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15
16 **UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
18

19 MIRAMAX, LLC,

20 Plaintiff,

21 vs.

22 QUENTIN TARANTINO; VISIONA
23 ROMANTICA INC.; and DOES 1–50,
24 Defendants.

Case No. 2:21-cv-08979-FMO-JC

[Assigned to Honorable Fernando M.
Olguin]

**QUENTIN TARATINO’S AND
VISIONA ROMANTICA INC.’S
ANSWER TO THE COMPLAINT**

REQUEST FOR JURY TRIAL

1 Defendants Quentin Tarantino and Visiona Romantica, Inc. (“Defendants”), by
2 and through the undersigned counsel, hereby answer the Complaint (“Complaint”) of
3 plaintiff Miramax, LLC (“Plaintiff”), as follows:

4 **INTRODUCTION**

5 Twenty-eight years ago, Quentin Tarantino wrote a screenplay that would
6 change the future of the entertainment business. He subsequently directed a film based
7 on that screenplay, a critical darling and financial success that would, more than any
8 other motion picture, define Miramax’s role atop the independent film pyramid. That
9 movie, of course, was *Pulp Fiction*.

10 Now a shell of its former self and flailing under a new ownership consortium,
11 Miramax has decided to bite the hand that fed it for so many years by bringing this
12 offensively meritless lawsuit. As Miramax knows well, Tarantino has every right to
13 publish portions of his original handwritten screenplay for *Pulp Fiction*, a personal
14 creative treasure that he has kept private for decades. Tarantino’s contracts clearly and
15 unambiguously grant him the opportunity to do so – those rights were carefully
16 identified, bargained for and memorialized – and Miramax in its prior incarnation
17 freely agreed. But now, the new Miramax implausibly attempts to use the concept of
18 NFTs to confuse the public and mislead this Court in an effort to deny artists such as
19 Tarantino their hard earned and long-standing rights. Fortunately, Tarantino’s *Pulp*
20 *Fiction* contracts are clear, as is the law, and this ill-conceived lawsuit will not succeed
21 in preventing Tarantino from exercising his contractual rights.

22 **THE COMPLAINT’S ALLEGATIONS**

23 1. Answering the allegations in Paragraph 1 of the Complaint, Defendants
24 admit that Tarantino has announced that portions of his original *Pulp Fiction*
25 screenplay would be published via NFTs. Defendants further admit that Tarantino
26 also announced that an NFT version of a portion of his original screenplay would be
27 offered at an auction. Defendants are without knowledge or information as to the
28 truth of the allegation of what was reported in the media, and therefore deny such

1 allegation. Defendants are without knowledge or information as to the truth of the
2 allegation that the website <https://tarantinonfts.com/>, states that “[t]he collection holds
3 secrets from Pulp Fiction,” and “[e]ach NFT contains one or more previously
4 unknown secrets of a specific iconic scene from Pulp Fiction” and that the
5 “privileged” purchasers “will get a hold of those secrets”, and therefore deny such
6 allegation. Defendants deny all other allegations in this paragraph.

7 2. Answering the allegations in Paragraph 2 of the Complaint, Defendants
8 admit that prior to the public announcement, Tarantino did not speak to Miramax
9 about portions of his original *Pulp Fiction* screenplay being potentially published via
10 NFTs. Defendants deny that any such disclosure was required. Defendants further
11 admit that Miramax has previously financed some of Tarantino’s film(s). Defendants
12 further admit that *Pulp Fiction*, *Jackie Brown*, and *Kill Bill: Volumes 1 and 2* were
13 critically and commercially successful films. Defendants further admit that Tarantino
14 has spoken to third-parties about the potential development and potential sale of NFT
15 versions of his screenplays. Defendants deny all other allegations in this paragraph.

16 3. Answering the allegations in Paragraph 3 of the Complaint, Defendants
17 deny such allegations.

18 4. Answering the allegations in Paragraph 4 of the Complaint, Defendants
19 are without knowledge or information as to the truth of the allegation that Miramax
20 learned of any plan by Tarantino, and therefore deny such allegation. Defendants
21 admit that counsel for Miramax sent a cease and desist letter to Tarantino’s counsel on
22 November 4, 2021, and that the cease and desist letter speaks for itself. Defendants
23 further admit that Tarantino’s “Reserved Rights” under the operative agreements “are
24 sufficient.” Defendants deny all other allegations in this paragraph.

25 5. Answering the allegations in paragraph 5 of the Complaint, Defendants
26 deny that Tarantino had any plans to distribute or authorize distribution of Miramax’s
27 intellectual property via NFT. Defendants are without sufficient knowledge or
28 information as to the truth of the remaining allegations, and therefore deny such

1 allegations.

2 6. Answering the allegations in Paragraph 6 of the Complaint, Defendants
3 admit that Tarantino is a valued talent relationship. Defendants deny all other
4 allegations in this paragraph.

5 7. Answering the allegations in Paragraph 7 of the Complaint, Defendants
6 are without knowledge or information as to the truth of those allegations, and
7 therefore deny such allegations.

8 8. Answering the allegations in Paragraph 8 of the Complaint, Defendants
9 admit that Tarantino is a United States Citizen. Defendants are without knowledge or
10 information as to whether or not Tarantino qualifies as a resident of Israel, which calls
11 for a legal conclusion. Defendants admit that Tarantino has ownership interests in
12 entities that own businesses within Los Angeles, California, including the New
13 Beverly Cinema and the Vista Theatre. Defendants deny all other allegations in this
14 paragraph.

15 9. Answering the allegations in Paragraph 9 of the Complaint, Defendants
16 admit such allegations.

17 10. Paragraph 10 of the Complaint requires no response as it merely states a
18 legal conclusion. Moreover, there is no rule in federal practice expressly authorizing
19 the use of the Doe defendants. To the contrary, the federal rules of civil procedure
20 expressly require that each defendant be named and identified by their capacity to be
21 sued. Defendants reserve all rights under the federal rules of civil procedure,
22 including without limitation the right to oppose amendments of pleadings, including
23 pleadings that purport to add additional defendants to this action. To the extent
24 required, Defendants are without knowledge or information as to the truth of any
25 allegations as to individuals or entities not named in the Complaint, and therefore
26 deny such allegations.

27 11. Paragraph 11 of the Complaint requires no response as it merely states a
28 legal conclusion.

1 12. Paragraph 12 of the Complaint requires no response as it merely states a
2 legal conclusion.

3 13. Paragraph 13 of the Complaint requires no response as it merely states a
4 legal conclusion.

5 14. Paragraph 14 of the Complaint requires no response as it merely states a
6 legal conclusion, but to the extent required, Defendants deny that there are any events
7 giving rise to Miramax's claims.

8 15. Answering the allegations in Paragraph 15 of the Complaint, Defendants
9 admit that Miramax is a film and television studio. Defendants are without sufficient
10 knowledge or information as to the truth of the remaining allegations, and therefore
11 deny such allegations.

12 16. Answering the allegations in Paragraph 16 of the Complaint, Defendants
13 admit that *Pulp Fiction* is an influential film. Defendants are without sufficient
14 knowledge or information as to the truth of the remaining allegations, and therefore
15 deny such allegations.

16 17. Answering the allegations in Paragraph 17 of the Complaint, Defendants
17 admit that *Pulp Fiction* is a prestigious and critically acclaimed film that has been
18 highly lucrative for Miramax. Defendants are without sufficient knowledge or
19 information as to the truth of the remaining allegations, and therefore deny such
20 allegations.

21 18. Answering the allegations in paragraph 18 of the Complaint, Defendants
22 admit that *Pulp Fiction* was written and directed by Quentin Tarantino, and produced
23 by Lawrence Bender. Defendants further admit that Quentin Tarantino and Lawrence
24 Bender formed B25 Productions as a single purpose entity to produce and deliver the
25 film to Miramax Film Corp. as the distributor. Defendants deny all other allegations
26 in this paragraph.

27 19. Answering the allegations in paragraph 19 of the Complaint, Defendants
28 admit that effective as of June 23, 1993, Tarantino and Bender entered into an

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