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

BY MAD

8 JAMES A. JANOWITZ (*pro hac vice* pending)
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15 *Attorneys for Plaintiffs*
16 Clarke Abbey and
17 Edward R. Pressman Film Corporation

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

20 CLARKE ABBEY and EDWARD R.
21 PRESSMAN FILM CORPORATION,

Cas. No.

12-7931 - JFW
(CWE)

22 Plaintiffs,

23 vs.

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

24 FILM SCIENCE LLC; JONATHAN
25 RAYMOND; KELLY REICHARDT;
26 MAYBACH FILM PRODUCTIONS
27 LLC; RT FEATURES; UTA
28 INDEPENDENT FILM GROUP, A
DIVISION OF UNITED TALENT
AGENCY, INC.; THE MATCH
FACTORY GMBH; ANISH
SAVJANI; NEIL KOPP;
CHRISTOPHER MAYBACH;
RODRIGO TEIXEIRA; SAEREM
KIM; SAEMI KIM; LOURENÇO
SANT ANNA; ALEJANDRO DE
LEON; TODD HAYNES and LARRY
FESSENDEN,

DEMAND FOR JURY TRIAL

Defendants.

ILS
ET
C

1 Plaintiffs Clarke Abbey (“Abbey”) and Edward R. Pressman Film
2 Corporation (“ERPFC”) (collectively “Plaintiffs”), by their attorneys, Pryor
3 Cashman LLP, for their complaint against defendants Film Science LLC, Jonathan
4 Raymond, Kelly Reichardt, Maybach Film Productions LLC, RT Features, UTA
5 Independent Film Group, a division of United Talent Agency, Inc., The Match
6 Factory GmbH, Anish Savjani, Neil Kopp, Christopher Maybach, Rodrigo
7 Teixeira, Saerem Kim, Saemi Kim, Lourenço Sant’ Anna, Alejandro De Leon,
8 Todd Haynes and Larry Fessenden (collectively “Defendants”), hereby allege as
9 follows:

10 **NATURE OF THE ACTION**

- 11 1. This is an action seeking injunctive relief based on copyright
12 infringement engaged in by Defendants by reason of their creating and/or
13 producing an unauthorized work based on the iconic novel “The Monkey Wrench
14 Gang” by Edward Abbey.
- 15 2. This action arises under the Copyright Act of 1976, 17 U.S.C. §101 et
16 seq.
- 17 3. Venue of this action in this district is proper pursuant to 28 U.S.C.
18 1391(b).

19 **THE PARTIES**

- 20 4. Abbey is a citizen of the State of Utah, residing in Moab, Utah.
- 21 5. ERPFC is a corporation formed and existing under the laws of the
22 State of Delaware with offices at 1639 11th Street, Suite 251, Santa Monica,
23 California.
- 24 6. Defendant Film Science LLC (a/k/a “filmscience”) is an independent
25 film production company with offices in Houston, Texas and Austin, Texas.
- 26 7. Upon information and belief, Jonathan Raymond (“Raymond”) is a
27 screenwriter.
- 28

1 8. Upon information and belief, Kelly Reichardt (“Reichardt”) is a
2 screenwriter, director and editor.

3 9. Upon information and belief, Maybach Film Productions LLC (a/k/a
4 “Maybach Films USA”) (“Maybach Films”) is an independent film production
5 company, investment group and acquisition company with offices at 10 Universal
6 City Plaza, 20th Floor, Universal City, California.

7 10. Upon information and belief, RT Features (“RTF”) is an independent
8 film production company based in Sao Paulo, Brazil, which lists UTA Talent
9 Agency in Beverly Hills, California as its agent.

10 11. Upon information and belief, The Match Factory GmbH (“Match
11 Factory”) is in the business of selling distribution rights to motion pictures,
12 including films produced in this district, in foreign markets.

13 12. Upon information and belief, UTA Independent Film Group (“UTA”)
14 is a division of United Talent Agency, Inc., with offices located at 9560 Wilshire
15 Blvd., Beverly Hills, California.

16 13. Upon information and belief, Anish Savjani (“Savjani”) is a film
17 producer and principal of Filmscience.

18 14. Upon information and belief, Neil Kopp (“Kopp”) is an independent
19 film producer and is associated with Savjani and/or Filmscience.

20 15. Upon information and belief, Christopher Maybach (“Maybach”) is a
21 film producer and is a principal of Maybach Films.

22 16. Upon information and belief, Saemi Kim is a film producer and is
23 associated with Maybach and/or Maybach Films.

24 17. Upon information and belief, Saerem Kim is a film producer and is
25 associated with Maybach and/or Maybach Films.

26 18. Upon information and belief, Rodrigo Teixeira (“Teixeira”) is the
27 CEO of RTF.

28

1 19. Upon information and belief, Lourenço Sant’ Anna (“Sant’ Anna”) is
2 a film producer and is affiliated with RTF.

3 20. Upon information and belief, Alejandro De Leon (“De Leon”) is a
4 film producer.

5 21. Upon information and belief, Todd Haynes (“Haynes”) is a
6 screenwriter and film producer.

7 22. Upon information and belief, Larry Fessenden (“Fessenden”) is a film
8 producer, director and actor.

9 23. Upon information and belief, all of the Defendants conduct business
10 activities within this judicial district, either directly or through their agents.

11 **CLAIM FOR COPYRIGHT INFRINGEMENT**

12 **(AGAINST ALL DEFENDANTS)**

13 24. Repeat and reallege the allegations of paragraphs 1 through 23 as if
14 fully set forth herein.

15 25. Abbey is the widow of Edward Abbey, the well-known American
16 author dubbed “the Thoreau of the American West.” “The Monkey Wrench
17 Gang” (the “Novel”) is an original work written by Edward Abbey and first
18 published in or around 1975. The Novel tells the story of a group of self-
19 appointed environmental terrorists who take it upon themselves to sabotage
20 symbols of industrial development, hoping to eventually destroy a major dam in
21 the western United States by filling boats with ammonium nitrate fertilizer and
22 detonating them by the dam. The Novel is widely believed to have inspired
23 environmental groups, including the Earth First! organization.

24 26. Abbey is the owner of the copyright in the Novel, which was and
25 remains duly registered with the United States Copyright Office and has always
26 been published with a proper copyright notices.

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1 27. Pursuant to an agreement with Abbey, ERPFC holds the exclusive
2 right to produce a derivative work based on the Novel in the form of a theatrical
3 motion picture. ERPFC's rights in the Novel and its development of a motion
4 picture based thereon have been widely reported in the U.S. entertainment industry
5 press.

6 28. Upon information and belief, defendants Raymond and Reichardt
7 have written a screenplay entitled "Night Moves."

8 29. Upon information and belief, Lifescience, Maybach Films and RTF
9 are engaged in producing a theatrical motion picture based on "Night Moves" (the
10 "Film"), which is to star Jesse Eisenberg, Dakota Fanning and Peter Sarsgaard.
11 The Film is being directed by Reichardt. Savjani, Kopp, Maybach, Saemi Kim,
12 Saerem Kim, Teixeira, Sant' Anna, De Leop, Haynes and Fessenden, are all acting
13 as producers or executive producers. UTA is selling domestic distribution rights
14 to the Film. Match Factory is selling foreign distribution rights to the Film.

15 30. "Night Moves" tells the story of a group of self-appointed
16 environmental terrorists who take it upon themselves to sabotage symbols of
17 industrial development, with their primary objective being the destruction of a
18 major dam. Upon information and belief, "Night Moves" copies protectable
19 elements of the Novel. By way of example only, both works feature the targeting
20 of a dam for destruction by means of ammonium fertilizer-laden boats. In the
21 Novel, the principal bomb-maker is a beer-guzzling veteran who served overseas
22 as a Green Beret, where he acquired his knowledge of explosives. The bomb-
23 maker in "Night Moves" is a beer-guzzling veteran who served overseas as a U.S.
24 Marine, where he acquired his knowledge of explosives. Both the Novel and
25 "Night Moves" also feature a 20-something woman who starts out as a companion
26 of another member of the group but develops a sexual relationship with the bomb-
27 making veteran, despite his initial objections to her participation in the group's
28 illegal activities.

1 31. The similarities between “Night Moves” and the Novel are so obvious
2 that Internet bloggers have commented about the Film’s misappropriation of the
3 Novel’s plot.

4 32. The Novel was and is a popular and critically acclaimed work which
5 has enjoyed distribution and commercial success since it first appeared in 1975.

6 33. By virtue of the Novel’s wide distribution, there can be no question
7 that Raymond and Reichardt had access to it.

8 34. Upon information and belief, Raymond and Reichardt copied
9 protectable elements of the Novel in writing “Night Moves” and, since they had no
10 authorization from Plaintiffs to do so, they thereby infringed the exclusive rights
11 in the Novel afforded to Plaintiffs under the Copyright Act, 17 U.S.C. §101 et seq.

12 35. By participating in the production, sales and distribution of the Film,
13 all of the remaining Defendants are inducing, causing and/or materially
14 contributing to the infringement of Plaintiff’s rights, which they knew or should
15 have known of by virtue of the obvious similarities which “Night Moves” bears to
16 the Novel, which are so glaring that they have been noted by the public on the
17 Internet in comments about the production of the Film.

18 36. By reason of the above, each of Defendants is directly or contributory
19 liable for the infringement of the Novel by the “Night Moves” screenplay and
20 Film.

21 37. Upon information and belief, unless enjoined by this Court,
22 Defendants will continue their course of infringing conduct.

23 38. Plaintiffs will suffer irreparable harm in the absence of an injunction
24 preventing the production and distribution of the Film, and Plaintiffs have no
25 adequate remedy at law to redress the injuries they will suffer if such production
26 and distribution proceeds.

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1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiffs pray for judgment as follows:

3 a. Awarding preliminary and permanent injunctive relief enjoining
4 Defendants, their officers, directors, agents, servants, employees and all others
5 acting in concert with them from producing, promoting, selling or distributing the
6 Film or any film based on the "Night Moves" screenplay;

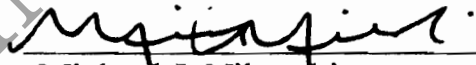
7 b. Awarding Plaintiffs all damages suffered by reason of Defendants'
8 wrongful acts, including reasonable attorneys' fees, pursuant to 17 U.S.C. §505,
9 and the costs of this action; and

10 c. Awarding Plaintiffs such other and further relief as the Court deems
11 just and proper.

12
13 **PRYOR CASHMAN LLP**

14
15 Dated: September 13, 2012

By:


16 Michael J. Niborski
17 mniborski@pryorcashman.com

18 James A. Janowitz (*pro hac vice* pending)
19 jjanowitz@pryorcashman.com

20 *Attorneys for Plaintiffs*
21 Clarke Abbey and
22 Edward R. Pressman Film Corporation
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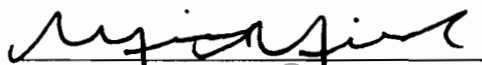
1 **DEMAND FOR JURY TRIAL**

2 Plaintiffs Clarke Abbey and Edward R. Pressman Film Corporation hereby
3 demand a jury trial as provided by Rule 38(a) of the Federal Rules of Civil
4 Procedure.

5
6 **PRYOR CASHMAN LLP**

7
8
9 Dated: September 13, 2012

By:



Michael J. Niborski
mniborski@pryorcashman.com

James A. Janowitz (*pro hac vice* pending)
jjanowitz@pryorcashman.com

Attorneys for Plaintiffs
Clarke Abbey and
Edward R. Pressman Film Corporation

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

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Clarke Abbey and Edward R. Pressman Film Corporation	DEFENDANTS Film Science LLC, et al. [Please see Attachment A for full list of Defendants]
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(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Michael J. Niborski (SBN 192111), Pryor Cashman LLP 1801 Century Park East, 24th Floor Los Angeles, CA 90067; Tel: 310-556-9608	Attorneys (If Known)
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II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:30%; border: none;">Citizen of This State</td> <td style="width:10%; border: none; text-align: center;">PTF</td> <td style="width:10%; border: none; text-align: center;">DEF</td> <td style="width:40%; border: none;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%; border: none; text-align: center;">PTF</td> <td style="width:10%; border: none; text-align: center;">DEF</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;">2</td> <td style="border: none; text-align: center;">2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;">5</td> <td style="border: none; text-align: center;">5</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;">3</td> <td style="border: none; text-align: center;">3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;">6</td> <td style="border: none; text-align: center;">6</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> <td style="border: none; text-align: center;"><input type="checkbox"/></td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business in this State	PTF	DEF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Citizen of Another State	2	2	Incorporated and Principal Place of Business in Another State	5	5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: **JURY DEMAND:** Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ Not Specified; Injunctive Relief

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

17 U.S.C. Section 101 et seq.; Infringement of copyright in literary work.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 540 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) (405(g)) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-7931

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? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District, California County outside of this District, State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If 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 County (Edward R. Pressman Film Corporation)	Grand County, Utah (Clarke Abbey)

(b) List the County in this District, California County outside of this District, State if other than California; or Foreign Country, in which **EACH** named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. 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
Los Angeles County (All Defendants)	

(c) List the County in this District, California County outside of this District, State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District, State, if other than California; or Foreign Country
Los Angeles County	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date September 13, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social 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	SSID	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 (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

ATTACHMENT A

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

CIVIL COVER SHEET

FILM SCIENCE LLC; JONATHAN RAYMOND; KELLY REICHARDT;
MAYBACH FILM PRODUCTIONS LLC; RT FEATURES; UTA
INDEPENDENT FILM GROUP, A DIVISION OF UNITED TALENT AGENCY,
INC.; THE MATCH FACTORY GMBH; ANISH SAVJANI; NEIL KOPP;
CHRISTOPHER MAYBACH; RODRIGO TEIXEIRA; SAEREM KIM; SAEMI
KIM; LOURENÇO SANT ANNA; ALEJANDRO DE LEON; TODD HAYNES
and LARRY FESSENDEN,

Defendants.

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