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

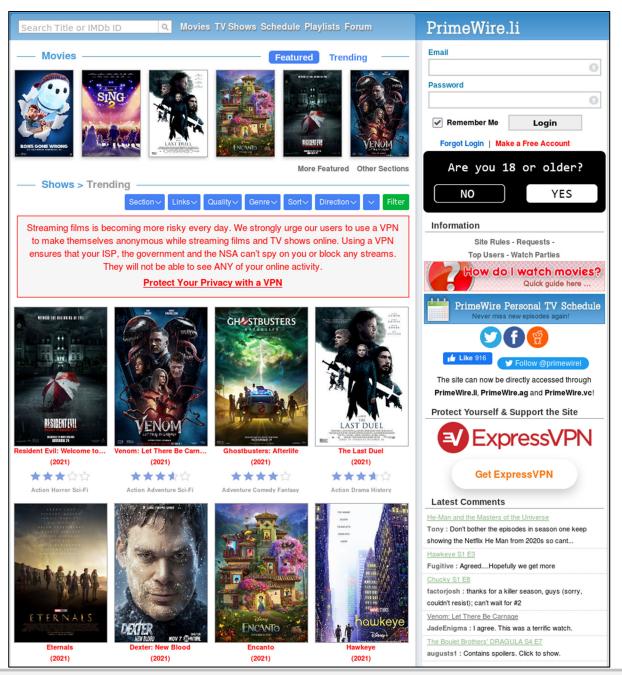
INTRODUCTION

- 1. Defendants own, operate, and profit from PrimeWire, an illegal enterprise devoted to mass online copyright piracy. PrimeWire provides users with unauthorized on-demand access to infringing streams of the world's most popular movies and TV shows, including those protected by copyrights that Plaintiffs or their affiliates own or exclusively control (the "Copyrighted Works"). Defendants fuel the illicit market for pirated content by connecting users to high-quality streams of pirated copies of everything from classics to popular new releases, including those just released in theaters such as Columbia Picture's *Ghostbusters: Afterlife* (released November 19, 2021) and Disney's *Encanto* (released November 24, 2021).
- 2. The infringing nature of Defendants' service is obvious from even a cursory review of the PrimeWire Websites. Starting with the very first screen, users are presented with an array of copyrighted movies and TV shows available

¹ For example, Defendants recently registered and launched vendtxt.com, which is a "mirror" website for PrimeWire. Operators of pirate websites like PrimeWire frequently create "mirror" websites to move their illicit operations to another online 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



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



- The scale of Defendants' infringement is breathtaking. Defendants have drawn approximately 20 million monthly visits to the PrimeWire Websites in the United States, a number that has been growing. PrimeWire's total monthly visits far exceed the number of visits to the websites of many lawful businesses, such as apnews.com, overstock.com, or delta.com. Over half of global traffic comes from users in the United States. Unsurprisingly, PrimeWire is one of the most popular websites for finding pirated content in the United States.
- 5. Defendants operate an infringing enterprise for a simple reason: to make money. Defendants sell space on the site to third-party advertisers. Defendants also generate revenue by including sponsored links on the PrimeWire Websites. Defendants' business model uses the lure of unrestricted on-demand access to copyrighted content to generate substantial ill-gotten profits.
- 6. Defendants know what they are doing is illegal. Just as they exhort 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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- The harms that Defendants are causing to Plaintiffs are significant, 7. irreparable, and growing. Plaintiffs and/or their affiliates have invested and continue to invest substantial resources and effort each year to develop, produce, and distribute their Copyrighted Works. Plaintiffs themselves, or through their affiliates, recoup their investments and invest in new movies and TV shows by licensing their content through lawful channels, including services engaged in authorized streaming. Defendants' infringing service undermines the market for licensed distribution and usurps Plaintiffs' exclusive rights under copyright.
- Defendants have increasingly focused their unlawful activities on the 8. United States as court orders in other countries have reduced the reach of the PrimeWire Websites in those jurisdictions. As PrimeWire grows in popularity in the United States, so does the harm to Plaintiffs. Plaintiffs bring this action to stop Defendants' ongoing copyright infringement and to secure damages on account of Defendants' blatantly unlawful conduct.

THE PARTIES

- 9. Plaintiff Paramount Pictures Corporation ("Paramount") is a corporation duly incorporated under the laws of the State of Delaware with its principal place of business in Los Angeles, California. Paramount owns or controls copyrights or exclusive rights in content that it or its affiliates produce or distribute.
- Plaintiff Universal City Studios Productions LLLP is a limited liability 10. limited partnership duly organized under the laws of the State of Delaware with its principal place of business in Universal City, California.
- Plaintiff Universal Content Productions LLC (formerly known as 11. Universal Cable Productions LLC and Universal Network Television, LLC) is a limited liability company duly organized under the laws of the State of Delaware 28 | with its principal place of business in Universal City, California.



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