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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GETTY IMAGES (US), INC., a New
York corporation,

Plaintiff,

v.

VIRTUAL CLINICS, d/b/a VIRTUAL
CLINICS USA; VETERINARY
WEBSITE DESIGNERS, d/b/a VET
WEB DESIGNERS; RONALD CAMP;
KENDRA RYAN, a/k/a KENDRA
CAMP; JOHN DOE ONE, a/k/a ABE and
ABRAHAM GOLDSTIEN; and JOHN
DOE TWO, a/k/a HARRY GRANGER,

Defendants.

No.

COMPLAINT

Plaintiff Getty Images (US), Inc. (“Getty Images”), by and through its undersigned attorneys, alleges as follows:

INTRODUCTION

1. Plaintiff Getty Images brings this action to recover damages resulting from copyright infringements by defendants Virtual Clinics, Veterinary Website Designers, Ronald Camp, Kendra Ryan, John Doe One and John Doe Two of photographic images exclusively licensed to Getty Images, and to enjoin future infringements by defendants of

1 those copyrights. Defendants have reproduced, displayed, distributed and otherwise
2 misused the protected images on numerous websites, including those identified in this
3 Complaint, without authorization and without paying Getty Images the required commercial
4 license fee. Defendants' conduct violates the rights of Getty Images and the rights of the
5 photographers that Getty Images represents.

6 **PARTIES**

7 2. Plaintiff Getty Images is a New York corporation with its principal place of
8 business in New York, New York.

9 3. Defendant Virtual Clinics, doing business as Virtual Clinics USA, is a
10 business organization of unknown legal authority, operating from an address in Westlake
11 Village, California and doing business in Washington. Upon information and belief,
12 Virtual Clinics is owned and/or controlled by defendants Veterinary Website Designers,
13 Ronald Camp, Kendra Ryan, John Doe One and John Doe Two.

14 4. Defendant Veterinary Website Designers, doing business as Vet Web
15 Designers, is a business organization of unknown legal authority, operating from an address
16 in Westlake Village, California and doing business in Washington. Upon information and
17 belief, Veterinary Website Designers is owned and/or controlled by defendants Virtual
18 Clinics, Ronald Camp, Kendra Ryan, John Doe One and John Doe Two.

19 5. Defendant Ronald Camp ("Camp") is or was a resident of California. Camp
20 is the spouse of defendant Kendra Ryan. In 1983, Camp pled guilty to federal charges of
21 fraud and served time in prison. *See United States v. Kendra Ryan Camp, Ronald Edwin*
22 *Camp*, No. 83-cr-113-C (United States District Court, Northern District of Oklahoma).
23 Upon information and belief, Camp directly participated in the wrongful conduct alleged in
24 this Complaint, and/or had the right and ability to supervise, direct and control the wrongful
25 conduct of others, and derived a direct financial benefit from that wrongful conduct.

26

1 6. Defendant Kendra Ryan (“Ryan”), also known as Kendra Camp, is or was a
2 resident of California. Ryan is the spouse of defendant Camp. In 1983, Ryan pled guilty to
3 federal charges of fraud and served time in prison. *See Kendra Ryan Camp, Ronald Edwin*
4 *Camp*, No. 83-cr-113-C (United States District Court, Northern District of Oklahoma).
5 Upon information and belief, Ryan directly participated in the wrongful conduct alleged in
6 this Complaint, and/or had the right and ability to supervise, direct and control the wrongful
7 conduct of others, and derived a direct financial benefit from that wrongful conduct.

8 7. Defendant John Doe One (“Doe One”), using the aliases Abe and Abraham
9 Goldstien, purports to be “Legal Counsel” for defendants Virtual Clinics and Veterinary
10 Website Designers. Doe One’s true identity, and state or country of Doe One’s residence,
11 are currently unknown to Getty Images and, for those reasons, Doe One is identified by
12 such fictitious name. Upon information and belief, Doe One directly participated in the
13 wrongful conduct alleged in this Complaint, and/or had the right and ability to supervise,
14 direct and control the wrongful conduct of others, and derived a direct financial benefit
15 from that wrongful conduct.

16 8. Defendant John Doe Two (“Doe Two”), using the alias Harry Granger, is
17 believed to be employed as a graphic and/or website designer for defendants Virtual Clinics
18 and Veterinary Website Designers. Doe Two’s true identity, and state or country of Doe
19 Two’s residence, are currently unknown to Getty Images and, for those reasons, Doe Two is
20 identified by such fictitious name. Upon information and belief, Doe Two directly
21 participated in the wrongful conduct alleged in this Complaint, and/or had the right and
22 ability to supervise, direct and control the wrongful conduct of others, and derived a direct
23 financial benefit from that wrongful conduct.

JURISDICTION AND VENUE

1
2 9. This Court has original jurisdiction over this action, pursuant to 28 U.S.C. §§
3 1331 and 1338(a), as this action involves claims brought under federal law, the Copyright
4 Act, 17 U.S.C. § 101, *et seq.*

5 10. Defendants are subject to personal jurisdiction in this Court because they
6 have purposefully aimed at Washington their activities from which the claims asserted in
7 this Complaint arise. Upon information and belief, defendants' contacts with Washington
8 include but are not limited to personal visits to Washington by defendants Camp and Ryan
9 for the purpose of soliciting veterinarian customers, defendants' development of websites
10 for veterinarian customers in Washington, including Companion Animal Hospital
11 (www.companionbellevue.com) in Bellevue, Washington and Canyon Park Veterinary
12 Hospital (www.canyonparkvet.com) in Bothell, Washington that display or displayed
13 protected images that are the subject of this action, and defendants' ongoing contacts with
14 veterinarian customers in Washington in connection to maintaining websites developed by
15 defendants. Additionally, defendants own, operate and/or control multiple websites,
16 including www.virtualclinics.net, www.veterinarywebsitedesigners.com,
17 www.vetwebdesigners.com, www.petclinicwebsites.com and
18 www.animalhousemagazine.com throughout Washington, purposefully direct those
19 websites to residents of Washington, and otherwise are engaged in business in Washington.

20 11. Venue is proper in the Western District of Washington, pursuant to 28
21 U.S.C. § 1391(b)(2) - (3), because a substantial part of the events or omissions giving rise
22 to the claims asserted in this Complaint occurred in the District, or because there is no
23 district in which the action may otherwise be brought and at least one defendant is subject
24 to personal jurisdiction in this District. Venue is also proper in this District, pursuant to 28
25 U.S.C. §§ 1391(c)(2) and 1400(a), as Virtual Clinics and Veterinary Website Designers
26 and/or their agents reside in this District.

FACTUAL BACKGROUND

12. Getty Images is one of the world’s leading digital content providers, supplying imagery, video and music to business customers. Getty Images licenses content for a wide variety of uses, including use online, in websites, books, newspapers, magazines, television and film productions, advertisements, marketing materials, products and packaging. Getty Images generates revenue from licensing the rights to use its content, including imagery, and from providing related services.

13. Getty Images was the first company to license imagery via the Internet and today delivers virtually all of its visual content digitally. Visitors to Getty Images’ website, www.gettyimages.com, can search through and view millions of images and obtain licenses for those images online.

14. Getty Images owns some of the content that it licenses. Getty Images also acts as the distributor for more than 150,000 content suppliers – contributors, such as individual photographers, illustrators, filmmakers, media organizations, other stock photo agencies, and independent musicians. Content suppliers typically prefer to retain ownership of their works and, as a result, copyrights in the content remain with the artists in most cases, while Getty Images obtains by contract the right to market, distribute, and license that content to third parties. Some of this content is licensed to Getty Images on an exclusive basis.

DEFENDANTS’ WRONGFUL CONDUCT

15. Beginning at a time unknown and continuing to the present, defendants Virtual Clinics, Veterinary Website Designers, Camp, Ryan, Doe One and Doe Two have engaged in repeated unlawful acts and practices, which have included extensive infringements of copyrights in photographic images exclusively licensed to Getty Images and attempts to disguise their identity and location.

1 16. Defendants have pursued a business model built around a web of false and
2 misleading statements. By way of example, defendant Ryan holds herself out as a
3 “professor” of an undisclosed affiliation with a post doctorate degree in an undisclosed
4 discipline. Additional credentials claimed by “Professor Ryan” include the following:

5 Chairman, International Veterinary Society (Geneva, Switzerland)
6 President, U.S. National Veterinary Education Association
7 Director of Education, Society of Internet Doctors (Geneva, Switzerland)
8 Chief Executive Officer, Vet Web Designers and Virtual Clinics
9 Senior Editor, Animal House Magazine¹

10 Upon information and belief, the credentials and affiliations claimed by Ryan do not exist,
11 are not verifiable, or relate to fictitious organizations and/or businesses owned or controlled
12 by defendants Ryan and Camp.

13 17. Defendant Camp has claimed at various times to hold a “doctorate” in
14 chiropractic care and degrees in “Biology, Chemistry, Chiropractic and Clinical Nutrition,”
15 as well as being a “best selling author” and a “Certified Veterinary Chiropractic
16 Technician.” Additional credentials claimed by “Dr. Camp” include the following:

17 Chairman, International Veterinary Society
18 Director of Education, Society of Internet Doctors
19 European Liaison, National Veterinary Education Association
20 Chief Financial Officer, Virtual Clinics
21 President, Virtual Clinics Veterinary Management Consultants²

22 Upon information and belief, the credentials and affiliations claimed by Camp do not exist,
23 are not verifiable, or relate to fictitious organizations and/or businesses owned or controlled
24 by defendants Camp and Ryan.

25 _____
26 ¹ http://www.veterinaryeducation.org/meet_our_chairman.htm (March 16, 2013).

² http://www.internationalveterinarysociety.org/nutritional_seminars.htm (archived).

1 18. Defendants Virtual Clinics and Veterinary Websites Designers claim to
2 operate from addresses in Westlake Village, California and Geneva, Switzerland. Upon
3 information and belief, the California address is a private mailbox associated with
4 defendants Camp and Ryan; the Swiss address is a temporary office rental business. Mail
5 addressed to defendants at the Swiss address has been returned as undeliverable by Swiss
6 postal authorities.

7 19. Defendants Virtual Clinics and Veterinary Website Designers claim to be
8 legally represented by “Abraham Goldstien,” which, upon information and belief, is an alias
9 used by defendant Doe One. Doe One has claimed at various times to be “Legal Counsel”
10 and “V.P. Legal Affairs” for the corporate defendants, and has used the address in
11 Switzerland described in the preceding paragraph, although at least some correspondence
12 from Doe One was postmarked as having been mailed from Orlando, Florida.

13 20. Defendants Virtual Clinics and Veterinary Website Designers advertise,
14 distribute and sell pet food and other products through defendants’ website
15 www.animalhousemagazine.com and through websites developed by defendants for their
16 veterinary customers. Online purchases are processed by PayPal and credited to a merchant
17 account in the name of defendant Virtual Clinics. Telephone orders are handled by “Abe,”
18 which, upon information and belief, is an alias used by defendant Doe One.

19 21. Upon information and belief, defendants Virtual Clinics and Veterinary
20 Website Designers employ Doe Two as a graphic and/or website designer. Doe Two uses
21 the name “Harry” in his communications with defendants’ veterinary customers, including
22 those located in Washington, and maintains a Facebook page in the name of “Harry
23 Granger.” Upon information and belief, Doe Two is personally responsible for designing
24 and developing websites that display or displayed protected images that are the subject of
25 this action.

26

1 22. Defendants have used false and misleading statements to create a lucrative
2 website design business that profits, in part, by using photographic images that are the
3 protected works of others. Defendants have incorporated those works in websites they
4 designed for their veterinary customers and others, without seeking authorization from, or
5 making payments to, the authors of those works. Photographic images infringed by
6 defendants include many that are exclusively licensed to Getty Images.

7 23. By way of example, defendants' infringements of copyrights include, but are
8 not limited to, the following:

9 a. In or about April 2011, Getty Images identified a photographic
10 image, with the catalog description "200374104-001 Dog sleeping in bed between
11 two people (focus on feet)," that had been reproduced, displayed, and distributed on
12 the website www.hotspringsvillagewebsites.com without authorization by Getty
13 Images. Upon information and belief, the identified site was designed and was
14 owned, operated and/or controlled by defendants Virtual Clinics and Veterinary
15 Website Designers, and used by them to promote defendants' website development
16 services. By letter dated June 30, 2011, Getty Images notified Village Hot Springs
17 Websites in Westlake Village, California that its use of the image was without
18 authorization and constituted copyright infringement. The photographic image is
19 the subject of copyright Certificate of Registration VA 1-850-496 (dated March 4,
20 2013), a true and correct copy of which is attached as Exhibit A-1.

21 b. In or about August 2011, Getty Images identified two photographic
22 images, with the catalog descriptions "200374104-001 Dog sleeping in bed between
23 two people (focus on feet)" and "200396789-001 Brown and white dog licking
24 tabby cat" that had been reproduced, displayed, and distributed on the website
25 www.canyonparkvet.com without authorization by Getty Images. By letter dated
26 January 19, 2012, Getty Images notified Canyon Park Veterinary Hospital in

1 Bothell, Washington that its use of the images was without authorization and
2 constituted copyright infringement. Getty Images received a response by letter from
3 “Abraham Goldstien,” who claimed he was “V.P. Legal Affairs” for defendants
4 Virtual Clinics and Veterinary Website Designers. Goldstien’s letter denied
5 copyright infringement and threatened legal and other action against Getty Images.
6 The photographic images are the subject of copyright Certificates of Registration
7 VA 1-850-496 (dated March 4, 2013) and VAu 713-178 (dated August 18, 2006),
8 respectively. True and correct copies of the Certificates of Registration are attached
9 as Exhibits A-1 and A-2, respectively.

10 c. In or about August 2011, Getty Images identified a photographic
11 image, with the catalog description “200374104-001 Dog sleeping in bed between
12 two people (focus on feet),” that had been reproduced, displayed, and distributed on
13 the website www.unioncityvetmedcenter.com without authorization by Getty
14 Images. By letter dated January 12, 2012, Getty Images notified Veterinary Medical
15 Center in Union City, California that its use of the image was without authorization
16 and constituted copyright infringement. Getty Images received a response by letter
17 from “Abraham Goldstien,” who claimed he was “Legal Counsel” for defendant
18 Virtual Clinics. Goldstien’s letter denied copyright infringement and threatened
19 legal and other action against Getty Images. The photographic image is the subject
20 of copyright Certificate of Registration VA 1-850-496 (dated March 4, 2013), a true
21 and correct copy of which is attached as Exhibit A-1.

22 d. In or about October 2011, Getty Images identified a photographic
23 image, with the catalog description “200396789-001 Brown and white dog licking
24 tabby cat,” that had been reproduced, displayed, and distributed on the website
25 www.companionchillicothe.com without authorization by Getty Images. By letter
26 dated February 16, 2012, Getty Images notified Companion Animal Hospital in

1 Chillicothe, Ohio that its use of the image was without authorization and constituted
2 copyright infringement. Getty Images received a response by letter from “Abraham
3 Goldstien,” who claimed he was “V.P. Legal Affairs” for defendants Virtual Clinics
4 and Veterinary Website Designers. Goldstien’s letter denied copyright infringement
5 and threatened legal and other action against Getty Images. The photographic
6 image is the subject of copyright Certificate of Registration VAu 713-178 (dated
7 August 18, 2006), a true and correct copy of which is attached as Exhibit A-2.

8 e. In or about November 2011, Getty Images identified a photographic
9 image, with the catalog description “200396789-001 Brown and white dog licking
10 tabby cat,” that had been reproduced, displayed, and distributed on the website
11 www.texas-petvax.com without authorization by Getty Images. By letter dated
12 March 15, 2012, Getty Images notified Texas Pet Vax in Rowlett, Texas that its use
13 of the image was without authorization and constituted copyright infringement.
14 Getty Images received a response by letter from “Abraham Goldstien,” who claimed
15 he was “V.P. Legal Affairs” for defendants Virtual Clinics and Veterinary Website
16 Designers. Goldstien’s letter denied copyright infringement and threatened legal
17 and other action against Getty Images. The photographic image is the subject of
18 copyright Certificate of Registration VAu 713-178 (dated August 18, 2006), a true
19 and correct copy of which is attached as Exhibit A-2.

20 f. In or about January 2012, Getty Images identified a photographic
21 image, with the catalog description “200374104-001 Dog sleeping in bed between
22 two people (focus on feet),” that had been reproduced, displayed, and distributed on
23 the website www.aucccmi.com without authorization by Getty Images. By letter
24 dated April 12, 2012, Getty Images notified Animal Urgent & Critical Care Center
25 in Harper Woods, Michigan that its use of the image was without authorization and
26 constituted copyright infringement. Getty Images received a response by letter from

1 “Abraham Goldstien,” who claimed he was “Legal Counsel” for defendants Virtual
2 Clinics and Veterinary Website Designers. Goldstien’s letter denied copyright
3 infringement and threatened legal and other action against Getty Images. The
4 photographic image is the subject of copyright Certificate of Registration VA 1-850-
5 496 (dated March 4, 2013), a true and correct copy of which is attached as Exhibit
6 A-1.

7 g. In or about February 2012, Getty Images identified a photographic
8 image, with the catalog description “200374104-001 Dog sleeping in bed between
9 two people (focus on feet),” that had been reproduced, displayed, and distributed on
10 the website www.abcanimalclinic.com without authorization by Getty Images. By
11 letter dated April 26, 2012, Getty Images notified ABC Animal Clinic in San Jose,
12 California that its use of the image was without authorization and constituted
13 copyright infringement. Upon information and belief, the identified site was
14 designed by defendants Virtual Clinics and Veterinary Website Designers. The
15 photographic image is the subject of copyright Certificate of Registration VA 1-850-
16 496 (dated March 4, 2013), a true and correct copy of which is attached as Exhibit
17 A-1.

18 h. In or about April 2012, Getty Images identified a photographic
19 image, with the catalog description “200518841-002 Mixed breed dog with paws
20 covering eyes,” that had been reproduced, displayed, and distributed on the website
21 www.hometownvetservices.com without authorization by Getty Images. By letter
22 dated May 24, 2012, Getty Images notified Hometown Veterinary Services in
23 Canton, Ohio that its use of the image was without authorization and constituted
24 copyright infringement. Getty Images received a response by letter from “Abraham
25 Goldstien,” who claimed he was “Legal Counsel” for defendants Virtual Clinics and
26 Veterinary Website Designers. Goldstien’s letter denied copyright infringement and

1 threatened legal and other action against Getty Images. The photographic image is
2 the subject of a pending copyright registration application, a true and correct copy of
3 which is attached as Exhibit A-3.

4 i. In or about September 2012, Getty Images identified a photographic
5 image, with the catalog description “200355950-001 Dog with suitcase, wearing
6 Hawaiian shirt,” that had been reproduced, displayed, and distributed on the website
7 www.countylinevethospital.com without authorization by Getty Images. By letter
8 dated December 4, 2012, Getty Images notified County Line Veterinary Hospital in
9 Marlton, New Jersey that its use of the image was without authorization and
10 constituted copyright infringement. Getty Images received a response by letter from
11 “Abraham Goldstien,” who claimed he was “Legal Counsel” for defendant Virtual
12 Clinics. Goldstien’s letter denied copyright infringement and threatened legal and
13 other action against Getty Images. The photographic image is the subject of
14 copyright Certificate of Registration VA 1-850-499 (dated March 23, 2013), a true
15 and correct copy of which is attached as Exhibit A-4.

16 j. In or about November 2012, Getty Images identified a photographic
17 image, with the catalog description “200523984-003 Young woman lying on floor
18 with dog using mobile phone,” that had been reproduced, displayed, and distributed
19 on the website www.dogwoodvetlasercenter.com without authorization by Getty
20 Images. By letter dated December 27, 2012, Getty Images notified Dogwood
21 Veterinary Hospital & Laser Center in Newnan, Georgia that its use of the image
22 was without authorization and constituted copyright infringement. Getty Images
23 received a response by letter from “Abraham Goldstien,” who claimed he was
24 “Legal Counsel” for defendant Virtual Clinics. Goldstien’s letter denied copyright
25 infringement and threatened legal and other action against Getty Images. The
26 photographic image is the subject of a pending copyright registration application

1 (VA0001851063, dated March 12, 2013), a true and correct copy of which is
2 attached as Exhibit A-5.

3 k. In or about December 2012, Getty Images identified two
4 photographic images, with the catalog descriptions “200523984-003 Young woman
5 lying on floor with dog using mobile phone” and “10104008 DOG COUPLE,” that
6 had been reproduced, displayed, and distributed on the website
7 www.vetwebdesigners.com without authorization by Getty Images. Upon
8 information and belief, the identified site was designed and is owned, operated
9 and/or controlled by defendants Virtual Clinics and Veterinary Website Designers,
10 and used by them to promote defendants’ website development services. The
11 photographic images are the subject of pending copyright registration applications.
12 True and correct copies of the pending applications are attached as Exhibits A-5 and
13 A-6, respectively. Defendants’ infringements of the subject images are continuing.

14 l. In or about January 2013, Getty Images identified two photographic
15 images, with the catalog descriptions “200396789-001 Brown and white dog licking
16 tabby cat” and “BD8365-001 Chinchilla cat wearing diamond tiara, resting on
17 cushion,” that had been reproduced, displayed, and distributed on the website
18 www.ah-bc.com without authorization by Getty Images. Upon information and
19 belief, the identified site was designed by defendants Virtual Clinics and Veterinary
20 Website Designers. The first photographic image is the subject of copyright
21 Certificate of Registration VAu 713-178 (dated August 18, 2006); the second
22 photographic image is the subject of a pending copyright registration application.
23 True and correct copies of the Certificate of Registration and the pending
24 application are attached as Exhibits A-2 and A-7, respectively. Defendants’
25 infringements of the subject images are continuing.
26

1 m. In or about March 2013, Getty Images identified a photographic
2 image, with the catalog description “200355950-001 Dog with suitcase, wearing
3 Hawaiian shirt,” that had been reproduced, displayed, and distributed on the
4 websites www.canyonparkvet.com, www.companionbellevue.com,
5 www.avondalevet.com, www.hanoverparkvet.com and www.petvetstoneycreek.com
6 without authorization by Getty Images. Upon information and belief, the identified
7 sites were designed by defendants Virtual Clinics and Veterinary Website
8 Designers. The photographic image is the subject of copyright Certificate of
9 Registration VA 1-850-499 (dated March 13, 2013), a true and correct copy of
10 which is attached as Exhibit A-4. Defendants’ infringements of the subject image
11 are continuing.

12 n. In or about March 2013, Getty Images identified a photographic
13 image, with the catalog description “CB8638-001 Male executive wearing telephone
14 headset, smiling, portrait,” that had been reproduced, displayed, and distributed on
15 the website www.virtualclinics.net without authorization by Getty Images. Upon
16 information and belief, the identified site was designed and is owned, operated
17 and/or controlled by defendants Virtual Clinics and Veterinary Website Designers,
18 and used by them to promote defendants’ website development services. The
19 photographic image is the subject of a pending copyright registration application, a
20 true and correct copy of which is attached as Exhibit A-8. Defendants’ infringement
21 of the subject image is continuing.

22 o. In or about March 2013, Getty Images identified a photographic
23 image, with the catalog description “200137589-001 Pit bull mix dog with tongue
24 out, close-up,” that had been reproduced, displayed, and distributed on the websites
25 www.petclinicwebsites.com, www.boonevethospital.com,
26 www.dogwoodvetlasercenter.com, www.hometownvetservices.com and

1 www.villageanimalhospitaljericho.com without authorization by Getty Images.
2 Upon information and belief, the identified websites were designed by defendants
3 Virtual Clinics and Veterinary Website Designers. The photographic image is the
4 subject of a pending copyright registration application, a true and correct copy of
5 which is attached as Exhibit A-9. Defendants' infringements of the subject image
6 are continuing.

7 p. In or about March 2013, Getty Images identified a photographic
8 image, with the catalog description "887206-001 Tabby cat wearing toy glasses and
9 stethoscope, close-up," that had been reproduced, displayed, and distributed on the
10 website www.lennoxanimalhospital.com without authorization by Getty Images.
11 Upon information and belief, the identified site was designed by defendants Virtual
12 Clinics and Veterinary Website Designers. The photographic image is the subject of
13 a pending copyright registration application, a true and correct copy of which is
14 attached as Exhibit A-10. Defendants' infringement of the subject image is
15 continuing.

16 q. In or about March 2013, Getty Images identified a photographic
17 image, with the catalog description "489050-016 White, standard poodle sitting on
18 sofa watching television, pink cast," that had been reproduced, displayed, and
19 distributed on the websites www.northernvalleyvet.com and
20 www.petvetstoneycreek.com without authorization by Getty Images. Upon
21 information and belief, the identified sites were designed by defendants Virtual
22 Clinics and Veterinary Website Designers. The photographic image is the subject
23 of a pending copyright registration application, a true and correct copy of which is
24 attached as Exhibit A-11. Defendants' infringements of the subject image are
25 continuing.
26

1 r. In or about March 2013, Getty Images identified a photographic
2 image, with the catalog description “sb10069917c-001 Profile of Dalmatian
3 yawning, fly going into mouth,” that had been reproduced, displayed, and
4 distributed on the website www.avondalevet.com without authorization by Getty
5 Images. Upon information and belief, the identified site was designed by
6 defendants Virtual Clinics and Veterinary Website Designers. The photographic
7 image is the subject of copyright Certificate of Registration VA 1-740-624 (dated
8 September 22, 2010), a true and correct copy of which is attached as Exhibit A-12.
9 Defendants’ infringement of the subject image is continuing.

10 Each of the images identified in the preceding subparagraphs was exclusively licensed to
11 Getty Images at the time the infringing use was identified. The images remain exclusively
12 licensed to Getty Images today.

13 24. Defendants’ infringements were and are willful and deliberate, and done
14 with knowledge of the copyrights held by Getty Images and the photographers it represents.
15 By way of example, defendants were on notice of the copyrights held by Getty Images and
16 the photographers it represents, yet defendants continued to make infringing uses of those
17 images:

18 a. ***Getty Images catalog description “200396789-001 Brown and white***
19 ***dog licking tabby cat.”*** Defendants received written notice of Getty Images’ rights
20 in the subject image at least as early as January 19, 2012, when Getty Images wrote
21 to object to the infringing use of the image in defendants’ website
22 www.canyonparkvet.com. In willful disregard of the rights held by Getty Images,
23 defendants continued to make repeated infringing uses of the subject image in
24 websites created by them, including www.companionchillicothe.com (Getty Images
25 notice February 16, 2012), www.texas-petvax.com (Getty Images notice March 15,
26 2012) and www.ah-bc.com (infringing use continuing).

1 b. ***Getty Images catalog description “200374104-001 Dog sleeping in***
2 ***bed between two people (focus on feet).”*** Defendants received written notice of
3 Getty Images’ rights in the subject image at least as early as June 30, 2011, when
4 Getty Images objected to the infringing use of the image in defendants’ website
5 www.hotspringsvillagewebsites.com. In willful disregard of the rights held by
6 Getty Images, defendants continued to make repeated infringing uses of the subject
7 image in websites created by them, including www.unioncityvetmedcenter.com
8 (Getty Images notice January 12, 2012), www.canyonparkvet.com (Getty Images
9 notice January 19, 2012), www.aucccmi.com (Getty Images notice April 12, 2012)
10 and www.abcanimalclinic.com (Getty Images notice April 26, 2012).

11 c. ***Getty Images catalog description “200355950-001 Dog with***
12 ***suitcase, wearing Hawaiian shirt.”*** Defendants received written notice of Getty
13 Images’ rights in the subject image at least as early as December 4, 2012, when
14 Getty Images objected to the infringing use of the image in defendants’ website
15 www.countylinevethospital.com. In willful disregard of the rights held by Getty
16 Images, defendants continued to make infringing uses of the subject image in
17 websites created by them, including www.canyonparkvet.com (infringing use
18 continuing), www.companionbellevue.com (same), www.avondalevet.com (same),
19 www.hanoverparkvet.com (same) and www.petvetstoneycreek.com (same).

20 d. ***Getty Images catalog description “200523984-003 Young woman***
21 ***lying on floor with dog using mobile phone.”*** Defendants received written notice
22 of Getty Images’ rights in the subject image at least as early as December 27, 2012,
23 when Getty Images objected to the infringing use of the image in defendants’
24 website www.dogwoodvetlasercenter.com. In willful disregard of the rights held by
25 Getty Images, defendants continued to make infringing uses of the subject image in
26

1 websites created by them, including www.vetwebdesigners.com (infringing use
2 continuing).

3 25. In an attempt to conceal their continuing infringements from Getty Images,
4 Defendants have, without authorization, modified, altered and incorporated copyright-
5 protected elements of the photographic images exclusively licensed to Getty Images. By
6 way of example, in willful and deliberate disregard of the exclusive right granted to
7 copyright owners to prepare derivative works, defendants have made unauthorized
8 alterations to the following photographic images:

9 a. **Getty Images catalog description “200374104-001 Dog sleeping in**
10 **bed between two people (focus on feet).”** Defendants have made unauthorized
11 alterations to the subject image (addition of spots) as reproduced by defendants on
12 websites created by them, including www.canyonparkvet.com,
13 www.abcanimalclinic.com, www.aucccmi.com and
14 www.unioncityvetmedcenter.com.

15 b. **Getty Images catalog description “200355950-001 Dog with**
16 **suitcase, wearing Hawaiian shirt.”** Defendants have made unauthorized alterations
17 to the subject image (alteration of face, background) as reproduced by defendants on
18 websites created by them, including www.canyonparkvet.com,
19 www.companionbellevue.com, www.avondalevet.com,
20 www.countylinevethospital.com, www.hanoverparkvet.com and
21 www.petvetstoneycreek.com.

22 c. **Getty Images catalog description “200523984-003 Young woman**
23 **lying on floor with dog using mobile phone.”** Defendants have made unauthorized
24 alterations to the subject image (alteration of dog face) as reproduced by defendants
25 on websites created by them, including www.dogwoodvetlasercenter.com and
26 www.vetwebdesigners.com (owned by defendants).

1 d. **Getty Images catalog description “10104008 DOG COUPLE.”**

2 Defendants have made unauthorized alterations to the subject image (addition of
3 third dog) as reproduced by defendants on websites created by them, including
4 www.vetwebdesigners.com (owned by defendants).

5 e. **Getty Images catalog description “BD8365-001 Chinchilla cat**
6 **wearing diamond tiara, resting on cushion.”** Defendants have made unauthorized

7 alterations to the subject image (alteration of cat face) as reproduced by defendants
8 on websites created by them, including www.ah-bc.com.

9 f. **Getty Images catalog description “489050-016 White, standard**
10 **poodle sitting on sofa watching television, pink cast.”** Defendants have made

11 unauthorized alterations to the subject image (alteration of dog face, background)
12 as reproduced by defendants on websites created by them, including
13 www.northernvalleyvet.com and www.petvetstoneycreek.com.

14 g. **Getty Images catalog description “200137589-001 Pit bull mix dog**
15 **with tongue out, close-up.”** Defendants have made unauthorized alterations to the

16 subject image (alteration of dog face) as reproduced by defendants on websites
17 created by them, including www.petclinicwebsites.com (owned by defendants),
18 www.boonevethospital.com, www.dogwoodvetlasercenter.com,
19 www.hometownvetservices.com and www.villageanimalhospitaljericho.com.

20 h. **Getty Images catalog description “887206-001 Tabby cat wearing**
21 **toy glasses and stethoscope, close-up.”** Defendants have made unauthorized

22 alterations to the subject image (alteration of background, briefcase in foreground)
23 as reproduced by defendants on websites created by them, including
24 www.lennoxanimalhospital.com.

25 26. In an attempt to intimidate Getty Images and dissuade Getty Images from
26 enforcing its copyrights and the copyrights of the photographers it represents, defendants

1 have threatened at various times to sue Getty Images, to file complaints against Getty
2 Images with various federal and state regulatory agencies, to report lawyers working for
3 Getty Images to state bar associations for disciplinary action, and to take other unwarranted
4 actions.

5 27. In an attempt to protect their business and mislead the public, including,
6 upon information and belief, veterinary and other customers of Virtual Clinics and
7 Veterinary Website Designers, defendants have created purported “public information”
8 websites that seek to disparage Getty Images and its legal counsel:
9 www.stopgettyimages.com (“Stop Getty Images Harassment”) and
10 www.timothybmccormack.com.³

11 28. Defendants have engaged in similar conduct with respect to their business
12 competitors. For example, in November 2012, defendants Ryan, Camp, Virtual Clinics,
13 Veterinary Website Designers and others were sued for trademark, defamation, trade libel
14 and other claims in the action *Internet Matrix, Inc. v. Kendra Ryan, et al.*, No. 3:12-cv-
15 02746 (United States District Court, Southern District of California). The claims asserted
16 by the plaintiff in that action included a claim under 15 U.S.C. § 1125(d) arising from
17 defendants’ creation of purported “public service sites” that were alleged to falsely
18 disparage and defame plaintiff’s business.

19 29. Similar to the allegations alleged in this Complaint, the purported “public
20 service sites” allegedly created by defendants were titled “Stop the Vet Matrix Harassment”
21 and included links and information for filing complaints against plaintiff Vet Matrix with
22 various federal and state regulatory agencies and other actions. That case resulted in a
23 default judgment against defendants that awarded \$1,025,242 in damages to plaintiff. *See*
24 *Default Judgment* (Feb. 11, 2013) (Dkt. # 16). Upon information and belief, plaintiff also

25 ³ Timothy B. McCormack is a lawyer licensed by the state of Washington and has
26 represented Getty Images. The website www.timothybmccormack.com redirects viewers to
www.stopgettyimages.com.

1 reclaimed from defendants the domains used in connection with the “Stop the Vet Matrix
2 Harassment” websites.

3 30. Getty Images now brings this action to recover damages resulting from
4 defendants’ copyright infringements, and to enjoin future infringements by defendants of
5 those copyrights.

6 **FIRST CAUSE OF ACTION**

7 **Copyright Infringement, 17 U.S.C. § 501, et seq.**

8 31. Getty Images repeats and incorporates by this reference each and every
9 allegation set forth in paragraphs 1 through 30, inclusive.

10 32. Getty Images is the exclusive licensee of the photographic images that are
11 the subject of this action. Among the rights granted to Getty Images is the exclusive right
12 to market and sublicense the right to copy, reproduce, display, modify, alter and create
13 derivative works of each image. Additionally, Getty Images is granted the exclusive right
14 to make and control claims related to infringements of copyrights in the images. A
15 certificate of registration has been issued for or an application for registration has been filed
16 with the United States Copyright Office with respect to each image, as evidenced by the
17 certificates and applications attached as Exhibit A.

18 33. Defendants have reproduced, displayed, distributed and made other
19 infringing uses of the protected images, without authorization by Getty Images, including
20 defendants’ infringing use of those images on the following websites:

21 www.virtualclinics.net

22 www.vetwebdesigners.com

23 www.petclinicwebsites.com

24 www.hotspringsvillagewebsites.com

25 www.abcanimalclinic.com

26 www.ah-bc.com

1 www.aucccmi.com
2 www.avondalevet.com
3 www.boonevethospital.com
4 www.canyonparkvet.com
5 www.companionbellevue.com
6 www.companionchillicothe.com
7 www.countylinevethospital.com
8 www.dogwoodvetlasercenter.com
9 www.hometownvetservices.com
10 www.lennoxanimalhospital.com
11 www.northernvalleyvet.com
12 www.petvetstoneycreek.com
13 www.texas-petvax.com
14 www.unioncityvetmedcenter.com
15 www.villageanimalhospitaljericho.com

16 34. Defendants have modified, altered and incorporated copyright-protected
17 elements of the subject images in purported new works, without authorization by Getty
18 Images and in an attempt to conceal their continuing infringements from Getty Images, in
19 violation of 17 U.S.C. § 106(3) granting to a copyright owner the exclusive right to prepare
20 derivative works based upon a copyrighted work.

21 35. As a result of the foregoing activities, defendants are liable to Getty Images
22 for willful infringement under 17 U.S.C. § 501, *et seq.*

23 36. Getty Images has suffered, and will continue to suffer, substantial and
24 irreparable damage to its business reputation and goodwill as a result of defendants'
25 infringements. In addition to its actual damages, Getty Images is entitled to an award of
26 any profits made by defendants from their wrongful acts pursuant to 17 U.S.C. § 504. In

1 the alternative, Getty Images is entitled to statutory damages pursuant to 17 U.S.C. §
2 504(c), which should be enhanced in accordance with 17 U.S.C. § 504(c)(2) due to
3 defendants' willful conduct.

4 37. Getty Images has no adequate remedy at law for defendants' wrongful
5 conduct in that: (1) the subject images are unique and valuable properties; (2) defendants'
6 infringements interfere with Getty Images' goodwill and customer relations; and (3)
7 defendants' infringements and damage resulting therefrom are continuing. Getty Images is
8 entitled therefore to injunctive relief pursuant to 17 U.S.C. § 502, and an order impounding
9 all infringing materials pursuant to 17 U.S.C. § 503.

10 38. Getty Images is also entitled to recover its attorney's fees and costs pursuant
11 to 17 U.S.C. § 505.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, plaintiff Getty Images respectfully requests judgment as follows:

14 (1) That the Court enter a judgment against defendants finding that they have
15 willfully infringed Getty Images' rights in the photographic images listed in Exhibit A;

16 (2) That the Court enter an order, pursuant to 17 U.S.C. § 502(a), enjoining and
17 restraining defendants, and any persons or entities controlled directly or indirectly by
18 defendants, from engaging in the following conduct:

19 (a) reproducing, distributing, displaying or making any other infringing
20 uses of the photographic images listed in Exhibit A;

21 (b) modifying, altering or incorporating copyright-protected elements of
22 the photographic images listed in Exhibit A in new works;

23 (c) making any infringing uses of photographic images owned by or
24 exclusively licensed to Getty Images; and

25 (d) assisting, aiding or abetting any other person or entity in engaging or
26 performing any of the activities referred to in subparagraphs (a), (b) and (c) above;

1 (3) That the Court enter an order, pursuant to 17 U.S.C. § 503 and 28 U.S.C. §
2 1651(a), impounding all infringing photographic images, and any related items, including
3 business records, that are in defendants' possession or under their control, and ordering the
4 return, remedial destruction, or other appropriate disposition of all impounded items;

5 (4) That the Court enter an order, pursuant to 17 U.S.C. § 504(b), declaring that
6 defendants hold in trust, as constructive trustees for the benefit of Getty Images, all profits
7 received by defendants from their infringing uses of the photographic images listed in
8 Exhibit A, and requiring defendants to provide Getty Images a full and complete accounting
9 of all profits received by defendants;

10 (5) That the Court order defendants to pay actual or statutory damages to Getty
11 Images, as follows:

12 (a) As to works registered before defendants' infringements, an award of
13 either:

14 (i) actual damages suffered by Getty Images as a result of
15 defendants' infringements and all profits of defendants that are attributable
16 to those infringements, pursuant to 17 U.S.C. § 504(b); or

17 (ii) statutory damages, enhanced to a sum of not more than
18 \$150,000 per work infringed, for defendants' willful infringement of
19 copyrights, pursuant to 17 U.S.C. § 504(c); and

20 (b) As to works registered after defendants' infringements, an award of
21 actual damages suffered by Getty Images as a result of defendants' infringements
22 and all profits of defendants that are attributable to those infringements, pursuant to
23 17 U.S.C. § 504(b);

24 (6) That the Court further order that defendants are jointly and severally liable
25 for damages awarded by the Court;

26

1 (7) That the Court order defendants, pursuant to 17 U.S.C. § 505, to pay full
2 costs, including reasonable attorney's fees, incurred by Getty Images in prosecuting this
3 action;

4 (8) That the Court order prejudgment interest on the amount of any award to
5 Getty Images; and

6 (9) That the Court grant to Getty Images such other and additional relief as is
7 just and proper.

8
9 DATED this 5th day of April, 2013.

10
11 **YARMUTH WILSDON PLLC**

12 By s/ Scott T. Wilsdon

13 Scott T. Wilsdon, WSBA No. 20608

14 818 Stewart Street, Suite 1400

15 Seattle, WA 98101

16 Phone: 206.516.3800

17 Fax: 206.516.3888

18 Email: wilsdon@yarmuth.com

19 Attorneys for Plaintiff Getty Images (US), Inc.
20
21
22
23
24
25
26

EXHIBIT A-1

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.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-850-496

Effective date of
registration:
March 4, 2013

Title _____

Title of Work: Dog sleeping in bed between two people (focus on feet)

Completion/Publication _____

Year of Completion: 2000

Date of 1st Publication: December 1, 2000

Nation of 1st Publication: United States

Author _____

▪ Author: Vedros Photography, Inc.

Author Created: photograph(s)

Work made for hire: Yes

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: Vedros Photography, Inc.

REDACTED

Rights and Permissions _____

Organization Name: Getty Images

Address: 605 - 5th Ave. S.

Ste. 400

Seattle, WA 98104 United States

Certification _____

Name: Cynthia Sharp

Date: March 4, 2013

Applicant's Tracking Number: 1155538

Registration #: VA0001850496

Service Request #: 1-899723983



Getty Images
Cynthia Sharp
605 - 5th Ave. S.
Ste. 400
Seattle, WA 98104 United States

EXHIBIT A-2

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.

Marybeth Peters

Register of Copyrights, United States of America

FORM VA
For a Work of the Visual Arts
UNITED STATES COPYRIGHT OFFICE

VAu713-178



Aug 18 2006
Month Day Year

ARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼ **NATURE OF THIS WORK** ▼ See Instructions
G.K. & Vikki Hart-June 2006 Collection (134 photographs)

PREVIOUS OR ALTERNATIVE TITLES ▼
N/A

Publication as a Contribution If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. **Title of Collective Work** ▼
N/A

If published in a periodical or serial give: **Volume** ▼ **Number** ▼ **Issue Date** ▼ **On Page** ▼

2

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼ **DATES OF BIRTH AND DEATH**
Year Born ▼ Year Died ▼
a GERALD KIMBLE HART 1952

Was this contribution to the work a "work made for hire"? Yes No
Author's Nationality or Domicile Name of Country OR Citizen of USA Domiciled in

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions
 3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

NAME OF AUTHOR ▼ **DATES OF BIRTH AND DEATH**
Year Born ▼ Year Died ▼
b VIKKI W. HART 1952

Was this contribution to the work a "work made for hire"? Yes No
Author's Nationality or Domicile Name of Country OR Citizen of USA Domiciled in

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions
 3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

3

Year in Which Creation of This Work Was Completed 2006 **Date and Nation of First Publication of This Particular Work**
Month Day Year

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼
GERALD KIMBLE HART, VIKKI W. HART

REDACTED

Transfer If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

DO NOT WRITE HERE OFFICE USE ONLY
APPLICATION RECEIVED
AUG 18 2006
ONE DEPOSIT RECEIVED
AUG 18 2006
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

MORE ON BACK ▶ Complete all applicable spaces (numbers 5-8) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE
Page 1 of 1

d.1

REDACTED

Feb 27 13 05:46p Hart Productions Inc

EXAMINED BY _____ FORM VA
 CHECKED BY _____
 CORRESPONDENCE
 Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number Year of Registration

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

N/A

6
a See instructions before completing this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

N/A

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name Account Number

N/A

7
a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

G.K. & VIKKI HART

REDACTED

b

Area code and daytime telephone number REDACTED

Fax number REDACTED

Email

CERTIFICATION I, the undersigned, hereby certify that I am the

check only one

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

GERALD K. HART

VIKKI W. HART

Date 8/17/06

Handwritten signature (X)

Gerald K. Hart

Vikki W. Hart

8

Certificate will be mailed in window envelope to this address:

Name

G.K. & VIKKI HART

Number

REDACTED

City/State

YOU MUST

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL FILLEMENTS BY THE MAIL PACKAGE

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6300

9

17 U.S.C. § 506(a): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

p.1

REDACTED

Hart Productions Inc.

Feb 27 13 05:47p

EXHIBIT A-3

-APPLICATION-

Title _____
Title of Work: Mixed breed dog with paws covering eyes (200518841-002)

Completion/Publication _____
Year of Completion: 2007
Date of 1st Publication: April 27, 2007 Nation of 1st Publication: United States

Author _____
▪ Author: Sharon Montrose
Author Created: photograph(s)
Work made for hire: No
Citizen of: United States Domiciled in: United States

Copyright claimant _____
Copyright Claimant: Sharon Montrose Photographs, LLC
Redacted
Transfer Statement: By written agreement

Rights and Permissions _____
Organization Name: GETTY IMAGES (US), INC.
Email: copyright@gettyimages.com Telephone: 206-925-5000
Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Certification _____
Name: Cynthia Sharp
Date: March 21, 2013

Registration #:

Service Request #: 1-909358951

Priority: Routine

Application Date: March 21, 2013 10:16:02 PM

Correspondent _____

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate _____

GETTY IMAGES (US), INC.
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104

EXHIBIT A-4

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.

Maui A. Pallante

Register of Copyrights, United States of America

Registration Number
VA 1-850-499

Effective date of
registration:
March 13, 2013

Title _____

Title of Work: Dog with suitcase, wearing Hawaiian shirt (200355950-001)

Completion/Publication _____

Year of Completion: 2005

Date of 1st Publication: April 29, 2006

Nation of 1st Publication: United States

Author _____

Author: John William Banagan

Author Created: photograph(s)

Citizen of: Australia

Domiciled in: Australia

Year Born: 1949

Copyright claimant _____

Copyright Claimant: John William Banagan

REDACTED

Rights and Permissions _____

Organization Name: GETTY IMAGES

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: March 13, 2013

Registration #: VA0001850499

Service Request #: 1-904983201



GETTY IMAGES
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104

EXHIBIT A-5

-APPLICATION-

Title _____

Title of Work: Young woman lying on floor with dog using mobile phone (200523984-003)

Completion/Publication _____

Year of Completion: 2006

Date of 1st Publication: April 3, 2007

Nation of 1st Publication: United States

Author _____

▪ **Author:** Larry Williams and Associates Design and Photography Inc.

Pseudonym: LWA

Author Created: photograph(s)

Work made for hire: Yes

Citizen of: Canada

Domiciled in: Canada

Pseudonymous: Yes

Copyright claimant _____

Copyright Claimant: Larry Williams and Associates Design and Photography Inc.

Redacted

Rights and Permissions _____

Organization Name: GETTY IMAGES

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104 United States

Certification _____

Name: Cynthia Sharp

Date: March 12, 2013

Applicant's Tracking Number: 1284919

Registration #:

Service Request #: 1-904785421

Priority: Routine

Application Date: March 12, 2013 07:19:31 PM

Correspondent

Organization Name: GETTY IMAGES

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Ave. S, Suite 400
Seattle, WA 98104 United States

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104 United States

>

Type of Work: Visual Material

Registration Number / Date:
VA0001851063 / 2013-03-12

Application Title: Young woman lying on floor with dog using mobile phone
(200523984-003)

Title: Young woman lying on floor with dog using mobile phone
(200523984-003)

Description: Electronic file (eService)

Copyright Claimant:
Larry Williams and Associates Design and Photography Inc.

Date of Creation: 2006

Date of Publication:
2007-04-03

Nation of First Publication:
United States

Authorship on Application:
LWA, pseud. of Larry Williams and Associates Design and
Photography Inc. (author of pseudonymous work), employer
for hire; Domicile: Canada; Citizenship: Canada.
Authorship: photograph(s)

Rights and Permissions:
GETTY IMAGES, 605 5th Avenue S, Suite 400, Seattle, WA,
98104, United States, (206) 925-5000,
copyright@gettyimages.com

Names:
LWA, pseud.
Larry Williams and Associates Design and Photography Inc.

=====

EXHIBIT A-6

-APPLICATION-

Title _____
Title of Work: DOG COUPLE (10104008)

Completion/Publication _____
Year of Completion: 1999
Date of 1st Publication: March 1, 2000 Nation of 1st Publication: United States

Author _____

- Author: Gerald Kimble (G.K.) Hart
Author Created: photograph(s)
Work made for hire: No
Citizen of: United States Domiciled in: United States
Year Born: 1952
- Author: Vikki W. Hart
Author Created: photograph(s)
Work made for hire: No
Citizen of: United States Domiciled in: Afghanistan
Year Born: 1952

Copyright claimant _____
Copyright Claimant: Gerald Kimble (G.K.) Hart
Redacted
Copyright Claimant: Vikki W. Hart
Redacted

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Certification

Name: Cynthia Sharp

Date: March 18, 2013

Applicant's Tracking Number: 1300088

Registration #:
Service Request #: 1-907601231
Priority: Routine

Application Date: March 18, 2013 10:29:29 PM

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104

EXHIBIT A-7

-APPLICATION-

Title _____

Title of Work: Chinchilla cat wearing diamond tiara, resting on cushion (BD8365-001)

Completion/Publication _____

Year of Completion: 2001

Date of 1st Publication: May 18, 2001

Nation of 1st Publication: United States

Author _____

▪ **Author:** Tim Flach Photography Ltd.

Author Created: photograph(s)

Work made for hire: Yes

Citizen of: United Kingdom

Domiciled in: United Kingdom

Copyright claimant _____

Copyright Claimant: Tim Flach Photography Ltd.

Redacted

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: March 19, 2013

Applicant's Tracking Number: 1318619

Registration #:

Service Request #: 1-908007571

Priority: Routine

Application Date: March 19, 2013 12:58:43 PM

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Alt. Telephone: 206-925-5623

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104

EXHIBIT A-8

-APPLICATION-

Title _____

Title of Work: Male executive wearing telephone headset, smiling, portrait (CB8638-001)

Completion/Publication _____

Year of Completion: 2001

Date of 1st Publication: October 31, 2001

Nation of 1st Publication: United States

Author _____

▪ Author: Laurence Monneret

Author Created: photograph(s)

Work made for hire: No

Citizen of: France

Domiciled in: France

Copyright claimant _____

Copyright Claimant: Laurence Monneret

Redacted

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: March 21, 2013

Registration #:

Service Request #: 1-909339071

Priority: Routine

Application Date: March 21, 2013 09:01:43 PM

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.

Cynthia Sharp

605 5th Avenue S, Suite 400

Seattle, WA 98104

EXHIBIT A-9

-APPLICATION-

Title _____

Title of Work: Pit bull mix dog with tongue out, close-up (200137589-001)

Completion/Publication _____

Year of Completion: 2004

Date of 1st Publication: July 30, 2004

Nation of 1st Publication: United States

Author _____

▪ Author: Julia Fishkin

Author Created: photograph(s)

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: Julia Fishkin

REDACTED

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: April 1, 2013

Registration #:
Service Request #: 1-912781551

Priority: Routine

Application Date: April 1, 2013 01:59:48 PM

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.
Cynthia Sharp
605 5th Avenue S, Suite 400
Seattle, WA 98104

EXHIBIT A-10

-APPLICATION-

Title _____

Title of Work: Tabby cat wearing toy glasses and stethoscope, close-up (887206-001)

Completion/Publication _____

Year of Completion: 1998

Date of 1st Publication: June 23, 1999

Nation of 1st Publication: United States

Author _____

▪ **Author:** Meredith Parmelee

Author Created: photograph(s)

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: Meredith Parmelee

REDACTED

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: March 25, 2013

Registration #:

Service Request #: 1-910889761

Priority: Routine

Application Date: March 25, 2013 04:03:48 PM

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.

Cynthia Sharp

605 5th Avenue S, Suite 400

Seattle, WA 98104

EXHIBIT A-11

-APPLICATION-

Title _____

Title of Work: White, standard poodle sitting on sofa watching television, pink cast (489050-016)

Completion/Publication _____

Year of Completion: 1995

Date of 1st Publication: September 26, 1995

Nation of 1st Publication: United States

Author _____

▪ Author: Donna Day

Author Created: photograph(s)

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: Donna Day

Redacted

Rights and Permissions _____

Organization Name: GETTY IMAGES (US), INC.

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400

Seattle, WA 98104

Certification _____

Name: Cynthia Sharp

Date: March 20, 2013

Registration #:

Service Request #: 1-908744661

Priority: Routine

Application Date: March 20, 2013 06:42:15 PM

Note to C.O.: Donna Day (author and claimant) is the sole proprietor of, and also does business as, Donna Day Photography.

Correspondent

Organization Name: GETTY IMAGES (US), INC.

Name: Cynthia Sharp

Email: copyright@gettyimages.com

Telephone: 206-925-5000

Address: 605 5th Avenue S, Suite 400
Seattle, WA 98104

Fax: 206-925-5000

Mail Certificate

GETTY IMAGES (US), INC.

Cynthia Sharp

605 5th Avenue S, Suite 400

Seattle, WA 98104

EXHIBIT A-12

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.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-740-624

Effective date of
registration:
September 22, 2010

Title

Title of Work: GANDEE VASAN STOCK IMAGES - 21st SEPTEMBER 2010

Completion/Publication

Year of Completion: 2010

Date of 1st Publication: September 21, 2010

Nation of 1st Publication: United Kingdom

Author

Author: Gandee Vaikunthavasan, dba Photographer

Pseudonym: Gandee Vasan

Author Created: photograph(s)

Work made for hire: No

Citizen of: United Kingdom

Domiciled in: United Kingdom

Pseudonymous: Yes

Copyright claimant

Copyright Claimant: Gandee Vaikunthavasan, dba Photographer

REDACTED

Rights and Permissions

Name: Rehman Nizam

Email:

REDACTED

Telephone: **REDACTED**

Address:

REDACTED

Certification

Name: Gandee Vasan

Date: September 22, 2010

Registration #: VA0001740624

Service Request #: 1-490751613



Gandee Vaikunthavasan
REDACTED