

1 KELLY KLAUS (SBN 161091)
 Kelly.Klaus@mto.com
 2 ROSE LEDA EHLER (SBN 296523)
 Rose.Ehler@mto.com
 3 SHANNON GALVIN AMINIRAD (SBN 324780)
 Shannon.Aminirad@mto.com
 4 MUNGER, TOLLES & OLSON LLP
 350 South Grand Avenue, Fiftieth Floor
 5 Los Angeles, California 90071
 Telephone: (213) 683-9100
 6 Facsimile: (213) 687-3702

7 Attorneys for Plaintiffs
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9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA
 11 WESTERN DIVISION
 12

13 PARAMOUNT PICTURES
 14 CORPORATION; UNIVERSAL CITY
 STUDIOS PRODUCTIONS LLLP;
 15 UNIVERSAL CONTENT
 PRODUCTIONS LLC; UNIVERSAL
 16 TELEVISION LLC; WARNER BROS.
 ENTERTAINMENT INC.,
 17 COLUMBIA PICTURES
 INDUSTRIES, INC.; DISNEY
 18 ENTERPRISES, INC.; NETFLIX
 STUDIOS, LLC; NETFLIX US, LLC;
 19 and NETFLIX WORLDWIDE
 ENTERTAINMENT, LLC,
 20

Case No. 2:21-cv-09317

**COMPLAINT FOR
 COPYRIGHT INFRINGEMENT**

DEMAND FOR JURY TRIAL

21 Plaintiffs,

22 vs.

23 DOES 1-10 d/b/a PRIMEWIRE,

24 Defendants.
 25
 26
 27
 28

1 Plaintiffs bring this Complaint for copyright infringement under the
2 Copyright Act (17 U.S.C. § 101 *et seq.*) against Does 1–10, the individuals (who
3 have taken steps to hide their identities) who own and operate the websites
4 www.primewire.li, www.primewire.ag, and www.primewire.vc (together with other
5 websites owned and operated by Defendants¹ the “PrimeWire Websites”) and
6 related technology and internet protocol addresses presented to the public as
7 “PrimeWire” (collectively, “Defendants”). This Court has subject matter
8 jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a), and 17 U.S.C. § 501(b).
9 Plaintiffs allege, on personal knowledge as to themselves and information and belief
10 as to others, as follows:

11 INTRODUCTION

12 1. Defendants own, operate, and profit from PrimeWire, an illegal
13 enterprise devoted to mass online copyright piracy. PrimeWire provides users with
14 unauthorized on-demand access to infringing streams of the world’s most popular
15 movies and TV shows, including those protected by copyrights that Plaintiffs or
16 their affiliates own or exclusively control (the “Copyrighted Works”). Defendants
17 fuel the illicit market for pirated content by connecting users to high-quality streams
18 of pirated copies of everything from classics to popular new releases, including
19 those just released in theaters such as Columbia Picture’s *Ghostbusters: Afterlife*
20 (released November 19, 2021) and Disney’s *Encanto* (released November 24, 2021).

21 2. The infringing nature of Defendants’ service is obvious from even a
22 cursory review of the PrimeWire Websites. Starting with the very first screen, users
23 are presented with an array of copyrighted movies and TV shows available
24 _____

25 ¹ For example, Defendants recently registered and launched vendtxt.com, which is a
26 “mirror” website for PrimeWire. Operators of pirate websites like PrimeWire
27 frequently create “mirror” websites to move their illicit operations to another online
28 location in response to successful anti-piracy actions. Vendtxt.com is hosted at IP
address 31.10.5.190. From the user’s perspective, vendtxt.com appears to be

1 unlawfully for on-demand, free-to-the-user streaming. Defendants curate titles into
2 categories that make clear users can immediately access popular content, including
3 “Featured Movies,” “New Movies,” and “Latest TV Shows to Air.” Defendants
4 admit that watching movies and TV shows through PrimeWire is “risky”—in other
5 words, Defendants are providing an illegal service—and Defendants “strongly urge”
6 their users “to use a VPN [a virtual private network] to make themselves anonymous
7 while streaming films and TV shows online.”

The screenshot displays the PrimeWire.li website. At the top, there is a search bar and navigation links for Movies, TV Shows, Schedule, Playlists, and Forum. Below this, there are sections for 'Featured' and 'Trending' movies, including titles like 'Boys Gone Wrong', 'Sing 2', 'Last Duel', 'Encanto', 'Resident Evil', and 'Venom'. A 'Shows > Trending' section is also visible with filter options for Section, Links, Quality, Genre, Sort, Direction, and Filter. A prominent red-bordered box contains a warning: 'Streaming films is becoming more risky every day. We strongly urge our users to use a VPN to make themselves anonymous while streaming films and TV shows online. Using a VPN ensures that your ISP, the government and the NSA can't spy on you or block any streams. They will not be able to see ANY of your online activity. Protect Your Privacy with a VPN'. Below the warning are more movie recommendations with star ratings and genres, such as 'Resident Evil: Welcome to...', 'Venom: Let There Be Carnage...', 'Ghostbusters: Afterlife', 'The Last Duel', 'Eternals', 'Dexter: New Blood', 'Encanto', and 'Hawkeye'. On the right side of the page, there is a login section with fields for Email and Password, a 'Remember Me' checkbox, and a 'Login' button. Below the login section is a 'Are you 18 or older?' confirmation box with 'NO' and 'YES' buttons. Further down, there are links for 'Information', 'Site Rules - Requests -', 'Top Users - Watch Parties', and a 'How do I watch movies?' guide. At the bottom of the right sidebar, there is a promotion for ExpressVPN with a 'Get ExpressVPN' button and a 'Latest Comments' section with several user comments.

1 3. PrimeWire provides its users a too-good-to-be-true offering. Users
2 need only make a few clicks to start receiving illicit, on-demand streams of titles
3 without any payment by the user or PrimeWire to the rights' holders. The
4 PrimeWire service is free to the user. PrimeWire makes money by selling
5 advertising on the site or by getting users to click on sponsored links. PrimeWire
6 includes titles that lawfully may be viewed only through licensed distribution
7 channels and that often are in exclusive distribution "windows," including motion
8 pictures in their initial theatrical release or available for streaming only through
9 legitimate streaming services. To take just a few examples, PrimeWire users can
10 use the site to stream Disney's *Cruella* (2021), Universal's *Dear Evan Hansen*
11 (2021), and Paramount's *Clifford the Big Red Dog* (2021), all of which were first
12 released in theaters and for authorized on-demand streaming at the same time
13 PrimeWire also made them available to its users.

14 4. The scale of Defendants' infringement is breathtaking. Defendants
15 have drawn approximately 20 million *monthly* visits to the PrimeWire Websites in
16 the United States, a number that has been growing. PrimeWire's total monthly
17 visits far exceed the number of visits to the websites of many lawful businesses,
18 such as apnews.com, overstock.com, or delta.com. Over half of global traffic comes
19 from users in the United States. Unsurprisingly, PrimeWire is one of the most
20 popular websites for finding pirated content in the United States.

21 5. Defendants operate an infringing enterprise for a simple reason: to
22 make money. Defendants sell space on the site to third-party advertisers.
23 Defendants also generate revenue by including sponsored links on the PrimeWire
24 Websites. Defendants' business model uses the lure of unrestricted on-demand
25 access to copyrighted content to generate substantial ill-gotten profits.

26 6. Defendants know what they are doing is illegal. Just as they exhort
27 users to hide their identities by using VPNs to access the PrimeWire Websites,
28 Defendants go to great lengths to cloak themselves in anonymity. Defendants use

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