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10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 GILES HARRISON,  
13 *Plaintiff,*

14 v.

15 PAUL PIERCE,  
16 *Defendant.*

Case No. 2:26-cv-00829

**COMPLAINT FOR COPYRIGHT  
INFRINGEMENT**

*Jury Trial Demanded*

17 Plaintiff Giles Harrison, for his Complaint against defendant Paul Pierce,  
18 alleges as follows:

19 **JURISDICTION**

20 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C. § 101  
21 et seq. This Court therefore has jurisdiction over the subject matter of this action  
22 under 28 U.S.C. § 1331 (federal question) and § 1338 (copyright).

23 **PARTIES**

24 2. Plaintiff Giles Harrison has been a freelance photographer for 30 years.  
25 Often through global premier celebrity news and photo agencies, Mr. Harrison  
26 provides the world's news outlets with real-time content about celebrities such as the  
27 defendant. He licenses photographs to leading magazines, newspapers, and editorial  
28 clients throughout the world.



1 14. The Images were used to promote Mr. Pierce’s personal brand, boost  
2 user engagement, increase shareability, and lend credibility to his branded content—  
3 each of which enhanced the growth, reach, and perceived authority of Mr. Pierce’s  
4 digital presence. Mr. Pierce’s unauthorized use of the Images is therefore commercial  
5 in nature, intended for the purpose of self-promotion.

6 15. Indeed, on information and belief, defendant knew that because of the  
7 Images’ depiction of him, users would be attracted to view the Images and thus more  
8 likely to subscribe and follow his social media accounts and engage with and share the  
9 content, thus enhancing his reach and online influence.

10 **CLAIM ONE**

11 **(For Copyright Infringement, 17 U.S.C. § 501)**

12 16. Plaintiff realleges and incorporates by reference the allegations contained  
13 in the preceding paragraphs of this Complaint as if fully set forth here.

14 17. Plaintiff is the copyright owner of the protected Images named above in  
15 this Complaint.

16 18. Defendant has reproduced, displayed, or otherwise copied the Images  
17 without plaintiff’s authorization or license.

18 19. The foregoing acts of defendant infringed upon the exclusive rights  
19 granted to copyright owners under 17 U.S.C. § 106 to display, reproduce, and  
20 distribute their work to the public. Such actions and conduct constitute copyright  
21 infringement in violation of 17 U.S.C. §§ 501 et seq.

22 20. Plaintiff has complied in all respects with 17 U.S.C §§ 101 et seq. and  
23 secured and registered the exclusive rights and privileges in and to the copyright of  
24 the above-referenced work in accordance with 17 U.S.C § 408.

25 21. Plaintiff suffered damages as a result of defendant’s unauthorized use of  
26 the Images.



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F. For reasonable attorney fees;

G. For court costs, expert witness fees, and all other costs authorized under law;

H. For such other and further relief as the Court deems just and proper.

**JURY TRIAL DEMAND**

Plaintiff demands a trial by jury of all issues permitted by law.

Dated: January 27, 2026

Respectfully submitted,

**PERKOWSKI LEGAL, PC**

By:           /s/ Peter Perkowski          

Peter E. Perkowski

Attorneys for Plaintiff  
GILES HARRISON