

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No.: \_\_\_\_\_

RIGHTHAVEN LLC, a Nevada limited-liability company,

Plaintiff,

v.

BUZZFEED, INC., a Delaware corporation;  
JONAH PERETTI, an individual; and  
GAVON LAESSIG, an individual,

Defendants.

---

**COMPLAINT AND DEMAND FOR JURY TRIAL**

---

Righthaven LLC (“Righthaven”) complains as follows against BuzzFeed, Inc. (“BuzzFeed”), Jonah Peretti (“Mr. Peretti”) and Gavon Laessig (“Mr. Laessig”; collectively with BuzzFeed and Mr. Peretti known herein as the “Defendants”) (BuzzFeed and Mr. Peretti collectively known herein as the “Publishers”) on information and belief, and at all times relevant to this lawsuit, unless otherwise specifically indicated herein to the contrary:

**NATURE OF ACTION**

1. This is an action for copyright infringement pursuant to 17 U.S.C. § 501.

**PARTIES**

2. Righthaven is a Nevada limited-liability company with its principal place of business in Nevada.
3. Righthaven is in good standing with the Nevada Secretary of State.

4. BuzzFeed is a Delaware corporation.

5. Mr. Peretti is identified by the current registrar, GoDaddy.com, Inc. (“GoDaddy”) as the registrant of the Internet domain found at <buzzfeed.com> (the “Domain”).

6. Mr. Peretti is identified by GoDaddy as the administrative contact and technical contact of the Domain (the content accessible through the Domain and the Domain itself known herein as the “Website”).

7. Mr. Peretti is identified on the “Our Team” page of Website, as the “Founder & CEO” of the Website, attached hereto as Exhibit 1.

8. Mr. Laessig is identified on Mr. Laessig’s Facebook profile, as an employee of Buzzfeed, attached hereto as Exhibit 2.

9. BuzzFeed is the self-proclaimed owner of the copyright(s) in the work(s) displayed on the Website, as evidenced by a copyright notice displayed on the Website: “Copyright © 2011 BuzzFeed, Inc.”

10. Mr. Laessig contributed an unauthorized copy of the photograph entitled: “TSA Agent performs enhanced pat-downs” (the “Work”), attached hereto as Exhibit 3, to the Website.

### **JURISDICTION**

11. This Court has jurisdiction over the subject matter and the parties under the copyright laws of the United States, 17 U.S.C. § 101 et seq., as well as jurisdictional provisions of 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

12. Righthaven is the owner of the copyright in and to the Work.

13. On or about December 10, 2010, the Defendants willfully reproduced the Work, on an unauthorized basis, from a source emanating from Colorado.

14. On or about December 10, 2010, the Defendants displayed, and continue to display, an unauthorized reproduction of the Work (the “Infringement”), attached hereto as Exhibit 4, on the Website.

15. The composition, at least in part, of the Work and the Infringement, is a Transportation Security Administration Agent performing an enhanced pat-down search in the Denver, Colorado airport.

16. The focal point of the Infringement is Denver, Colorado.

17. The only geographic location that is associated with, and related to, the Work is Denver, Colorado.

18. The Work was originally published in *The Denver Post*.

19. The Defendants knew that the Work was originally published in *The Denver Post*.

20. The Defendants knew that the Work originally emanated from Colorado.

21. The Infringement, as publicly displayed on the Website, was and is accessible to persons in Colorado.

22. The Infringement occurred and continues to occur in Colorado.

23. The Defendants' display of the Infringement was and is purposefully directed at Colorado residents.

24. The harm caused by the Infringement, was experienced, at least in part, in Colorado.

### **VENUE**

25. The United States District Court for the District of Colorado is an appropriate venue, pursuant to 28 U.S.C. § 1400 (a), because the Defendants are subject to personal jurisdiction in Colorado.

26. The United States District Court for the District of Colorado is an appropriate venue, pursuant to 28 U.S.C. § 1391(b)(2), because a substantial part of the events giving rise to the claim for relief are situated in Colorado.

**FACTS**

27. The Work constitutes copyrightable subject matter, pursuant to 17 U.S.C. § 102(a)(5).

28. Righthaven is the owner of the copyright in and to the Work.

29. The Work was originally published on or about November 18, 2010.

30. On December 8, 2010, the United States Copyright Office (the “USCO”) granted Righthaven the registration to the Work, copyright registration number VA0001751279 (the “Registration”) and attached hereto as Exhibit 5 is evidence of the Registration in the form of a printout of the official USCO database record depicting the occurrence of the Registration.

31. On or about December 10, 2010, the Defendants displayed, and continue to display, the Infringement on the Website.

32. The Defendants did not seek permission, in any manner, to reproduce, display, or otherwise exploit the Work.

33. The Defendants were not granted permission, in any manner, to reproduce, display, or otherwise exploit the Work.

34. The Publishers knew, or reasonably should have known, that websites, such as the Website, are and were the habitual subject of contributions by others of copyright-infringing content to the Website.

35. The Publishers did not institute any proactive policy of precluding or attempting to preclude the contributions by others of copyright-infringing content to the Website.

36. The Publishers did not institute any proactive policy of monitoring or attempting to monitor the contributions by others of copyright-infringing content to the Website.

37. The Publishers did not institute any proactive policy of deleting or attempting to delete the contributions by others of copyright-infringing content to the Website.

38. The Publishers' failure to institute any proactive policies intended to address the contributions by others of copyright-infringing content to the Website constituted and constitutes the Publishers' willful blindness to copyright infringements occurring on the Website.

**FIRST CLAIM FOR RELIEF: DIRECT COPYRIGHT INFRINGEMENT**

39. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through 38 above.

40. Righthaven holds the exclusive right to reproduce the Work, pursuant to 17 U.S.C. § 106(1).

41. Righthaven holds the exclusive right to prepare derivative works based upon the Work, pursuant to 17 U.S.C. § 106(2).

42. Righthaven holds the exclusive right to distribute copies of the Work, pursuant to 17 U.S.C. § 106(3).

43. Righthaven holds the exclusive right to publicly display the Work, pursuant to 17 U.S.C. § 106(5).

44. The Defendants reproduced the Work in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(1).

45. The Defendants created an unauthorized derivative of the Work in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(2).

46. The Defendants distributed, and continue to distribute, an unauthorized reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(3).

47. The Defendants publicly displayed, and continue to publicly display, an unauthorized reproduction of the Work on the Website, in derogation of Righthaven's exclusive rights under 17 U.S.C. § 106(5).

48. BuzzFeed has willfully engaged in the copyright infringement of the Work.

49. Mr. Peretti has willfully engaged in the copyright infringement of the Work.

50. Mr. Laessig has willfully engaged in the copyright infringement of the Work.

51. The Defendants' acts as alleged herein, and the ongoing direct results of those acts, have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

52. Unless the Defendants are preliminarily and permanently enjoined from further infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus entitled to preliminary and permanent injunctive relief against further infringement by the Defendants of the Work, pursuant to 17 U.S.C. § 502.

**SECOND CLAIM FOR RELIEF: VICARIOUS COPYRIGHT  
INFRINGEMENT AS TO THE PUBLISHERS ONLY**

53. Righthaven repeats and realleges the allegations set forth in Paragraphs 1 through 52 above.

54. The Publishers directly profited and continue to directly profit from infringement of the Work.

55. The Publishers have the right to stop or limit infringement of the Work by contributors to the Website, but have declined to meaningfully exercise that right.

56. Righthaven has been damaged as a result of the Defendants' acts as alleged herein, and the Publishers are liable to Righthaven for such damages pursuant to 17 U.S.C. § 504(a)(2).

57. The Publishers' acts as alleged herein, and the ongoing direct results of those acts, have caused and will continue to cause irreparable harm to Righthaven in an amount Righthaven cannot ascertain, leaving Righthaven with no adequate remedy at law.

58. Unless the Publishers are preliminarily and permanently enjoined from further infringement of the Work, Righthaven will be irreparably harmed, and Righthaven is thus

entitled to preliminary and permanent injunctive relief against further infringement by the Publishers of the Work, pursuant to 17 U.S.C. § 502.

### **PRAYER FOR RELIEF**

Righthaven requests that this Court grant Righthaven's claim for relief herein as follows:

1. Preliminarily and permanently enjoin and restrain the Defendants, and the Defendants' officers, agents, servants, employees, attorneys, related companies, partners, and all persons acting for, by, with, through, or under the Defendants, from directly or indirectly infringing the Work by reproducing the Work, preparing derivative works based on the Work, distributing the Work to the public, and/or displaying the Work, or ordering, directing, participating in, or assisting in any such activity;
2. Direct the Defendants to preserve, retain, and deliver to Righthaven in hard copies or electronic copies:
  - a. All evidence and documentation relating in any way to the Defendants' use of the Work, in any form, including, without limitation, all such evidence and documentation relating to the Website;
  - b. All evidence and documentation relating to the names and addresses (whether electronic mail addresses or otherwise) of any person with whom the Defendants have communicated regarding the Defendants' use of the Work; and
  - c. All financial evidence and documentation relating to the Defendants' use of the Work;
3. Direct GoDaddy, the current registrar, and any successor domain name registrar for the Domain, to lock the Domain and transfer control of the Domain to Righthaven;
4. Award Righthaven statutory damages for the willful infringement of the Work, pursuant to 17 U.S.C. § 504(c);

5. Award Righthaven costs, disbursements, and attorneys' fees incurred by Righthaven in bringing this action, pursuant to 17 U.S.C. § 505;
6. Award Righthaven pre- and post-judgment interest in accordance with applicable law; and
7. Grant Righthaven such other relief as this Court deems appropriate.

**DEMAND FOR JURY TRIAL**

Righthaven requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Dated this 30<sup>th</sup> day of March, 2011.

By: /s/ Steven G. Ganim  
STEVEN G. GANIM, ESQ.  
Righthaven LLC  
9960 West Cheyenne Avenue, Suite 210  
Las Vegas, Nevada 89129-7701  
Tel: (702) 527-5900  
Fax: (702) 527-5909  
sganim@righthaven.com

SHAWN A. MANGANO, ESQ.  
SHAWN A. MANGANO, LTD.  
9960 West Cheyenne Avenue, Suite 170  
Las Vegas, Nevada 89129-7701  
Tel: (702) 304-0432  
Fax: (702) 922-3851  
shawn@manganolaw.com

*Attorneys for Plaintiff Righthaven LLC*



# EXHIBIT 1

LOL      OMG      **DISAPPROVE**      top 20  
 cute      WTF      geeky      boost  
 games      more ↓      follow us ↓      mobile



Search What's Hot...

Search

Adve

Help / FAQ **NEW**

Feedback

Widgets & Apps

Bookmarklet

RSS Feeds

About BuzzFeed

Our Team

Jobs

Contact Us

Privacy Policy

User Agreement

Advertising Terms

# Our Team

## Founder & CEO

Jonah Peretti

## Founders

John S. Johnson

Kenneth Lerer

## President

Jon Steinberg

## General Manager

Eric Harris

## Project Manager

Amy Powell

## Director of Product

Chris Johanesen

## Designers

Emily Getman

Greg Leuch

## Director of Technology

Mark Wilkie

## Director of Sales

Chris Puckett

## Director of Sales, West Coast

Gabrielle Heyman

## Director, Viral Targeted Sales

Jane Hegleman

## Senior Account Executive

Stephen Loguidice

## Ad Operations Managers

Jen Wolosoff

Katherine Griffiths

## Managing Editor

Scott Lamb

## Editors

Peggy Wang

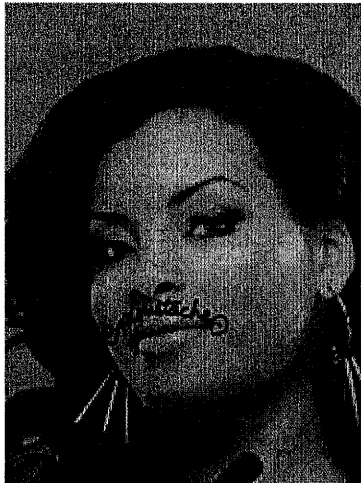
Jack Shepherd

Matt Stopera

Melissa Rosenthal

# EXHIBIT 2

Search



# Gavon Laessig

Add as Friend

Works at BuzzFeed Studied at The University of Kansas Lives in Brooklyn, New York  
From Lawrence, Kansas

## Education and Work

### Employers



BuzzFeed

### College



The University of Kansas

### High School



Lincoln East High School

Class of 1996

Wall

### Info

Share Profile

Report/Block This Person

## Arts and Entertainment

### Music



Danger Bob

### Television



Shark Shrink

## Activities and Interests

### Other

Astrokitty Spacepussy, Diablo Sandwich, Astrokitty Comics & More, Lawrence.com, Love Garden Sounds, Democratic Party, Films For Action, Smackdown Trivia, SUPER NERD NIGHT @ THE JACKPOT, Kansas Health Institute, The Pitch Plog, Union Hall, Babycastles, Jack Shepherd

Chat (0)

# EXHIBIT 3

1/20/2011

Controversy over pat-downs, body scan...

**ADVANCE AMERICA**  
CASH ADVANCE  
www.AdvanceAmerica.net

**GET THE MONEY YOU NEED**

# denverpost.com

New letter: Sign In | Register  
 Commenting: Sign In | Register  
 Thursday, January 20, 2011

Home | Media Kit

News Politics Sports Business Entertainment Lifestyles Opinion Travel Multimedia **Weekly Ad** Shopping Autos Real Estate Jobs Classifieds

15°

Search Site Web search by

Home > Denver & the West

DENVER AND THE WEST

## Controversy over pat-downs, body scans lands at DIA

By Jeffrey Leib  
The Denver Post

POSTED: 11/18/2010 01:00:00 AM MST  
UPDATED: 11/18/2010 09:33:54 PM MST

Recommend

689 people recommend this.  
Be the first of your friends.

BOOKMARK   
 PRINT EMAIL  
 408 COMMENTS



Transportation Security Administration agents perform enhanced pat-downs on passengers at DIA on Wednesday amid growing controversy about the screenings and full-body scanners, one week before Thanksgiving air travelers crowd airports. (Craig F. Walker, The Denver Post)

Despite ongoing criticism from some Washington lawmakers and many travelers, Transportation Security Administration chief John Pistole refused Wednesday to back off the agency's position that tougher airport screening techniques are needed to counter evolving threats.

"I'm not going to change those policies," he declared to lawmakers.

At U.S. airports, the TSA has been deploying more advanced imaging scanners that perform a kind of electronic strip-search on passengers and allow screeners hidden in control rooms to search the images for concealed weapons and explosives.

And in recent weeks, TSA screeners also have escalated the pat-down procedure on passengers in a way that some say is far too intrusive.

"I'm

frankly bothered by the level of these pat-downs," Sen. George

POPULAR TALKERS EMAILED VOTED YEAR AGO

- Nuggets on the clock to trade Anthony after Nets say no
- Offensive coordinator gets to call plays for Fox's Broncos
- Buffs hiring Scherer to coach their QBs
- Billionaire Russian owner nixes deal for Nuggets' Carmelo Anthony
- Broncos, Eagles not getting Mora
- Carmelo Anthony trade to New Jersey is dead, Nets owner says
- Josh McDaniels eager for new start with St. Louis Rams
- Jim Mora declines Broncos' defensive coordinator job

### FRONT PAGE

- "Cutting-edge" stem-cell treatment at CSU helping hobbled critters
- Immigration-crackdown bill introduced in Colorado Senate
- Visiting Chinese president concedes nation must do more on human rights
- Kiszka: Nuggets on the clock to trade Anthony after Nets say no

### FRONT PAGE: LOCAL NEWS

- "Cutting-edge" stem-cell treatment at CSU helping hobbled critters
- Immigration-crackdown bill introduced in Colorado Senate
- Denver's projected \$99.4 million deficit in 2012 will be "challenging" for budget planners
- Big Air organizers bring out snow guns for Civic Center ramp

### FRONT PAGE: BUSINESS NEWS

- Larimer Square stores team up with Dallas shopping center
- Snowmass real estate developer to lead Colorado economic development office
- U.S. homebuilders had second-worst year ever
- Early snow boosts resort skier visits

### RELATED ARTICLES

- Dec 18: [Revamping of U.S. flight security urged](#)
- Nov 30: [Colo. law suit filed over TSA airport screening](#)  
[TSA gives registered-traveler program the all Clear](#)
- Nov 24: [Few problems for Denver fliers, but drivers warned](#)
- Nov 23: [TSA chief mulling less invasive traveler pat-downs](#)  
[TSA chief urges against boycott of airport scans](#)
- Nov 22:

1/20/2011

Controversy over pat-downs, body scan...

EXTRAS

- [View TSA security screening images from Denver International Airport.](#)
- [Explore an interactive graphic about TSA screening from the AP.](#)

LeMieux, R-Fla., told Pistole, who was testifying before the Senate Committee on Commerce, Science and Transportation.

"I wouldn't want my wife to be touched in the way that these folks are being touched," LeMieux said. "I wouldn't want to be touched that

way."

Pistole, who has been subjected to a pat-down himself, said: "It is clearly more invasive." But the procedures are necessary, he said, to detect devices not seen before.

As passengers traveled through Denver International Airport on Wednesday in advance of the Thanksgiving rush, some invoked their constitutional right against unreasonable search, while others were more forgiving of efforts to keep travel safe.

Jeffrey "Gator" Henry of Charlotte, N.C., moved through security in skimpy gym shorts and a sleeveless tank top as part of his plan to reject screening by advanced imaging machines — the devices that use either millimeter-wave or backscatter X-ray technology — and to request a pat-down instead.

"It's an invasion of privacy," said Henry, a television and film producer, as he waited at DIA's A concourse checkpoint.

Henry said he's joined the nascent

movement that is asking travelers to voluntarily opt out of screening by the full-body scanners in favor of more time-consuming pat-downs. Some have designated the day before Thanksgiving as National Opt-Out Day.

"I dressed this way so there is nothing to pat down," he said of the more intensive TSA hand searches.

TSA pat-downs have evolved into more of a light massage, with screeners running their hands up and down the arms, torsos and legs of those passengers selected for the extra screening procedure.

Anthony Giovingo of New Orleans was flying home after visiting his daughter in the Denver area and said he is unfazed about full-body scanning.

"It doesn't bother me," Giovingo said. "I'd rather go through the scanner than be patted down. It's quicker and less invasive. I have nothing to hide, so what's the problem?"

Smooth flying for some

On Wednesday, it appeared that most travelers, including Henry, were able to avoid screening by the advanced imaging devices or pat-downs by passing through the checkpoint metal detectors without generating alarms.

Jill Johnson of Colorado Springs arrived at DIA from Dallas and said at that city's airport, she similarly had cleared the metal detector and avoided the more controversial screening techniques.

Johnson said she has not yet been screened at an airport by a full-body scanner but would not object if she were asked to submit to such an electronic scan.

"Everybody has to understand that we're talking about preventing another 9/11," she said. "It might be an invasion of privacy, but we're talking about a matter of life and death."

Of the enhanced pat-downs, Johnson added, "If it's done respectfully, people should allow it."

TSA's new pat-down procedure is "more up close and personal" than earlier hand-search techniques, but it is "not just Keystone Kops making it up as they go along," said Richard Bloom, director of terrorism, intelligence and security studies at Embry-Riddle Aeronautical University in Prescott, Ariz.

- [Gibbs: Concerns over body scans w/ll be considered](#)
- [Security protest could disrupt Thanksgiving travel](#)
- [TSA chief warns against boycott of airport scans](#)
- [Rocky Flats underw ear invention aims to protect privacy while passing through airport security](#)
- [Clinton: Security measures shouldn't be too intrusive](#)
- [Administration tries to balance security and privacy at airport screenings](#)

Nov 21:

[Obama asks whether there are less-intrusive options](#)



Transportation Security Administration agents perform enhanced pat-downs on passengers at DIA on Wednesday amid growing controversy about the screenings and full-body scanners, one week before Thanksgiving air travelers crowd airports. (Craig F. Walker, The Denver Post)



A passenger at Denver International Airport on Wednesday

**What Terrifies Bill Gates**  
Bill Gates is the richest man in the world. For the first time, his personal fortune is full story.

**Why Wal-Mart is Doomed**  
The reign of the "King of Retail" is over. A rapidly expanding rival is stealing away. Full story.

**Apple Can't Win**  
It's light-years behind the competition in 1 high-tech industry. Full story.

**The Motley Fool**  
To Educate, Amuse & Enrich™

**Recent Activity**

- Immigration-crackdown bill introduced in Colorado Senate - The Denver Post**  
60 people shared this.
- Denver man accused of leaving chicken parts in heating vents of ex-wife's home - The Denver Post**  
93 people shared this.
- "Cutting-edge" stem-cell treatment at CSU helping hobbled critters - The Denver Post**  
19 people shared this.

Facebook social plugin

MOST POPULAR: NEWS: PAST 3 DAYS

- Woman killed on I-25 by flying tire identified
- Woman killed by truck tire while driving on I-25
- I-25 reopens after overnight closure at Eisenhower Tunnel
- Denver's Big Air ramp going up after debate about how to hold it down
- Komen cancels Denver's 3-Day for the Cure
- Coroner: Aurora woman was drowned; common-law husband committed suicide
- Body believed to be that of missing snowboarder
- Judge bans Loveland woman from having pets at home
- Skier reported missing near Eldora
- Steamboat deals with snow, wind

**Our No.1 Stock for 2011**

Each January, The Motley Fool reveals its top stocks for the coming year. Stocks highlighted in this coveted report have gone on to soar by 462%, 655% and 1,203%! It sells for \$99, but you can get a sneak peek FREE. Click the link below now for instant access to "The Motley Fool's Top Stock for 2011."

You'll get the name, stock symbol, and full research case for the remarkable small company that's revolutionizing broadband — and that one top analyst just named his No. 1 pick for 2011. The stock is on the move, so don't wait.

[Click here for instant access to this FREE report!](#)

BROUGHT TO YOU BY THE MOTLEY FOOL

**Post Poll - Apple's Core?**

With co-founder and chief executive Steve Jobs on medical leave from Apple, how do you think the company will fare in his absence? [Read the related article: Uncertainty surrounds health of Steve Jobs, future of Apple](#)

Apple will be fine. The loss of Jobs is huge, but the

1/20/2011

### Controversy over pat-downs, body scan...

New TSA techniques develop out of a collaboration between the security and intelligence personnel that is constantly evaluating ever-changing threats, said Bloom, who spent 20 years in U.S. intelligence work. goes through a security pat-down. (Craig F. Walker, The Denver Post)

company has proven resilient in the past and will move forward despite his absence.

Apple will struggle. Jobs is a true visionary who cannot be replaced.

I don't know.

The TSA operates 768 security checkpoints, with 2,225 screening lanes, at 458 airports across the country. Currently, the agency has deployed 385 of the advanced imaging scanners at 68 U.S. airports, including six at the three checkpoints at DIA. Those six use millimeter-wave technology.

In remarks to the Senate committee, Pistole said the TSA's goal is to have 1,000 advanced imaging machines deployed at airports by the end of 2011.

#### A topic for the courts

Currently, there is no legal "bright line" to determine whether advanced imaging scans or intensive pat-downs amount to unreasonable searches of passengers, said Sam Kamin, an associate professor of constitutional law and criminal procedure at the University of Denver law school.

As lawsuits develop, courts undoubtedly will be looking at the privacy question, but they likely will be "loathe to second-guess" the TSA's balancing of security and privacy, Kamin said.

TSA officials undoubtedly would rather be on Capitol Hill answering questions about screening intrusiveness than "explaining why an airliner was brought down," he said.

*The Associated Press contributed to this report.*

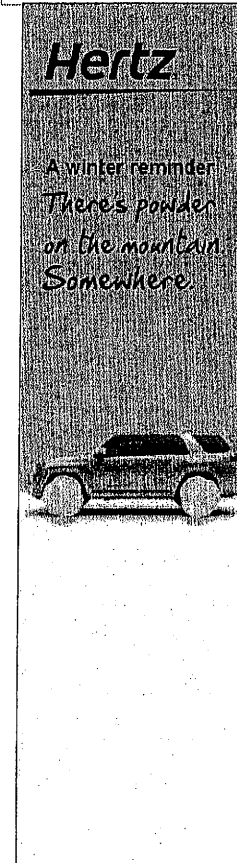
#### Pie can fly, but not the jam

If you're flying to Grandma's for Thanksgiving and have a favorite cranberry relish to share with her and the rest of the family, the TSA reminds you to pack it in your checked luggage or ship it ahead.

"Travelers should know that while pies are permitted through the security checkpoint," numerous other foods, including "creamy dips and spreads," gravy and gift baskets with salsa and jams are not, according to the Transportation Security Administration. A more complete list of foods prohibited from passing through checkpoints can be found on the travel tips section of the agency's website, [www.tsa.gov](http://www.tsa.gov).

"Additionally, TSA does not permit snow globes through the security checkpoint because they contain an undetermined amount of liquid," the agency adds.

The TSA's policy for passengers bringing liquids, gels and aerosols on the plane says travelers can tote such items in containers of 3.4 ounces or less if the items fit in a 1-quart, clear plastic, zip-top bag. Each passenger can travel with one such bag; it must be removed from luggage and placed in the screening bin at the checkpoint, the TSA says. *Jeffrey Leib, The Denver Post*



Passengers at Denver International Airport on Wednesday go through a full-body scanner. (Craig F. Walker, The Denver Post)

#### NEWS: RECENT COMMENTS

**Comment on House to vote on repealing Obama's health care law** (2 minutes ago)  
*Exactly. They now have control of congress. They complained their ideas were not heard by the Democ...*

**Comment on Beauty Bar's arrival signals a makeover for Denver's punk-rock block** (3 minutes ago)  
*A breakfast spot taking the place of a nightclub. That says it all...*

**Comment on Griego: Tiger Mother stirs reflections on parenthood** (11 minutes ago)  
*I am Chinese, and I am a mother. That makes me a Chinese mother which is not the same as a Tiger Mot...*

**Comment on Denver murders in 2010 hit 10-year low** (21 minutes ago)  
*[quote="commknightj"]Hmmm, More guns = More crime. Not so much. <!-- s:shock: --></img src...*

**Comment on "Cutting-edge" stem-cell treatment at CSU helping hobbled critters** (40 minutes ago)  
*This is such revolutionary technology, but the term alone riles fundamentalist brainpans. Note: No ...*

Visit the news forum for more discussion

More recent comments on Denver Post news articles

»  »

#### WE RECOMMEND

Highways, passes west of Denver shut

#### FROM AROUND THE WEB (SPONSORED)

Pack in a Carry-On to Save Money - And



1/20/2011

- down by snow, wind, avalanche danger** (The Denver Post - News)
- Lafayette mom was drunk when she, daughter died in car** (The Denver Post - News)
- TSA chief: Resisting scanners just means delays** (The Denver Post - Business)
- US airports to broadcast words from TSA chief** (The Denver Post - Business)
- Pistole: Relatively few travelers getting pat down** (The Denver Post - Breaking News)

- Controversy over pat-downs, body scan...**
- Your Sanity** (OPEN Forum)
- Bad weather and strikes cost EasyJet £24m** (Financial Times)
- Are Chihuahuas the New Pit Bulls?** (The Dog Daily)
- US Airways Pilots Protest Slow Talks** (TheStreet)
- How Operation Window Seat Changed My Life** (OPEN Forum)

[what's this]

LIKE THIS ARTICLE? RECOMMEND IT (5 REC'S) ALL READER-RECOMMENDED NEWS

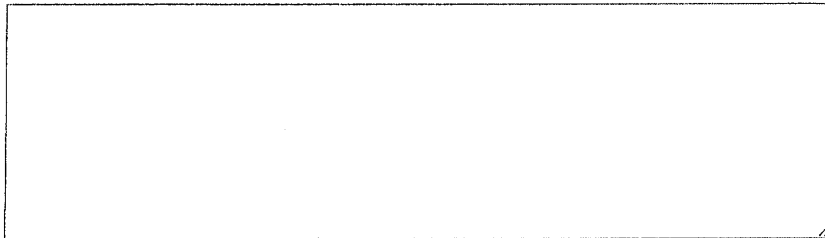
98 OR

ARTICLE COMMENTS (408)

[Login](#) | [Sign Up](#) | [Email Support](#)

You must be registered to comment (your comment will be saved for you while you register). It's quick (it takes about 30 seconds) and we only require your email and name. Comments that include any offensive material are prohibited. By using our site you agree to our terms of use.

» View all this article's 408 comments



1. Use the "Report Abuse" link when necessary (you don't have to be a member, or be logged in to use it)
2. Keep it clean and respect others — don't use language you wouldn't use with your parents
3. Read the Post's Article Commenting Ground Rules [here](#) (link will open in a new window)

**POST COMMENT**

» SHOW OLDEST COMMENTS FIRST (CURRENTLY NEWEST COMMENTS ARE FIRST)

RE: TSA GROPE-A-THON: FIND THE PELOSI

*troyjgrice* wrote:

*FF324* wrote:

*meatpieandtatters* wrote: This is the Hope and Change you wanted. Get over it!

*\*\*?* I fly a lot, and prefer to live. I'm over it, things are way better (looked at your IRA lately)?

You are a hypocrit. If you "Prefer to live" than you should never get in a car. Your odds of getting killed in a car crash = 1:6,500. Odds of getting killed by a terrorist while on a plane 1:44,000,000.

I ride the bus to work, but ,I don't think you're odds are too far off, even for a hypocrite. You don't know how I drive, your gramma woud be shouting "speed up" to me. Happy everything Steve, best to you.



Ray E | 8:35 PM on Friday Jan 7 | Reply to this comment

Report Abuse

*finally\_in* wrote:

*perplexedandsaddened* wrote:

*finally\_in* wrote: That quote was an explanation of why they still see (and so does the SCOTUS)

# EXHIBIT 4

LOL cute games  
 OMG WTF more ↓  
 DISAPPROVE geeky follow us ↓  
 top 20 boost mobile



**LOL** 264,541  
 560,829 likes, 1,458,497 dislikes  
 Song by Justin Bieber

sign in / sign up

Search What's Hot...

Search

Advertise Track Your Site Dashboard + New Post

# The TSA Fisting Guy

**CULTURE BUZZ** If you needed a better visual metaphor for the current state of airport security, then you are very picky about your visual metaphors. Plus! You can go elbow deep into a photo of your choosing with our Fist-O-Matic generator at the bottom of the page. We'll dole out gold stars to our favorite submissions in the comments thread.

Gavon Laessig  
 posted about 4 months ago



47 Responses Add Yours ↓

Like 64 people like this. Be the first of your friends.

0

submit



get more buzz

**LOL Feed**

Like 11,574 people like this. Be the first of your friends.

Follow @LOLFeed on Twitter



RESPOND LOVE? YOUR REACTION?  
 47  
 LOL WIN OMG WTF CUTE GEEKY DISAPPROVE TRASHY OLD EW

Like 64 0 • Stumb submit

### Related Links

- The Obamas Are Into Fisting
- McCain and Obama Fist Pound
- George Bush's Fist Bump

STATS **6,345** TOTAL VIEWS

View Stats Dashboard

Tagged denver, fisting, grope, guy, probe, rage, screening, transportation security administration, tsa, lol, trashy, collection

### article links

- 1 | Malcolm816  
malcolm816.com
- 2 | Controversy over pat-downs, body scans lands at DIA  
denverpost.com

### partner buzz

**Who Is Hanna?**  
 Here's a first look at Focus Features' new film, 'Hanna'. In this action-packed thriller, director Joe Wright reunites with Atonement

SURGING ON  
 Who Is Hanna?

**Foxy Brown Kicked Off Cruise After Nail Disaster**  
 She was booted off a Royal Caribbean cruise because she flipped out after missing her at-sea manicure.

SURGING ON  
 TMZ

**10 Teams That Make Sense for Albert Haynesworth**  
 Again, all of this is assuming there will be a NFL season.

SURGING ON  
 bleacherreport

Sign Up To Get The Best Buzz In Your Inbox The Best Buzz In Your Inbox Sign Up For Our Daily Email Get the best posts every morning by email.

your email address

Sign Up!

Related On switched



Scientist Says He Found Alternative to TSA Body...

PARTNER

Viral on Facebook



12 Classic Movie Moments Made Possible By Abuse...

Hot Search



Jenna Rose Of 'My Jeans' Fame Is Ba...

Surging On Just Jared



Brooklyn Decker: Bikini Bod in Miami

going viral right now



Selena Gomez At Perez Hilton's Birthday Party  
Selena Gomez at Perez Hilton's birthday party, dressed as ...



New Zealand's Bizarre New Air Safety Video  
In case of unforeseen disco, the plane's floor can be used ...

facebook conversations



Add a comment...

Post to Facebook

Posting as Josh Aronson (log out)

Comment

Facebook social plugin

recent activity



http://www.buzzfeed.com/mjs538/willie-nelson-ordered-to-sing-judges-favorite-son  
888 people shared this.



60 Completely Unusable Stock Photos  
295 people shared this.



The Cutest Interspecies Animal Friendships  
1,454 people shared this.



Twin Babies Have A Conversation  
506 people shared this.



The 50 Funniest Roller Coaster Snapshots  
202 people shared this.

Facebook social plugin

all responses contributions (10) reactions (37)

Latest First

Sinistral thinks The TSA Fisting Guy is LOL about 4 months ago

radiosinmotion thinks The TSA Fisting Guy is LOL about 4 months ago

Veronica H. thinks The TSA Fisting Guy is EW & LOL about 4 months ago

Daniel R. The TSA Fisting Guy and thinks it's EW, LOL & TRASHY about 4 months ago



TOO FAR, MAN

He wipes your tears....he cares.

2 Responses to This ↑

React Share Link Flag

brandyh thinks The TSA Fisting Guy is EW about 4 months ago

Hello, Michelle thinks The TSA Fisting Guy is LOL about 4 months ago

bobbyw thinks The TSA Fisting Guy is LOL about 4 months ago

user0001 thinks The TSA Fisting Guy is LOL, EW & TRASHY about 4 months ago

Becka Noel thinks The TSA Fisting Guy is OMG about 4 months ago

crazy astronaut thinks The TSA Fisting Guy is LOL about 4 months ago

thesightsieeblogspot thinks The TSA Fisting Guy is WTF, OMG & LOL about 4 months ago

Zan Z. thinks The TSA Fisting Guy is TRASHY about 4 months ago

The TSA Fisting Guy is starting to go viral on Facebook Share It about 4 months ago

JP thinks The TSA Fisting Guy is LOL about 4 months ago

Stephen D. 4 months ago

now buzzing



Drunk Woman Tries To Say The Alphabet  
I think she just failed her sobriety test.



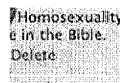
Rihanna On The Cover Of Rolling Stone  
Might be picking up this issue!



Alec Baldwin's Chest Hair  
Is there a support group, or medication I should be taking? I feel ...



Swagimals  
A single-service Tumblr that finally recognizes that "animals are s...



Schooled In FaceBook Theological Debate  
Whoever you are, Lacey, you're my hero.



Kicks To The Crotch In Comics: A Photo Essay  
This is a beautiful, thought provoking collection of the finest kic...



Geno The Bulldog Can't Keep His Head Up  
Someone please open the door for him!



Young Girl Tries To Commit Suicide From Shopping Mall  
A woman attempts suicide in Malaysia . Burnred note. I'm not to...



Kuwait Sandstorm  
It's like watching a scene in a post-apocalypse movie.

TYRANNOWHOREUS REX



that dino's got blow pellets up her coo and he's going to find them

5 Responses to This |

React Share Link Flag

prettyjumbles thinks The TSA Fisting Guy is LOL about 4 months ago



Brought to you by the letter F

3 Responses to This |

React Share Link Flag

kirkwood thinks The TSA Fisting Guy is EW about 4 months ago

bedouin thinks The TSA Fisting Guy is TRASHY about 4 months ago

katieg5 thinks The TSA Fisting Guy is EW about 4 months ago

mrossana The TSA Fisting Guy and thinks it's EW & OMG about 4 months ago



emblem 4 months ago



World's Most Inappropriate Cheering Crowd  
I saw this cheering crowd on CNN.

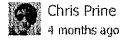
More Buzz →

neither of them like it.

5 Responses to This ↑ React Share Link Flag

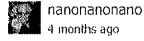
**Reza A.** thinks The TSA Fisting Guy is LOL about 4 months ago

If you want a picture of the present, imagine a TSA agent grabbing human balls — forever.

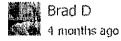
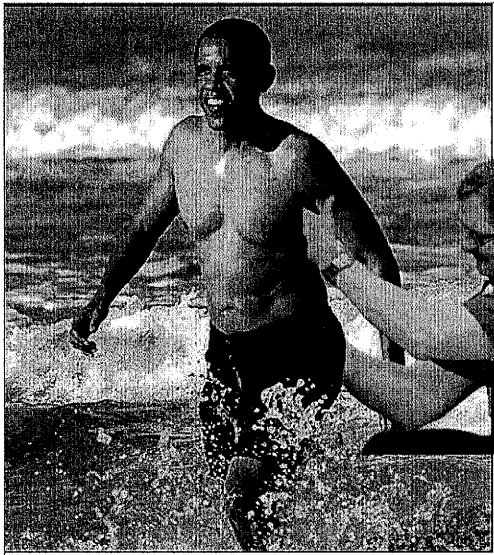


Respond to This ↑ React Share Link Flag

The Glenn Beck picture getting fisted makes more sense since he's always crying and saying freaky ass shit...



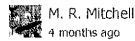
Respond to This ↑ React Share Link Flag



Beach Time!

3 Responses to This ↑ React Share Link Flag

**Obienator** The TSA Fisting Guy and thinks it's EW, TRASHY & OMG about 4 months ago



That'll give him something to cry about

6 Responses to This ↑ React Share Link Flag


**johng16** The TSA Fisting Guy about 4 months ago

**Eric Buth** The TSA Fisting Guy about 4 months ago

**Ronald Gardner** thinks The TSA Fisting Guy is TRASHY about 4 months ago


**Whitney Lou** thinks The TSA Fisting Guy is TRASHY about 4 months ago

Dude would get slapped if he touched me that way. Guess I better not fly anytime soon...

 Whitney Lou  
4 months ago

Respond to This ↑      React    Share    Link    Flag



 Gavon Laessig  
4 months ago

Safety first.

2 Responses to This ↓      React    Share    Link    Flag

---

### add something interesting

Text    **Image**    Video    Link

#### Image

[Use the Photo Editor...](#)



 You

Link Image To (optional)

Description (Allowed HTML Tags: <a href=""> <b> <i> <em> <strong>)

Preview

#### Related On switched



Scientist Says He Found  
Alternative to TSA  
Body...

PARTNER

#### More Buzz



Hannibal Lecter Pug

#### Going Viral



New Company Promises  
to Give You a Pretend  
Face...

#### Hot Search



Anne Hathaway: Bikini  
Babe in Rio

# EXHIBIT 5



Type of Work: Visual Material

Registration Number / Date:  
VA0001751279 / 2010-12-08

Application Title: TSA Agent performs enhanced pat-downs.

Title: TSA Agent performs enhanced pat-downs.

Description: Electronic file (eService)

Copyright Claimant:  
Righthaven LLC, Transfer: By written agreement.

Date of Creation: 2010

Date of Publication:  
2010-11-18

Nation of First Publication:  
United States

Authorship on Application:  
Media News Group, Inc., employer for hire; Domicile: United States; Citizenship: United States. Authorship: photograph.

Rights and Permissions:  
Chief Executive Officer, Righthaven LLC, 9960 West Cheyenne Avenue, Suite 210, Las Vegas, NV, 89129-7701, United States, (702) 527-5900, sgibson@righthaven.com

Copyright Note: C.O. correspondence.

Names: Media News Group, Inc.  
Righthaven LLC

=====

JS 44 (Rev. 12/07)

### CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

RIGHTHAVEN LLC, a Nevada limited-liability company

(b) County of Residence of First Listed Plaintiff Clark (Nevada)  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

STEVEN G. GANIM, ESQ.; Righthaven LLC; 9960 West Cheyenne Avenue, Suite 210; Las Vegas, Nevada 89129-7701; Tel: (702) **+**

**DEFENDANTS**

BUZZFEED, INC., a Delaware corporation; JONAH PERETTI, an individual; and GAVON LAESSIG, an individual **+**

County of Residence of First Listed Defendant \_\_\_\_\_  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES**(Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))
			<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
		<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions		

**V. ORIGIN**

(Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
17 U.S.C. § 501

Brief description of cause:  
Copyright Infringement

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ 150,000.00

CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions): JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE 03/30/2011 SIGNATURE OF ATTORNEY OF RECORD  
/s/ Steven G. Ganim, Esq.

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44****Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553  
Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

Court Name: U.S. District Court, Colorado  
Division: 1  
Receipt Number: COX036462  
Cashier ID: sg  
Transaction Date: 03/30/2011  
Payer Name: RAISHA Y GIBSON

---

CIVIL FILING FEE  
For: RAISHA Y GIBSON  
Amount: \$350.00

---

CREDIT CARD  
Amt Tendered: \$350.00

---

Total Due: \$350.00  
Total Tendered: \$350.00  
Change Amt: \$0.00

11-CV-00811

A fee of \$45.00 will be assessed on any returned check.

---