

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 NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Julie Dermansky

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Andrew T. Lilly (La. 32559) / Lilly PLLC, 4907 Magazine
Street, New Orleans, LA 70115 / 504-812-6388

DEFENDANTS

Hayride Media, LLC

County of Residence of First Listed Defendant East Baton Rouge
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF 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)Click here for: [Nature of Suit Code Descriptions.](#)

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 (Excludes 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	PERSONAL INJURY <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 <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <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"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <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)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <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 (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <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	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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 - Transfer ☐ 8 Multidistrict Litigation - Direct File

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. 101, 17 U.S.C. 1202

Brief description of cause:

Suit for infringement of copyrighted photographs and for unauthorized removal/alteration of Copyright Management Information

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

Sep 27, 2022

Andrew T. Lilly (La. 32559)

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.Cv.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; **NOTE: 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 there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- 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.
- 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 – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- 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 actual dollar amount 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.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

Julie Dermansky,

plaintiff,

versus

Hayride Media, LLC,

defendant.

Civil Action No. 22-cv-3491

Section Division

District Judge

Magistrate Judge

Jury Trial Requested

COMPLAINT

To support this *Complaint*, the plaintiff alleges the following against the defendant:

Nature of the Action

1. This is an action for direct copyright infringement and for the violation of rights under Section 1202 of the U.S. Copyright Act resulting from the unauthorized removal and/or alteration of Copyright Management Information (“CMI”), as that term is defined under 17 U.S.C. § 1202. Plaintiff sues in response to the unauthorized use of her original copyrighted photographs and other copyright violations by the defendant through its website, thehayride.com.

Parties

2. Appearing as plaintiff is **Julie Dermansky** (“**Dermansky**”), a natural person of the full age of majority and a citizen of the State of Louisiana.
3. Named as defendant is **Hayride Media, LLC** (“**Hayride**”), a juridical person organized in and under the laws of the State of Louisiana, with a registered office in East Baton Rouge Parish, Louisiana.

Jurisdiction

4. **Subject matter.** This Court has original jurisdiction over civil actions arising under any Act¹ of Congress relating to copyrights. 28 U.S.C. § 1338(a). Actions “arise

¹ Here, 17 U.S.C. § 101, *et seq.* (“Copyright Act” or the “Act”).

under” the Copyright Act if the complaint seeks a remedy granted by the Act, asserts a claim requiring construction of the Act, or presents a case where a distinctive policy of the Act requires that federal principles control the disposition of the claim.

5. And where copyrightability, ownership, or right to use is placed at issue, § 1338(a) jurisdiction is exclusive because claim resolution involves the application and interpretation of the Act.
6. This case is the prototypical case invoking federal jurisdiction because it involves requests for injunctive relief, finding of infringement, and an award of actual damages, which are provided for in the Act and which turn on an analysis of the dismemberments of “ownership” in copyright, a distinctly federal concept.
7. Subject matter jurisdiction is not only proper in this Court, it is *exclusive* in this Court as to the matters described in ¶¶ 4-6, above.
8. **Personal.** This court has personal jurisdiction over Hayride because it was served through its registered agent in, is registered to do and does business in, has appointed an agent for service of process in, is comprised of members who are citizens of, the State of Louisiana.

Venue

9. Venue is proper under 28 U.S.C. §§ 1391(b)(1) because Hayride is deemed to reside in this judicial district based on the Court’s ability to exercise personal jurisdiction over it. See § 1391(c)(2). Venue is also proper under § 1391(b)(2) because a substantial part of the events giving rise to Dermansky’s claims occurred, and a substantial part of the property that is the subject of this action is situated, in this judicial district.
10. Venue is also proper under 28 U.S.C. § 1400(a) because Dermansky’s is a civil action arising under the Copyright Act and Hayride or its agent(s) reside [see § 1391(c)(2)] or may be found in this judicial district.

Background Facts

11. **Dermansky.** Since 2008, and at all relevant times, Dermansky has provided professional commercial photography services, specializing in political figures, social injustice, and environmental matters.
12. Dermansky charges and invoices her clients for the cost of her services, and licenses her photographs for use by such clients according to limitations specified under her written and oral licensing agreements. Dermansky also licenses her photographs for uses in print and on the Internet.
13. **The Groby and Chambers Photographs.** In 2014, Dermansky shot a photograph of former St. Tammany Councilman Jake Groby before a council meeting (the “Groby Photograph”). Attached as **Exhibit A** is a copy of the Groby Photograph as depicted on DeSmogblog.com, (now called “DeSmog.com”), a news site focused on issues related to climate change, to which Dermansky is a frequent contributor and which is an authorized user of the Groby Photograph.
14. In 2016, Dermansky shot a photograph of community activist Gary Chambers visiting the flooded neighborhood of Glen Oaks (the “Chambers Photograph”). Attached as **Exhibit B** is a copy of the Chambers Photograph as depicted on Dermansky’s professional commercial photography website. Attached as **Exhibit C** is a copy of the Chambers Photograph as depicted on Reveal.com.
15. Dermansky is the sole owner of the copyright in the Groby Photograph and effectively registered the Groby Photograph with the U.S Copyright Office on March 24, 2018, with the Reg. No. VA 2-100-104. Attached as **Exhibit D** is a copy of the registration certificate for the Groby Photograph.
16. Dermansky is the sole owner of the copyright in the Chambers Photograph and effectively registered the Chambers Photograph with the U.S Copyright Office on July 31, 2017, with the Reg. No. VA 2-061-265. Attached as **Exhibit E** is a copy of the registration certificate for the Chambers Photograph.

17. As shown on **Exhibit A**, Dermansky's publication of the Groby Photograph on DeSmog.com included a copyright notice attributing the authorship and ownership of the copyright in the Photograph to Dermansky, which constitutes Copyright Management Information ("CMI") under 17 U.S.C. § 1202 (*See Exhibit A, stating: "St. Tammany Councilman Jake Groby before a council meeting. ©2014 Julie Dermansky"*).
18. As shown on **Exhibit B**, Dermansky's publication of the Chambers Photograph on Dermansky's professional commercial photography website included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Photograph to Dermansky, which constitutes CMI under 17 U.S.C. § 1202 (*See Exhibit B, stating: "Copyright ©2016 Julie Dermansky"*).
19. As shown on **Exhibit C**, Dermansky's publication of the Chambers Photograph on Reveal.com included a copyright notice attributing the authorship and ownership of the copyright in the Photograph to Dermansky, which constitutes CMI under 17 U.S.C. § 1202 (*See Exhibit C, stating: "Credit: Julie Dermansky for Reveal"*).
20. **Hayride.** Upon information and belief, Hayride operates the commercial website thehayride.com.
21. **The infringement.** Upon information and belief, without authorization or permission, Hayride obtained the Groby Photograph from DeSmog.com downloaded it, cropped it, intentionally removed Dermansky's CMI attributing authorship and ownership of the copyright in the Photograph to Dermansky, and published it on Hayride's own website. Attached as **Exhibit F** are screen captures of the Hayride's webpages displaying the Groby Photograph, which on information and belief were first published by Hayride on July 23, 2015 and July 27, 2015.
22. Upon information and belief, without authorization or permission, Hayride obtained the Chambers Photograph from Dermansky's professional commercial photography website, downloaded it, cropped it, intentionally removed Dermansky's

- CMI attributing authorship and ownership of the copyright in the Photograph to Dermansky, and published it on Hayride's own website. Attached as **Exhibit G** are screen captures of the Hayride's webpages displaying the Chambers Photograph, which on information and belief were first published by Hayride on March 31, 2017, May 10, 2017, June 18, 2017, July 11, 2017, December 17, 2018, and May 7, 2019.
23. Alternatively, upon information and belief, without authorization or permission, Hayride obtained the Chambers Photograph from an article posted to Reveal.com, downloaded it, cropped it, intentionally removed Dermansky's CMI attributing authorship and ownership of the copyright in the Photograph to Dermansky, and published it on Hayride's own website.
 24. **No permission or license.** Hayride did not ask Dermansky for permission to use the Groby Photograph.
 25. Hayride did not ask Dermansky for permission to use the Chambers Photograph.
 26. At the time of Hayride's display and distribution of the Groby Photograph on its website, Dermansky had not granted Hayride any license or permission to reproduce, publicly display, or otherwise use the Groby Photograph for any purpose.
 27. At the time of Hayride's display and distribution of the Chambers Photograph on its website, Dermansky had not granted Hayride any license or permission to reproduce, publicly display, or otherwise use the Chambers Photograph for any purpose.
 28. **CMI removal/alteration.** Although the publication of the Groby Photograph on DeSmog.com contained Dermansky's CMI, Hayride intentionally removed and/or altered Dermansky's CMI.
 29. Although the publication of the Chambers Photograph on Dermansky's professional commercial photography website contained Dermansky's CMI, Hayride intentionally removed and/or altered Dermansky's CMI.

30. Alternatively, although the publication of the Chambers Photograph on Reveal.com contained Dermansky's CMI, Hayride intentionally removed and/or altered Dermansky's CMI.
31. Besides the foregoing, by its unauthorized publication and display of the Groby Photograph, Hayride distributed copies of the Groby Photograph with its CMI having been removed and/or altered knowing that the CMI had been removed and/or altered.
32. Besides the foregoing, by its unauthorized publication and display of the Chambers Photograph, Hayride distributed copies of the Chambers Photograph with its CMI having been removed and/or altered knowing that the CMI had been removed and/or altered.
33. **Dermansky's CCB claim.** To reduce the cost of litigation for both parties, and receive expedited relief for her damages, Dermansky first filed her claims, (as further detailed below), before the newly formed Copyright Claims Board ("CCB"), a tribunal of administrative judges within the copyright office designed to handle small claims under 17 U.S.C. § 1500 et seq. Attached as **Exhibit H** is a copy of Dermansky's filing with the CCB, styled as 22-CCB-0007, *Dermansky v. Hayride Media, LLC*, without attachments. The CCB case filing required Dermansky to pay filing fees and caused her attorneys to dedicate additional time to preparing and submitting these filings.
34. **Hayride's refusal to participate.** Despite Dermansky's attempt at a cost-efficient and streamlined conclusion to this matter in the CCB, Hayride opted out of those proceedings.
35. To recover damages for Hayride's infringement (which have only been compounded by the fees and efforts spent while attempting to resolve this matter in the CCB), Dermansky is now forced to sue in this Court to obtain the relief requested below.
36. While Dermansky would have limited her monetary claims (\$15,000/work or \$30,000 total) and forego her Section 1202 remedies (CMI removal/alteration) to

participate in a streamlined CCB proceeding, because Hayride opted out of that proceeding, she is no longer willing to limit her remedies.

37. Like many professional commercial photographers, Dermansky's livelihood depends on revenue generated by licensing her original works for reproduction and public display. Regarding the Groby Photograph and the Chambers Photograph, the actions of Hayride have deprived Dermansky of such revenue and have caused significant monetary harm to Dermansky, threatening her livelihood. Dermansky sues to recover her damages.

**FIRST CLAIM FOR RELIEF:
Direct Copyright Infringement
17 U.S.C. §101, *et seq.***

38. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 37, inclusive, as though fully set forth herein.
39. The Groby Photograph is an original copyrightable work.
40. Dermansky is the sole author and owner of the Groby Photograph.
41. Dermansky has complied in all respects with 17 U.S.C. §101, *et seq.*, and secured the exclusive rights in and ownership of the Groby Photograph, and has filed her registration of copyright in the Groby Photograph with the U.S. Copyright Office under its rules and regulations. Dermansky has received Registration No. VA 2-100-104, with an effective registration date of March 24, 2018, a copy of which is attached as **Exhibit D**.
42. By publishing and displaying a copy of the Groby Photograph on its website, thehayride.com, in connection with articles titled, "Anti-Fracking St. Tammany Councilman's Water Plant Has Tested Positive For Brain-Eating Ameba," and "Your Water System Has Brain-Eating Amoeba, What Do You Do? Share Anti-Fracking Propaganda On Facebook!", Hayride has infringed Dermansky's copyright

in the Groby Photograph by reproducing and publicly displaying the same, without Dermansky's permission or authorization.

43. Hayride has done so willfully and intentionally, with full knowledge of Dermansky's copyright, in particular as demonstrated by Hayride's unauthorized use of the Groby Photograph, which contained CMI, including Dermansky's copyright notice.
44. As a direct and proximate result of the copyright infringement detailed herein, Dermansky has been and continues to be damaged in an amount to be determined at trial.
45. As a direct and proximate result of the copyright infringement detailed herein, Hayride has gained and/or will gain substantial profits because of its infringement in an amount unknown and to be determined at trial.
46. Dermansky is entitled to recover her actual damages and any additional Hayride profits not calculated in the computation of her actual damages in an amount to be determined at trial under 17 U.S.C. § 504.
47. In addition, Dermansky is entitled to recover costs under 17 U.S.C. § 505, including costs relating to filing the case 22-CCB-0007 in the CCB.
48. In addition, Dermansky is entitled to permanent injunctive relief enjoining and restraining Hayrides from infringing her copyright under 17 U.S.C. § 502.

SECOND CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

49. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 48, inclusive, as though fully set forth herein.
50. In association with her publication of the Groby Photograph on DeSmog.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Groby Photograph to Dermansky.

51. When Hayride obtained the Groby Photograph in an unauthorized manner from DeSmog.com, the Groby Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Groby Photograph to Dermansky.
52. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
53. Hayride removed and/or altered Dermansky's CMI.
54. Hayride's removal and/or alteration of the CMI from the Groby Photograph, as described herein, and in particular by removing Dermansky's copyright notice, was committed intentionally.
55. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
56. Hayride reproduced, publicly displayed, and distributed the Groby Photograph in connection with a July 23, 2015 article titled, "Anti-Fracking St. Tammany Councilman's Water Plant Has Tested Positive For Brain-Eating Ameba" (*See Exhibit F*).
57. Further, Hayride's distribution of the Groby Photograph, or copies thereof, was done knowing that the Groby Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
58. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
59. Based on the foregoing, Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
60. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
61. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.

62. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
63. And at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
64. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
65. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

THIRD CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

66. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 65, inclusive, as though fully set forth herein.
67. In association with her publication of the Groby Photograph on DeSmog.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Groby Photograph to Dermansky.
68. When Hayride obtained the Groby Photograph in an unauthorized manner from DeSmog.com, the Groby Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Groby Photograph to Dermansky.
69. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
70. Hayride removed and/or altered Dermansky's CMI.

71. Hayride's removal and/or alteration of the CMI from the Groby Photograph, and in particular by removing Dermansky's copyright notice, was committed intentionally.
72. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
73. Hayride reproduced, publicly displayed, and distributed the Groby Photograph in connection with a July 27, 2015 article titled, "Your Water System Has Brain-Eating Amoeba, What Do You Do? Share Anti-Fracking Propaganda On Facebook!" (*See Exhibit F*).
74. Further, Hayride's distribution of the Groby Photograph, or copies thereof, was done knowing that the Groby Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
75. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
76. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
77. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
78. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
79. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
80. In the alternative and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).

81. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
82. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

**FOURTH CLAIM FOR RELIEF:
Direct Copyright Infringement
17 U.S.C. §101, *et seq.***

83. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 82, inclusive, as though fully set forth herein.
84. The Chambers Photograph is an original copyrightable work.
85. Dermansky is the sole author and owner of the Chambers Photograph.
86. Dermansky has complied in all respects with 17 U.S.C. §101, *et seq.*, and secured the exclusive rights in and ownership of the Chambers Photograph, and has filed her registration of copyright in the Chambers Photograph with the U.S. Copyright Office under its rules and regulations. Dermansky has received Registration No. VA 2-061-265, with an effective registration date of July 31, 2017, a copy of which is attached as **Exhibit E**.
87. By publishing and displaying a copy of the Chambers Photograph on its website, thehayride.com, in connection with articles titled, "Tasha Clark Amar's Defenders – Who Are The Usual Suspects – Come Out Of The Woodwork," "The Alton Sterling Fan Club Is Now Threatening To "Shut Down" The Baton Rouge Metro Council," "Gary Chambers Called For A Riot In Baton Rouge This Weekend...", "Marital Advice From Gary Chambers," "Coming Soon: State Senator...Gary Chambers?", and "Welcome to NBRED Week In Baton Rouge!", Hayride has infringed Dermansky's copyright in the Chambers Photograph by reproducing, publicly

displaying, and distributing the same, without Dermansky's permission or authorization.

88. Besides the foregoing, by publishing and displaying a copy of the Chambers Photograph with the text "Everyday I'm Hustlin'" superimposed upon the Chambers Photograph, on its website, thehayride.com, in connection with articles titled, "Tasha Clark Amar's Defenders – Who Are The Usual Suspects – Come Out Of The Woodwork," "The Alton Sterling Fan Club Is Now Threatening To "Shut Down" The Baton Rouge Metro Council," "Gary Chambers Called For A Riot In Baton Rouge This Weekend...", "Marital Advice From Gary Chambers," "Coming Soon: State Senator...Gary Chambers?", and "Welcome to NBRED Week In Baton Rouge!", Hayride has infringed Dermansky's copyright in the Chambers Photograph by preparing derivative works based upon the Chambers Photograph, without Dermansky's permission or authorization.
89. Hayride has done so willfully and intentionally, with full knowledge of Dermansky's copyright, in particular as demonstrated by Hayride's unauthorized use of the Chambers Photograph, which contained CMI, including Dermansky's copyright notice.
90. As a direct and proximate result of the copyright infringement detailed herein, Dermansky has been and continues to be damaged in an amount to be determined at trial.
91. As a direct and proximate result of the copyright infringement detailed herein, Hayride has gained and/or will gain substantial profits because of its infringement in an amount unknown and to be determined at trial.
92. Dermansky is entitled to recover from Hayride statutory damages of up to \$150,000.00 under 17 U.S.C. § 504.

93. In the alternative, and at her election, Dermansky is entitled to recover her actual damages and any additional Hayride profits not calculated in the computation of her actual damages in an amount to be determined at trial under 17 U.S.C. § 504.
94. In addition, Dermansky is entitled to recover her attorneys' fees and costs under 17 U.S.C. § 505, including costs relating to filing the case 22-CCB-0007 in the CCB.
95. In addition, Dermansky is entitled to permanent injunctive relief enjoining and restraining Hayrides from infringing her copyright under 17 U.S.C. § 502.

FIFTH CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

96. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 95, inclusive, as though fully set forth herein.
97. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
98. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
99. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
100. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph

contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.

101. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
102. Hayride removed and/or altered Dermansky's CMI.
103. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.
104. None of the acts removing and/or altering the CMI described herein were authorized by Dermansky or the law.
105. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a March 31, 2017 article titled, "Tasha Clark Amar's Defenders – Who Are The Usual Suspects – Come Out Of The Woodwork," in connection with Hayride's unauthorized copy of the Chambers Photograph. (*See Exhibit G*).
106. Further, Hayride's distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
107. Hayride committed the acts described herein knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
108. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
109. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
110. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.

111. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
112. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
113. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
114. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

SIXTH CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

115. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 114, inclusive, as though fully set forth herein.
116. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
117. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.

118. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
119. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
120. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
121. Hayride removed and/or altered Dermansky's CMI.
122. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.
123. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
124. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a May 10, 2017 article titled, "The Alton Sterling Fan Club Is Now Threatening To "Shut Down" The Baton Rouge Metro Council," in connection with Hayride's unauthorized copy of the Chambers Photograph. (*See Exhibit G*).
125. Further, Hayride's distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
126. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
127. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).

128. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
129. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
130. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
131. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
132. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
133. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

SEVENTH CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

134. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 133, inclusive, as though fully set forth herein.
135. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
136. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography

website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.

137. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
138. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
139. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
140. Hayride removed and/or altered Dermansky's CMI.
141. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.
142. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
143. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a June 18, 2017 article titled, "Gary Chambers Called For A Riot In Baton Rouge This Weekend...", in connection with Hayride's unauthorized copy of the Chambers Photograph. (*See Exhibit G*).
144. Further, Hayride's distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.

145. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
146. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
147. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
148. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
149. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
150. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
151. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
152. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

EIGHTH CLAIM FOR RELIEF:

**Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

153. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 152, inclusive, as though fully set forth herein.
154. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright

notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.

155. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
156. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
157. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
158. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
159. Hayride removed and/or altered Dermansky's CMI.
160. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.
161. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
162. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a July 11, 2017 article titled, "Marital Advice From Gary Chambers," in connection with Hayride's unauthorized copy of the Chambers Photograph. (*See Exhibit G*).

163. Further, Hayride's distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
164. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
165. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
166. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
167. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
168. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
169. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
170. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.
171. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

**NINTH CLAIM FOR RELIEF:
Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

172. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 171, inclusive, as though fully set forth herein.
173. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
174. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
175. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
176. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
177. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
178. Hayride removed and/or altered Dermansky's CMI.
179. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.

180. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
181. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a December 17, 2018 article titled, “Coming Soon: State Senator...Gary Chambers?”, in connection with Hayride’s unauthorized copy of the Chambers Photograph. (*See Exhibit G*).
182. Further, Hayride’s distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph’s CMI had been removed and/or altered without the authority of Dermansky or the law.
183. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
184. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
185. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
186. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
187. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
188. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).
189. Dermansky is further entitled to recover her attorney’s fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.

190. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

**TENTH CLAIM FOR RELIEF:
Removal and/or Alteration of Copyright Management Information
Digital Millennium Copyright Act, 17 U.S.C. §1202(b)**

191. Dermansky incorporates by reference and realleges the allegations in paragraphs 1 through 190, inclusive, as though fully set forth herein.
192. In association with her publication of the Chambers Photograph on her professional commercial photography website, Dermansky included a watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
193. On information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Dermansky's professional commercial photography website, the Chambers Photograph contained Dermansky's watermark and copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
194. In association with her publication of the Chambers Photograph on Reveal.com, Dermansky included a copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
195. Alternatively, on information and belief, when Hayride obtained the Chambers Photograph in an unauthorized manner from Reveal.com, the Chambers Photograph contained Dermansky's copyright notice attributing the authorship and ownership of the copyright in the Chambers Photograph to Dermansky.
196. The foregoing constitutes CMI, in particular under 17 U.S.C. §§ 1202(c)(1), (c)(2), and (c)(3).
197. Hayride removed and/or altered Dermansky's CMI.

198. Hayride's removal and/or alteration of the CMI from the Chambers Photograph, as described herein, and in particular by removing Dermansky's watermark and/or copyright notice, was committed intentionally.
199. None of the acts removing and/or altering the CMI described were authorized by Dermansky or the law.
200. Hayride reproduced, publicly displayed, and distributed the Chambers Photograph in connection with a May 7, 2019 article titled, "Welcome to NBRED Week In Baton Rouge!", in connection with Hayride's unauthorized copy of the Chambers Photograph. (*See Exhibit G*).
201. Further, Hayride's distribution of the Chambers Photograph, or copies thereof, was done knowing that the Chambers Photograph's CMI had been removed and/or altered without the authority of Dermansky or the law.
202. Hayride committed the acts described knowing, or having reasonable grounds to know, that it would induce, enable, facilitate, and/or conceal an infringement of one more or more rights accorded to Dermansky under the U.S. Copyright Act.
203. Hayride is in violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3).
204. Dermansky has suffered actual damages because of the acts complained of herein in an amount to be determined at trial.
205. Hayride has gained profits attributable to the acts complained of herein in an amount unknown and to be determined at trial.
206. Dermansky is entitled to recover from Hayride her actual damages and any additional Hayride profits not considered in computing her actual damages under 17 U.S.C § 1203(c)(2).
207. In the alternative, and at her election, Dermansky is entitled to recover from Hayride, for each violation of 17 U.S.C. §§ 1202(b)(1) and (b)(3), the full extent of which is unknown to Dermansky and which will be proven at trial, statutory damages of up to \$25,000.00 per violation under 17 U.S.C. § 1203(c)(3)(B).

208. Dermansky is further entitled to recover her attorney's fees and costs from Hayride under 17 U.S.C. §§ 1203(b)(4) and (b)(5), including costs relating to filing the case 22-CCB-0007 in the CCB.

209. Dermansky is also entitled to permanent injunctive relief to prevent or restrain further violations of 17 U.S.C. § 1202(b) under 17 U.S.C. § 1203(b)(1).

Prayer for Relief

WHEREFORE, plaintiff Julie Dermansky prays for judgment in her favor and against Hayride Media, LLC:

- (a) For an award of monetary damages in an amount to be proven at trial, but which is no less than \$500,000.00;
- (b) For her attorneys' fees and costs;
- (c) For a permanent injunction preventing further violations of her rights;
- (d) For interest as allowed by law; and
- (e) For such relief as the Court deems just and proper.

Jury Trial Demand

Under Rule 38 of the Federal Rules of Civil Procedure, Dermansky demands a trial by jury for all issues so triable.

Respectfully submitted,

/s/ Andrew T. Lilly

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Attorneys for Julie Dermansky

² Motion to appear *pro hac vice* forthcoming.

³ Motion to appear *pro hac vice* forthcoming.

Exhibit A

In mid-April, word started spreading like wildfire among Louisiana residents: Helis Oil & Gas LLC wants to drill a well in search of oil and gas on a 960-acre tract of land about 30 miles from New Orleans, in the Mandeville area.

Helis plans to use hydraulic fracturing, or fracking, to extract oil and gas from [the Tuscaloosa Marine Shale \(PDF\)](#), which holds an [estimated 7 billion barrels](#) of oil beneath the Southern Hills aquifer, which extends from St. Tammany to beyond Baton Rouge and well into Mississippi.

On April 16, residents packed a [meeting](#), expressing fear and outrage about the proposed drilling. Right away, they learned two things: firstly, that they're up against Louisiana's strong laws protecting the oil and gas industry. And secondly, that there's no time to waste.

On May 13, the Department of Natural Resources' office of conservation, which regulates oil and gas drilling in Louisiana, will hold a hearing to consider issuing a unit permit — the first step in the permitting process.

Rep. Tim Burns, R-Mandeville, asked to delay the permitting process, but was denied.

"There is no legal provision to take the scheduled hearing off the docket," Patrick Courreges, communications director for the Louisiana Department of Natural Resources, told DeSmogBlog.

As for what could prevent the permit from being issued, the short answer, according to Courreges, is geology, not the public's concerns about fracking.

Just a couple of weeks later, there were two more meetings dealing with fracking on May 2. One was held at the Mandeville Parish Council chambers, where citizens came to support a councilman's proposal to seek approval to hire an outside lawyer specializing in oil and gas, and the other was in Abita Springs and billed as a public "informational meeting."



St. Tammany Councilman Jake Groby before a council meeting. ©2014 Julie Dermansky



ON DESMOG UK



Oil Company Caves Under Pressure to Cut 'Draconian' Injunction

Campaigners are celebrating after an oil and gas exploration company was forced to scale back a "draconian" injunction against protesters.

Activists have posed a series of legal challenges...

[READ MORE](#)

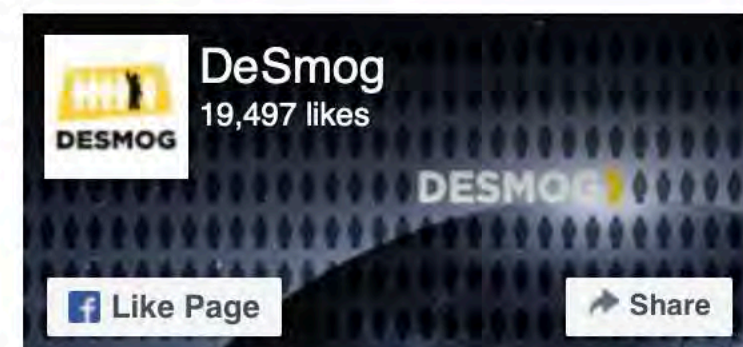


Exhibit B

DOCUMENTARY PHOTOGRAPHY/ VIDEO: JULIE DERMA

PORTFOLIO ARCHIVES TEAR SHEETS ABOUT CONTACT MULTI MEDIA REPORTS VIDEO BOOKS BLOG

< 1000 Year Flood in Southern Louisiana

< PREV NEXT >

LESS INFO



Image 226 of 317
Flooding in Southern Louisiana238.jpg

- + ADD TO LIGHTBOX
- ▼ DOWNLOAD

Gary Chambers, a community activist who is a leading voice for fighting for justice following Alton Sterlings killing, visiting the African American neighborhood of Glen Oaks, where most of the homes were flooded. He is doing what he can to help the black community recover encouraging African American's to support African American businesses.

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Image Size
4000x2624 / 3.0MB

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Exhibit C

The truth will not reveal itself.

SUPPORT OUR WORK TODAY

Reveal

CLIMATE CHANGE, SUSTAINABILITY

Wading through the aftermath of Louisiana's 1,000-year flood

by Julie Dermansky
September 26, 2016



Home after home is underwater in the Livingston Parish devastation. Credit: Julie Dermansky for Reveal

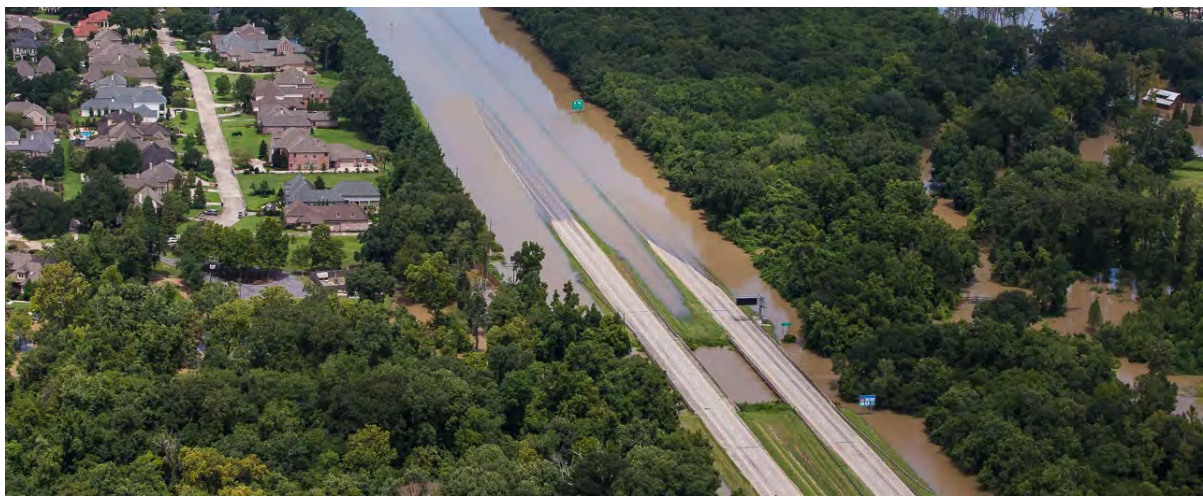


A Home Depot in Livingston Parish, Baton Rouge, is submerged on Aug. 15 after record-breaking flooding caused by more than 2 feet of rain over 48 hours. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Mary Bradford, a widowed 78-year-old, cleans the gutted house she has lived in for more than 30 years about five weeks after the flood. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Mary Bradford invited me into her gutted home in Baton Rouge earlier this month after she saw me taking pictures of the pile of her discarded household items. It had been five weeks since the 1,000-year flood hit southern Louisiana.





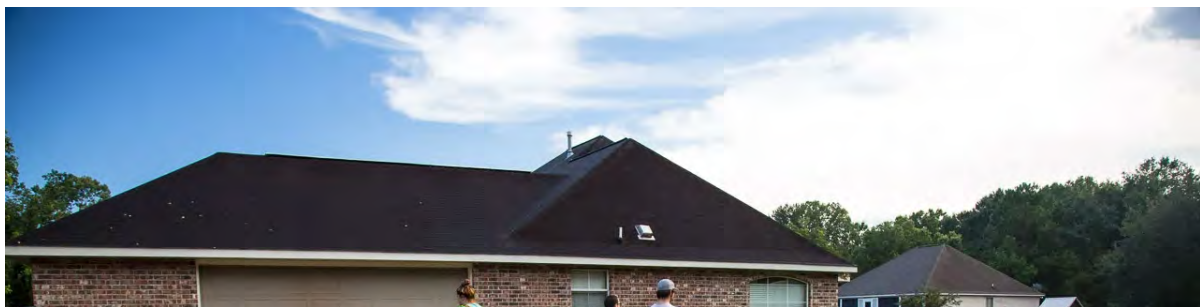
Floodwaters make Interstate 10 impassable on Aug. 15. The highway, which connects Baton Rouge to New Orleans, was closed in the days following the storm. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal





Residents in Paulina, Louisiana, say they were able to keep floodwater out of their homes with sandbags and pumps going around the clock. Credit: Julie Dermansky for Reveal

The flood was caused by a storm that dropped up to 29 inches of rain in some areas in less than 48 hours and caused rivers to crest at record-breaking heights.





Three people in Denham Springs, Louisiana, encounter a cow that lost its way on Aug. 15. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

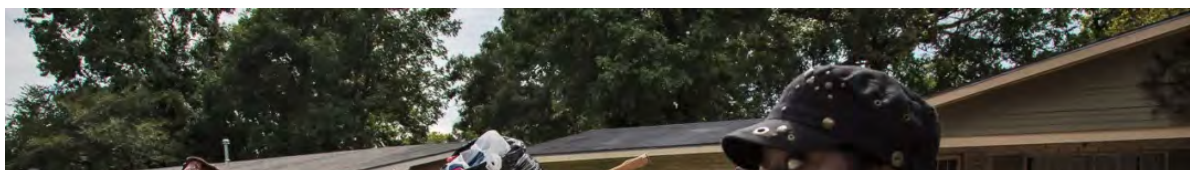


A Denham Springs supermarket remains flooded on Sept. 15, weeks after historic rainfall. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal



A rusted casket sits unearthed at a flooded cemetery in Zachary, Louisiana, on Aug. 20. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

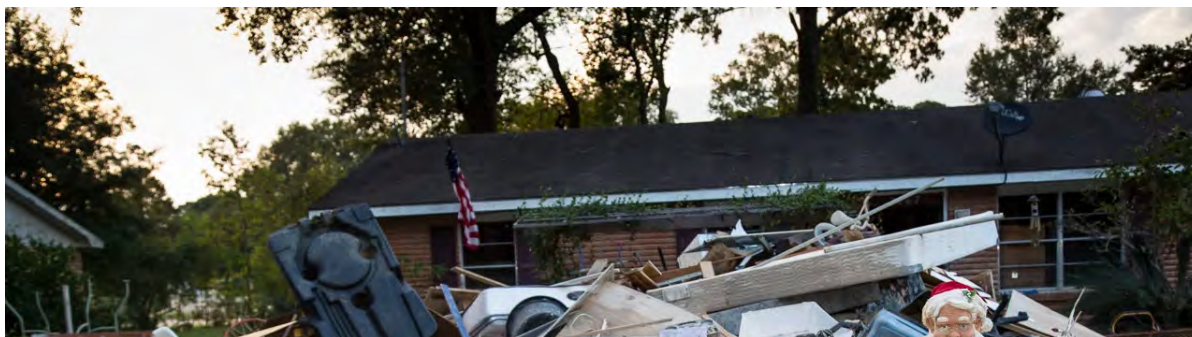
Statistically, a flood of these proportions has a .001 chance of happening in any given year, which is why it's called a **1,000-year flood**. The rain, along with questionable water-management decisions, made this flood a disaster that the Red Cross deemed the worst in the United States since Hurricane Sandy struck the East Coast.





Roxanna Johnson, of East Fairlane, a Baton Rouge subdivision, discusses on Aug. 19 being rescued by boat during the storm. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Many of the homes that were flooded in the Baton Rouge area still have contents and debris that haven't been hauled away, according to the **Baton Rouge Advocate**.





Piles of belongings line the streets in Denham Springs, Louisiana, on Sept. 1 as homeowners hold on to hope that they'll be able to rebuild. A dancing Santa is getting "his last dance," said homeowner Lisa Herbert. Credit: Julie Dermansky for Reveal

Bradford considers herself luckier than most. She has flood insurance and she was able to get family, friends and volunteers from local churches to gut her house within the first week of the flood.





An American flag hangs above floodwater in Sorrento, Louisiana, on Aug. 20 as a girl clutches her doll.
Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal



Tamara Williams' cellphone shows a picture of the flooded Baton Rouge church where a funeral was held

for slain Baton Rouge police officer Montrell Jackson. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

All the same, “It gets overwhelming because it goes on day after day after day, and there is no relief,” Bradford told me. Her eyes teared up as she explained how difficult it is to look at the “piles of stuff in the front – all of your memories.”



Carletta Cannon surveys the extensive damage to her home and belongings on Sept. 3 in the Townhomes of Sherwood Forest complex in Baton Rouge. Cannon has been displaced by the flood and said all of her clothes were destroyed. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Once search and rescue was over, people started looking for explanations about why many areas that never flooded before did so this time.

In Walker, Louisiana, Mayor Rick Ramsey said he is planning to sue the state and federal government for building a dividing wall on Interstate 12 that he

believes acted as a dam for the rainwater during the storm. **Video shot** during the storm showed water hitting the wall and being pushed into the city instead of flowing across the interstate. Had the divider not been built, he contends, much of the flooding would have been averted.

Bradford, **some local officials** and residents in the Baton Rouge area question if their homes would have been spared if the state had finished the Comite River diversion canal, a project government officials have talked about for 33 years.



A cleanup crew sets about clearing debris from Walker, Louisiana. Credit: Julie Dermansky for Reveal
Credit: Julie Dermansky for Reveal





A temporary landfill creates a mountain of storm debris on Sept. 15 in Baton Rouge. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal



Terry Dougan (on crane), a disaster cleanup worker from Arkansas, is one in an army of workers from around the country who came to the Baton Rouge area to help with the massive relief effort. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

I started photographing the aftermath of the flood on August 14, when the rain began to taper off. It was a month after Baton Rouge's racial tensions made national news following the police shooting death of Alton Sterling and the killing of three officers by a lone gunman.



Community activist Gary Chambers, who has led a call for justice in the Baton Rouge community following the police shooting death of Alton Sterling, visits the mostly black neighborhood of Glen Oaks, where most homes were flooded. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Community activist Gary Chambers, publisher of the **Rouge Collection**, said he is continuing to fight for justice for Alton Sterling and now doing what he can to help the African-American community recover from both hardships.





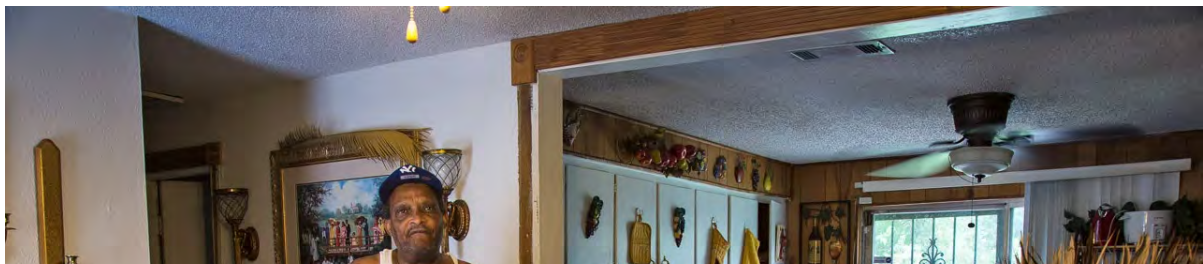
Still backflow water sits trapped in Assumption Parish, Louisiana, on Sept. 2. The local government made cuts in a road to give the water a path to drain. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal





A vehicle remains stuck in flooded Ascension Parish, Louisiana, on Aug. 27. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

“We have an abundance of issues to fix,” Chambers said on his **Facebook Live feed**. Among them is the issue of where potentially toxic storm debris would be dumped. Two of the sites officials picked impact African-American communities: a **long-controversial landfill** in Alsen, north of Baton Rouge, and a temporary landfill next to Monticello, on the city’s east side.





Leroy James, of East Fairlane, said he and his family will do their best to fix their home because they have nowhere else to go. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Zanie Whitehead shows a photo on Sunday of Donald Trump's Aug. 19 visit to Chaperral Drive in Denham

Springs. Heaps of debris and belongings remain on the street six weeks after the flood. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

Despite the pain caused by the flooding, there are signs of humor and faith in the wreckage. A couple of homeowners deemed themselves winners of the “Yard of the Month,” and in Central, in East Baton Rouge Parish, I spotted some spray-painted neon smiley faces.

Aaron Sutton, standing outside his flooded Baton Rouge home on Sunday, compares the aftermath of the flood with Marine boot camp. Credit: Julie Dermansky for Reveal Credit: Julie Dermansky for Reveal

American flags on porches and the tops of junk piles raise the question: Did those who survived the flood win a battle or live to fight another day?

Exhibit D

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Kary A. Lush

Acting United States Register of Copyrights and Director

Registration Number

VA 2-100-104

Effective Date of Registration:

March 24, 2018

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 22, 2014 to November 26, 2014

Title

Title of Group: Julie Dermansky
Number of Photographs in Group: 714

- **Individual Photographs:** 1.22.14 austin protest.jpg, 1.27.14 NOLA .jpg, 1.27.14 NOLA1.jpg, 1.27.14 nola10.jpg, 1.27.14 nola11.jpg, 1.27.14 nola12.jpg, 1.27.14 nola13.jpg, 1.27.14 nola14.jpg, 1.27.14 nola15.jpg, 1.27.14 nola16.jpg, 1.27.14 nola17.jpg, 1.27.14 nola18.jpg, 1.27.14 nola2.jpg, 1.27.14 nola3.jpg, 1.27.14 nola4.jpg, 1.27.14 nola5.jpg, 1.27.14 nola6.jpg, 1.27.14 nola7.jpg, 1.27.14 nola8.jpg, 1.27.14 nola9.jpg, 1.30.14 texas.jpg, 1.30.14 texas2.jpg, 1.30.14 texas3.jpg, 1.30.14 texas4.jpg, 1.30.14 texas5.jpg, 1.30.14 texas6.jpg, 1.30.14 texas7.jpg, 1.30.14 texas8.jpg,

Published: January 2014

- **Individual Photographs:** 2.08.14 comiccom.jpg, 2.08.14 comiccom1.jpg, 2.08.14 comiccom10.jpg, 2.08.14 comiccom11.jpg, 2.08.14 comiccom12.jpg, 2.08.14 comiccom13.jpg, 2.08.14 comiccom14.jpg, 2.08.14 comiccom15.jpg, 2.08.14 comiccom2.jpg, 2.08.14 comiccom3.jpg, 2.08.14 comiccom4.jpg, 2.08.14 comiccom5.jpg, 2.08.14 comiccom6.jpg, 2.08.14 comiccom7.jpg, 2.08.14 comiccom8.jpg, 2.08.14 comiccom9.jpg, 2.10.14 buffalo .jpg, 2.10.14 eaglford 932.jpg, 2.10.14 ealgefords family.jpg, 2.10.14 flare 2.jpg, 2.10.14 flare mask.jpg, 2.10.14 flare2.jpg, 2.10.14 flare3.jpg, 2.10.14 flare4.jpg, 2.10.14 flare5.jpg, 2.10.14 flare9.jpg, 2.17.14 texas.jpg, 2.17.14 texas2.jpg, 2.18.14 MardiGras.jpg, 2.18.14 MardiGras1.jpg, 2.18.14 MardiGras10.jpg, 2.18.14 MardiGras11.jpg, 2.18.14 MardiGras12.jpg, 2.18.14 MardiGras13.jpg, 2.18.14 MardiGras14.jpg, 2.18.14 MardiGras15.jpg, 2.18.14 MardiGras16.jpg, 2.18.14 MardiGras17.jpg, 2.18.14 MardiGras18.jpg, 2.18.14 MardiGras19.jpg, 2.18.14 MardiGras2.jpg, 2.18.14 MardiGras20.jpg, 2.18.14 MardiGras21.jpg, 2.18.14 MardiGras22.jpg, 2.18.14 MardiGras3.jpg, 2.18.14 MardiGras4.jpg, 2.18.14 MardiGras5.jpg, 2.18.14 MardiGras6.jpg, 2.18.14 MardiGras7.jpg, 2.18.14 MardiGras8.jpg, 2.18.14 MardiGras9.jpg, 2.23.14 texas.jpg, 2.23.14 texas1-.jpg, 2.23.14 texas1.jpg, 2.23.14 texas2.jpg, 2.23.14 texas4.jpg, 2.23.14 texas5.jpg, 2.23.14 texas6.jpg, 2.23.14 texas7.jpg, 2.23.14 texas9.jpg,

Published: February 2014

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Published: February 2014

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Published: March 2014

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- **Individual Photographs:** 7.31.14 Kansas08.jpg, 7.31.14 Kansas09.jpg, 7.31.14 Kansas10.jpg, 7.31.14 Kansas20.jpg,

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- **Individual Photographs:** 8.08.14 cat.2.jpg, 8.08.14 cat.3.jpg, 8.08.14 cat.4.jpg, 8.08.14 cat.jpg, 8.14.14 Protest 01.jpg, 8.14.14 Protest 02.jpg, 8.14.14 Protest 03.jpg, 8.14.14 Protest 05.jpg, 8.14.14 Protest 07.jpg, 8.14.14 Protest 08.jpg, 8.14.14 Protest 099.jpg, 8.14.14 Protest 20.jpg, 8.14.14 Protest 22.jpg, 8.14.14 Protest 25.jpg, 8.14.14 Protest 26.jpg, 8.14.14 Protest 27.jpg, 8.14.14 Protest 32.jpg, 8.14.14 Protest 36.jpg, 8.14.14 Protest 39.jpg, 8.14.14 Protest 41.jpg, 8.14.14 Protest.jpg, 8.14.14 Protest0 29.jpg, 8.14.14 Protest009.jpg, 8.14.14 Protest04.jpg, 8.14.14 Protest06.jpg, 8.14.14 Protest11.jpg, 8.14.14 Protest12.jpg, 8.14.14 Protest13.jpg, 8.14.14 Protest14.jpg, 8.14.14 Protest15.jpg, 8.14.14 Protest16.jpg, 8.14.14 Protest17.jpg, 8.14.14 Protest18.jpg, 8.14.14 Protest19.jpg, 8.14.14 Protest23.jpg, 8.14.14 Protest24.jpg, 8.14.14 Protest29.jpg, 8.14.14 Protest30.jpg, 8.14.14 Protest33.jpg, 8.14.14 Protest34.jpg, 8.14.14 Protest35.jpg, 8.14.14 Protest37.jpg, 8.14.14 Protest38.jpg, 8.14.14 Protest40.jpg, 8.14.14 Protesto28.jpg, 8.20.14 Flare.jpg, 8.20.14 General Russel Honor .jpg, 8.20.14 IMG_9532_2.jpg, 8.20.14 J46A7986-Edit.jpg, 8.20.14 J46A7996-Edit_2.jpg, 8.20.14 Seirra Club.jpg, 8.22.14 nola.jpg, 8.22.14 nola00.jpg, 8.22.14 nola06.jpg, 8.22.14 nola07.jpg, 8.22.14 nola08.jpg, 8.22.14 nola09.jpg, 8.22.14 nola1.jpg, 8.22.14 nola10.jpg, 8.22.14 nola11.jpg,

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- **Individual Photographs:** 8.22.14 nola112.jpg, 8.22.14 nola12.jpg, 8.22.14 nola13.jpg, 8.22.14 nola14.jpg, 8.22.14 nola15.jpg, 8.22.14 nola16.jpg, 8.22.14 nola17.jpg, 8.22.14 nola18.jpg, 8.22.14 nola19.jpg, 8.22.14 nola2.jpg, 8.22.14 nola20.jpg, 8.22.14 nola21.jpg, 8.22.14 nola22.jpg, 8.22.14 nola2223.jpg, 8.22.14 nola23.jpg, 8.22.14 nola24.jpg, 8.22.14 nola26.jpg, 8.22.14 nola27.jpg, 8.22.14 nola29.jpg, 8.22.14 nola2r2.jpg, 8.22.14 nola3.jpg, 8.22.14 nola4.jpg, 8.22.14 nola432.jpg,

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Published: August 2014

- **Individual Photographs:** 9.07.14 anti.jpg, 9.07.14 anti frack.jpg, 9.07.14 anti frack2.jpg, 9.07.14 farm.jpg, 9.07.14 farm2.jpg, 9.07.14 frack.jpg, 9.07.14 steph.jpg, 9.07.14 wll.jpg, 9.14.14 CO01 33.jpg, 9.14.14 CO01--w24.jpg, 9.14.14 CO01-22.jpg, 9.14.14 CO01.jpg, 9.14.14 CO0100.jpg, 9.14.14 CO01000312.jpg, 9.14.14 CO010014.jpg, 9.14.14 CO010021.jpg, 9.14.14 CO010038.jpg, 9.14.14 CO01009.jpg, 9.14.14 CO01011.jpg, 9.14.14 CO01040.jpg, 9.14.14 CO01043.jpg, 9.14.14 CO0105.jpg, 9.14.14 CO0107.jpg, 9.14.14 CO011.jpg, 9.14.14 CO0110.jpg, 9.14.14 CO012.jpg, 9.14.14 CO0120.jpg, 9.14.14 CO0122.jpg, 9.14.14 CO01222.jpg, 9.14.14 CO0122231.jpg, 9.14.14 CO013.jpg, 9.14.14 CO0132.jpg, 9.14.14 CO0133.jpg, 9.14.14 CO0134.jpg, 9.14.14 CO0135.jpg, 9.14.14 CO0136.jpg, 9.14.14 CO014.jpg, 9.14.14 CO0142.jpg, 9.14.14 CO0144.jpg, 9.14.14 CO01444.jpg, 9.14.14 CO014443.jpg, 9.14.14 CO01446.jpg, 9.14.14 CO0146.jpg, 9.14.14 CO0149.jpg, 9.14.14 CO015.jpg, 9.14.14 CO0150.jpg, 9.14.14 CO0151.jpg, 9.14.14 CO0152.jpg, 9.14.14 CO0153.jpg, 9.14.14 CO0154.jpg, 9.14.14 CO0155555.jpg, 9.14.14 CO016.jpg, 9.14.14 CO018.jpg, 9.14.14 CO01933.jpg, 9.14.14 CO0199-23.jpg, 9.14.14 CO0199.jpg, 9.14.14 CO019916.jpg, 9.25.14 bird.jpg, 9.25.14 flower2.jpg, 9.25.14 flower3.jpg, 9.25.14 st tammany.jpg, 9.25.14 flower.jpg, 9.25.14 liak.jpg, 9.25.14 st tammany 5.jpg,

Published: September 2014

- **Individual Photographs:** 10.04.14 LAfrack.jpg, 10.04.14 LAfrack1.png, 10.04.14 LAfrack10.jpg, 10.04.14 LAfrack11.jpg, 10.04.14 LAfrack12.jpg, 10.04.14 LAfrack13.jpg, 10.04.14 LAfrack14.jpg, 10.04.14 LAfrack15.jpg, 10.04.14 LAfrack16.jpg, 10.04.14 LAfrack2.jpg, 10.04.14 LAfrack3.jpg, 10.04.14 LAfrack4.jpg, 10.04.14 LAfrack5.jpg, 10.04.14 LAfrack6.jpg, 10.04.14 LAfrack7.jpg, 10.04.14 LAfrack8.jpg, 10.04.14 LAfrack9.jpg, 10.14.14 LA sing.jpg, 10.22.14 Barnett Shale - 1.jpg, 10.22.14 kids.jpg, 10.22.14 rig.jpg, 10.22.14 sign denotn.jpg, 10.27.14 denton.jpg, 10.27.14 la fracking.jpg,

Published: October 2014

- **Individual Photographs:** 11.05.14 denton.2.jpg, 11.05.14 denton.4.jpg, 11.05.14 denton.5.jpg, 11.05.14 denton.jpg, 11.13.14 texas.jpg, 11.13.14 texas2.jpg, 11.13.14 texas3.jpg, 11.13.14 texas4.jpg, 11.14.14 ian 2.jpg, 11.14.14 ian crwd.jpg, 11.14.14 ian.jpg, 11.14.14 ian3.jpg, 11.14.14 ian4.jpg, 11.14.14 ian5.jpg, 11.14.14 ian6.jpg, 11.14.14 kid.jpg, 11.14.14 tree.jpg, 11.19.14 activist OK03.jpg, 11.19.14 Damage Oklahoma 04.jpg, 11.19.14 ok.jpg, 11.19.14 ok00.jpg, 11.19.14 ok7.jpg, 11.19.14 ok9.jpg, 11.26.14 nola 2.jpg, 11.26.14 nola.jpg, 11.26.14 nola10.jpg, 11.26.14 nola3.jpg, 11.26.14 nola4.jpg, 11.26.14 nola5.jpg, 11.26.14 nola6.jpg, 11.26.14 nola7.jpg, 11.26.14 nola8.jpg, 11.26.14 nola9.jpg,

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Author

• **Author:** Julie Dermansky
Author Created: photographs
Work made for hire: No
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Julie Dermansky
2357 Cours Carson Street, Mandeville, LA, 70448, United States

Certification

Name: Richard Liebowitz
Date: March 24, 2018

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



Registration #: VA0002100104
Service Request #: 1-6421244271

Richard Liebowitz
11 Sunrise Plaza
Suite 305
Valley Stream, NY 11580 United States



0000V/A00021001040401

Exhibit E

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Karen Leigh Claypoole

Acting United States Register of Copyrights and Director

Registration Number

VA 2-061-265

Effective Date of Registration:

July 31, 2017

Title

Title of Work: Group Registration of Published Photographs - Julie Dermansky; 2016 Photos; 1/19/16-12/29/16; 749 Photos

Content Title: 114A9909.jpg
114A9988-Edit.jpg
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Oklahoma Earthquake Damage28.jpg
Oklahoma Earthquake Damage34.jpg
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114A8294-Edit.jpg
114A9172-Edit.jpg
114A9638-Edit.jpg
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114A9234-Edit.jpg
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 Joe McKnight Memorial 01.jpg
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 Joe McKnight Memorial 05.jpg; 12/4/16

114A1759-Edit.jpg; 12/25/16

Completion/Publication

Year of Completion: 2016
 Date of 1st Publication: January 19, 2016
 Nation of 1st Publication: United States

Author

- Author: Julie Dermansky
- Author Created: photograph
- Work made for hire: No
- Domiciled in: United States

Copyright Claimant



Copyright Claimant: Julie Dermansky
2357 Cours Carson Street, Mandeville, LA, 70448, United States

Certification

Name: Richard Liebowitz
Date: July 31, 2017



0000VA00020612650909

Registration #: VA0002061265
Service Request #: 1-5678977351

Richard Liebowitz
11 Sunrise Plaza
Suite 305
Valley Stream, NY 11580 United States



0000VA00020612650901

Exhibit F



PRESIDENT TRUMP WON MORE LOUISIANA VOTES IN 2020 THAN IN 2016, using Dominion voting machines.



Anti-Fracking St. Tammany Councilman's Water Plant Has Tested Positive For Brain-Eating Ameba

July 23rd, 2015

America UNRECOGNIZABLE (Withing two years?) Move Your Money NOW

DOMINION VOTING

A PROUD AMERICAN COMPANY.

We provide honest voting machines that have supported Louisiana for more than 20 years.



Your Water System Has Brain-Eating Amoeba, What Do You Do? Share Anti-Fracking Propaganda On Facebook!

July 27th, 2015



Exhibit G

DOMINION
VOTING

**A PROUD AMERICAN
COMPANY.**

*We provide honest voting machines
that have supported Louisiana for
more than 20 years.*



**Tasha Clark Amar's Defenders – Who Are The Usual Suspects –
Come Out Of The Woodwork**

March 31st, 2017 MacAoidh





The Alton Sterling Fan Club Is Now Threatening To “Shut Down” The Baton Rouge Metro Council

May 10th, 2017 MacAoidh



- Menu
- National
- Politics & Elections
- Business & Energy
- Life & Culture
- Government & Policy

PRESIDENT TRUMP WON MORE LOUISIANA VOTES IN 2020 THAN IN 2016, using Dominion voting machines.



Gary Chambers Called For A Riot In Baton Rouge This Weekend...

June 18th, 2017 MacAoidh





PRESIDENT TRUMP WON MORE LOUISIANA VOTES IN 2020 THAN IN 2016, using Dominion voting machines.



Marital Advice From Gary Chambers
July 11th, 2017 MacAoidh





PRESIDENT TRUMP WON MORE LOUISIANA VOTES IN 2020 THAN IN 2016, using Dominion voting machines.



Coming Soon: State Senator...Gary Chambers?
December 17th, 2018 MacAoidh





- Menu
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- Politics & Elections
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- Life & Culture
- Government & Policy

PRESIDENT TRUMP WON MORE LOUISIANA VOTES IN 2020 THAN IN 2016, using Dominion voting machines.



Welcome to NBRED Week In Baton Rouge!
May 7th, 2019 MacAoidh



Exhibit H

Claim

[← Go to case details](#)

Type	A claim for infringement		
Would you like to proceed as a "smaller claims" proceeding (including the \$5,000 monetary limit) instead of the standard CCB small claims proceeding?	No		
Claimant	<div><div><div>Name</div><div>Julie Dermansky</div></div><div><div>Authorized representative information</div><div><div>Name</div><div>David Leichtman</div><div>Email</div><div>dleichtman@leichtmanlaw.com</div><div>Address</div><div>228 East 45th Street, Suite 605 New York, NY 10017</div></div></div><div><div>City</div><div>Mandeville, LA</div><div>Law firm, clinic, or pro bono legal services organization name</div><div>Leichtman Law PLLC</div><div>Phone</div><div>917-597-4417</div></div></div>		
Respondent	<div><div>Organization</div><div>Hayride Media, LLC</div></div>		
Infringement claim: Works infringed	<div><div><div>Title of work</div><div>5.06.14 Jake Groby</div><div>Author(s)</div><div>Julie Dermansky</div><div>Has the work been registered by the Copyright Office?</div><div>Yes</div><div>Registration number</div><div>VA0002100104</div><div>Effective date</div><div>03/24/2018</div><div>Type of work</div><div>Pictorial Graphic and Sculptural (such as two-dimensional and three-dimensional works of art, graphic art, and photographs)</div><div>Describe the work</div><div>Photograph of Local Politician regarding Environmental Activism</div></div></div>		

Title of work

Flooding in Southern Louisiana238

Author(s)

Julie Dermansky

Has the work been registered by the Copyright Office?

Yes

Registration number

VA0002160265

Effective date

07/01/2017

Type of work

Pictorial Graphic and Sculptural (such as two-dimensional and three-dimensional works of art, graphic art, and photographs)

Describe the work

Photograph of Environmental Activist during Flood

Infringement claim: Wrongful activities

Wrongful activities

- Reproduce the work
- Create a derivative work
- Distribute copies of the work
- Publicly display the work

Is the infringement ongoing?

No

Infringement dates

July 2015 - February 2021

Where the alleged infringing acts occurred, such as a physical place or online. If unknown, type unknown.

On or around July 23, 2015, and July 27, 2015. Respondent published two (2) separate articles using the infringing Groby Photograph (Reg. No. 2-100-104), as further described below.

On or around March 31, 2017, March 10, 2017, June 18, 2017, July 11, 2017, December 17, 2018, and May 7, 2019. Respondent published six (6) separate articles using the infringing Flooding Photograph (Reg. No. 2-160-265), as further described below.

Describe the infringement

Respondent reproduced, displayed, and distributed unauthorized copies of Claimant’s Groby Photograph on its website, thehayride.com. Respondent reproduced, displayed, and distributed unauthorized copies of Claimant’s Flooding Photograph on its website, thehayride.com, and additionally created an unauthorized derivative work by superimposing the text “Everyday I’m Hustlin” over the Flooding Photograph and otherwise altering that Photograph.

In addition, despite the presence of Claimant’s authorship credit when the photographs were first published on two separate authorized third-party websites, in each case with authorship credits indicating Julie Dermansky as the author, Respondent omitted Claimant’s name from the infringing articles, inducing, facilitating, and encouraging further downstream infringement. Claimant never authorized Respondent to reproduce, publish, display, or make use of any kind of the Photographs.

No

Description of harm suffered and relief sought

\$30,000 (15 x 2)

- Lost license fees/royalties
- Disgorgement of Respondent’s profits
- Omitted attribution induced, facilitated, and encouraged further downstream infringement
- Creation and exploitation of unauthorized derivative work.

Documentation

-  [Infringing Use -- Groby Photo -- The Hayride.pdf](#)
-  [Legitimate Publication -- Groby Photo -- The Hayride.pdf](#)
-  [Legitimate Publication \(compressed\) -- Flooding Photo -- The Hayride.pdf](#)
-  [Prior Settlements and Licenses Chart -- The Hayride.pdf](#)
-  ['104 Registration -- Groby Photo-- The Hayride.pdf](#)
-  ['265 Registration --Flooding Photo -- The Hayride.pdf](#)
-  [Infringing Use -- Flooding Photo-- The Hayride.pdf](#)

101 Independence Ave. S.E.
Washington, D.C. 20559-6000
(202) 707-3000 or
1 (877) 476-0778 (toll-free)