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8
9 UNITED STATES DISTRICT COURT

10 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
11

12 HOLLYWOOD INNOVATIONS GROUP,
LLC,

13 Plaintiff,

14 vs.
15

NETFLIX, INC., a Delaware Corporation, ZIP
16 CINEMA CO., LTD., a South Korean
Corporation, KAKAO ENTERTAINMENT
17 CORP., a South Korean Corporation,
PERSPECTIVE PICTURES CO., LTD, a
18 South Korean Corporation, and Does 1-10,
inclusive,
19

Defendants.
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Case No. 2:21-cv-09423-TJH-GJS

**DEFENDANT NETFLIX, INC.'S
ANSWER TO COMPLAINT FOR
COPYRIGHT INFRINGEMENT**

Judge: Hon. Terry J. Hatter, Jr.

Ctrm: 9B

ANSWER

Defendant NETLFX, INC. (“Netflix”) hereby answers the Complaint in this matter as follows:

1. The allegations of Paragraph 1 are arguments or conclusions that do not require a response. To the extent a response is required, Netflix denies the allegations of Paragraph 1.

2. The allegations of Paragraph 2 are arguments or conclusions that do not require a response. To the extent a response is required, Netflix denies the allegations of Paragraph 2.

3. In response to the allegations of Paragraph 3, Netflix avers that *#Saraitda* premiered in South Korea in or around June 2020; that Netflix, with authorization, streamed *#Saraitda*, dubbed into different languages, on Netflix’s service; and that Netflix streamed *#Saraitda* dubbed into the English language with the title *#Alive*. The remaining allegations of Paragraph 3 are arguments or conclusions that do not require a response. To the extent a response is required, Netflix denies the remaining allegations of Paragraph 3. Except as specifically admitted herein, Netflix denies the allegations of Paragraph 3.

4. The allegations of Paragraph 4 are arguments or conclusions that do not require a response. To the extent a response is required, Netflix denies the allegations of Paragraph 4.

5. In response to the allegations of Paragraph 5, Netflix admits that this Court has subject matter jurisdiction over Plaintiff’s claim of copyright infringement. Except as specifically admitted herein, Netflix denies the allegations of Paragraph 5.

6. In response to the allegations of Paragraph 6, Netflix denies that venue in this District is proper, for the reasons set forth in Netflix’s motion to dismiss. Netflix is without knowledge or information as to the truth of the remaining allegations of Paragraph 6 and on that basis denies them.

7. Netflix is without knowledge or information as to the truth of the allegations in Paragraph 7 and on that basis denies them.

8. In response to the allegations of Paragraph 8, Netflix avers that it is a Delaware corporation with its principal place of business in Los Gatos, California; that it operates a

1 subscription-based streaming service; and that it has millions of subscribers around the world.
2 The remaining allegations of Paragraph 8 are arguments or conclusions that do not require a
3 response. To the extent a response is required, Netflix denies the remaining allegations of
4 Paragraph 8. Except as specifically admitted herein, Netflix denies the allegations of Paragraph 8.

5 9. Netflix is without knowledge or information as to the truth of the allegations in
6 Paragraph 9 and on that basis denies them.

7 10. Netflix is without knowledge or information as to the truth of the allegations in
8 Paragraph 10 and on that basis denies them.

9 11. Netflix is without knowledge or information as to the truth of the allegations in
10 Paragraph 11 and on that basis denies them.

11 12. The allegations of Paragraph 12 are legal arguments or conclusions that do not
12 require a response. To the extent a response is required, Netflix is without knowledge or
13 information as to the truth of the allegations in Paragraph 12 and on that basis denies them.

14 13. In response to the allegations of Paragraph 13, Netflix avers on information and
15 belief that Matt Naylor is the author of the screenplay that was the basis for *#Saraitda* and the
16 screenplay tells the story of a zombie attack on a man living in an apartment building in Seoul,
17 South Korea. Netflix is without knowledge or information as to the remaining allegations of
18 Paragraph 13 and on that basis denies them. Except as specifically admitted herein, Netflix denies
19 the allegations of Paragraph 13.

20 14. In response to the allegations of Paragraph 14, Netflix avers on information and
21 belief that Matt Naylor was the sole and exclusive owner of the copyright in his screenplay prior
22 to July 18, 2018. Except as specifically admitted herein, Netflix denies the allegations of
23 Paragraph 14.

24 15. In response to the allegations of Paragraph 15, Netflix avers on information and
25 belief that Matt Naylor entered into an agreement, dated as of July 18, 2018, with Zip Cinema Co.,
26 Limited and Perspective Pictures Co., Limited. Netflix further avers that the written agreement is
27 the best evidence of its contents. The remaining allegations of Paragraph 15 are legal arguments
28 or conclusions that do not require a response. To the extent a response to the remaining

1 allegations of Paragraph 15 is required, Netflix denies the remaining allegations of Paragraph 15.
2 Except as specifically admitted herein, Netflix denies the allegations of Paragraph 15.

3 16. Netflix is without knowledge or information as to the truth of the allegations in
4 Paragraph 16 and on that basis denies them.

5 17. Netflix is without knowledge or information as to the truth of the allegations in
6 Paragraph 17 and on that basis denies them.

7 18. Netflix is without knowledge or information as to the truth of the allegations in
8 Paragraph 18 and on that basis denies them.

9 19. The allegations of Paragraph 19 are arguments or conclusions that do not require a
10 response. To the extent a response is required, Netflix is without knowledge or information as to
11 the truth of the allegations in Paragraph 19 and on that basis denies them.

12 20. The allegations of Paragraph 20 are arguments or conclusions that do not require a
13 response. To the extent a response is required, Netflix is without knowledge or information as to
14 the truth of the allegations in Paragraph 20 and on that basis denies them.

15 21. The allegations of Paragraph 21 are arguments or conclusions that do not require a
16 response. To the extent a response is required, Netflix denies that it has any record of a deal or
17 deals with Johnny Martin. Netflix is without knowledge or information as to the truth of the
18 remaining allegations in Paragraph 21 and denies them on that basis.

19 22. In response to the allegations of Paragraph 22, Netflix avers on information and
20 belief that *#Saraitda* premiered in South Korea in or around June 2020. Netflix further avers that
21 *#Saraitda* was released as *#Alive* on Netflix's service. The remaining allegations in Paragraph 22
22 are arguments or conclusions that do not require a response. To the extent a response is required,
23 Netflix is without knowledge or information as to the truth of the remaining allegations and on
24 that basis denies them. Except as specifically admitted herein, Netflix denies the allegations of
25 Paragraph 22.

26 23. The allegations of Paragraph 23 are arguments or conclusions that do not require a
27 response. To the extent a response is required, Netflix is without knowledge or information as to
28 the truth of the allegations in Paragraph 23 and on that basis denies them.

1 24. The allegations of Paragraph 24 are arguments or conclusions that do not require a
2 response. To the extent a response is required, Netflix is without knowledge or information as to
3 the truth of the allegations in Paragraph 24 and on that basis denies them.

4 25. The allegations of Paragraph 25 are arguments or conclusions that do not require a
5 response. To the extent a response is required, Netflix is without knowledge or information as to
6 the truth of the allegations in Paragraph 25 and on that basis denies them.

7 26. The allegations of Paragraph 26 are arguments or conclusions that do not require a
8 response. To the extent a response is required, Netflix is without knowledge or information as to
9 the truth of the allegations in Paragraph 26 and on that basis denies them.

10 27. The allegations of Paragraph 27 are arguments or conclusions that do not require a
11 response. To the extent a response is required, Netflix is without knowledge or information as to
12 the truth of the allegations in Paragraph 27 and on that basis denies them.

13 28. In response to the allegations of Paragraph 28, Netflix avers that it acquired the
14 rights to stream *#Saraitda* throughout the world except for Korea and mainland China and the
15 rights to translate *#Saraitda* into all languages. Netflix further avers that it acquired those rights
16 from an entity called Lotte Culture Works, Ltd., which represented, covenanted, and warranted
17 that it was the possessor of the rights it granted to Netflix. On information and belief, Netflix
18 avers that Lotte Culture Works, Ltd. is the successor in interest to Lotte Entertainment. Except as
19 specifically admitted herein, Netflix denies the allegations of Paragraph 28.

20 29. In response to the allegations of Paragraph 29, Netflix avers that *Squid Game* is a
21 Korean-language television series that has streamed on the Netflix service dubbed into other
22 languages, including English; that *Money Heist* is a Spanish-language television series that has
23 streamed on the Netflix service dubbed into other languages, including English; and that *Lupin* is a
24 French-language television series that has streamed on the Netflix service dubbed into other
25 languages, including English. Netflix further avers that the three series were viewed numerous
26 times on Netflix's service, and that as of the filing of this Answer, *Squid Game* and *Money Heist*
27 are among the ten most-viewed series in the history of the Netflix service. The remaining
28 allegations of Paragraph 29 are arguments or conclusions that do not require a response. To the

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