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7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **CENTRAL DISTRICT OF CALIFORNIA**

10 BRADFORD PERRY, individually and  
 11 doing business as STARFIELDSTUDIO,  
 12 Plaintiff,  
 13  
 14 v.  
 15 CALVIN BROADUS JR., an individual,  
 16 doing business as SNOOP DOGG; and  
 17 DOES 1-10,  
 18 Defendants.  
 19

Case No.:  
 COMPLAINT FOR COPYRIGHT  
 INFRINGEMENT

Jury Trial Demanded

20  
 21 Plaintiff Bradford Perry, individually and doing business as Starfieldstudio  
 22 (hereinafter, "Perry") hereby prays for relief based on the following:

23  
 24 **JURISDICTION AND VENUE**

25 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C., § 101  
 26 *et seq.*



1 **CLAIMS RELATED TO THE INFRINGEMENT**

2 8. Perry is a prolific and successful animator who created and owns original  
3 3D animated work, including an original video depicting how many animals humans  
4 eat every year (“Subject Video”). A representative screen grab from the Subject  
5 Video and the URL at which it is available is set forth in **Exhibit A**.

6 9. Plaintiff has registered the Subject Video with the United States  
7 Copyright Office under Registration No. PA 2-429-526.

8 10. Prior to the acts complained of herein, Perry published the Subject Video  
9 including without limitation on his TikTok account via the handle “@starfieldstudio.”  
10 Perry posted the Subject Video to TikTok with the intention that it be shared and  
11 disseminated by users across the platform as that is one of the primary ways Perry  
12 generates revenues as a professional animator, and it has in fact been widely shared  
13 and viewed over 7,500,000 times on TikTok.

14 11. Following Perry’s publication of the Subject Video, Defendants copied,  
15 displayed, distributed, and/or otherwise used the Subject Video without license,  
16 authorization, or consent, including by displaying the Subject Video (“Infringing  
17 Video”) without attribution or credit to Perry on Instagram via his handle  
18 “@snoopdogg.” A true and correct screen capture of the Infringing Video is included  
19 in **Exhibit B** attached hereto.

20 12. Upon discovering the unauthorized use of the Infringing Video, Perry  
21 sent a Takedown Notice to the Defendant on or about February 1, 2024, pursuant to  
22 17 U.S.C. § 512(c)(3) requesting for the Infringing Video to be removed.

23 13. In response to the Takedown Notice, Calvin Broadus Jr. removed the  
24 video from Instagram’s platform, though removal of the Infringing post does not  
25 resolve the matter as the Defendant has obtained direct and indirect profits that he  
26 would not otherwise have realized but for his infringement of Perry’s rights in the  
27 Subject Video.

1 14. Due to Defendants', and each of their, acts of infringement, Perry has  
2 suffered general and special damages in an amount to be established at trial.

3 15. Due to Defendants', and each of their, acts of copyright infringement as  
4 alleged herein, Defendants, and each of them, have obtained direct and indirect  
5 profits they would not otherwise have realized but for their infringement of Perry's  
6 rights in the Subject Video. As such, Perry is entitled to disgorgement of Defendants'  
7 profits directly and indirectly attributable to Defendants' infringement of Perry's  
8 rights in the Subject Video in an amount to be established at trial.

9 **PRAYER FOR RELIEF**

10 Wherefore, Plaintiff prays for judgment as follows:

11 **Against all Defendants, and Each with Respect to Each Claim for Relief:**

- 12 a. That Defendants, and each of them, as well as their employees, agents,  
13 or anyone acting in concert with them, be enjoined from infringing  
14 Perry's copyrights in the Subject Video, including without limitation an  
15 order requiring Defendants, and each of them, to remove any content  
16 incorporating, in whole or in part, the Subject Video from any print,  
17 web, or other publication owned, operated, or controlled by any  
18 Defendant;
- 19 b. That Defendants, their affiliates, and employees be enjoined from filing  
20 false Section 512 Counter Notifications in regard to the Subject Video  
21 and be required to withdraw their Counter Notification;
- 22 c. That Perry be awarded all profits of Defendants, and each of them, plus  
23 all losses of Perry, plus any other monetary advantage gained by the  
24 Defendants, and each of them, through their infringement, the exact sum  
25 to be proven at the time of trial, and, to the extent available, statutory  
26 damages as available under the 17 U.S.C. §§ 504, 512, 1203 and other  
27 applicable law;
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- d. That a constructive trust be entered over any revenues or other proceeds realized by Defendants, and each of them, through their infringement of Perry’ intellectual property rights;
- e. That Perry be awarded his attorneys’ fees as available under the Copyright Act U.S.C. §§ 505, 512, 1203 et seq.;
- f. That Perry be awarded his costs and fees under the above statutes;
- g. That Perry be awarded statutory and enhanced damages under the statutes set forth above;
- h. That Perry be awarded pre-judgment interest as allowed by law;
- i. That Perry be awarded the costs of this action; and
- j. That Perry be awarded such further legal and equitable relief as the Court deems proper.

Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P. 38 and the 7<sup>th</sup> Amendment to the United States Constitution.

Dated: March 19, 2024

Respectfully submitted,  
DONIGER / BURROUGHS

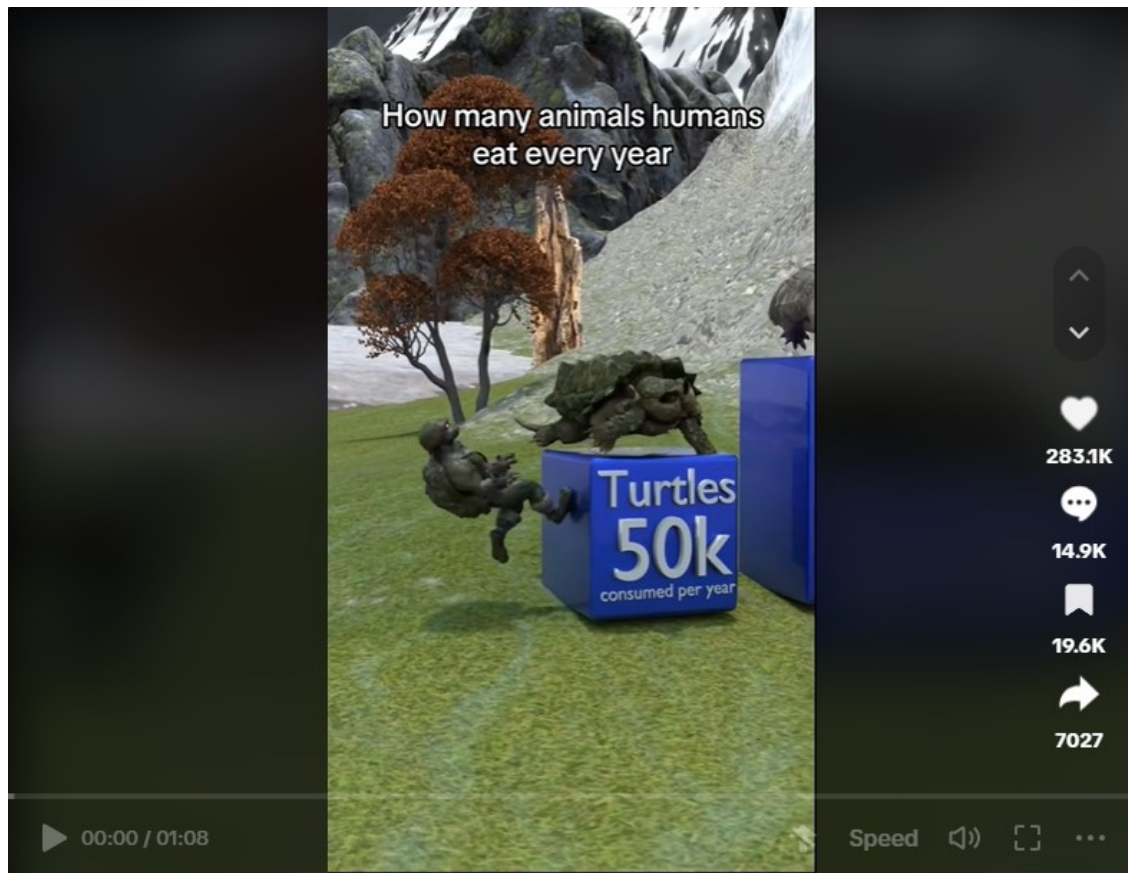
By: /s/ Stephen M. Doniger  
Stephen M. Doniger, Esq.  
*Attorney for Plaintiff*

Exhibit A

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**Subject Video and URL**

<https://www.tiktok.com/@starfieldstudio/video/7322820145817193774>



 **starfieldstudio**  
Brad Perry · 1-11

**Follow**

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**Exhibit B**

**Infringing Video and URL**

<https://www.instagram.com/p/C2YUU3fpml-/>

