

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN

theJasmineBRAND

**PARABLES ENTERTAINMENT, LLC.
(FORMERLY KNOWN AS VANESSA LYNN),**

Plaintiff,

Hon.

Vs.

Case No.

**TYLER PERRY STUDIOS & HARPO
PRODUCTIONS, INC.,**

Defendants.

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PERKINS LAW GROUP, PLLC

Todd Russell Perkins (P55623)

Nikkiya T. Branch (P68844)

Attorney for Plaintiff



There is no other pending civil litigation arising out of the transaction or occurrence alleged in this complaint.

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/s/ NIKKIYA T. BRANCH

NIKKIYA T. BRANCH (P68844)

COMPLAINT

NOW COMES Plaintiff, **PARABLES ENTERTAINMENT, LLC.**, by and through its attorneys, **PERKINS LAW GROUP PLLC**, and for its Complaint in the above named matter, states the following:

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INTRODUCTION

1. "Affairs" is a copyrighted script/play created solely through the imagination and effort of writer Vanessa Lynn. The plot of "Affairs" focuses on the father, George Taylor Sr., a small town

mayor running for reelection, George's health-challenged wife, June, who has a strained relationship with her husband; their two children, George Jr., who has a troubled relationship with his father, and Peaches, their daughter who is in law school. The drama erupts when Peaches, the daughter in law school, brings home her friend who then has an affair with her father. The personalities and tribulations of each person in the play provide the mixture of drama, sadness, and frustration that makes "Affairs" its own individual creation. Plaintiff was never apprised as to whether the named Defendants had any interest in his screenplay, or in the alternative, that they would be adopting, utilizing, and/or modifying its plot in the making of Tyler Perry's "The Have and Have Nots."

2. That The Defendants have represented to the public that they, if fact, own the copyright to the show "The Have and Have Nots" and the plot therein. Those representations made to the public by the named Defendants are false.
3. That "Affairs" was created and debuted live in 2008. It was recorded and sold on DVD nationwide through Amazon in 2011, and then widely distributed through Walmart in 2013. As such, Defendants had access to "Affairs" and used key elements of the work without Plaintiff's permission.

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PARTIES, JURISDICTION AND VENUE

4. Plaintiff restates and incorporates allegations 1 through 3 as if fully stated herein.
5. That Plaintiff, PARABLES ENTERTAINMENT, LLC. is a registered Michigan limited liability located in the City of Detroit.
6. That Defendant, TYLER PERRY STUDIOS, is a limited liability corporation duly organized and existing under the laws of the State of Georgia, with its principal place of business located at

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3300 Continental Parkway SW, Atlanta, Georgia 30331-5713. Tyler Perry Studios is engaged in the business of motion picture production for worldwide distribution.

7. That Defendant, HARPO PRODUCTIONS, INC., is a corporation registered in California, with its principal place of business located at 110 N. Carpenter St., Chicago, Illinois 60607.
8. That this is a civil action seeking damages and injunctive relief for copyright infringement under the Copyright Laws of the United States, 17 U.S.C. § 101 et seq.
9. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 28 U.S.C. §

1338(a).theJasmineBRAND

10. Venue is proper in Michigan under 28 U.S.C. § 1400(a) because this Court has personal jurisdiction over Tyler Perry Studios and Harpo Productions, and because acts of copyright infringement concerning Plaintiff's screenplay occurred within the State of Michigan.

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FEDERAL COPYRIGHT INFRINGEMENT

11. Plaintiff restates and incorporates allegations 1 through 10 as if fully stated herein.
12. That Defendants have used Plaintiff's script and accompanying plot without permission or remuneration in the making of the television series "The Haves and Have Nots."
13. That Plaintiff has complied in all respects with 17 U.S.C. § 101 et seq. including registering its work with the United States Copyright Office. As such, Plaintiff has secured the exclusive rights and privileges in and to the copyright of "Affairs" and the plot therein.theJasmineBRAND
14. That Defendants' exploitation and use of the plot contained in "Affairs" as set forth above, without Plaintiff's consent, violates the exclusive rights belonging to Plaintiff as the owner of the copyright in "Affairs", including without limitation, Plaintiff's rights under 17 U.S.C. § 106.

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15. That Plaintiff seeks an award of actual and statutory damages pursuant to 17 U.S.C. § 504 and costs pursuant to 17 U.S.C. § 505.

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16. That the conduct of the Defendants is causing, and, unless enjoined and restrained by this Court, will continue to cause the Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiff is entitled to injunctive relief prohibiting Defendants from further infringing on Plaintiff's copyright.

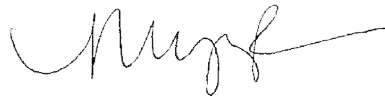
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WHEREFORE, Plaintiff seeks judgment against Defendants as follows:

- a) Declaring that Defendants' unauthorized conduct violates Plaintiff's rights under common law and the Federal Copyright Act; theJasmineBRAND
- b) Permanently enjoining Defendants, its officers, directors, agents, service employees, representatives, attorneys, related companies, successors, assigns and all others in active concert or participation with them from copying and republishing any of "Affairs" without consent or otherwise infringing Plaintiff's copyrights or other rights in any manner;
- c) Ordering Defendants to account to Plaintiff for all past, present, and future gains, profits, and advantages derived by Defendants by their infringement of Plaintiff's copyrights or such damages as are proper, and since Defendants intentionally infringed Plaintiff's copyrights, for the maximum allowable statutory damages for theJasmineBRAND each violation;
- d) Ordering the Defendants to edit the series "The Haves and Have Nots" to prominently display in the opening and closing credits "Based on the play 'Affairs' by Vanessa Lynn."

- e) Awarding Plaintiff actual and/or statutory damages for Defendants' copyright infringement in the amount to be determined at trial;
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- f) Awarding Plaintiff its costs, reasonable attorneys' fees, and disbursements in this action pursuant to 17 U.S.C. § 505(n);
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- g) Awarding Plaintiff such other and further relief as is just and proper in the premises.

Respectfully Submitted,



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Perkins Law Group, PLLC
Todd Russell Perkins (P55623)
Nikkiya T. Branch (P68844)



Dated: March 21, 2014

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Todd Russell Perkins (P55623)
Nikkiya T. Branch (P68844)
Attorney for Plaintiff



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JURY DEMAND

NOW COMES Plaintiff, PARABLES ENTERTAINMENT, LLC., by and through its attorneys, The Perkins Law Group, PLLC, who hereby demands a jury trial for all the issues above for which there is a right to trial by jury.

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Respectfully Submitted,

Perkins Law Group, PLLC
Nikkiya T. Branch (P68844)



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Dated: February 13, 2014