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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MARSHALL DIVISION**

JENNIFER STETSON,

Plaintiff,

v.

CURTIS JACKSON A/K/A 50 CENT,

Defendant.

Civil Action No.

JURY TRIAL DEMANDED

COMPLAINT FOR COPYRIGHT INFRINGEMENT

This is an action for copyright infringement in which the Jennifer Stetson (“Plaintiff”) makes the following allegations against Curtis Jackson a/k/a 50 Cent (“Defendant”):

PARTIES

1. Plaintiff, Jennifer Stetson, is an individual residing at 2052 Barnard, #5, Houston, Texas 77098.
2. On information and belief, Defendant, Curtis Jackson a/k/a 50 Cent, is an individual residing at 50 Poplar Hill Road, Farmington, Connecticut 06032.

JURISDICTION AND VENUE

3. This action arises under the copyright laws of the United States, Title 17 of the United States Code. This court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1338(a).
4. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). On

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information and belief, Defendant has transacted business in this district, and has committed and/or induced acts of copyright infringement in this district.

5. On information and belief, Defendant is subject to this Court’s specific and general personal jurisdiction pursuant to due process and/or the Texas Long Arm Statue, due at least to his substantial business in this forum, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Texas and in this Judicial District.

COUNT I
INFRINGEMENT OF COPYRIGHTS

6. Before February 7, 2012, Plaintiff, a United States citizen, created a photograph entitled Claudia (“Copyrighted Picture”).

7. The Copyrighted Picture is an original work that may be copyrighted under United States law. A copy of the Copyrighted Picture is attached as Exhibit A.

8. Between January 1, 2012 and February 7, 2012, Plaintiff applied to the copyright office and received a certificate of registration dated July 9, 2012, identified as U.S. Copyright Registration No. VA0001828424 for the Copyrighted Picture. A true and correct copy of the Copyright Registration is attached as Exhibit B.

9. Since February 7, 2012, the Plaintiff has either published or licensed for publication all copies of the Copyrighted Picture in compliance with the copyright laws and has remained the sole owner of the copyright.

10. After the copyright was issued, Defendant infringed the copyright by publishing and reproducing copies and/or derivatives of the Copyrighted Picture on the Defendant’s website www.ThisIs50.com (“Website”). Defendant’s infringing picture (“Infringing Picture”) is

attached as Exhibit C.

11. Plaintiff provided notice at least as early as September 10, 2013, that Defendant's use of Original Picture was authorized, and in violation of Plaintiff's copyright.

12. Defendant continues to infringe the copyright by continuing to publish and reproduce the Infringing Picture in violation of the copyright, and further has engaged in unfair trade practices and unfair competition in connection with its publication and production of the Infringing Picture, thus causing irreparable damage.

13. On information and belief, since at least September 10, 2013, Defendant has willfully engaged in, and is willfully engaging in, the acts complained of in conscious disregard of the rights of Plaintiff. Plaintiff is, therefore, entitled to the maximum statutory damages allowable.

14. On information and belief, Defendant has realized and continues to realize profits and other benefits rightly belonging to Plaintiff. Accordingly, Plaintiff seek an award of damages pursuant to 17 U.S.C. §§ 504 and 505.

15. Defendant's infringing conduct has also caused and is causing substantial and irreparable injury and damage to Plaintiff in an amount not capable of determination, and, unless restrained, will cause further irreparable injury, leaving the Plaintiff with no adequate remedy at law.

PRAYER FOR RELIEF

THEREFORE, Plaintiff prays for judgment against Defendant as follows:

- (a) Declaring that Defendant's unauthorized conduct violates Plaintiff's rights under common law and the Federal Copyright Act;
- (b) Immediately and permanently enjoining Defendant, his officers, directors,

agents, servants, employees, representatives, attorneys, related companies, successors, assigns, and all others in active concert or participation with him from copying and republishing any of Plaintiff's copyrighted articles or copyrighted material without consent or otherwise infringing Plaintiff's copyrights or other rights in any manner;

(c) Ordering Defendant account to Plaintiff for all gains, profits, and advantages derived by Defendant by its infringement of Plaintiff's copyrights or such damages as are proper, and since Defendant intentionally infringed Plaintiff's copyright, for the maximum allowable statutory damages for each violation;

(d) Awarding Plaintiff actual and/or statutory damages for Defendant's copyright infringement in an amount to be determined at trial;

(e) Awarding Plaintiff its costs, reasonable attorneys' fees, and disbursements in this action, pursuant to 17 U.S.C. § 505; and

(f) Awarding Plaintiff such other and further relief as is just and proper.

Dated October 22, 2013

By: /s/ Neal G. Massand
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com

Ni, Wang & Associates, PLLC
8140 Walnut Hill Ln., Ste. 310
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEY FOR PLAINTIFF JENNIFER
STETSON**