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 10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA
 12 WESTERN DIVISION

13 DISNEY ENTERPRISES, INC.;
 14 LUCASFILM LTD. LLC; TWENTIETH
 CENTURY FOX FILM
 CORPORATION; and WARNER
 15 BROS. ENTERTAINMENT INC.,

16 Plaintiffs,

17 vs.

18 VIDANGEL, INC.,

19 Defendant.

CASE NO.
**COMPLAINT FOR COPYRIGHT
 INFRINGEMENT AND
 VIOLATION OF DIGITAL
 MILLENNIUM COPYRIGHT ACT**

DEMAND FOR JURY TRIAL

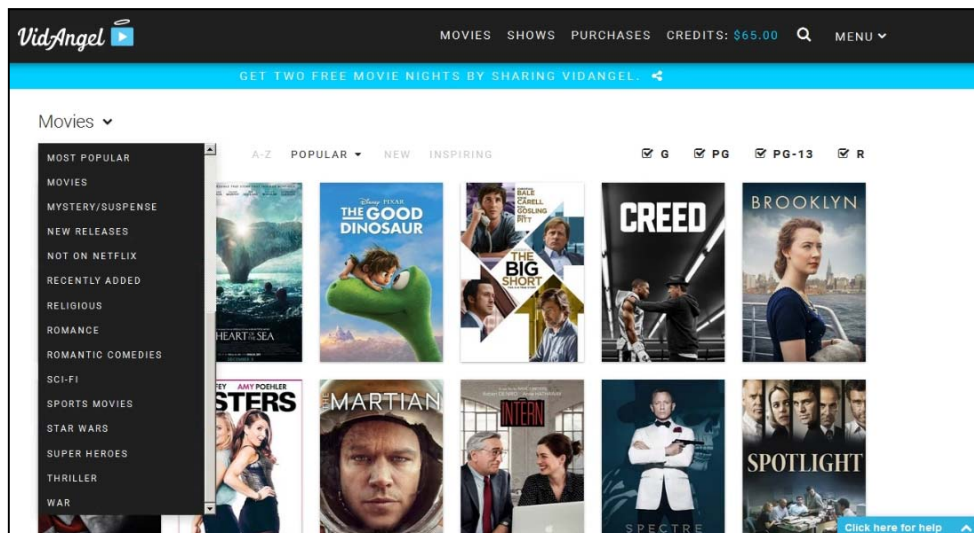
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1 Plaintiffs Disney Enterprises, Inc. (“Disney”), Lucasfilm Ltd. LLC
 2 (“Lucasfilm”), Twentieth Century Fox Film Corporation (“Fox”), and Warner Bros.
 3 Entertainment Inc. (“Warner Bros.”) (“Plaintiffs”), through their undersigned
 4 counsel, hereby bring this Complaint against VidAngel, Inc. (“Defendant” or
 5 “VidAngel”) for infringing Plaintiffs’ exclusive rights under the Copyright Act (17
 6 U.S.C. § 101 *et seq.*) and for violating the Digital Millennium Copyright Act
 7 (§ 1201 *et seq.*) (“DMCA”). This Court has subject matter jurisdiction pursuant to
 8 28 U.S.C. §§ 1331, 1338(a), and 17 U.S.C. §§ 501(b), 1203(a). Plaintiffs allege, on
 9 personal knowledge as to themselves and information and belief as to others, as
 10 follows:

11 INTRODUCTION

12 1. VidAngel operates a video-on-demand (“VOD”) service that streams
 13 popular movies and television shows. VidAngel charges users for watching that
 14 content but has no authorization and pays nothing for the rights it exploits. At its
 15 core, VidAngel is no different from many other unlawful online services. Plaintiffs
 16 bring this action to stop VidAngel’s infringement of their rights.

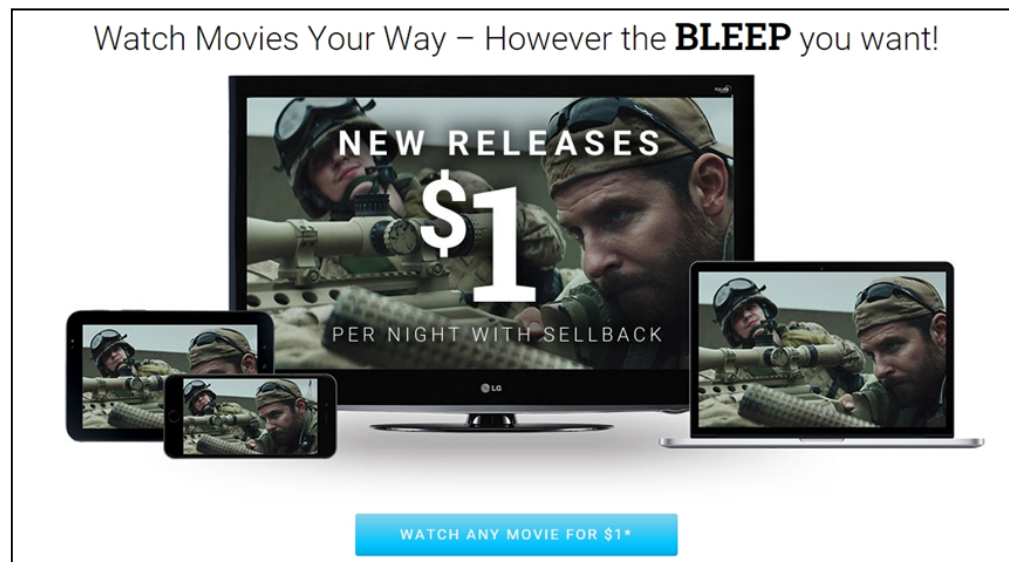
17 2. VidAngel’s VOD service looks and feels very similar to licensed
 18 services such as Netflix, Hulu, and iTunes. Users can search for copyrighted motion
 19 picture content by popularity, genre or categories (e.g., “New Releases”):



1 And, like these other services, VidAngel streams movies via computer, mobile
2 device (e.g., a smartphone, iPad, or tablet), or internet-connected television (e.g.,
3 through Apple TV, Chromecast or Roku).

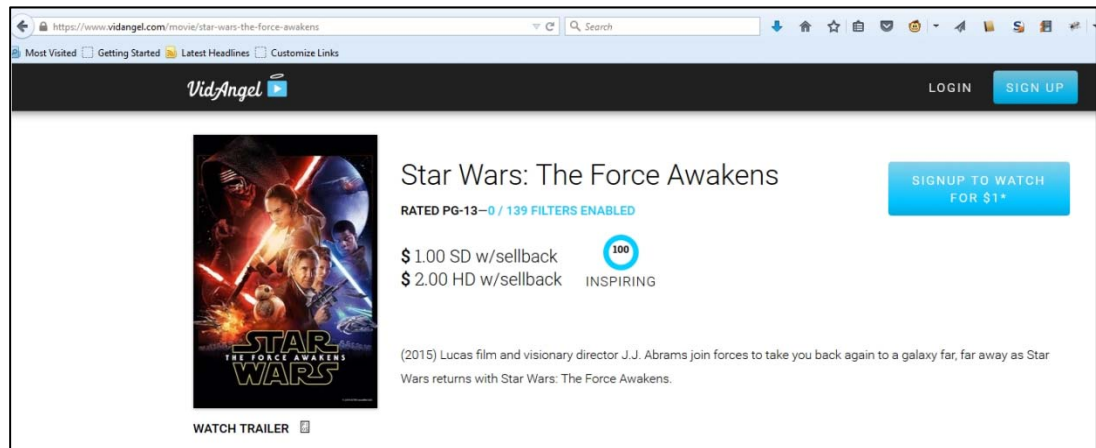
4 3. But there is a fundamental difference between VidAngel and licensed
5 VOD services: VidAngel does not have permission to copy Plaintiffs' movies and
6 television shows or to stream them to VidAngel's users. Instead, VidAngel appears
7 to circumvent the technological protection measures on DVDs and Blu-ray discs to
8 create unauthorized copies and then uses those copies to stream Plaintiffs' works to
9 the public without authorization.

10 4. By running this service without a license, VidAngel blatantly violates
11 the Copyright Act and confers on itself unfair and unlawful advantages vis-à-vis
12 licensed services in the VOD marketplace. First, by cutting out payments to
13 copyright owners, VidAngel is able to offer prices that undercut licensed services
14 and charge only \$1 for daily access to movies in standard definition format.
15 VidAngel emphatically touts its below-market pricing:

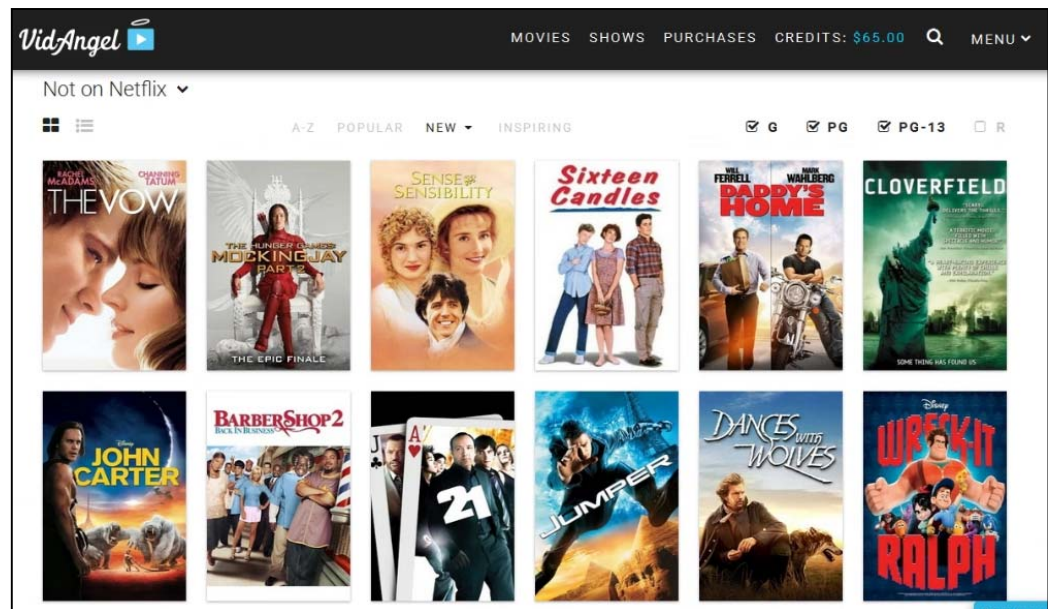


5. Second, because VidAngel absolves itself of having to abide by
contractual restrictions, VidAngel offers content that is not available on licensed
VOD services. For example, VidAngel makes many newly released titles available

1 for streaming well before they are available via licensed VOD services. Recently,
 2 VidAngel exploited this competitive advantage to offer *Star Wars: The Force*
 3 *Awakens* for \$1 a day at a time when lawful VOD services did not yet have the right
 4 to offer that work for single-day access at all:



13 VidAngel also flaunts this unfair competitive advantage by expressly promoting a
 14 selection of titles that are available on VidAngel but "Not Available on Netflix":



26 6. VidAngel publicly defends its unlicensed activities with legally and
 27 factually false claims. For example, VidAngel insists that it has the right to bypass
 28 copyright owner consent because VidAngel says it is "selling," not renting, movies

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