

1 SHAHROKH SHEIK (CA Bar ID #250650)
2 shahrokh@weinberg-gonser.com
3 CHARANJIT SINGH (CA Bar ID #311609)
4 charanjit@weinberg-gonser.com
5 WEINBERG GONSER LLP
6 10866 Wilshire Blvd., Suite 1650
7 Los Angeles, CA 90024
8 Telephone: (424) 239-2851
9 Facsimile: (424) 238-3060

10 Attorneys for Plaintiff,
11 DESIROUS PARTIES UNLIMITED, INC

12 UNITED STATES DISTRICT COURT
13 FOR THE DISTRICT OF ARIZONA

14 DESIROUS PARTIES UNLIMITED, INC., a
15 Texas corporation,

16 Plaintiff,

17 v.

18 RIGHT CONNECTION, INC., a Nevada
19 corporation; and DON HUGHES, an individual,

20 Defendants.

Case No.:

COMPLAINT FOR DAMAGES

- 1. **TRADEMARK INFRINGEMENT – 15 U.S.C. § 1114**
- 2. **COMMON LAW TRADEMARK INFRINGEMENT**
- 3. **COPYRIGHT INFRINGEMENT – 17 U.S.C. § 501**
- 4. **UNFAIR COMPETITION – 15 U.S.C. § 1125(a)**
- 5. **BREACH OF CONTRACT**
- 6. **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
- 7. **DECLARATORY RELIEF**
- 8. **INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

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22
23 Plaintiff Desirous Parties Unlimited, Inc., (“Plaintiff”), by and through its attorneys, brings
24 this action and alleges against Defendants Right Connection, Inc. (“RCT”) and Don Hughes
25 (“Hughes”) (RCT and Hughes collectively referred to as “Defendants”) as follows:

26 **NATURE OF THE ACTION**

27 1. This is an action seeking damages for trademark infringement, copyright
28 infringement, breach of contract, and declaratory relief arising out of a former partnership and use

1 of Plaintiff's trademarks and copyrights without consent and infringement of Plaintiff's trademark
2 and copyrights.

3 **JURISDICTION AND VENUE**

4 2. This Court has subject matter jurisdiction over this matter pursuant to the Lanham
5 Act, 15 U.S.C. § 1121, 17 U.S.C. § 501 and the Declaratory Judgment Act, 28 U.S.C. §2201, *et*
6 *seq.*, and 28 U.S.C. §§1331, 1332 and 1338.

7 3. This Court has personal jurisdiction over Defendant Hughes because Hughes resides
8 and is domiciled in the State of Arizona.

9 4. This Court has personal jurisdiction over Defendant RCT because RCT is owned and
10 operated by Hughes from his domicile in the state of Arizona. Hughes is the owner, director, and
11 an officer of RCT at all relevant times herein. (Exhibit A – Nevada Secretary of State Entity
12 Information). Upon information and belief, Hughes directs and controls RCT and handles most of
13 its day-to-day operations from the state of Arizona. Upon information and belief, Hughes has
14 served as president of RCT in the past and currently serves as RCT's operations manager. Hughes
15 represented himself as the owner of RCT in his dealings with Plaintiff and informed Plaintiff he
16 lives in Arizona and conducts all of RCT's business from his home in Arizona. As such, RCT's
17 principal place of business and nerve center is rightfully in Arizona. Further, upon information and
18 belief, Defendant RCT has intentionally, systematically, and continuously engaged in ongoing
19 business transactions, sales and marketing activities throughout Arizona. RCT regularly targets
20 Arizona residents with solicitation of RCT's services and sells its services to Arizona residents.
21 Hughes will serve as the principal party and witness for RCT as its officer, director, and owner.
22 Hughes is domiciled in Arizona as alleged above. Thus, it will not offend the notion of fair play or
23 the interests of justice for this Court to exercise personal jurisdiction over RCT and Arizona will
24 be most convenient for Hughes.

25 5. Venue is proper in this judicial district because Defendant is subject to the Court's
26 personal jurisdiction pursuant to 28 U.S.C. §1391(b) and 1400(a).

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THE PARTIES

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2 6. Plaintiff is a Texas corporation and with its principal place of business in Houston,
3 Texas.

4 7. Upon information and belief, Defendant RCT is a Nevada corporation with its
5 principal place of business in Arizona, and conducts business nationwide, including throughout
6 Arizona.

7 8. Defendant Don Hughes is the owner of Defendant RCT. On information and belief,
8 Hughes resides in Arizona. Don Hughes operates RCT and also engages in business individually
9 throughout Arizona.

10 9. At all times relevant herein there was such a unity of interest and ownership that
11 Defendant RCT and Defendant Hughes are inseparable from the other and Defendant RCT is
12 influenced and governed by Defendant Hughes for his own personal interest and to suit his
13 convenience. Specifically, at all times relevant hereto, Defendant Hughes:

- 14 a. Is the owner, director, and officer of RCT, a small corporation;
 - 15 b. Upon information and belief, controls the business and affairs of Defendant RCT;
 - 16 c. Upon information and belief, has served as the president of Defendant RCT until
17 stepping down to secretary, but still exercises substantial, if not total, control over
18 RCT operations;
 - 19 d. Upon information and belief, conducts all of RCT's business from his home in
20 Arizona and RCT's "nerve center" and actual place of business is the same as
21 Hughes' home in Arizona;
 - 22 e. Upon information and belief, uses the same employees for himself and Defendant
23 RCT;
 - 24 f. Has indicated to Plaintiff multiple times that should any judgment be rendered
25 against RCT, he will file for bankruptcy and simply start a new company to
26 essentially do the same business;
 - 27 g. Upon information and belief, comingled Defendant RCT's funds with his own;
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1 h. Upon information and belief, treats corporate assets as his own;

2 i. Upon information and belief, failed to observe corporate formalities.

3 10. There is such unity and ownership between Defendant Hughes and RCT that
4 Defendant RCT ceases to exist, and the facts show that adherence to the fiction of the separate
5 existence of RCT will sanction fraud and promote injustice.

6 **FACTS COMMON TO ALL ALLEGATIONS**

7 11. Plaintiff specializes in organizing, conducting, and arranging adult oriented
8 entertainment events, including without limitation, nightclub events and destination travel
9 packages (collectively, the “Services”). Plaintiff has developed a strong reputation in connection
10 with the Services.

11 **Plaintiff’s Trademark and Copyrights**

12 12. Plaintiff is the owner of the United States federal trademark registration number
13 6068727 for the trademark DIRTY VIBES issued on June 2, 2020 (the “Registered Mark”). The
14 Registered Mark covers the following services: (1) International Class 039: Arranging of cruises;
15 Coordinating travel arrangements for individuals and for groups; Organization of travel;
16 Organization of travel and boat trips; Providing a website featuring information on travel;
17 Providing links to web sites of others featuring travel, and (2) International Class 041: Arranging
18 and conducting nightclub entertainment events; Arranging and conducting nightclub parties;
19 Arranging and conducting special events for social entertainment purposes; Arranging, organizing,
20 conducting, and hosting social entertainment events; Entertainment services in the nature of
21 hosting social entertainment events; Hosting social entertainment events, namely, adult lifestyle
22 parties, for others; Entertainment services in the nature of arranging social entertainment events.

23 13. Plaintiff first started using the Registered Mark in commerce as early as November
24 2017.

25 14. Plaintiff has used the Registered Mark in connection with the Services continuously
26 since November 2017.

27 15. In addition to securing the Registered Mark, Plaintiff also purchased the domain
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1 name dirtyvibes.com and created, controls, and manages the Dirty Vibes website located at
2 www.dirtyvibes.com (“Website”) and related social media accounts (collectively referred to
3 hereafter along with the Website and Registered Mark, the “DV Brand(s)”).

4 16. Plaintiff developed and created two special trips events under the DV Brands: Tryst
5 and Wicked Eden. In connection with the two special events, Plaintiff created and began using the
6 marks “TRYST” and “WICKED EDEN” in commerce with the two corresponding events
7 throughout the United States (“Affiliated Marks”). Plaintiff has filed applications to register the
8 Affiliated Marks. Plaintiff currently owns all common law rights to each of the Affiliated Marks.

9 17. Plaintiff also holds all right of use of certain copyrights. Plaintiff owns rights to the
10 registered United States Copyrights for the group of photographs published on the Website under
11 the Registration number VAu001426732, effective date of April 6, 2021, known as “2019 Music
12 Fest” attached as Exhibit B.

13 18. Plaintiff also owns all rights to the registered United States Copyrights for the group
14 of photographs published on the Website under the Registration number VAu001426692, effective
15 date of April 6, 2021 known as “2018 Music Fest” attached Exhibit C.

16 19. Plaintiff also owns all rights to the registered United States Copyrights for the
17 “About” section on the Website (“Content”) under the Registration number TXu002269217,
18 effective date of April 6, 2021 attached as Exhibit D. (Plaintiff’s copyrights of 2019 Music Fest,
19 2018 Music Fest, and Content to be collectively referred to hereafter as the “Registered
20 Copyrights”)

21 20. Plaintiff created the Website to provide information about the DV Brands, Affiliated
22 Marks, and related events. Plaintiff bought the domain name, dirtyvibes.com, and paid all the
23 associated fees and costs with setting up the website. Plaintiff created and authored all aspects of
24 the Website including without limitation writing the informational “About” section on how DV
25 Brands came to be and what it is about. Additionally, Plaintiff routinely takes photographs of prior
26 events and publishes those photographs on the Website as well as the DV Brands social media to
27 showcase prior events as advertisements for future events. Plaintiff has published a group of
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1 photographs on Plaintiff's Website for its 2019 Dirty Vibes Music Fest and TRYST Temptation
2 Tower Takeover ("2019 Music Fest") and 2018 Dirty Vibes Music Fest and TRYST Temptation
3 Tower Takeover ("2018 Music Fest") with the logo for DV Brands on each photograph.

4 **Agreement with Defendants and Defendants' Subsequent Misconduct**

5 21. In or about 2017, Matlock and Hughes met and discussed their respective businesses.
6 Hughes represented to Matlock that he owned and was president of RCT, a travel agency. Hughes
7 stated that he could offer booking services for hotels for Plaintiff at discounted rates.

8 22. Toward the end of 2017, Plaintiff and Defendants orally agreed to organize certain
9 destination travel events ("Travel Events") promoted by Plaintiff under its Desirous Party brand
10 and/or DV Brands and splitting the profits fifty percent to Plaintiff and fifty percent to Defendants
11 ("Agreement").

12 23. Plaintiff created the DV Brands as a separate and distinct brand to market and
13 promote its events, including without limitation certain Travel Events under the Agreement.
14 Plaintiff came up with the concept and name of *Dirty Vibes* and financed and created the DV Brand
15 as proprietary intellectual property. While Plaintiff allowed the DV Brands to be used in the Travel
16 Events, Plaintiff always intended the DV Brands to be solely and exclusively owned by Plaintiff.

17 24. Since 2017, Plaintiff organized seven (7) Travel Events under the Agreement:

- 18 a. April 2018 – Wild on Spring Break
19 b. August 2018 – Dirty Vibes Music Fest
20 c. April 2019 – Wild on Dirty Vibes
21 d. August 2019 – Dirty Vibes Music Fest
22 e. February 2020 – Dirty Vibes Temptation Cruise
23 f. October 2020 – Dirty Vibes Temptation
24 g. April 2021- Tryst 2021 Temptation

25 25. Plaintiff believes Defendants failed to properly and fully account to Plaintiff, and
26 they knowingly underpaid Plaintiff for Plaintiff's share of proceeds in connection with the first
27 five (5) Travel Events under the Agreement. Plaintiff also believes Defendants intentionally
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1 concealed material financial information and misrepresented material information in connection
2 with the accounting and payments of the first five Travel Events. Despite numerous requests for
3 information related to the finance and accounting of these events, Defendants have failed to provide
4 reasonable and detailed financial information.

5 26. Defendants have also entirely failed to account and pay Plaintiff its share of proceeds
6 for the October 2020 event and April 2021 event.

7 27. When Hughes learned Plaintiff secured the Registered Mark, he unjustly demanded
8 Plaintiff turnover rights to the Mark to Defendants, threatened to withhold payments for the
9 October 2020 event and to shut Plaintiff out of the April 2021 event after Plaintiff spent
10 considerable time to setup and market the April 2021 event. Through Plaintiff's efforts, over 200
11 hotel rooms had been booked for the April 2021 event. Plaintiff refused to turn over the DV Brand
12 to Defendants, Defendants followed through on the aforementioned threats.

13 28. Consequently, Plaintiff terminated the relationship with Defendants and demanded
14 Defendants to cease and desist from any future use of the Registered Mark, and for all accounting
15 and payment of monies unjustly held by Defendants under the Agreement. Plaintiff also made clear
16 the Registered Mark was created by Plaintiff and Plaintiff was the rightful owner, not Defendants.
17 Defendants did not have Plaintiff's permission to use the Registered Mark.

18 29. However, Defendants continued to use the Registered Marks and Affiliated Marks
19 to promote their own competing events without Plaintiff's consent or involvement and in clear
20 violation of Plaintiff's rights. In fact, Defendants created a competing fake website- "dirty-
21 vibes.com." Defendants also set up several fake social media accounts directly and expressly
22 infringing on the DV Brand.

23 30. On the fake website, Defendants copied and pasted the Registered Copyrights and
24 the Registered Marks to promote their own travel events to the exclusion of Plaintiff and Matlock.
25 Defendants also stole and doctored the photographs and other videos to remove the DV logos and
26 publish them as their own on the fake website. Defendants also use content on their website that is
27 very similar to the materials and information found on Plaintiff's site. Essentially, Defendants'
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1 fake website replicates Plaintiff's Website and copies and pastes large sections of content without
2 consent or authorization.

3 31. Defendants have improperly and intentionally copied Plaintiff's copyrights without
4 consent to counterfeit Plaintiff's brand.

5 32. Defendants allege they created the Dirty Vibes brand and continue to use the
6 Registered Mark and Affiliated Marks without authorization. They fraudulently applied for similar
7 trademarks, namely USPTO applications under Serial Nos. 90442106 filed on December 31, 2020,
8 and 90433201 and 90433009 filed on December 30, 2020 (collectively, "Defendants' Applied for
9 Marks").

10 33. Recently, Defendants sent cease and desist letters to Plaintiff's IP host sites and asked
11 that they take down or remove Plaintiff's Websites and social media accounts on the basis of
12 copyright infringement for Plaintiff's use of their own logo. Defendants are wrongfully trying to
13 prove that they have rights to Plaintiff's copyrights and to put ownership of such rights in dispute
14 with these fake take down letters. Defendants also seek to disrupt Plaintiff's ability to post and
15 market its events on these sites so it can harm Plaintiff's economic opportunities.

16 34. Defendants have also interfered with Plaintiff's business and economic
17 opportunities. Plaintiff has been informed that Defendants have approached Plaintiff's clients and
18 made disparaging and defamatory comments about Plaintiff and its owner in order to harm
19 Plaintiff, its reputation, and steal clients. Defendants have tried to steal these clients and customers
20 away from Plaintiff and break their contracts and prospective contracts with Plaintiff. Defendants
21 have approached many of the hotel owners, DJs, vendors, and others that Plaintiff works with and
22 uses to set up events it hosts and asked that these third parties stop working with Plaintiff and
23 cancel their agreements with Plaintiff. Defendants has urged these third parties to work with them
24 instead of Plaintiff. These attempts to disrupt and break Plaintiff's contractual relationships make
25 clear that Defendants will not stop until Plaintiff's business has been ruined.

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COUNT I

(Trademark Infringement – 15 U.S.C. § 1114)

(As to All Defendants)

35. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

36. Plaintiff owns the Registered Mark and has exclusive rights to use the Registered Mark and the associated DV Brands in commerce. Plaintiff has, through its own sweat and equity, created the DV Brands and the Registered Mark. Plaintiff used the Registered Mark since approximately November 28, 2017.

37. Defendants have, without Plaintiff's consent, used the Registered Mark in a manner that infringes on Plaintiff's rights, and such use will and has caused actual confusion, mistake, or deception in violation of 15 U.S.C. § 1114.

38. As a result of Defendant's infringement, Plaintiff has suffered damages, including irreparable injury to its brand, lost profits, reputation, and goodwill.

39. Plaintiff is entitled to monetary damages, including attorneys' fees, in an amount to proven at trial pursuant to 15 U.S.C. § 1117(a).

COUNT II

(Common Law Trademark Infringement)

(As to All Defendants)

40. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs above as though fully set forth herein.

41. Plaintiff owns the Affiliated Marks and has exclusive rights to use the Affiliated Marks and the associated DV Brands in commerce. Plaintiff has, through its own sweat and equity, created the DV Brands and the Affiliated Marks. Plaintiff has continuously used the Affiliated Marks since their inception in or about 2017.

42. Defendants have, without Plaintiff's consent, used the Affiliated Marks to promote their own competing events under the same trademarks in a manner that infringes on Plaintiff's

1 rights, and such use will and has caused actual confusion, mistake, or deception.

2 43. By using Plaintiff's Affiliated Marks in connection with services similar to
3 Plaintiff's, Defendants are infringing on Plaintiff's Affiliated Marks.

4 44. As a result of Defendants' infringement, Defendants have unlawfully profited, and
5 Plaintiff has suffered damages including irreparable injury to its brand, lost profits, reputation, and
6 goodwill.

7 **COUNT III**

8 **(Copyright Infringement – 17 U.S.C. § 501)**

9 **(As to All Defendants)**

10 45. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs
11 above as though fully set forth herein

12 46. At all times relevant hereto, Plaintiff has exclusive rights to use the Registered
13 Copyrights including the 2019 Music Fest photographs, 2018 Music Fest photographs, and Content
14 that appears on its Website.

15 47. Defendants, have without permission or consent, improperly copied, used, published,
16 reproduced, and distributed Plaintiff's Registered Copyrights through their fake website.

17 48. As a result of the above-described conduct by Defendants, Plaintiff has been
18 damaged in an amount to be proven at trial.

19 49. By reason of the copyright infringement described above, Plaintiff is entitled to
20 recover Defendants' profits to the extent the same are not included as part of Plaintiff's damages.

21 50. In the alternative, at the election of Plaintiff, Plaintiff is entitled to recover from
22 Defendants statutory damages per copyright infringement for Defendant's willful copyright
23 infringement.

24 51. Plaintiff is entitled to attorneys' fees and costs, in an amount to proven at trial,
25 pursuant to 17 U.S.C. § 505.

26 52. Plaintiff additionally seeks injunctive relief against Defendants to immediately cease
27 use of Plaintiff's copyrights as identified above and remove from all websites, social media
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1 accounts, and other accounts associated Plaintiff's copyrights pursuant to 17 U.S.C. § 502.

2 **COUNT IV**

3 **(Unfair Competition – 15 U.S.C. § 1125(a))**

4 **(As to All Defendants)**

5 53. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs
6 above as though fully set forth herein.

7 54. Defendants' use of the Registered Mark, Affiliated Marks, and Registered
8 Copyrights has caused confusion, mistake, and deception, and will continue to do so as to the
9 affiliation, connection, or association of Defendants with Plaintiff, or as to the origin, sponsorship,
10 or approval of Plaintiff's brand in violation of 15 U.S.C. § 1125(a).

11 55. Defendants' commercial advertising and promotion of its events using the Registered
12 Mark, Affiliated Marks, and Registered Copyrights misrepresents the nature, characteristics,
13 qualities, or geographic origin of Defendants' goods and services in violation of 15 U.S.C. §
14 1125(a).

15 56. Defendants have realized profits as a result of their unlawful actions, and Plaintiff
16 has and will continue to suffer damages, including to its reputation and goodwill.

17 57. Plaintiff is entitled to monetary damages, including attorneys' fees, in an amount to
18 proven at trial pursuant to 15 U.S.C. § 1117(a).

19 **COUNT V**

20 **(Breach of Contract)**

21 **(As to All Defendants)**

22 58. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs
23 above as though fully set forth herein.

24 59. Plaintiff and Defendants entered into the Agreement.

25 60. Plaintiff performed all, or substantially all, of its obligations under the Agreement.

26 61. Defendants breached their obligations under the Agreement by among other things
27 failing to properly account for and pay Plaintiff's share of proceeds for the Travel Events under
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1 the Agreement, and for shutting Plaintiff out of the April 2021 event and refusing to share profits
2 for the April 2021 event.

3 62. As a result of the Defendants' breach, Plaintiff has been damaged in an amount to be
4 proven at trial.

5 **COUNT VI**

6 **(Intentional Interference with Prospective Economic Advantage)**

7 **(As to All Defendants)**

8 63. Plaintiff repeats and incorporates by reference the allegations set forth in paragraphs
9 above as though fully set forth herein.

10 64. Plaintiff has done extensive marketing and enjoys a strong reputation in connection
11 with entertainment events. Plaintiff maintains business relationships and agreements with a
12 network of clientele. Plaintiff has substantial prospective business opportunities thereto including
13 the promotion of its Services to such clientele.

14 65. Plaintiff maintains business relationships and agreements with a network of hotel
15 owners, DJs, and other vendors to use for its events. Plaintiff has a long history with many of the
16 hotel owners, DJs, and other vendors.

17 66. Defendants know of Plaintiff's relationships and agreements with its network of
18 clientele, hotel owners, DJs, and vendors. Defendants have intentionally and relentlessly engaged
19 on activities to interfere with and disrupt Plaintiff's relationship with clients and future clients as
20 well as hotel owners, DJs, and vendors.

21 67. Defendants have acted to steal Plaintiff's clients, and Plaintiff has lost clients and
22 prospective business opportunities due to Defendant's wrongful conduct.

23 68. Defendants have asked hotel owners, DJs, and other vendors to violate their
24 agreements with Plaintiff for Plaintiff's events and instead work with Defendants.

25 69. In addition, Defendant has tried to remove and deactivate Plaintiff's Website and
26 social media accounts to disrupt its working relationship with clients and hotel owners based on
27 fake copyright disputes.

1 78. Defendants continues to violate and infringe upon Plaintiff's Registered Mark by
2 using the Registered Mark to promote their own events and such use will and has caused actual
3 confusion, mistake, or deception in violation of 15 U.S.C. § 1114.

4 79. Defendants continue to infringe upon Plaintiff's Registered Copyrights.

5 80. As a direct and proximate result of Defendants' misconduct, Plaintiff has and
6 continues to suffer damages. As such, Plaintiff requests this Court for a preliminary and permanent
7 injunction to enjoin Defendant from further use of the Registered Mark and Registered Copyrights.

8
9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff respectfully prays that the Court:

- 11 1. Award actual damages suffered by Plaintiff according to proof at trial pursuant
12 to 15 U.S.C. § 1117(a);
- 13 2. Award actual damages suffered by Plaintiff according to proof at trial pursuant
14 to 17 U.S.C. § 504;
- 15 3. Award disgorgement of profits from Defendants pursuant to 15 U.S.C. § 1117(a);
- 16 4. Award disgorgement of profits from Defendants pursuant to 17 U.S.C. § 504;
- 17 5. Grant Plaintiff a monetary award to account for Defendants unlawful conduct;
- 18 6. For declaratory judgment that 727 Registration is Plaintiff's exclusive trademark;
- 19 7. For declaratory relief that Plaintiff is the exclusive owner of its registered
20 copyrights;
- 21 8. Injunctive relief;
- 22 9. Attorneys' fees as applicable pursuant to 17 U.S.C. § 505 and 15 U.S.C. §
23 1117(a);
- 24 10. Pre- and Post-judgment interest;
- 25 11. Any other relief as the Court deems just and equitable.

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1 DATED: August 10, 2021

By: /s/ Shahrokh Sheik

2 SHAHROKH SHEIK
3 CHARANJIT SINGH
4 WEINBERG GONSER LLP
5 10866 Wilshire Blvd., Suite 1650
6 Los Angeles, CA 90024
7 Telephone: (424) 239-2851
8 Facsimile: (424) 238-3060

9 Attorneys for Plaintiff,
10 DESIROUS PARTIES UNLIMITED, INC.
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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

DATED: August 10, 2021

By: /s/ Shahrokh Sheik

SHAHROKH SHEIK
CHARANJIT SINGH
WEINBERG GONSER LLP
10866 Wilshire Blvd., Suite 1650
Los Angeles, CA 90024
Telephone: (424) 239-2851
Facsimile: (424) 238-3060

Attorneys for Plaintiff,
DESIROUS PARTIES UNLIMITED, INC.

EXHIBIT A



BUSINESSINFORMATION



ENTITY INFORMATION

ENTITY INFORMATION

Entity Name: RIGHT CONNECTION INC. **Entity Number:** C10955-2001
Entity Type: Domestic Corporation (78) **Entity Status:** Active
Formation Date: 04/27/2001 **NV Business ID:** NV20011286094
Termination Date: Perpetual **Annual Report Due Date:** 4/30/2022

REGISTERED AGENT INFORMATION

Name of Individual or Legal Entity: STEVEN R. FLACKS **Status:** Active
CRA Agent Entity Type: **Registered Agent Type:** Non-Commercial Registered Agent
NV Business ID: **Office or Position:**
Jurisdiction:
Street Address: 2375 EAST TROPICANA #3, LAS VEGAS, NV, 89119, USA
Mailing Address:
Individual with Authority to Act:
Fictitious Website or Domain Name:

OFFICER INFORMATION

[VIEW HISTORICAL DATA](#)

Title	Name	Address	Last Updated	Status
President	JAMES A TERHUNE	7437 SO EASTERN AVE #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Secretary	DONALD D HUGHES II	1850 MCCULLOCH BLVD, STE C1-272, LAKE HAVASU CITY, AZ, 86403, USA	04/29/2019	Active
Treasurer	JAMES A TERHUNE	7437 SO EASTERN #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Director	JAMES A TERHUNE	7437 SO EASTERN AVE #230, LAS VEGAS, NV, 89123, USA	04/29/2019	Active
Director	DONALD D HUGHES II	1850 MCCULLOCH BLVD, STE C1-272, LAKE HAVASU CITY, AZ, 86403, USA	04/29/2019	Active

Page 1 of 1, records 1 to 5 of 5

CURRENT SHARES

Class/Series	Type	Share Number	Value
No records to view.			
	Number of No Par Value Shares:	25000	
	Total Authorized Capital:	25,000	

[Filing History](#)
[Name History](#)
[Mergers/Conversions](#)
[Return to Search](#)
[Return to Results](#)

EXHIBIT B

The Library has opened access to some reading rooms by appointment only. [More](#). The Jefferson Building has reopened to visitors via timed, ticketed entry. [More](#).

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[Titles](#)
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Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Copyright Number = vau001426732

Search Results: Displaying 1 of 1 entries



Labeled View

2019 Music Fest and Temptation Tower Takeover Photographs.

Type of Work: Visual Material

Registration Number / Date: VAu001426732 / 2021-04-06

Application Title: 2019 Music Fest and Temptation Tower Takeover Photographs

Title: 2019 Music Fest and Temptation Tower Takeover Photographs. [Group registration of unpublished photographs. 158 photographs]

Description: 158 photographs : Electronic file (eService)

Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.

Date of Creation: 2019

Authorship on Application: David Matlock; Citizenship: United States. Authorship: photographs.

Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States

Copyright Note: 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 unpublished 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) are unpublished AND (b) were created by the same author AND (c) are owned by the same copyright claimant AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title and file name 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.

Regarding group registration: Registration extends to corresponding photographs in contents titles and in deposit.

Photographs: (50 photographs): Dirty Vibes Music Fest 2019- Picture 1, Dirty Vibes Music Fest 2019- Picture 2, Dirty Vibes Music Fest 2019- Picture 3, Dirty Vibes Music Fest 2019- Picture 4, Dirty Vibes Music Fest 2019- Picture 5, Dirty Vibes Music Fest

2019- Picture 115,Dirty Vibes Music Fest 2019- Picture 116,Dirty Vibes Music Fest
2019- Picture 117,Dirty Vibes Music Fest 2019- Picture 118,Dirty Vibes Music Fest
2019- Picture 119,Dirty Vibes Music Fest 2019- Picture 120,Dirty Vibes Music Fest
2019- Picture 121,Dirty Vibes Music Fest 2019- Picture 122,Dirty Vibes Music Fest
2019- Picture 123,Dirty Vibes Music Fest 2019- Picture 124,Dirty Vibes Music Fest
2019- Picture 125,Dirty Vibes Music Fest 2019- Picture 126,Dirty Vibes Music Fest
2019- Picture 127,Dirty Vibes Music Fest 2019- Picture 128,Dirty Vibes Music Fest
2019- Picture 129,Dirty Vibes Music Fest 2019- Picture 130,Dirty Vibes Music Fest
2019- Picture 131,Dirty Vibes Music Fest 2019- Picture 132,Dirty Vibes Music Fest
2019- Picture 133,Dirty Vibes Music Fest 2019- Picture 134,Dirty Vibes Music Fest
2019- Picture 135

(23 photographs): Dirty Vibes Temptation Tower Takevoer 2019- Picture 1,Dirty
Vibes Temptation Tower Takevoer 2019- Picture 2,Dirty Vibes Temptation Tower
Takevoer 2019- Picture 3,Dirty Vibes Temptation Tower Takevoer 2019- Picture
4,Dirty Vibes Temptation Tower Takevoer 2019- Picture 5,Dirty Vibes Temptation
Tower Takevoer 2019- Picture 6,Dirty Vibes Temptation Tower Takevoer 2019-
Picture 7,Dirty Vibes Temptation Tower Takevoer 2019- Picture 8,Dirty Vibes
Temptation Tower Takevoer 2019- Picture 9,Dirty Vibes Temptation Tower Takevoer
2019- Picture 10,Dirty Vibes Temptation Tower Takevoer 2019- Picture 11,Dirty
Vibes Temptation Tower Takevoer 2019- Picture 12,Dirty Vibes Temptation Tower
Takevoer 2019- Picture 13,Dirty Vibes Temptation Tower Takevoer 2019- Picture
14,Dirty Vibes Temptation Tower Takevoer 2019- Picture 15,Dirty Vibes Temptation
Tower Takevoer 2019- Picture 16,Dirty Vibes Temptation Tower Takevoer 2019-
Picture 17,Dirty Vibes Temptation Tower Takevoer 2019- Picture 18,Dirty Vibes
Temptation Tower Takevoer 2019- Picture 19,Dirty Vibes Temptation Tower
Takevoer 2019- Picture 20,Dirty Vibes Temptation Tower Takevoer 2019- Picture
21,Dirty Vibes Temptation Tower Takevoer 2019- Picture 22,Dirty Vibes Temptation
Tower Takevoer 2019- Picture 23

Names: [Matlock, David](#)



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Labeled View

2018 Group Trip and Music Fest.

Type of Work: Visual Material

Registration Number / Date: VAu001426692 / 2021-04-06

Application Title: 2018 Group Trip and Music Fest

Title: 2018 Group Trip and Music Fest. [Group registration of unpublished photographs. 44 photographs]

Description: 44 photographs : Electronic file (eService)

Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.

Date of Creation: 2018

Authorship on Application: David Matlock; Citizenship: United States. Authorship: photographs.

Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States

Copyright Note: C.O. correspondence.

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 unpublished 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) are unpublished AND (b) were created by the same author AND (c) are owned by the same copyright claimant AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title and file name 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.

Regarding group registration: Registration extends to corresponding photographs in contents titles and in deposit.

Photographs: (44 photographs): Dirty Vibes Music Fest 2018- Picture 1,Dirty Vibes Music Fest 2018- Picture 2,Dirty Vibes Music Fest 2018- Picture 3,Dirty Vibes Music Fest

2018- Picture 4,Dirty Vibes Music Fest 2018- Picture 5,Dirty Vibes Music Fest
2018- Picture 6,Dirty Vibes Music Fest 2018- Picture 7,Dirty Vibes Music Fest
2018- Picture 8,Dirty Vibes Music Fest 2018- Picture 9,Dirty Vibes Music Fest
2018- Picture 10,Dirty Vibes Music Fest 2018- Picture 11,Dirty Vibes Music Fest
2018- Picture 12,Dirty Vibes Music Fest 2018- Picture 13,Dirty Vibes Music Fest
2018- Picture 14,Dirty Vibes Music Fest 2018- Picture 15,Dirty Vibes Music Fest
2018- Picture 16,Dirty Vibes Music Fest 2018- Picture 17,Dirty Vibes Music Fest
2018- Picture 18,Dirty Vibes Music Fest 2018- Picture 19,Dirty Vibes Music Fest
2018- Picture 20,Dirty Vibes Music Fest 2018- Picture 21,Dirty Vibes Music Fest
2018- Picture 22,Dirty Vibes Music Fest 2018- Picture 23,Dirty Vibes Music Fest
2018- Picture 24,Dirty Vibes Music Fest 2018- Picture 25,Dirty Vibes Music Fest
2018- Picture 26,Dirty Vibes Music Fest 2018- Picture 27,Dirty Vibes Music Fest
2018- Picture 28,Dirty Vibes Music Fest 2018- Picture 29,Dirty Vibes Music Fest
2018- Picture 30,Dirty Vibes Music Fest 2018- Picture 31,Dirty Vibes Music Fest
2018- Picture 32,Dirty Vibes Music Fest 2018- Picture 33,Dirty Vibes Music Fest
2018- Picture 34,Dirty Vibes Music Fest 2018- Picture 35,Dirty Vibes Music Fest
2018- Picture 36,Dirty Vibes Music Fest 2018- Picture 37,Dirty Vibes Music Fest
2018- Picture 38,Dirty Vibes Music Fest 2018- Picture 39,Dirty Vibes Music Fest
2018- Picture 40,Dirty Vibes Music Fest 2018- Picture 41,Dirty Vibes Music Fest
2018- Picture 42,Group Trip 2018- Picture 1,Group Trip 2018- Picture 2

Names: [Matlock, David](#)



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Search Results: Displaying 1 of 1 entries



Labeled View

dirtyvibes.com.

Type of Work: Text

Registration Number / Date: TXu002269217 / 2021-04-06

Application Title: dirtyvibes.com.

Title: dirtyvibes.com.

Description: Electronic file (eService)

Copyright Claimant: David Matlock. Address: 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States.

Date of Creation: 2019

Authorship on Application: David Matlock; Citizenship: United States. Authorship: text, photograph(s)
Ali Birney; Citizenship: United States. Authorship: text.

Pre-existing Material: text and photograph(s)

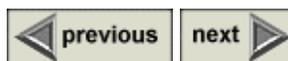
Basis of Claim: new text and photograph(s)

Rights and Permissions: David Matlock, 9225 Katy Freeway, Suite 410, Houston, TX, 77024, United States

Copyright Note: C.O. correspondence.

Names: [Matlock, David](#)

[Birney, Ali](#)



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