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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

Bill Gaede,

Case No.: X:XX-cv-XXXX-XX

Plaintiff(s),

v.

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT, FALSE
DESCRIPTIONS, UNFAIR
COMPETITION**

**DEMAND FOR SUMMARY
JUDGMENT**

Michael Shilo DeLay and Anastasia
Bendebury;

Defendant(s).

NATURE OF THIS ACTION

1. This is an action for copyright infringement and unfair competition under the laws of the United States (the Lanham Act, codified at 15 U.S.C. § 1125, *et seq.*, the Copyright Act, codified at 17 U.S.C. § 501, *et seq.*), and the common law of copyright infringement and unfair competition through false representation.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).
3. This Court has personal jurisdiction over Defendant because: (a) Defendant has substantial contacts in the State of Oregon related to the claims in this action, (b) Defendant engaged in the wrongful acts alleged herein in the State of Oregon.
4. Venue in this judicial district is proper under 28 U.S.C. § 1391(b) and (c).

PARTIES

5. Bill Gaede is the author of an alternative theory to mainstream physics known as The Rope Hypothesis embodied in a 514 page book titled *Why God Doesn't Exist (WGDE)* (<https://www.bookwire.com/book/USA/why-god-doesn-t-exist-9780970496041-7197948>). He owns the site www.ropehypothesis.com where a book titled *The Rope Hypothesis (TRH)* (<https://www.bookwire.com/book/USA/the-rope-hypothesis-9780970496065-bill-gaede-73650026>) is showcased.

6. Bill Gaede runs a personal YouTube site at <https://www.youtube.com/user/bgaede> (Oct 20th, 2006) and a YouTube channel at <https://www.youtube.com/c/RationalScience> (Jan 12th, 2018) in which he popularizes the Rope Hypothesis through biweekly lectures. The Rope Hypothesis and the foundations that underlie it have been published in several [articles, books](#), interviews and conferences ([Exhibit 1](#)) dating back to 2003.

7. Anastasia Bendebury (a.k.a. Nastia, Quinn Garrow) and Michael Shilo DeLay (a.k.a. Shilo, Micky Callahan) own an informal Internet scientific content site known as Demystifying Science (DS) (<https://demystifyingscience.com/>). The domain was registered on October 14, 2019, with their access software provider: Squarespace Inc. The known business activities DS engages in include:

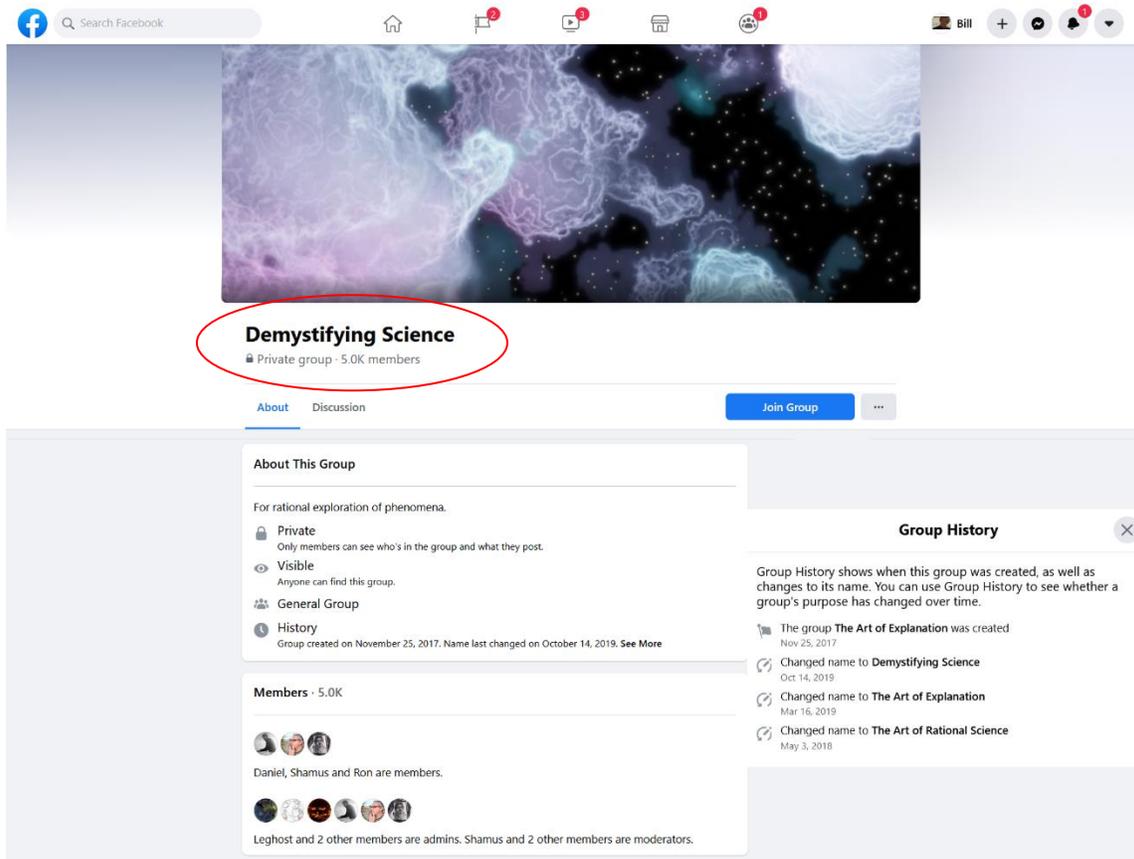
- a) publishing scientific articles in popular magazines;
- b) educating the public through articles and blogs;
- c) podcasts;
- d) Youtube videos; <https://www.youtube.com/c/DemystifyingScience>
- e) selling of merchandise such as T-shirts.

THE COPYRIGHTS

8. The rope model of light and gravity is embodied in *Why God Doesn't Exist* (WGDE) and was registered at the United States Copyright Office of the Library of Congress on January 4, 1999 ([Exhibit 2](#)). *The Rope Hypothesis* (TRH) was registered with the United States Copyright Office on January 31, 2020 ([Exhibit 2](#))

FACTUAL ALLEGATIONS

9. From 2018 to 2019, defendants Bendebury and DeLay formally referenced Gaede's intellectual material in articles where they explained the physical mechanisms that underlie light, gravity, electromagnetism, and the workings of the atom. [*See the references at the end of each article published at The Art of Rational Science* (<https://issuu.com/artofrationalscience>)]. (Exhibit 12)
10. On October 14, 2019, defendants Bendebury and DeLay registered their professional Demystifying Science website with Squarespace Inc.
11. On April 16, 2020, the defendants referenced their fledgling site in an article they published in Business Insider <https://www.businessinsider.com/how-couple-furloughed-turned-science-website-into-viable-business-2020-4> (Exhibit 3).
12. For over a year, Defendants Bendebury and DeLay published articles in popular scientific magazines and directed readers to their Demystifying Science website. Their Facebook page for Demystifying Science grew to 5000 members. The Defendants plagiarized material in their Youtube videos that resulted in over 5000 hits.



13. During this time, the Defendants procured donations from their supporters via Facebook and in each article of their website. (<https://demystifyingscience.com/>)

14. On April 7, 2021, the Plaintiff discovered the plagiarizing activities of the Defendants due to a thread posted in a Facebook group.

15. On April 13, 2021, the Plaintiff served Defendants Bendebury and DeLay with a formal cease and desist letter requesting removal of the plagiarized material. By then, the Defendants had garnered over 5,000 hits on their Youtube videos. In their Business Insider article they claimed to have received 17,000 visitors in the first month alone.

16. Defendants replied by conceding via e-mail and through comments in a Facebook group that the intellectual property belongs to the Plaintiff ([Exhibit 4](#)). However, they blocked the Plaintiff on Facebook, presumably to prevent him from downloading comments made in past threads that could serve as evidence in future litigation ([Exhibit 4, page 2](#)). A few days later, realizing that the Plaintiff had already downloaded the relevant comments, they unblocked the Plaintiff and asked for instructions on how to provide attribution to him.

17. Realizing that the Plaintiff demanded the unconditional removal of the plagiarized intellectual property, Defendants Bendebury and DeLay changed tactics. Despite vaguely attributing credit to the Plaintiff in a couple of their DS articles, Defendants argued from then on that the material was in fact theirs and that even if it wasn't, they had a right to it without providing attribution ([Exhibit 5](#)).

18. By April 11, 2021, rather than remove the plagiarized material, defendants Bendebury and DeLay began editing their blogs and articles, replacing key words in patently copyrighted definitions with synonyms in hopes of avoiding legal action.

19. On April 15, 2021, the defendants created a Youtube channel titled 'Demystifying Atomics' and moved videos containing plagiarized intellectual property to it, presumably to avoid compromising their main Demystifying Science channel.

20. On April 22, 2021, defendants Bendebury and DeLay registered a limited liability company named Biospintronics LLC with a post office box as an address, presumably to avoid compromising their personal assets. The Defendants had by then palmed off the intellectual property for over a year before they registered their company.

21. On May 6, 2021, the Plaintiff sent a cease-and-desist letter to Squarespace Inc., the Internet provider of the content site Demystifying Science, and to Youtube, the platform where DS has a channel of the same name.
22. On May 7, 2021, Squarespace notified the Plaintiff that the copyrighted material was removed.
23. On May 19, 2021, Youtube notified the plaintiff that the plagiarized videos were removed. Shortly after, either Youtube or the defendants deleted the secondary channel Demystifying Atomics channel altogether.
24. However, on May 10, 2021, Squarespace notified Plaintiff that, since Defendants Bendebury and DeLay contested the claim, the material would be restored unless the Plaintiff served them with a court order within 10 days. Youtube did likewise on May 30.
25. By June, both Squarespace and Youtube restored DS articles and videos. However, Bendebury and DeLay made the videos private. In order to preserve the videos as evidence, the Plaintiff uploaded them to his channel.

Shape of a Photon?

<https://www.youtube.com/watch?v=rSFaY1X6Fg4> (DS made private)

<https://www.youtube.com/watch?v=IjwfO-cQ530> (Uploaded for the Court)

(Transcript of the video: [Exhibit 6](#))

Electricity Begins with Atoms

<https://www.youtube.com/watch?v=pi-kEpbxOlc> (DS made private)

<https://www.youtube.com/watch?v=7PuyCijXQgA> (Uploaded for the Court)

(Transcript of the video: [Exhibit 7](#))

What's Inside a Magnetic Field?

<https://www.youtube.com/watch?v=AU1ejXvWF0g> (DS made private)

<https://www.youtube.com/watch?v=6msF1yLmBJM> (Uploaded for the Court)

(Transcript of the video: [Exhibit 8](#))

26. On August 13, 2021, Plaintiff's attorney reached out to Defendants to coordinate a virtual meeting between the parties so they could resolve the issues amicably.

27. On August 17, 2021, the parties met virtually without legal counsel, meeting that concluded in no resolution to the issues, and Plaintiff now seeks relief with the Courts.

Infringement of Plaintiff's Copyrights

28. [Exhibit 11](#) summarizes the copyrighted intellectual property infringed.

29. Bendebury and DeLay copied the strategic **definitions** from WGDE and TRH that form the Foundations of Physics and are necessary to provide physical interpretations to phenomena: *object, distance, location, motion, exist, concept*.

DS: "**Object**... something with a shape (modified in April 2021 to read: "*An object is a thing with a surface...*")

WGDE p. 13. **object**: that which has shape; TRH p. 156. **object**: that which has shape.

DS: "in order for that object to exist it has to also have **location**: *a set of static distances* to all the other objects in the scene. Without a **location** an object cannot be said to **exist**"

(Replaced on April 11 by: “*in order for that object to exist it has to also have physical place: a set of static distances to all the other objects in the scene.*”)

“reserve the word ‘**exist**’ for physical objects with definite **locations**”

“an **existing** object is a body with a **location**; that is something with a shape”

WGDE p. 15. **distance**: the gap or separation that exists between two objects.

location: the set of distances of the object with respect to the remaining matter in the Universe. WGDE p. 460. **exist**: physical presence. The physical component invokes an object. The presence part requires a location. TRH p. 156. **distance**: separation between two objects. **location**: the set of distances from one object to all others. **exist**: physical presence (object + location).

DS: Without two or more locations, no **travel** is possible in physics...

WGDE p. 15. **motion**: two or more locations of an object.

TRH p 156. **motion**: two or more locations of an object.

DS: “All words, and hence all ideas... can be divided into one of two categories: object and **concept**.” (DS changed this on April 11 to read: “*All words, and hence all **ideas** ... can be divided into one of two categories: objects and **ideas**.*”). A **concept**... is merely the relationship between one existing object and another or an additional concept. (DS replaced the word **concept** in this sentence on April 11 with: “*Ideas abstractly link one existing object and another or an additional concept*”)

WGDE p. 13 : In Physics... we must define the crucial word *object* in such a restrictive way as to exclude abstract **concepts**. All words in the dictionary are either objects or **concepts**. WGDE p. 16. **concept**: A word that embodies or invokes more than one object or location. WGDE p. 15. A **concept** is a relation between TWO objects.

TRH p. 156. **concept**: a word that invokes or embodies two objects or two words treated as objects.

30. No researcher or theorist in physics has ever proposed that all atoms are *physically* interconnected. This is the seminal hypothesis of WGDE and TRH. The establishment still simulates every phenomenon with either discrete particles or transverse waves. WGDE (published in 1998) and TRH (published in 2020) discuss for the very first time that only if every atom is physically bound to all others can we explain action at a distance and why ‘gravity goes through things.’ In TRH, all atoms are interconnected by a twined rope-like entity and light is a 3D torsion along this matter. [Exhibit 9](#) is a side by side comparison of the physical interpretations of Mathematical Physics and the Rope Model of Light and Gravity. It shows that there is no commonality in the architectures and mechanisms proposed for light, gravity, electromagnetism, and the atom between mainstream theories (primarily General Relativity and Quantum Mechanics) and the Rope Hypothesis.

31. Bendebury and DeLay realized the importance of this seminal discovery to provide alternative physical interpretations to mainstream physics and incorporated it in ‘*their*’ physical interpretations of light and gravity. Pursuant to their own testimony in their published Business Insider article:

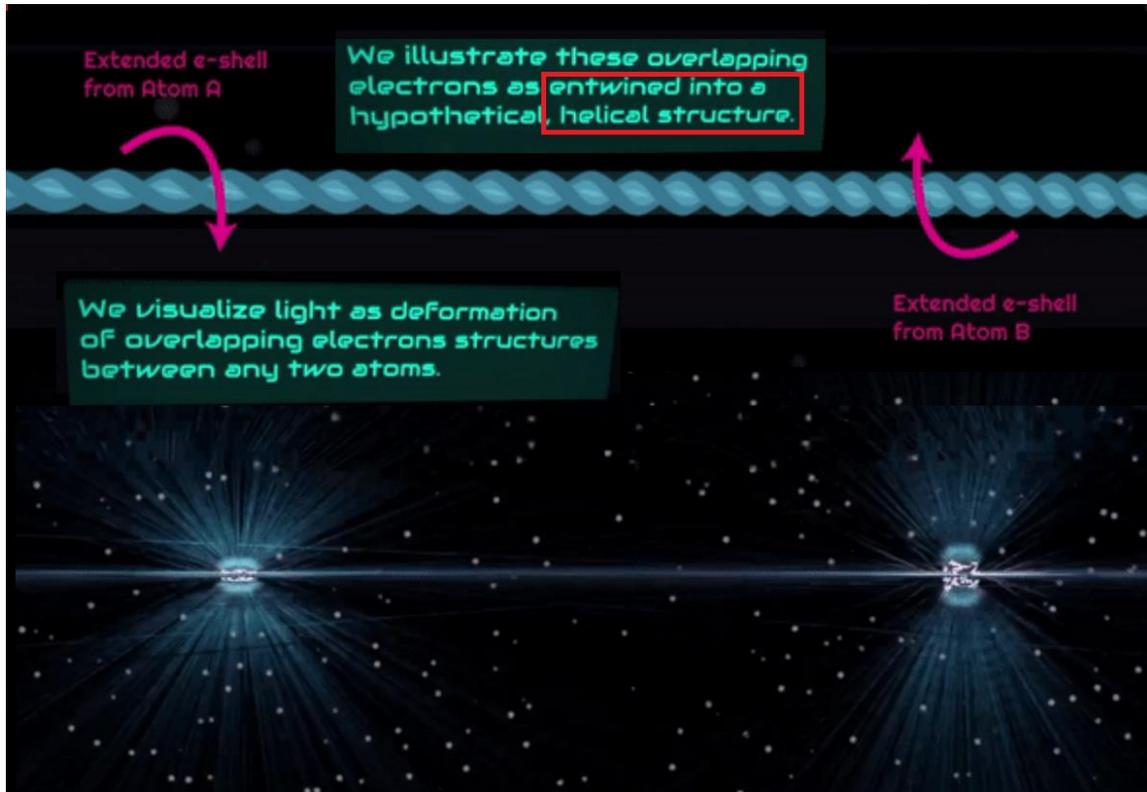
“...rendering visualizations of **light**, **gravity**, and **electromagnetism**... people loved our scientific explanations — 17,000 people came to read about them in the first month and we received hundreds of likes and shares on social media... in the first two weeks, we're on track to cover our rent...

Editorial comment: *They're* [Bendebury and DeLay] *the creators of Demystifying Science, a science literacy organization devoted to providing clear, **mechanistic** explanations for natural phenomena.*”

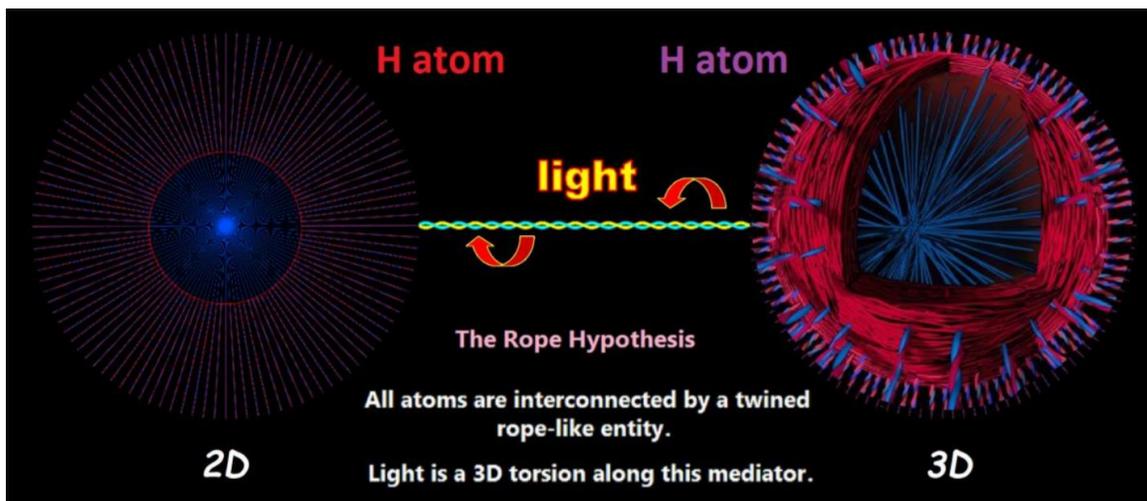
([Exhibit 3](#))

32. The Defendants interconnect their atoms with a pair of twined threads: a DNA-like rope (as proposed by TRH) that mediates **light**. They describe electromagnetic waves exactly like in WGDE and TRH: torsions propagating along this coiled, doubly-stranded medium.

Demystifying Science (Defendants)



The Rope Hypothesis (Plaintiff)



33. In 1911, Niels Bohr proposed that **atoms** do what today is known as **Quantum Jump**: the electron bead jumps back and forth between energy levels that encapsulate the proton bowling ball.

34. Under TRH there is no bead and there is no bowling ball. The electron is a balloon: a physical membrane that encapsulates the proton STAR. The electron membrane and the urchin-like proton are made of the same threads that constitute the electromagnetic (EM) rope. Under TRH, **Quantum jumping** works as follows: The electron balloon expands and contracts. By doing so it torques the EM rope. Torsion propagates bidirectionally to the atoms located at opposite ends. (See [Exhibit 9](#), p. 3 for a comparison of the atom between Mathematical Physics and TRH.)

35. Bendebury and DeLay appropriated this concept from TRH and changed the language in their blogs and videos. TRH calls the expansion and contraction of the electron shell: *pumping*. The Defendants describe the same expansion and contraction as *breathing*. TRH refers to the mediators as *rope* and *thread*. DS named the same features: *tails*, *filaments*, and *wires*, and like TRH proposes that torsions along these physical mediators constitutes light. A dynamic, side by side comparison of the **quantum jumping** mechanism that the Defendants plagiarized can be seen at the following link: <https://www.youtube.com/watch?v=niBpTAdJ2E4>.

36. Under Mathematical Physics, **electricity** consists of a flow of electron beads from one end of the wire (negative pole) to the other (positive pole).

37. In contrast, TRH proposes that a live wire consists of long strings of countless merged electron shells of atoms. **Electricity** (current) consists of clockwise (CW) and counter-clockwise (CCW) rotating strings comprised of these blended membranes. There is no flow of electron beads. The entire row of fused electron balloons spins *in situ*.

[Exhibit 9](#), page 3 shows just how different the versions of Mathematical Physics and TRH are.

38. Bendebury & DeLay copied this model verbatim from TRH and attributed it to themselves. The Defendants propose that electricity consists of a string of merged electron shells that are spinning *in situ*:

“We build on an idea first proposed by Bill Gaede in the mid-2000s: Electricity as surface-to-surface rotational gearing between electron-shells on atoms.”

This comment was placed in the DS article on or about April 15, 2021 after they were served with a cease and desist letter. A side by side comparison of **electricity** between DS and TRH can be watched at the following videos:

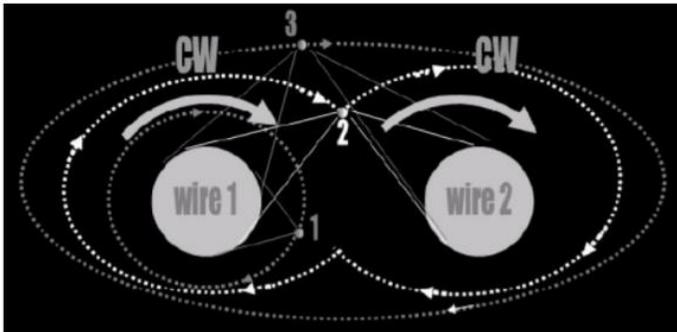
Merged e-shells <https://www.youtube.com/watch?v=PSRC28dQtrQ>

Electric Circuit https://www.youtube.com/watch?v=_RQn-r0jLLE

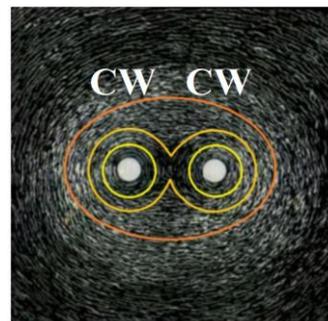
39. The mathematical establishment has no explanation for how a **magnet** attracts another from a distance. Nobel laureate Richard Feynman testifies in this regard here: <https://www.youtube.com/watch?v=Pq9wDVFajYo>.

40. TRH illustrates magnetic attraction and repulsion so that anyone can understand these mechanisms. When the electron shells rotate *in situ*, they swing around themselves the threads that make up the electron shells and the EM ropes that comprise the EM ropes that interconnect them. A magnetic 'field' is a region where countless threads that make up the electron shells and the EM ropes that interconnect the atoms swing through at high speeds. Two parallel live wires are exactly like two magnets: they attract if current travels in the same direction and repel if current travels through them in opposite directions (discovered by Ampere in 1820). Under TRH what happens is that if current flows in the same direction on the two wires, the gazillions of electron shells spin in the same direction and swing countless threads in the same direction. While the threads of one wire come down, those of the other come up. They interact like two gears turning in the same direction and the wires attract each other. If we turn one of the wires around, now the threads clash against each other: repulsion.

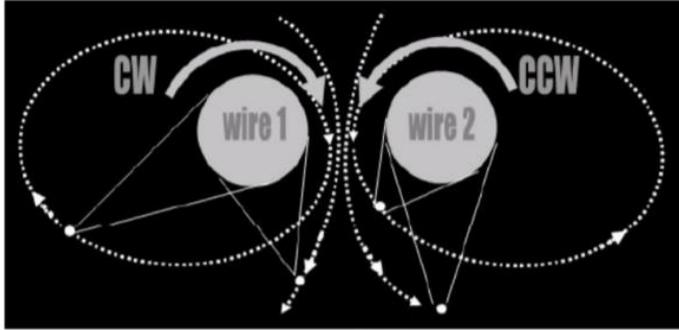
TRH Attraction (current in the same direction)
 As threads on the left come down at 2, they interact with the threads on wire 2 coming up. Friction between countless threads pulls the wires together.



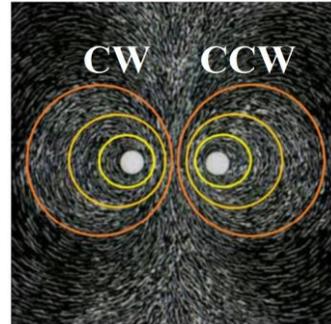
Pattern left by iron filings sprinkled over two wires carrying current in the same direction.



TRH Repulsion (current in opposite directions)
Threads swinging around the wires travel in opposite directions and clash against each other. As a result the wires push each other away.



Pattern left by iron filings sprinkled over two wires carrying current in opposite directions.



41. Bendebury and DeLay realized the importance of these discoveries, gave credit to WGDE and Gaede in their 2018/19 papers (<https://issuu.com/artofrationalscience>), but failed to attribute their sources after they created their professional website.

“Current flow is merely reimaged as propagation of in situ e-shell surface rotation. This perspective, that electromagnetic phenomena are the result of physical objects rather than mathematical equations, is rooted in the conceptual framework of rational science, as championed by Bill Gaede...”

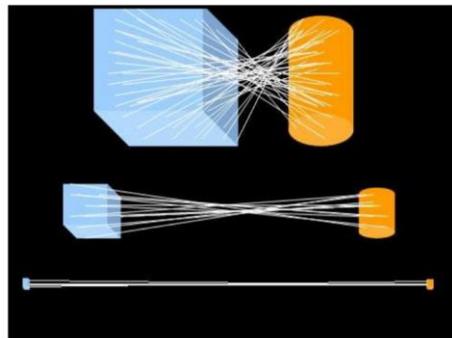
The comment was introduced on or about April 15, 2021, in the DS magnetism article after Plaintiff served the Defendants with a cease and desist letter. A side by side comparison of the mechanisms of electricity and magnetism DS vs. TRH can be appreciated at the following videos:

DS vs TRH magnetic attraction <https://www.youtube.com/watch?v=wRC5OFleG2M>

DS vs TRH magnetic repulsion <https://www.youtube.com/watch?v=vqum76cjAKI>

42. Defendants Bendebury and DeLay plagiarized the mechanism of **gravity** of TRH which proposes that all atoms are physically interconnected. It is the EM rope that binds any two atoms which serves as this physical mediator. Without this elongated entity action at a distance cannot be visualized. Under TRH, as an object approaches another, the elongated mediators that bind any two atoms fan out. It is this fanning out that explains gravitational acceleration of one object towards another..

Action-at-a-distance



**short distance,
EM ropes fan out**

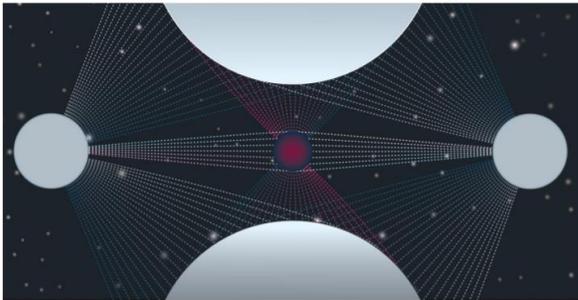
**longer distance,
EM ropes come together**

**enormous distance,
EM ropes act as one**

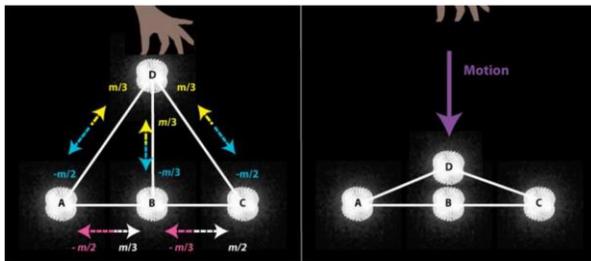
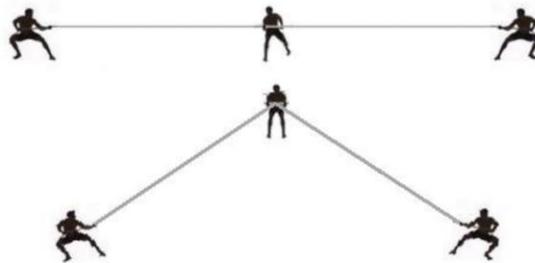
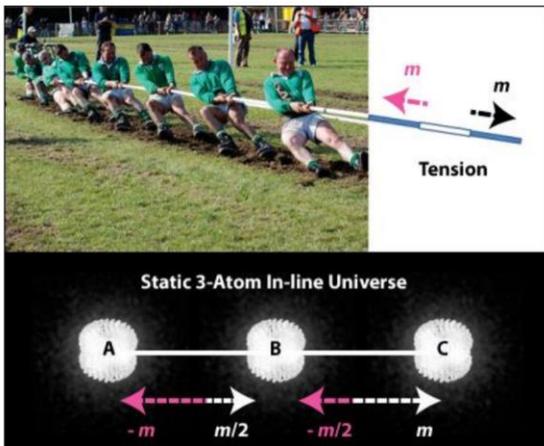
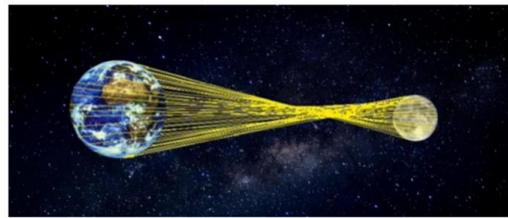
DS: *“all of your atoms are gravitationally entwined with all of the atoms around them... atoms behave as if they are pulling on one another. One way to visualize mass is to imagine atoms connected by an imaginary tensile structure... web of tensioned connectivity... visualize the word mass as meaning outward pull from one object upon the next in a network of interconnected bodies”*

43. The defendants even copied the images of TRH related to mass and gravity and claimed the cosmetic modifications as theirs.

DS mass/gravity: physical interconnectivity



TRH physical interconnectivity:
why the Moon doesn't leave
the Solar System



**PLAINTIFF'S FIRST CLAIM
(Copyright Infringement)**

44. Plaintiff repeats and realleges each of the allegations contained in paragraphs 1 through 42 of this Complaint as if fully set forth herein.

45. Copyright infringement requires the Plaintiff to prove ownership of the copyright, that the defendants had access to the copyrighted work, and that there exists 'substantial similarity' between the defendants' and the copyrighted works. Sid & Marty Krofft Television Productions, Inc. v. McDonald's Corp., 562 F.2d (1977).

46. Bill Gaede holds a registered copyright for the works WGDE and the Rope Hypothesis.

47. Bill Gaede is also the owner of all right, title, and interest in and to all other copyrightable elements of the Rope hypothesis and Rope Models, including the concepts, pictures, and texts, and their compilation and arrangement to explain unique descriptions of atomic and subatomic entities such as the atom, the electron, and light itself as well as the explanations of how these mediators work during phenomena such as magnetism, electricity, and gravity.

48. Defendants Bendebury and DeLay had access to the copyrighted works WGDE and TRH and their derivative works as discussed at www.ropehypothesis.com and Youtube sites.

49. Defendants Bendebury and DeLay copied and/or created derivative works from WGDE and TRH in their Demystifying Science website and in Youtube videos that they made private after their plagiarism was discovered.

50. Content on the Demystifying Science website, Defendant's Youtube channel and Facebook page relating to unique descriptions of atomic and subatomic entities such as the atom, the electron, and light itself as well as the explanations of how these mediators work during phenomena such as magnetism, electricity, and gravity and/or portions thereof, are substantially similar to Plaintiff's copyrighted and their derivative works and/or portions thereof.

51. Defendants Bendebury and DeLay infringed Plaintiff's copyrighted work in violation of 17 U.S.C. § 501 by reproducing, distributing, creating derivative works based upon, and publicly displaying works that were copied or caused to be copied from WGDE, TRH, and the www.ropehypothesis.com and Plaintiff's Youtube channels that are substantially similar to that copyrighted work.

52. Defendants Bendebury and DeLay have acted, and are acting, without the permission, license, consent, or authorization of the Plaintiff.

53. Defendants' Bendebury and DeLay acts of copyright infringement have caused and are causing great and irreparable harm to Plaintiff, Plaintiff's goodwill, and Plaintiff's rights in and to the WGDE and TRH Copyrights, in an amount which cannot be adequately determined at this time and, unless restrained, will cause further irreparable injury and damage, leaving Plaintiff with no adequate remedy at law.

54. On information and belief, Defendants Bendebury and DeLay acts of copyright infringement have been and are being committed with actual knowledge of Plaintiff's prior rights in WDGE and TRH, and derivative works and are willful and in gross disregard of Plaintiff's rights.

55. By reason of the foregoing, Plaintiff is entitled to injunctive relief against Defendants Bendebury and DeLay, and anyone associated therewith, to restrain further acts of copyright infringement, and to recover any damages proven to have been caused by reason of Defendants' aforesaid acts of copyright infringement, and to recover enhanced damages based upon the willful, intentional, and/or grossly negligent activities of the Defendants.

**PLAINTIFF'S SECOND CLAIM
(False Designations of origin, False Descriptions and Unfair Competition)**

56. Plaintiff repeats and realleges each of the allegations contained in paragraphs 1 through 54 of this Complaint as if fully set forth herein.

57. Defendants Bendebury and DeLay appropriated Plaintiff's copyrighted work by reproducing, distributing, creating derivative works based upon, and publicly displaying works that were copied or caused to be copied from WGDE, TRH and derivative works mentioned in this complaint without attribution to Plaintiff.

58. Defendants Bendebury and DeLay recruit followers with articles and videos that contain Plaintiff's copyrighted material with a percentage of followers become donors. Derivative works from the copyrighted material is producing an income for the Defendants and not being utilized solely for educational purposes. Defendants are direct competitors of Bill Gaede in the science information market, on the world wide web, YouTube and social media platforms.

59. Defendants' Bendebury and DeLay use of false description and acts of unfair competition have caused and are causing great and irreparable harm to Plaintiff, his goodwill, and his rights in and to profit from copyrighted works and derivative works, in an amount which cannot be adequately determined at this time and, unless restrained, Defendants Bendebury and DeLay will cause further irreparable injury and damage, leaving Plaintiff with no adequate remedy at law.

60. Defendants have rewritten portions of their website pages and placed dubious notes in which they belatedly and vaguely credited Plaintiff for unspecified contributions. Bendebury and DeLay deliberately changed the language used as the foundations for physics in WGDE, TRH and derivative works to mislead and confuse readers, followers, visitors on the internet, blogs, social media and in print articles regarding the original source of the works. Defendants knowingly and willfully employed synonymous language to deceive readers, followers, visitors to the various virtual and print forums into thinking that the mechanisms, connections, entities originated with the Defendants
15 U.S.C. § 1125 (a) (1) (A).

61. By reason of the foregoing, Plaintiff is entitled to injunctive relief against Defendants Bendebury and DeLay, and anyone associated therewith, to restrain further acts of infringement or unfair competition, and to recover any damages proven to have been caused by reason of Defendants' aforesaid acts of infringement and unfair competition, and to recover enhanced damages based upon the willful, intentional, and/or grossly negligent activities of the same.

PRAYER

WHEREFORE, Plaintiff prays for the following relief:

A. A permanent injunction enjoining Defendants Bendebury and DeLay, their employees, agents, officers, directors, attorneys, representatives, successors, affiliates, subsidiaries and assigns, and all those in concert or participation with any of them, from:

1. imitating, copying, using, reproducing, transmitting, and/or displaying works unique to Plaintiff's copyrighted materials and derivative works thereof or other materials that imitate or are confusingly similar to unique descriptions, pictures, diagrams, videos and explanations;
2. using any other false representation or description or any other thing calculated or likely to cause confusion, deception, or mistake in the marketplace with regard to Plaintiff's protectable copyright; and
3. copying, distributing, publicly displaying, or creating derivative works based upon the WGDE, TRH and any derivative works including videos, blogs, articles or any other copyrightable element of Plaintiff's work.

B. An order directing Defendants to remove from the Demystifying Science website, YouTube, social media and other known and unknown digital and written media any and all materials that infringe Plaintiff's copyrights, specifically the articles and videos listed in [Exhibit 10](#);

<https://ropehypothesis.com/wp-content/uploads/2021/12/Exhibit-10-Specific-Plagiarized-Intellectual-Property.pdf>

C. An award of Plaintiff's attorneys' fees, actual damages, and treble damages based upon an accounting of Defendants' profits, including all statutory enhancements, other enhancements, and attorneys' fees on account of the willful nature of Defendants' acts as provided in and pursuant to 17 U.S.C. § 504;

D. An order directing Defendants to undertake corrective action in a form and manner that is acceptable to Plaintiff and the Court; and

E. Such other relief, in law or in equity, to which Plaintiff may be entitled, or which this Court may deem just and proper.

Dated this day of September xx, 2021.

BAILEY LAW FIRM, PLLC

/s/ Jenna C. Bailey

Jenna C. Bailey (OSB No. 196215)

jbailey@baileylawfirmaz.com

Attorney for Plaintiff

Dated: _____.

s/Attorney name
Attorney name, bar number