

Richard S. Busch (SBN 319881)  
E-Mail: [rbusch@kingballow.com](mailto:rbusch@kingballow.com)  
**KING & BALLOW**  
1999 Avenue of the Stars, Suite 1100  
Los Angeles, CA 90067  
Telephone: (424) 253-1255  
Facsimile: (888) 688-0482  
*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ROBIN WILLIAMS TRUST,

Plaintiff,

vs.

PANDORA MEDIA, LLC,  
*a limited liability company*

Defendant.

Case Number: 22-cv-00815

**COMPLAINT FOR  
COPYRIGHT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff ROBIN WILLIAMS TRUST, by and through its attorneys of record,  
alleges as follows:

**JURISDICTION**

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 as the action arises under the original and exclusive jurisdiction of the federal court and 28 U.S.C. § 1338(a) as the controversy arises under the Copyright Act of 1976 (17 U.S.C. § 101 *et seq.*).

2. This Court has personal jurisdiction over Defendant as discussed fully below.

1           3.       This Court has general personal jurisdiction over Pandora Media,  
2 LLC (“Pandora”) because Pandora’s principal place of business is in Oakland,  
3 California, while also having a substantial office in Santa Monica, California,  
4 meaning that Pandora is at home in the State of California. Furthermore:

5           a.       Upon information and belief, through January 28, 2022, Pandora was  
6 qualified to do business in California and was registered as a foreign  
7 corporation with the California Secretary of State.

8           b.       Pandora is also registered as a foreign limited liability company with  
9 the California Secretary of State.

10          c.       Pandora’s designated DMCA Copyright Agent identified in its  
11 “Intellectual Property Policy” on its website is located in California at  
12 2100 Franklin Street, 7th Floor, Oakland, California 94612.

13          d.       Pandora has previously admitted in other federal court filings that  
14 California has jurisdiction over it. *See*, Wixen Music Publishing, Inc.  
15 v. Pandora Media, Inc., Case No. 2:19-cv-5278-SVW (C.D. Cal.), Dkt.  
16 15 (Pandora Media, Inc.’s Answer) at ¶¶ 16-17 (“Pandora admits that  
17 [it] has availed itself of California law . . . and venue is proper in the  
18 [Central District of California]”).

19          4.       This Court has specific personal jurisdiction over Pandora because its  
20 suit-related conduct creates a substantial connection with the State of California  
21 and this Judicial District. ROBIN WILLIAMS TRUST (hereinafter “Williams”) is  
22 a copyright owner of properly registered literary works (the “Works” or  
23 “Williams’s Works”) (*see* Exhibit A). Upon information and belief, Pandora has  
24 generated substantial revenue from exploitation of the Works in California, as  
25 further discussed below:

26          a.       Pandora actively and purposely does business in California, as  
27 evidenced by its (i) subscribers and users in California, which Pandora  
28

1 actively reaches out to through, at a minimum, its website  
2 ([www.pandora.com](http://www.pandora.com)) and mobile app; (ii) contracts and other  
3 transactions that it has entered into in California; (iii) revenue  
4 generated from California residents and businesses in connection with  
5 its service; and (iv) advertisements that target California residents.

6 b. Pandora has purposefully availed itself of California law and could  
7 and did reasonably anticipate being brought into this Court because,  
8 among other reasons, Pandora (i) has been engaged and is engaged in  
9 infringing conduct within the State of California and this District,  
10 including by knowingly, intentionally, and repeatedly streaming  
11 sound recordings and the Works over the Internet to California  
12 residents via its services; (ii) knew or should have known that the harm  
13 caused by its repeated unlicensed public performance of the Works  
14 over the Internet was aimed at comedy writers and comedy publishers,  
15 including Plaintiff, who control the Works and are managed and  
16 administered in or near Los Angeles County, California, a global hub  
17 of the entertainment industry; and (iii) knew or should have known  
18 that Plaintiff, an industry leading comedian, actor and comedy writer  
19 for nearly 40 years, would suffer, and in fact did suffer, the brunt of  
20 the harm caused by Pandora's unauthorized acts in California and  
21 around the world.

22 5. Finally, the ROBIN WILLIAMS TRUST is managed and  
23 administered in Los Angeles, California.

#### 24 VENUE

25 6. Venue in this judicial district is proper pursuant to 28 U.S.C. § 1391(b),  
26 and § 1400(a), as a substantial part of the events or omissions giving rise to the  
27 claim occurred in this district, including for example, by the maintenance of  
28

1 Pandora's corporate office in Santa Monica, California. Plaintiff has its principal  
2 place of business in this District and has been injured in this District as a result of  
3 Pandora's infringing conduct.

#### 4 **PARTIES**

5 7. Plaintiff, ROBIN WILLIAMS TRUST, represents the intellectual  
6 property rights of the late Robin Williams, who was an actor and comedian and  
7 resided in California. The ROBIN WILLIAMS TRUST is in the care of Trustee,  
8 Arnold D. Kassoy, of Manatt, Phelps & Phillips, LLP, located in Los Angeles,  
9 California.

10 8. Defendant, Pandora, is a Delaware limited liability company with a  
11 principal place of business at 2100 Franklin Street, Suite 700, Oakland, California  
12 94612. According to its website, Pandora maintains another corporate office in  
13 California, located at 3000 Ocean Park Boulevard, Suite 3050, Santa Monica,  
14 California 90405.

#### 15 **PRELIMINARY STATEMENT**

16 8. Just like with music, there are two copyrights involved in the recorded  
17 performance of a literary copyrighted work: a copyright in the sound recording,  
18 and a separate copyright in the underlying spoken word composition (Williams'  
19 compositions, as noted, are referred to herein as "the Works" or "Williams's  
20 Works"). Pursuant to 17 U.S.C. §§ 106 and 204 of the Copyright Act of 1976,  
21 copyright owners have the exclusive right to, among other things, reproduce,  
22 distribute, license, and publicly perform their works. Anyone wishing to obtain the  
23 right to do so, must get a license from the respective copyright owner in both of  
24 these copyrights, and pay agreed to royalties. The failure to do so constitutes  
25 copyright infringement. As discussed below, Pandora not only did not obtain any  
26 copyright in Williams's Works but admitted that it did not do so in SEC filings,  
27 and admitted that it would very likely face copyright infringement liability as a

1 result. But Pandora did what most goliaths do: it decided it would infringe now to  
2 ensure it had this very valuable intellectual property on its platform to remain  
3 competitive, and deal with the consequences later. Later is now.

#### 4 **STATEMENT OF FACTS**

5 9. Throughout history, comedy and spoken word have been the bedrock  
6 of entertainment. From Shakespearian comedies to modern-day standup comedians,  
7 comedy has brought happiness to the faces of billions of people, and for nearly the  
8 last five decades, Robin Williams has been an integral part of that history.

9 10. Spanning nearly forty years with unique insights expressed as an  
10 active comedian, philosopher, and entertainer in literally every format imaginable,  
11 the comedic works of Robin Williams have enriched global culture, our lives, the  
12 entertainment industry and provided insights into the absurdity, joy, pains, and  
13 irony of life. He pushed other comedians and entertainers to further hone their craft  
14 while continuing to trail blaze as a comedic talent until the end of his career.

15 11. From his early beginnings at the Holy City Zoo in San Francisco and  
16 the Roxy in West Hollywood, California, to the television show Mork & Mindy  
17 and then through a plethora of movie acting roles, such as Genie in Disney's  
18 Aladdin, and his iconic roles in Dead Poets Society and Good Will Hunting,  
19 Williams put his heart, soul and mind into every composition he wrote or role he  
20 played. His heart was never more evident and on display then when he spent years  
21 lending his comedic talent to the charitable organization Comic Relief USA, whose  
22 mission was to raise funds to those in need, particularly America's homeless. He  
23 was joined on those Comic Relief USA television specials by Billy Crystal and  
24 Whoopi Goldberg among others. It is nowhere close to an exaggeration to say that  
25 Robin Williams was a national treasure.

26 12. Williams' on-stage presence and skill with comedic improvisation set  
27 the standard for the stand-up comedians. Not only was he skilled at communicating  
28

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