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6 Attorneys for Plaintiff  
7 NATIONAL CENTER FOR JEWISH FILM

FILED  
12 JAN -9 PM 3:55  
CLERK U.S. DISTRICT COURT  
CENTRAL DISTRICT CALIF.  
LOS ANGELES

8 UNITED STATES DISTRICT COURT  
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 NATIONAL CENTER FOR  
11 JEWISH FILM,

12 Plaintiff,

13 vs.

14 RIVERSIDE FILMS LLC, a New  
15 York limited liability company;  
16 JOSEPH DORMAN, an individual;  
17 and DOES 1 through 10

18 Defendants.

EDCV12-0044VAP(DTBx)  
CASE NO.

COMPLAINT FOR:

- (1) COPYRIGHT INFRINGEMENT;
- (2) VICARIOUS AND/OR CONTRIBUTORY COPYRIGHT INFRINGEMENT;
- (3) UNFAIR COMPETITION IN VIOLATION OF CAL. BUS. & PROF. CODE § 17200 ET SEQ.; AND
- (4) UNFAIR COMPETITION UNDER LANHAM ACT § 43(a);
- (5) COMMON LAW UNFAIR COMPETITION;
- (6) INJUNCTIVE RELIEF; AND
- (7) DECLARATORY RELIEF

[DEMAND FOR JURY TRIAL]

19 Plaintiff National Center for Jewish Film ("Plaintiff"), by and through its  
20 undersigned attorneys, hereby prays to this honorable Court for relief based on the  
21 following:  
22

23 ///

**PARTIES**

1  
2 1. Plaintiff is an award-winning non-profit film archive and distributor  
3 dedicated to preserving and sharing Jewish heritage. Plaintiff's unique collection  
4 of over twelve thousand reels of film includes features, documentaries, shorts,  
5 newsreels, and home movies. Plaintiff also distributes its own newly restored  
6 versions of rare Yiddish feature films and services hundreds of venues worldwide,  
7 including theatres, film festivals, synagogues and museums. Plaintiff is located at  
8 Brandeis University, Lown Building #102 MS053, Waltham, Massachusetts 02454.

9 2. Plaintiff is informed and believes, and thereon alleges, that Defendant  
10 Riverside Films LLC ("Riverside") is a New York Limited Liability Company with  
11 its principal place of business located at 250 Riverside Drive, #65, New York, New  
12 York 10025.

13 3. Plaintiff is informed and believes, and thereon alleges, that Defendant  
14 Joseph Dorman ("Dorman") is an individual with a principal place of residence in  
15 New York, New York.

16 4. The true names and capacities, whether individual, corporate,  
17 associate, employee or otherwise, of the Defendants sued herein as Does 1 through  
18 20, inclusive, currently are unknown to Plaintiff, and Plaintiff therefore sues  
19 Defendants by such fictitious names. Plaintiff is informed and believes, and  
20 thereon alleges, that each of the Defendants designated herein as a Doe is  
21 responsible legally in some manner for the acts, conduct, omissions and events  
22 referred to herein, causing injury and damage proximately thereby to Plaintiff, and  
23 each of them, as alleged hereinafter. Plaintiff will seek leave to amend this  
24 Complaint to allege that true names, capacities and circumstances establishing the  
25 liability of the Defendants designated herein as Does 1 through 20, inclusive, at  
26 such time as Plaintiff ascertains the same.

27 5. Plaintiff is informed and believes, and thereon alleges, that at all times  
28 herein relevant, each of the Defendants was the agent, servant, employee,

1 supervisor, partner, associate, co-venturer, subsidiary and/or corporate parent of  
2 each of the remaining Defendants and, at all times herein relevant, each Defendant  
3 was acting within the course, scope, purpose, consent, knowledge, ratification, and  
4 authorization of such agency, employment, partnership, joint venture, subsidiary  
5 and/or corporate parent.

6 **JURISDICTION AND VENUE**

7 6. The Court has original subject matter jurisdiction over Plaintiff's  
8 copyright claims arising under the copyright laws of the United States (17 U.S.C. §  
9 101 et seq.) and founded on 28 U.S.C. §§ 1331, 138(a) and 1338(b). Additionally,  
10 the Court has original jurisdiction as to Plaintiff's federal claim under the Lanham  
11 Act pursuant to 28 U.S.C. §§ 1331, 1337(a) and 1338(a). The Court also has and  
12 should assume pendent jurisdiction of the claims for unfair competition pursuant to  
13 28 U.S.C. § 1338(b) because they are substantial and related to Defendants'  
14 infringement of Plaintiff's copyrights.

15 7. This Court has personal jurisdiction over Defendants in that  
16 Defendants have conducted a substantial amount of business, including the acts of  
17 infringement complained of herein, in the State of California and in this District.

18 8. Venue in this District is proper under 28 U.S.C. §§ 1931(b)(2) and (c)  
19 and 1400(a) because Defendants purposefully availed themselves of the State of  
20 California and this District, and because Defendants' acts of infringement  
21 complained of herein occurred or arose in the State of California and in this  
22 District. Attached hereto as Exhibit "A" is a true and correct copy of an  
23 advertisement for the infringing film in a commercial theater in Los Angeles,  
24 California.

25 **FACTS COMMON TO ALL CLAIMS**

26 9. Plaintiff owns copyright to the film *Tevye*, Registration No.  
27 PA0000111844, with a registration date of July 9, 1981.

28 10. Plaintiff owns copyright to the film *Yiddle With His Fiddle* and *A*

1 *Letter to Mother* by an assignment from the films' producer, Joseph Green, on  
2 January 1, 1990. The assignment was timely recorded as Document No.  
3 V3333P186 with the U.S. Copyright Office on January 22, 1990.

4 11. Plaintiff applied for copyright registration to *Jewish Luck* on August  
5 22, 2011, and the application is pending.

6 12. Riverside Films LLC, Joseph Dorman, and potentially other  
7 individuals or entities whose identities are currently unknown to Plaintiff  
8 (collectively, "Defendants") have infringed Plaintiff's copyrights in *Teveye*, *Jewish*  
9 *Luck*, *Yiddle With His Fiddle* and *A Letter to Mother* (collectively, the  
10 "Copyrighted Works") by reproducing, preparing derivative works of, distributing  
11 copies, publicly performing and/or publicly displaying the Copyrighted Works in  
12 *Sholem Aleichem: Laughing in the Darkness* ("Infringing Film") while conducting  
13 business in Los Angeles County and other cities across California and the United  
14 States.

15 13. On or about July 8, 2011, Defendants released to general audiences the  
16 Infringing Film, which reproduces, prepares derivative works of, distributes copies,  
17 publicly performs and/or publicly displays the Copyrighted Works without consent,  
18 right or license from Plaintiff. Defendants had begun showing the Infringing Film  
19 in film festivals approximately six months prior to its release to general audiences.

20 14. Beginning on or about July 8, 2011, Defendants have shown, continue  
21 to show and are scheduled to show the Infringing Film to general audiences in  
22 commercial theaters and film festivals in Los Angeles County, various other cities  
23 in California, and across the United States, including in New York, Texas, Florida,  
24 Connecticut, Michigan, Colorado, Georgia, Arizona, Ohio, Maine, Nevada, New  
25 Mexico, Utah, Pennsylvania and Kentucky.

26 15. On or about July 27, 2011, Plaintiff sent a letter to Defendants,  
27 requesting that Defendants send Plaintiff a detailed shot list and time code and  
28 legally obtain from Plaintiff the footage from the Copyrighted Works used in the

1 Infringing Film. Defendants failed to comply and continue to show the Infringing  
2 Film throughout the United States without consent, right or license from Plaintiff.

3 16. Defendants have advertised the Infringing Film extensively, including  
4 but not limited to the internet and social media, such as maintaining a website for  
5 the Infringing Film and advertising on the iTunes Store and Facebook.

6 17. As of January 5, 2012, the domestic total of reported ticket sales to  
7 general audiences for the Infringing Film was at least \$800,000. Plaintiff reserves  
8 the right to amend the amount at a later time to conform to proof.

9 **FACTS RELATED TO *TEVYE***

10 18. Plaintiff is informed and believes, and thereon alleges, that Defendants  
11 have infringed Plaintiff's copyright in *Tevye* by reproducing, preparing derivative  
12 works of, distributing copies, publicly performing and/or publicly displaying *Tevye*  
13 in the Infringing Film.

14 19. Plaintiff is informed and believes, and thereon alleges, that Defendants  
15 have infringed Plaintiff's copyright in *Tevye* by reproducing, preparing derivative  
16 works of, distributing copies, publicly performing and/or publicly displaying in the  
17 Infringing Film scenes from *Tevye* that are central to its portrayal of a Jewish father  
18 who struggles to maintain the Jewish faith and tradition in his family and among  
19 his several daughters, as Eastern European Jews are on the brink of expulsion from  
20 their home during the pre-World War II period. Two scenes include the pivotal  
21 interaction between *Tevye* and his daughter, Chava, who wishes to marry outside  
22 the Jewish faith. A third scene depicts *Tevye* and his family leaving their village  
23 on their wagon as they are expelled before the beginning of World War II.

24 **FACTS RELATED TO *JEWISH LUCK***

25 20. Plaintiff is informed and believes, and thereon alleges, that  
26 Defendants have infringed Plaintiff's rights under the copyright laws in *Jewish*  
27 *Luck* by reproducing, preparing derivative works of, distributing copies, publicly  
28 performing and/or publicly displaying *Jewish Luck* in the Infringing Film.

1           21. Plaintiff is informed and believes, and thereon alleges, that Defendants  
2 have infringed Plaintiff's copyright in *Jewish Luck* by reproducing, preparing  
3 derivative works of, distributing copies, publicly performing and/or publicly  
4 displaying scenes from *Jewish Luck* that are fundamental to its plot about a  
5 daydreaming, struggling Jewish entrepreneur in Tsarist Russia who continued to  
6 have hopes for fortune despite the oppressive conditions from which he and  
7 millions of other Jews in Tsarist Russia suffered. The well-known and humorous  
8 clips depict the protagonist's daydream of being a matchmaker and shipping ready-  
9 to-marry brides on trains and lifting them by cranes onto ships as if they were  
10 ordinary cargo.

11                           **FACTS RELATED TO YIDDLE WITH HIS FIDDLE**

12           22. Plaintiff is informed and believes, and thereon alleges, that Defendants  
13 have infringed Plaintiff's copyright in *Yiddle With His Fiddle* by reproducing,  
14 preparing derivative works of, distributing copies, publicly performing and/or  
15 publicly displaying *Yiddle With His Fiddle* in the Infringing Film.

16           23. Plaintiff is informed and believes, and thereon alleges, that Defendants  
17 have infringed Plaintiff's copyright in *Yiddle With His Fiddle* by reproducing,  
18 preparing derivative works of, distributing copies, publicly performing and/or  
19 publicly displaying scenes of a traditional shetl market and town from *Yiddle With*  
20 *His Fiddle* that were fundamental to its portrayal of the vitality and spirit of  
21 traditional shetl culture, its inhabitants, as well as small town Jewish life in the late  
22 19<sup>th</sup> Century and during the pre-World War II era. The footage includes the  
23 opening shetl market and town scenes from *Yiddle With His Fiddle*.

24                           **FACTS RELATED TO A LETTER TO MOTHER**

25           24. Plaintiff is informed and believes, and thereon alleges, that Defendants  
26 have infringed Plaintiff's copyright in *A Letter to Mother* by reproducing, preparing  
27 derivative works of, distributing copies, publicly performing and/or publicly  
28 displaying *A Letter to Mother* in the Infringing Film.

1 25. Plaintiff is informed and believes, and thereon alleges, that Defendants  
2 have infringed Plaintiff's copyright in *A Letter to Mother* by reproducing, preparing  
3 derivative works of, distributing copies, publicly performing and/or publicly  
4 displaying scenes of the market and town in a traditional Polish Jewish community  
5 from *A Letter to Mother* that were fundamental to its portrayal of the traditional  
6 Polish Jewish community during the pre-World War II era.

7 **FIRST CLAIM FOR RELIEF**

8 **(Copyright Infringement)**

9 26. Plaintiff incorporates herein by this reference each and every  
10 allegation contained in paragraphs 1 through 25 inclusive.

11 27. Plaintiff is, and at all relevant times has been, the copyright owner of  
12 the Copyrighted Works.

13 28. Plaintiff is informed and believes, and thereon alleges, that  
14 Defendants, without the permission or consent of Plaintiff, reproduced, prepared  
15 derivative works, distributed copies of, publicly performed and/or publicly  
16 displayed within the territorial limits of the United States scenes from Plaintiff's  
17 Copyrighted Works in the Infringing Film. The acts described in this paragraph  
18 occurred since on or about July 8, 2011 and continue to occur.

19 29. Defendants' acts mentioned herein constitute infringement of  
20 Plaintiff's registered copyright and exclusive rights under copyright.

21 30. Due to Defendants' acts of infringement, Plaintiff has suffered  
22 substantial damages to its business in an amount to be established at trial.

23 31. Due to Defendants' acts of infringement, Plaintiff has suffered general  
24 and special damages in an amount to be established at trial.

25 32. Due to Defendants' acts of copyright infringement alleged herein,  
26 Defendants, and each of them, have obtained direct and indirect profits they would  
27 not otherwise have realized but for their infringement of the Copyrighted Works.  
28 As such, Plaintiff is entitled to disgorgement of Defendants' profits directly and

1 indirectly attributable to Defendants' infringement of the Copyrighted Works, in an  
2 amount to be established at trial.

3 33. Plaintiff is informed and believes, and thereon alleges, that Defendants  
4 engaged in the acts of copyright infringement alleged herein fully aware of  
5 Plaintiff's rights to the Copyrighted Works. Therefore, Defendants' acts of  
6 copyright infringement as alleged above were, and continue to be, willful,  
7 intentional, purposeful, with full knowledge and in disregard of and indifference to  
8 the rights of Plaintiff, subjecting Defendants, and each of them, to liability for  
9 statutory damages under Section 504(c)(2) of the Copyright Act in the sum of up to  
10 one hundred fifty thousand dollars (\$150,000) per infringement. Within the time  
11 permitted by law, Plaintiff will make its election between actual damages and  
12 statutory damages.

13 **SECOND CLAIM FOR RELIEF**

14 **(Vicarious and/or Contributory Copyright Infringement)**

15 34. Plaintiff incorporates herein by this reference each and every  
16 allegation contained in paragraphs 1 through 33 inclusive.

17 35. Plaintiff is informed and believes, and thereon alleges, that Defendants  
18 knowingly induced, participated in, aided and abetted in, and profited from the  
19 illegal reproduction and/or subsequent distribution of the Infringing Film featuring  
20 all of Plaintiff's copyrighted works mentioned above.

21 36. Plaintiff is informed and believes and, thereon alleges, that Defendants  
22 are vicariously liable for the infringements alleged herein because they had the  
23 right and ability to supervise the infringing conduct and because they had a direct  
24 financial interest in the infringing conduct.

25 37. By reason of Defendants', and each of their, acts of contributory  
26 infringement as alleged above, Plaintiff has suffered and will continue to suffer  
27 substantial damages to its business in an amount to be established at trial, as well as  
28 additional general and special damages in an amount to be established at trial.



1 38. Due to Defendants' acts of copyright infringement as alleged herein,  
2 Defendants, and each of them, have obtained direct and indirect profits they would  
3 not otherwise have realized but for their infringement of the Copyrighted Works.  
4 As such, Plaintiff is entitled to disgorgement of Defendants' profits directly and  
5 indirectly attributable to Defendants' infringement of the Copyrighted Works, in an  
6 amount to be established at trial.

7 39. Plaintiff is informed and believes, and thereon alleges, that Defendants  
8 engaged in the acts of copyright infringement alleged herein fully aware of  
9 Plaintiff's rights to the Copyrighted Works. Therefore, Defendants' acts of  
10 copyright infringement as alleged above were, and continue to be, willful,  
11 intentional, purposeful, with full knowledge, and in disregard of and indifference to  
12 the rights of Plaintiff, subjecting Defendants, and each of them, to liability for  
13 statutory damages under Section 504(c)(2) of the Copyright Act in the sum of up to  
14 one hundred fifty thousand dollars (\$150,000) per infringement. Within the time  
15 permitted by law, Plaintiff will make its election between actual damages and  
16 statutory damages.

17 **THIRD CLAIM FOR RELIEF**

18 **(Unfair Competition Under CAL. BUS. & PROF. CODE § 17200 et seq.)**

19 40. Plaintiff incorporates herein by this reference each and every  
20 allegation contained in paragraphs 1 through 39 inclusive.

21 41. The acts of Defendants complained of herein constitute unfair  
22 competition within the meaning of CAL. BUS. & PROF. CODE § 17200 et seq.

23 42. Defendants' actions constitute willful and knowing copyright  
24 infringement.

25 43. Defendants' unfair competition has caused and will continue to cause  
26 damage to Plaintiff, including irreparable harm for which there is no adequate  
27 remedy at law.

28 44. Pursuant to CAL. BUS. & PROF. CODE § 17203, Plaintiff is entitled to

1 preliminary and permanent injunctive relief ordering Defendants to cease this  
2 unfair competition.

3 45. Plaintiff is further entitled to the disgorgement of any and all of  
4 Defendants' profits associated with this unfair competition.

5 **FOURTH CLAIM FOR RELIEF**

6 **(Unfair Competition Under Lanham Act § 43(a))**

7 46. Plaintiff incorporates herein by this reference each and every  
8 allegation contained in paragraphs 1 through 45 inclusive.

9 47. The acts of Defendants complained of herein constitute unfair  
10 competition under Lanham Act § 43(a).

11 48. Defendants' actions constitute willful and knowing copyright  
12 infringement, and have caused and will likely continue to cause confusion, mistake  
13 and deception among consumers.

14 49. Defendants, by their unauthorized appropriation and use of Plaintiff's  
15 Copyrighted Works, have and are engaging in acts of unfair competition, unlawful  
16 appropriation, unjust enrichment, wrongful deception of the purchasing public and  
17 unlawful trading of Plaintiff's good will and the public's acceptance of Plaintiff's  
18 Copyrighted Works, all to Plaintiff's irreparable damage.

19 **FIFTH CLAIM FOR RELIEF**

20 **(Common Law Unfair Competition)**

21 50. Plaintiff incorporates herein by this reference each and every  
22 allegation contained in paragraphs 1 through 49 inclusive.

23 51. The acts of Defendants complained of herein constitute unfair  
24 competition under the common law of the State of California.

25 52. Defendants' actions constitute willful and knowing copyright  
26 infringement, and have caused and will likely to continue to cause confusion,  
27 mistake, and deception among consumers.

28 53. Defendants' unfair competition has caused and will continue to cause

1 damage to Plaintiff, including irreparable harm for which there is no adequate  
2 remedy at law.

3 54. As a consequence of Defendants' unfair competition, Plaintiff is  
4 entitled to damages and preliminary and permanent injunctive relief ordering  
5 Defendants to cease this unfair competition.

6 **SIXTH CLAIM FOR RELIEF**

7 **(Injunctive Relief)**

8 55. Plaintiff incorporates herein by this reference each and every  
9 allegation contained in paragraphs 1 through 54 inclusive.

10 56. Defendants' current release, sale and distribution of the Infringing  
11 Film, including all other acts complained of herein, have irreparably harmed  
12 Plaintiff and Defendants continue to profit from the same.

13 57. Plaintiff has no adequate remedy at law for the injuries currently being  
14 threatened by Defendants' acts complained of herein, and therefore seek injunctive  
15 relief from Defendants, and each of them, from otherwise releasing, selling,  
16 distributing or engaging in any other acts regarding the Infringing Film that cause  
17 similar harm to Plaintiff.

18 **SEVENTH CLAIM FOR RELIEF**

19 **(Declaratory Relief)**

20 58. Plaintiff incorporates herein by this reference each and every  
21 allegation contained in paragraphs 1 through 57 inclusive.

22 59. An actual controversy presently exists between Plaintiff and  
23 Defendants in that Defendants have wrongfully infringed Plaintiff's Copyrighted  
24 Works and engaged in unfair competition against Plaintiff. Plaintiff is informed  
25 and believes that Defendants contend Plaintiff is not entitled to any recovery. An  
26 actual controversy therefore exists that requires a judicial determination of the  
27 rights and responsibilities of Plaintiff and Defendants with respect to their duties,  
28 conduct and damages.



1 expense, including Plaintiff's costs and attorneys' fees to the extent allowed by law.  
2 At present, Plaintiff cannot ascertain the full extent of its damages and lost profits;  
3 and

4 4. such other relief as the equities of the case may require and as this  
5 Court may deem just and proper under the circumstances.

6 DATED: January 9, 2012.

FOX ROTHSCHILD LLP

7  
8 By: *JS*

9 Jeffrey S. Kravitz  
10 Jaysen S. Chung  
11 Attorneys for Plaintiff  
12 NATIONAL CENTER FOR  
13 JEWISH FILM  
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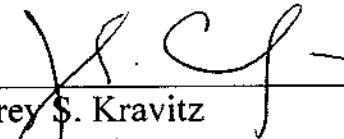
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**JURY DEMAND**

Plaintiff National Center for Jewish Film hereby demands a trial by jury for the matter herein.

Dated: January 9, 2012

FOX ROTHSCHILD LLP

By:   
\_\_\_\_\_  
Jeffrey S. Kravitz  
Jaysen S. Chung  
Attorneys for Plaintiff,  
National Center for Jewish Film

# Exhibit A

Before there was Fiddler, there was Tevye,  
and the Man who created him...

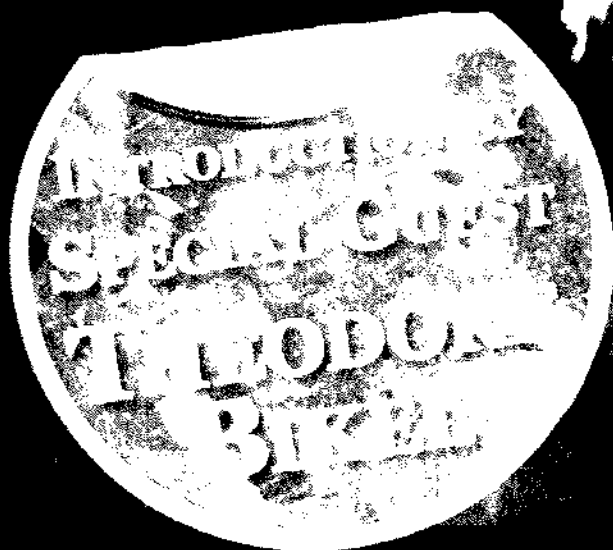
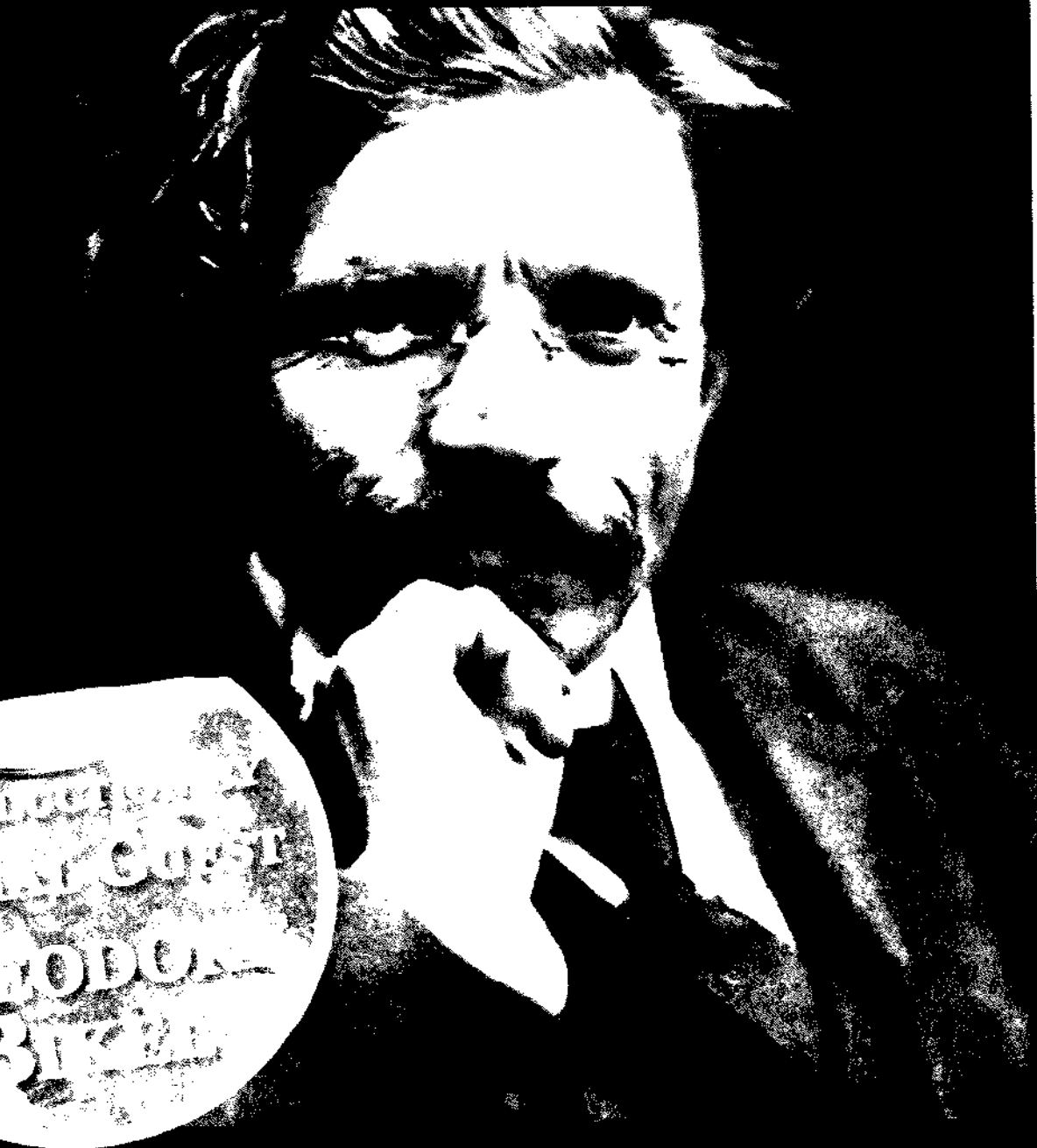
# Sholem Aleichem

LAUGHING IN THE DARKNESS

L.A. premiere

*followed by a  
discussion with  
the filmmaker*

A film by JOSEPH DORMAN



August 5th, 2011 at 7:40 PM  
Laemmle Royal Theatre - 11523 Santa Monica Boulevard  
presented by yiddishkayt | ייִדישקייט



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

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Virginia A. Phillips and the assigned discovery Magistrate Judge is David T. Bristow.

The case number on all documents filed with the Court should read as follows:

**EDCV12- 44 VAP (DTBx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

**Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

**Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

**Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Jeffrey S. Kravitz SBN 66481  
Jaysen S. Chung, SBN 280708  
FOX ROTHSCHILD LLP  
1800 Century Park East, Suite 300  
Los Angeles, CA 90067  
Tel: 310-598-415-  
Fax: 310-556-9828  
jskravitz@foxrothschild.com  
jchung@foxrothschild.com

**COPY**

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

NATIONAL CENTER FOR JEWISH FILM  PLAINTIFF(S)	CASE NUMBER  <b>EDCV12-0044VAP(DTBx)</b>
v.  RIVERSIDE FILMS LLC, a New York limited liability company; JOSEPH DORMAN, an individual; and DOES 1 through 10,  DEFENDANT(S).	<b>SUMMONS</b>

TO: DEFENDANT(S):

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, \_\_\_\_\_ whose address is \_\_\_\_\_. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

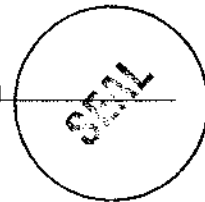
JAN - 9 2012

Dated: \_\_\_\_\_

Clerk, U.S. District Court

By: JULIE PRADO  
Deputy Clerk

(Seal of the Court)



[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> ) National Center for Jewish Film	<b>DEFENDANTS</b> Riverside Films LLC, a New York limited liability company; Joseph Dorman, an Individual; and Does 1 through 20
<b>(b) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Jeffrey S. Kravitz, SBN 66481 Fox Rothschild LLP 1800 Century Park East, Suite 300 Los Angeles, CA 90067 Tel: (310) 598-4150/Fax (310) 556-9828	Attorneys (If Known) Karen Shatzkin Shatzkin & Mayer, P.C. 1776 Broadway, 21st Floor New York, NY 10019-2002 TEL (212) 684-3000 FAX (212) 684-5333

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:30%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input checked="" type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input checked="" type="checkbox"/> 5</td> <td>DEF <input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input checked="" type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input checked="" type="checkbox"/> 5	DEF <input checked="" type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														

**IV. ORIGIN** (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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**V. REQUESTED IN COMPLAINT: JURY DEMAND:**  Yes  No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION under F.R.C.P. 23:**  Yes  No **MONEY DEMANDED IN COMPLAINT: \$**

**VI. CAUSE OF ACTION** (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 Copyright Infringement

**VII. NATURE OF SUIT** (Place an X in one box only.)

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <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 Act <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 Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <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 Loan (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>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>TORTS 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 Fed. 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-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>TORTS 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 <b>BANKRUPTCY</b> <input type="checkbox"/> 22 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <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 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <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>FORFEITURE / PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<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>PROPERTY RIGHTS</b> <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 61 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
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**FOR OFFICE USE ONLY:** Case Number: EDCV12-0044

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  No  Yes

If yes, list case number(s):

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  No  Yes

If yes, list case number(s):

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Massachusetts (National Center for Jewish Films)

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	New York (Joseph Dorman) New York (Riverside Films LLC)

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Los Angeles, Riverside

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties  
**Note: In land condemnation cases, use the location of the tract of land involved**

X. SIGNATURE OF ATTORNEY (OR PRO PER): J. Chung Date January 9, 2011  
 Jayson S. Chung

**Notice to Counsel/Parties:** The CV-71 (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. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)