

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DISH NETWORK L.L.C.,

Plaintiff,

v.

DOES 1-5, individually and together
d/b/a Universe IPTV; Universe TV;
World-Universeiptv.com; Uni-Update.com;
and Uni-Web.online,

Defendants.

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Civil Action No. 4:20-cv-2958

COMPLAINT

Plaintiff DISH Network L.L.C. (“DISH”) brings this suit against Does 1-5 individually and together d/b/a Universe IPTV; Universe TV; World-Universeiptv.com; Uni-Update.com; and Uni-Web.online, and states as follows:

Nature of the Action

1. DISH brings this suit for direct copyright infringement because Defendants are taking television channels exclusively licensed to DISH and are unlawfully retransmitting these channels over the Internet throughout the United States on Defendants’ Universe IPTV service (the “Universe Service”) to customers who purchase Defendants’ Universe Service subscriptions (“Universe Subscriptions”). Defendants demonstrated the willfulness of their copyright infringement by continuing to transmit channels exclusively licensed to DISH despite receiving numerous demands to cease.

Parties

2. Plaintiff DISH Network L.L.C. is a limited liability company organized under the laws of the State of Colorado, with its principal place of business located at 9601 South Meridian Blvd., Englewood, Colorado 80112.

3. Defendants Does 1-5 are individuals or entities doing business as Universe IPTV; Universe TV; World-Universeiptv.com; Uni-Update.com; and Uni-Web.online. Defendants transmit television channels to users of the Universe Service and distribute, sell, and promote Universe Subscriptions. Defendants own and operate the World-Universeiptv.com; Uni-Update.com; Uni-Web.online; Universe-ip.com; Universepro9.vip; Universeiptv.com; Universe-ip.world; Olink1.rocks; Olink2.rocks; Olink3.rocks; Olink4.rocks; Olink5.rocks; and Olink7.rocks domains and websites (collectively, the “Universe Domains”). Defendants are concealing their identities through the use of domain proxy services for the Universe Domains. Defendants claim they reside in Austria and they use a WhatsApp phone number including the +43 country code for Austria. DISH believes discovery will identify Does 1-5 and enable DISH to amend the complaint to list them by name.

Jurisdiction and Venue

4. DISH asserts claims under the Copyright Act, 17 U.S.C. § 101 *et seq.* This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

5. Personal jurisdiction is proper against Defendants under Rule 4(k)(2) of the Federal Rules of Civil Procedure. Does 1-5 transmit channels exclusively licensed to DISH to at least 1,000 Universe Service users located in the United States (“Service Users”), including in the State of Texas. Does 1-5 also have a reseller located in the United States, and offer to sell Universe Subscriptions to prospective resellers located in the United States. This Court’s exercise of jurisdiction over Defendants is consistent with the Constitution and laws of the United States, DISH’s claims arise under federal law, and Defendants are not subject to the jurisdiction of the courts of general jurisdiction of any state.

6. Venue is proper in this Court under 28 U.S.C. § 1391(b)(3) because Defendants are subject to personal jurisdiction in this district and under § 1391(c)(3) because Defendants are nonresidents that may be sued in any judicial district. Venue is also proper in this Court under 28 U.S.C. § 1400(a) because the case involves violations of the Copyright Act.

DISH's Copyrights

7. DISH is the fourth largest pay-television provider in the United States providing copyrighted programming to millions of subscribers nationwide. DISH is one of the largest providers of international television channels in the United States offering more than 400 channels in 27 different languages.

8. DISH contracts for and licenses rights for the international channels distributed on its platform from channel owners and their agents, including ARY Digital USA LLC; Asia TV USA Ltd.; B4U U.S.; Geo USA Holdings, Inc. d/b/a Geo USA LLC; Hum Network Limited; Impress Telefilm, Inc.; MBC FZ LLC; International Media Distribution (Luxembourg) S.A.R.L.; MSM Asia Limited; National Communications Services (SMC-PVT.) Limited; Soundview ATN LLC; Soundview Broadcasting LLC; Television Media Network (Pvt) Ltd; TV Today Network Ltd.; and World Span Media Consulting, Inc. (collectively, the “Networks”).

9. The Networks’ channels include Aaj Tak; Al Hayah 1; ART Cima; ARY Digital; ARY News; ATN Bangla; ATN News; B4U Movies; CBC; CBC Drama; Channel-i; Dunya TV; Express Entertainment; Express News; Future TV, Geo News; Geo TV; Hekayat; Hum Masala; Hum Sitaray; Hum TV; Hum World; India Today; LBC; LBCI (a/k/a LDC); MBC1; MBC Drama; MBC Kids (a/k/a MBC3); MBC Masr; Melody Aflam; Melody Classic; NTV Bangla; SAB; SET (a/k/a Sony SET); SET MAX; Zee Aflam; and Zee Alwan (collectively, the “Protected Channels”).

The Networks acquire copyrights in the works that air on their respective channels, including by producing the works and by assignment.

10. DISH entered into signed, written licensing agreements with the Networks granting DISH the exclusive right to distribute and publicly perform the Protected Channels and works that air on the Protected Channels in the United States by means including satellite, over-the-top (“OTT”), Internet protocol television (“IPTV”), and Internet. DISH’s exclusive rights were in effect at all relevant times and are currently in effect. Many of the works that aired on the Protected Channels and for which DISH holds exclusive distribution and public performance rights are registered with the United States Copyright Office. (*See* Exhibit 1.) A vast number of additional, unregistered copyrighted works in which DISH holds exclusive distribution and public performance rights also aired on the Protected Channels. (*See* Exhibit 2.)

11. Defendants are not authorized by DISH to transmit, distribute, or publicly perform the Protected Channels or works that air on those channels in the United States, and DISH has received no compensation from Defendants to do so.

Defendants’ Wrongful Conduct

12. Defendants distribute, sell, and promote Universe Subscriptions to consumers, including Service Users, and to resellers, including Universeonlinetv.co; Universeiptv.stream; Universeiptvs.com; Iptvuniverse.net; and Universe2iptv.com, with knowledge that these and other resellers distribute, sell, and promote Universe Subscriptions to Service Users.

13. Defendants promoted the Universe Service on their World-Universeiptv.com website, instructing consumers that “[t]here are more than 40,000 channels, films and series in every country in the world,” “we are constantly expanding the number of channels,” they have “[a]ll channels,” and “we continuously update our service.”

Universe Server

There are more than 40,000 channels, films and series in every country in the world. we are constantly expanding the number of channels. The server is very mature and unique and is supported by global servers. The prices are never comparable - Sender-logo - An electronic country directory - divided by country groups - A special application on the android - a special page to follow the explanations and developments for each new Note: There are no 18 channels All channels, Universe IPTV A world of entertainment Universe IPTV Get the entertainment you love at the time you want, with the service Universe IPTV is the best service in the areas of drama, which you need with over 40,000 channels at hand! Comedy and documentaries. Subscribe to the service and receive a bouquet of the latest movies, series, plays and TV programs as well as more than 5000 channels of total time, in which we continuously update our service Universe IPTV to ensure the comfort of our customers at all times and enhance the experience offer to enjoy the pictures anytime and on any device of the customer Get the

14. World-Universeiptv.com referred consumers and resellers of the Universe Service to Defendants' Uni-update.com website.

**txt or xls: Download Herunterladen for more information about the server and its applications
<http://uni-update.com>**

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Kontaktinfo@world-universeiptv.com0049 171 3340784
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15. Defendants' Uni-Update.com website serves as a communication portal between Defendants, resellers of Universe Subscriptions, and Service Users. Uni-Update.com provides news and updates about the Universe Service. For example, Uni-Update.com states, "To see real-time updates to the server You can know it from the following link, and it appears automatically Any update or addition to the server Whether adding channels, movies, series, or series episodes it appears on the site automatically and instantly." Universe IPTV apps and channel lists are also available for download at Uni-Update.com.

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