu000705005 / PA0000255668 / PA0000252652 / PA0000270334
The Max	PA0000608662 / PAu001640809
Electric Chair	PA0000427515 / PA0000433157
U Got The Look	PA0000339613
Colonized Mind	PA0001695121
Bambi	PA0000523663 / PAu001541679 / PAu001475738
Housequake	PAu000952526 / PAu000952525 / PA0000339606

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1 Sign O' the Times	PA0000335119 / PA0000322108 / 2 PA0000325919
3 Nothing Compares 2 U	PA0000261000
4 Purple Rain	PA0000217254 / PAu000613664 / 5 PA0000238407 /

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7 **Doe 8 - TheUltimateBootlegExperience**

8 25. TheUltimateBootlegExperience operates a blog at
9 TheUltimateBootlegExperience7.blogspot.com. His blog is used to direct users to
10 Guitars101.com, which in turn contains links to file sharing services to bootlegs of
11 many artists, including Prince. For example, one blog post contained a link that
12 allowed users to reach links to download Prince's live performances of the
13 following musical compositions:
14

15 COMPOSITION	REGISTRATION NUMBER
16 Future	PA0000427514
17 1999	PAu000440507 / PA0000157921 / 18 PA0000165680
19 Housequake	PAu000952526 / PAu000952525 / 20 PA0000339606
21 Kiss	PA0000284474 / PA0000289688
22 Purple Rain	PA0000217254 / PAu000613664 / 23 PA0000238407 /
24 Take Me With U	PA0000217249
25 If I Had a Harem	PAu001166396
26 Alphabet Street	PA0000377936 / PA0000371276 / 27 PAu001081257

Question of U	PA0000498334 / PA0000502595
Under the Cherry Moon	PA0000291368 / PAu000875301

Dan Chodera & Karina Jindrova

26. Dan Chodera and Karina Jindrova operate a Facebook account at www.facebook.com/kristynafanpage. The Facebook account has posted numerous videos of bootlegged Prince performances, including of the following musical compositions:

COMPOSITION	REGISTRATION NUMBER
Let's Go Crazy	PA0000217248 / PAu000613658 / PA0000224634 / PA0000243437
Bambi	PA0000523663 / PAu001541679 / PAu001475738
She's Always in My Hair	PAu000722566 / PA0000259277
Most Beautiful Girl in the World	PA0000692506 / PA0000732864 / PAu001832359
I Hate U	PA0000774220 / PAu001989956
Satisfied	PA0001331131
Dreamer	PA0001695103

27. In response to Prince's DMCA takedown notices to Facebook, Chodera submitted two counter-notifications pursuant to 17 U.S.C. § 512(g)(2) on January 9, 2014. Jindrova submitted a similar counter-notification on January 15, 2014. Both Chodera and Jindrova provided a foreign address. As a result, pursuant to 17 U.S.C. § 512(g)(3)(D), Chodera and Jindrova have expressly consented to the jurisdiction of any Federal District Court in which the service provider (Facebook)

1 can be found. Thus, Chodera and Jindrova have expressly consented to jurisdiction
2 in this district in which Facebook maintains its headquarters.

3 **Does 9-10**

4 28. On information and belief, Does 9-10 are responsible for the initial
5 fixation of the bootlegged material described in this Complaint. Does 9 through 10
6 are either the operators of one of the blogs and Facebook accounts described herein
7 and/or provide their material to operators of the blogs and Facebook accounts
8 described herein for further distribution.

9 **Does 11-20**

10 29. On information and belief, Does 11-20 are additional individuals or
11 entities responsible for one or more the blogs and Facebook accounts of Does 1-8,
12 Chodera and Jindrova.

13 **FIRST CLAIM FOR RELIEF**

14 **Direct Copyright Infringement**

15 **17 U.S.C. § 501**

16 **(All Defendants)**

17 30. All preceding paragraphs are incorporated here.

18 31. Prince is the owner of copyright registrations in numerous musical
19 compositions, each of which is a valid copyright.

20 32. As alleged herein, Defendants have reproduced and distributed copies of
21 these works without Prince's permission.

22 33. As a result, Defendants have committed direct copyright infringement.

23 34. Defendants' actions are and have been willful within the meaning of
24 17 U.S.C. § 504(2).

25 35. Defendants' infringements have caused and will continue to cause
26 substantial, immediate and irreparable injury to Prince for which there is no
27 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against
28 Defendants.

1 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against
2 Defendants.

3 46. In addition, Prince has suffered and is continuing to suffer damages in an
4 amount according to proof, but no less than \$1 million per Defendant, and, in
5 addition, is also entitled to recover from Defendants costs and attorneys' fees
6 pursuant to 17 U.S.C. § 505.

7 47. Prince is also entitled to recover statutory damages pursuant to 17 U.S.C.
8 § 504 in an amount according to proof, but no less than \$1 million per Defendant.

9 48. Prince is also entitled to recover the Defendants' profits in an amount
10 according to proof pursuant to 17 U.S.C. § 504(b).

11 49. Finally, Prince requests that the Court, to the extent practicable, order
12 impoundment and return to Prince all unlawful material pursuant to 17 U.S.C.
13 § 503 and the Court's inherent equitable powers.

14 **THIRD CLAIM FOR RELIEF**

15 **Contributory Copyright Infringement & Bootlegging**

16 **(All Defendants)**

17 50. All preceding paragraphs are incorporated here.

18 51. When Defendants posted the infringing and bootlegged material to their
19 blogs and Facebook accounts, they knew that the users of those blogs and accounts
20 would download such material in violation of Prince's rights.

21 52. Defendants intentionally induced and materially contributed to such
22 user's actions. Indeed, Defendants' entire purpose in setting up their blogs and
23 accounts was to induce such wrongful actions by their users.

24 53. Defendants' actions are and have been willful within the meaning of
25 17 U.S.C. § 504(2).

26 54. Defendants' infringements have caused and will continue to cause
27 substantial, immediate and irreparable injury to Prince for which there is no
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1 adequate remedy at law. Accordingly, Prince is entitled to injunctive relief against
2 Defendants.

3 55. In addition, Prince has suffered and is continuing to suffer damages in an
4 amount according to proof, but no less than \$1 million per Defendant and, in
5 addition, is also entitled to recover from Defendants costs and attorneys' fees
6 pursuant to 17 U.S.C. § 505.

7 56. Prince is also entitled to recover statutory damages pursuant to 17 U.S.C.
8 § 504 in an amount according to proof, but no less than \$1 million per Defendant.

9 57. Prince is also entitled to recover the Defendants' profits in an amount
10 according to proof pursuant to 17 U.S.C. § 504(b).

11 58. Finally, Prince requests that the Court, to the extent practicable, order
12 impoundment and return to Prince all unlawful material pursuant to 17 U.S.C.
13 § 503 and the Court's inherent equitable powers.

PRAYER FOR RELIEF

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16 **WHEREFORE** Prince prays for relief as follows:

17 A. For an award of actual or statutory damages in an amount according to
18 proof, but no less than:

- 19 i. \$1 million against Dan Chodera,
20 ii. \$1 million against Karina Jindrova,
21 iii. \$1 million against Doe 1 (PurpleHouse2),
22 iv. \$1 million against Doe 2 (DaBang319),
23 v. \$1 million against Doe 3 (PurpleKissTwo),
24 vi. \$1 million against Doe 4 (WorldOfBootleg),
25 vii. \$1 million against Doe 5 (FunkyExperienceFour),
26 viii. \$1 million against Doe 6 (NPRUniverse),
27 ix. \$1 million against Doe 7 (PSPMusicBlog),
28 x. \$1 million against Doe 8 (TheUltimateBootlegExperience), and
xi. \$1 million each for each of the remaining Defendants;

B. A permanent injunction prohibiting each Defendant (and anyone acting
in concert with one or more Defendants) from violating any of Prince's

DEMAND FOR JURY TRIAL

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Prince Rogers Nelson demands a jury trial on all issues so triable.

Dated: January 16, 2014

Respectfully submitted,

KAYE SCHOLER LLP

/s/

Rhonda R. Trotter
Oscar Ramallo
Attorneys for Plaintiff
PRINCE ROGERS NELSON

KAYE | SCHOLER_{LLP}