

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

FOX NEWS NETWORK, LLC
1211 Avenue of the Americas
New York, NY 10036,

And

FOX MEDIA LLC,
10201 West Pico Boulevard
Los Angeles, CA 90067,

Plaintiffs,

v.

XOFNEWS.COM AND
FOXNEWS-ENTERTAINMENT.COM,
Internet domain names,

and

JOHN DOE,

Defendants.

Civil Action No. 20-cv-149

VERIFIED COMPLAINT

Plaintiffs Fox News Network, LLC and Fox Media LLC (collectively, the “Plaintiffs” or “Fox News”), by counsel, allege as follows for their Verified Complaint against the Defendants xofnews.com and foxnews-entertainment.com (hereinafter the “Defendant Domain Names”) and Defendant John Doe seeking the disabling of a network of Internet scam websites purportedly to be Fox News.

NATURE OF THE SUIT

1. This is an action for *in rem* cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), against the Defendant Domain Names and for

trademark counterfeiting and infringement under the Lanham Act, 15 U.S.C. § 1114(1), and copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*, against Defendant John Doe.

2. Since its launch in 1996, consumers around the world have come to associate the FOX NEWS name as one of the most influential and recognized news brands in the world. A recent independent survey conducted by Brand Keys, ranked Fox News as the “most trusted” American television news brand in the United States.

3. Plaintiffs’ invaluable rights in the famous and distinctive FOX NEWS trademarks have been deliberately infringed through the bad faith registration and use of the Defendant Domain Names, and through the unauthorized use of the FOX NEWS trademarks by Defendant John Doe to display a number of counterfeit FOX NEWS trademarks on fraudulent websites to sell dietary supplements via the Internet, including to residents of this Court’s district.

PARTIES

4. Plaintiff Fox News Network, LLC is a limited liability company organized and existing under the laws of Delaware with a principal place of business at 1211 Avenue of the Americas, New York, NY 10036. Fox News Network, LLC is a licensee of the FOX NEWS trademarks.

5. Plaintiff Fox Media LLC is a limited liability company organized under the laws of Delaware having an address of 10201 West Pico Boulevard, Los Angeles, CA 90067. Fox Media LLC is the owner of the FOX NEWS trademarks.

6. Defendant Domain Name xofnews.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, was registered on

October 3, 2019 by “WHOISGUARD PROTECTED”. A copy of the domain name registration record for Defendant Domain Name One is attached as Exhibit A.

7. Defendant Domain Name foxnews-entertainment.com is an Internet domain name which, according to records in the WHOIS database of domain name registrations, was registered on October 5, 2019 by “Domain Protection Services Inc.” A copy of the domain name registration record for Defendant Domain Name Two is attached as Exhibit B.

8. Defendant John Doe is a person or persons of unknown identity who uses the Defendant Domain Names, and a multitude of other domain names (hereinafter the “Doe Domain Names”) identified on Exhibit C, to operate a large network of fraudulent websites displaying counterfeit FOX NEWS marks to sell variations of the same dietary supplement.

JURISDICTION, VENUE AND JOINDER

9. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), for trademark counterfeiting and infringement under the Lanham Act, 15 U.S.C. § 1114(1), and for copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*

10. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

11. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(i)(I) because the listed registrant of each of the Defendant Domain Names is a privacy service and therefore Plaintiffs cannot find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

12. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(i)(II)(aa), Plaintiffs will give notice of the violations of their rights and intent to proceed *in rem*, to the postal and e-mail addresses set forth in the registration records for the Defendant Domain Names.

13. The Anticybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(3) and (4), states that the *in rem* action, jurisdiction, and remedies created by the statute are “in addition to any other civil action or remedy otherwise applicable” and “in addition to any other jurisdiction that otherwise exists, whether in rem or in personam.”

14. Plaintiffs’ claims against John Doe for counterfeiting, trademark infringement, and copyright infringement are based on John Doe’s misuse of FOX NEWS trademarks and Plaintiffs’ copyright protected works to operate fraudulent websites in order to sell products, John Doe’s sale and shipment of such products to consumers in the District, and, on information and belief, John Doe’s use of instrumentalities in this district to maintain, host, and display fraudulent websites bearing Plaintiffs’ intellectual property and to sell dietary supplements.

15. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) and 28 U.S.C. § 1391(b)(2) in that the .com domain name registry operator, VeriSign Inc., is located in this District and pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this District.

16. Joinder of Defendant John Doe and the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the claims set forth herein arise out of the same series of transactions and the same questions of law are common to all of the Defendants.

FOX NEWS’ RIGHTS

17. Fox News is one of the world’s preeminent news organizations. It is engaged in the business of creating and producing original television programming and content, gathering

news and information, and telecasting, publicly performing, publicly displaying, licensing and otherwise distributing its copyrighted and trademarked programming and content.

18. Since October 1996, Plaintiffs have operated a 24-hour all-encompassing news service dedicated to delivering breaking news as well as political and business news. A top five cable network, Fox News has been the most watched news channel in the country for more than ten years and, according to Brand Keys, is the most trusted television news source in the country.

19. Fox News is available in over 80 million U.S. households. In 2019, Fox News averaged 2.5 million viewers per night, making it the most-watched channel on basic cable.

20. As part of their news services, Fox News operates an Internet website located at www.FoxNews.com.

21. Additionally, Fox News promotes its products and services throughout the United States and the world under its FOX NEWS and FOX NEWS CHANNEL formative marks including word marks and design marks (collectively the “FOX NEWS Marks”). This includes Fox News’ use of the FOX NEWS word mark in its domain name FoxNews.com, as well as Fox News’ use of the FOX NEWS Marks throughout its website in association with the FOX NEWS brand.

22. Fox News uses the FOX NEWS Marks to indicate the source of its high-quality news and information related products and services, and consumers have come to distinguish Fox News’ goods and services as a result of the use and widespread promotion of the FOX NEWS Marks.

23. The FOX NEWS Marks are entitled to common law trademark rights.

24. The FOX NEWS Marks are famous and/or distinctive throughout the United States and the world in connection with Plaintiffs’ products.

25. The FOX NEWS word marks are registered around the world including on the Principal Trademark Register of the U.S. Patent and Trademark Office. Following is a representative sampling of Fox News' U.S. federal trademark registrations for the FOX NEWS word marks.


REG. NO.	MARK	REG. DATE	REGISTERED SERVICES
2469849	FOXNEWS.COM	July 17, 2001	providing on-line information in the fields of news and entertainment via a global communications network
2708769	FOX NEWS	Apr. 22, 2003	television broadcasting services
2697433	FOX NEWS	Mar. 18, 2003	entertainment services in the nature of television news programming
5170377	FOX NEWS	Mar. 28, 2017	downloadable mobile software applications for mobile communication devices for use in distribution of digital video, video files, video, and multimedia content; software for receiving, streaming, searching, accessing and reviewing audiovisual and multimedia content via the internet, mobile digital electronic devices, communications networks and wireless telecommunications networks
5170376	FOX NEWS RADIO	Mar. 28, 2017	downloadable mobile software applications for mobile communication devices for use in distribution of audio and audiovisual files and multimedia content; software for receiving, streaming, searching, accessing and reviewing audiovisual and multimedia content via the internet, mobile digital electronic devices, communications networks and wireless telecommunications networks
5153634	FOX NEWS HEADLINES 24/7	Mar. 07, 2017	radio broadcasting services
3396098	FOX NEWS TALK	Mar. 11, 2008	radio transmission services
3628862	FOX NEWS TALK	May 26, 2009	radio programming; entertainment services in the nature of production and distribution of radio programs; on-line information in the field of news via the internet
2172925	FOX NEWS CHANNEL	Jul. 14, 1998	broadcasting services, namely, a television news channel
2154239	FOX NEWS	Apr.	entertainment services in the nature of

	CHANNEL	28, 1998	television programing
2083588	FOX NEWS SUNDAY	Jul. 29, 1997	entertainment services in the nature of an on-going television news program

26. A true and correct copy of U.S. trademark registrations owned by Fox News for the FOX NEWS word marks is attached hereto as Exhibit D.

27. Fox News has also registered several stylized design marks with the United States Patent and Trademark Office for use in connection with its FOX NEWS branded products and services. Following is a representative sampling of Fox News' U.S. federal trademark registrations for the FOX NEWS design marks.

REG. NO.	MARK	REG. DATE	REGISTERED SERVICES
2159608		May 19, 1998	broadcasting services, namely, a television news channel
2162714		Jun. 02, 1998	entertainment services in the nature of television programming
2697434		Mar. 18, 2003	television broadcasting services
2697436		Mar. 18, 2003	entertainment services in the nature of television news programming
2882856		Sep. 07, 2004	jackets; wind resistant jackets; t-shirts; sport shirts; sweatshirts; hats; caps; neckties
3336682		Nov. 13, 2007	radio programming; entertainment services in the nature of production and distribution of radio programs; on-line information in the field of news via the internet
3336683		Nov. 13, 2007	radio transmission services

5185099		Apr. 18, 2017	downloadable mobile software applications for mobile communication devices for use in distribution of digital video, video files, video, and multimedia content; software for receiving, streaming, searching, accessing and reviewing audiovisual and multimedia content via the internet, mobile digital electronic devices, communications networks and wireless telecommunications networks
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28. A true and correct copy of U.S. trademark registrations owned by Fox News for the FOX NEWS design marks is attached hereto as Exhibit E.

29. Several of Plaintiffs’ registered FOX NEWS Marks have obtained incontestable status pursuant to 15 U.S.C. § 1065.

30. Plaintiffs’ incontestable federal registrations for the FOX NEWS Marks are *conclusive* evidence of the validity of the marks, of Fox News’ ownership of the marks, and of Fox News’ exclusive right to use the marks in U.S. commerce.

DEFENDANTS’ UNLAWFUL ACTS

31. This action centers around an intricate online scam perpetrated by John Doe designed to collect consumer financial information and sell dietary supplements. The scam involves the use of a variety of websites that purport to be associated with Fox News. Upon arriving at these websites, users see a fake Fox News article about a miracle dietary supplement that will help them lose weight. The sites then allow consumers to access a page containing payment fields where the user is prompted to enter their credit card information to buy the advertised supplement. The Defendant Domain Names and Doe Domain Names are all being used in association with variations of these fraudulent websites — i.e. they are being used by John Doe to display counterfeit Fox News trademarks to falsely associate the “news articles” promoting the supplement with Fox News and then redirect consumers to the payment page.

32. The domain name foxnews-entertainment.com was registered on October 5, 2019 through the domain name registrar Namecheap, Inc. in a name which is hidden by a proxy service, which on information and belief, is an alias for Defendant John Doe.

33. The domain name merely consists of the FOX NEWS mark with “-entertainment” appended to the end of the mark.

34. The domain name xofnews.com was registered on October 3, 2019, through the domain name registrar Namecheap, Inc. in a name which is hidden by a proxy service, which on information and belief, is an alias for Defendant John Doe.

35. The domain name merely consists of a typo, “xofnews,” of the FOX NEWS mark.

36. After registration, Defendant Domain Names were configured to display websites replicating the genuine Fox News website available at www.FoxNews.com and displaying Fox News’ copyright protected content and the FOX NEWS Marks.

37. Specifically, the Defendant Domain Names were configured in an almost identical manner — they displayed counterfeit versions of the FOX NEWS Marks in association with fraudulent websites selling variations of a dietary supplement.

38. The majority of the Doe Domain Names listed on Exhibit C were registered in 2018 and 2019 through several domain name registrars, primarily through the use of privacy services to conceal the identity of the true owner of the domain names.

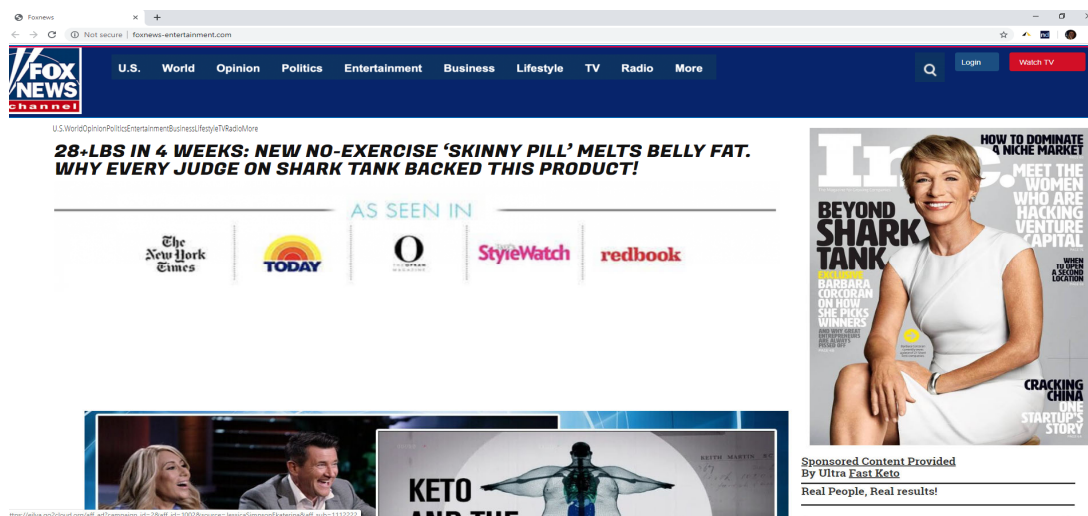
39. After registration, the Doe Domain Names were all configured in an almost identical manner to the Defendant Domain Names — they display counterfeit versions of the FOX NEWS Marks in association with websites providing fraudulent news and entertainment services in association with the sale of dietary supplements.

40. Fox News' investigator visited the Defendant Domain Names and the Doe Domain Names and purchased such products while in this District and later received the products in this District.

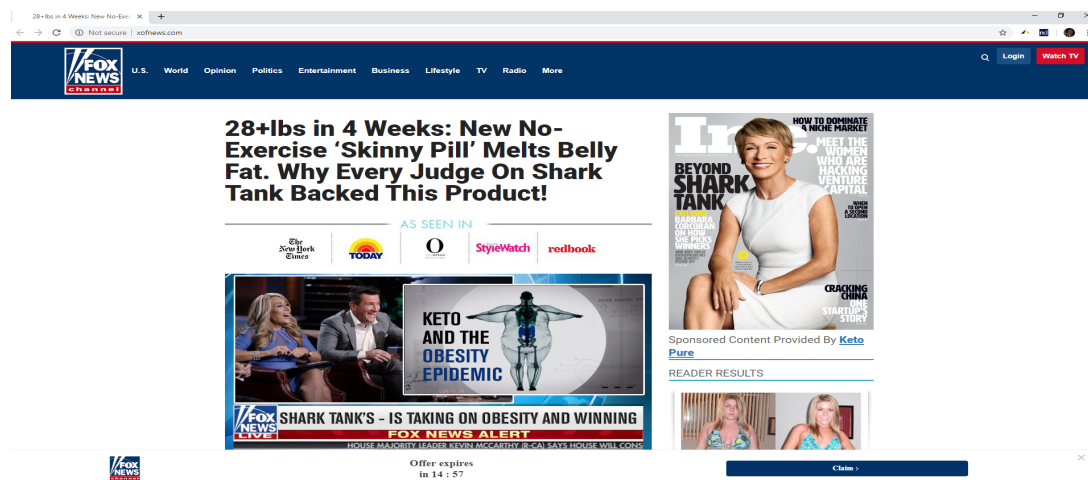
41. On information and belief, the Defendant Domain Names and Doe Domain Names are owned and/or operated by Defendant John Doe.

42. Following are two screen captures of the website displayed at the Defendant Domain Names:

foxnews-entertainment.com



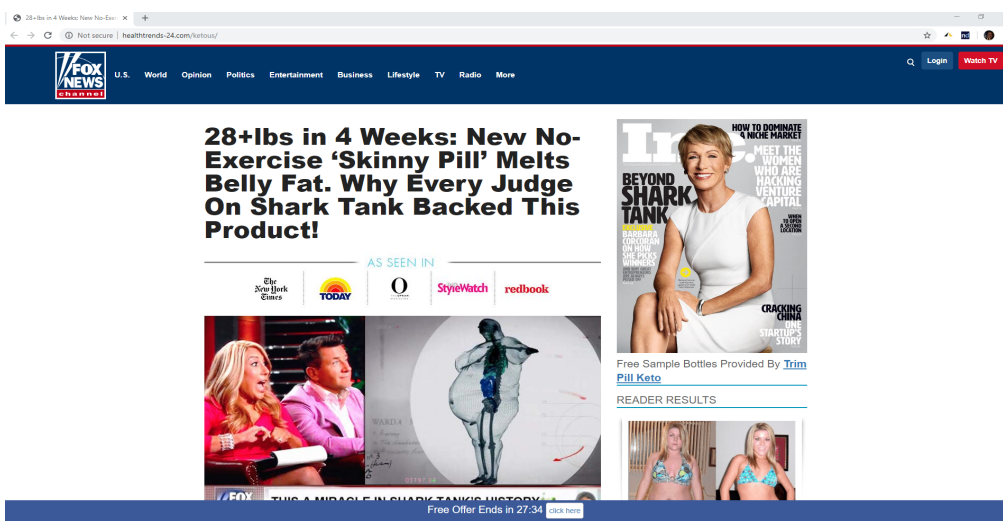
xofnews.com



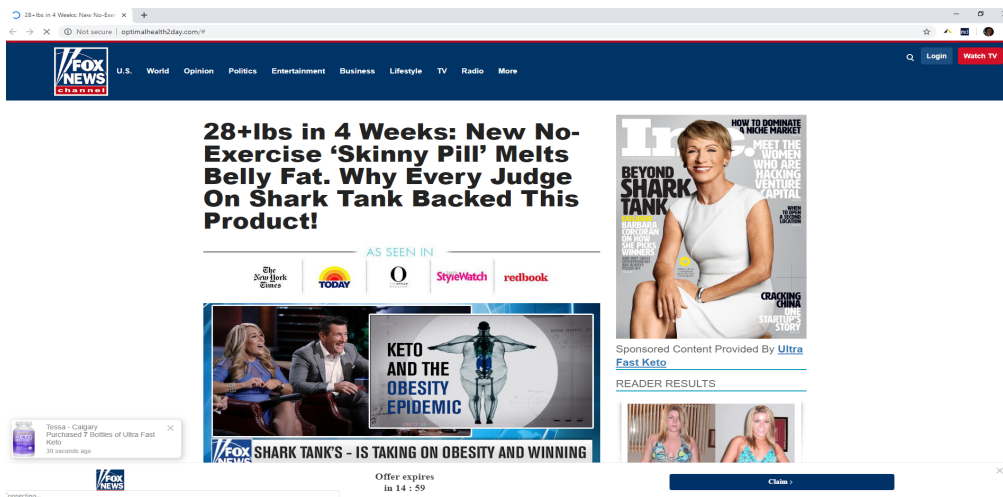
43. The screen captures shown above contain the FOX NEWS Marks of at least U.S. Reg. Nos. 2708769, 2697433, 5170377, 2172925, 2154239, 2159608, and 2162714.

44. Defendant John Doe is also using the Doe Domain Names, configured in the same manner as Defendant Domain Names, to display fraudulent websites containing copyright protected content and counterfeit FOX NEWS Marks to sell dietary supplement products. Following are several representative screen captures of the content found on the Doe Domain Names:

Example 1: healthtrends-24.com



Example 2: optimalhealth2day.com



Example 3: <https://www.patienthelp.org/weight-loss/ultra-fast-keto-boost-shark-tank-episode-diet-pill-fox-news.html>



45. The screen captures shown above contains the FOX NEWS Marks of at least U.S. Reg. Nos. 2708769, 2697433, 5170377, 2172925, 2154239, 2159608, and 2162714.

46. On information and belief, Defendant John Doe is using the counterfeit FOX NEWS Marks on the fraudulent sites displayed at the Doe Domain Names, to promote and sell dietary supplement products including to residents located in this District.

47. Fox News' investigator visited multiple websites displayed at the Doe Domain Names, while located in this District, and purchased products from the websites.

48. Defendant John Doe completed the sale through the Doe Domain Names by shipping the products to this District.

COUNT ONE:
(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)

49. Fox News repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

50. Fox News' federally registered FOX NEWS Marks are famous and/or distinctive and were famous and/or distinctive prior to the registration of the Defendant Domain Names.

51. The Defendant Domain Names fully incorporate the FOX NEWS mark and/or confusingly similar variations thereof.

52. The use of the FOX NEWS Marks within the Defendant Domain Names is without authorization from Fox News.

53. The Defendant Domain Names do not and cannot reflect the legal name of the registrant of the Domain Names.

54. The registrant of the Defendant Domain Names has not engaged in bona fide noncommercial or fair use of the FOX NEWS Marks in a website accessible under the Domain Names.

55. The websites displayed by the registrant of the Defendant Domain Names are likely to be confused with Fox News' legitimate online location at www.FoxNews.com.

56. Upon information and belief, the registrant of the Defendant Domain Names registered the Domain Names with intent to divert consumers seeking to access genuine FOX NEWS products online away from Fox News' online location at www.FoxNews.com, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain Names and the sites displayed through use of the Defendant Domain Names.

57. The images used on the websites associated with the Defendant Domain Names are copied from Fox News' online location at www.FoxNews.com without Plaintiffs' authorization.

58. The goods offered for sale via the Defendant Domain Names are promoted through fraudulent websites, bearing counterfeit FOX NEWS marks, and designed to mislead the public that the products are endorsed by Fox News.

59. Upon information and belief, the registrant of the Defendant Domain Names provided material and misleading false contact information when applying for and maintaining the registrations of the Defendant Domain Names, in that the person or entity identified as the registrant of the Defendant Domain Names is concealing their identity from the public WHOIS records for the Defendant Domain Names.

60. Fox News, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

61. The aforesaid acts by the registrant of the Defendant Domain Names constitutes registration, maintenance, or use of domain names that are confusingly similar to Plaintiffs' FOX NEWS Marks, with bad faith intent to profit therefrom.

62. The aforesaid acts by the registrant of the Defendant Domain Names constitutes unlawful cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

63. The aforesaid acts have caused, and are causing, great and irreparable harm to Fox News and the public. The harm to Fox News includes harm to the value and goodwill associated with the FOX NEWS Marks that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

64. Pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), Fox News is entitled to an order transferring the Defendant Domain Names to Fox News.

COUNT TWO:
(Trademark Counterfeiting)

65. Fox News repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

66. Defendant John Doe is intentionally and knowingly using counterfeit versions of the FOX NEWS Marks in connection with fraudulent websites that are being used for the sale, offering for sale and/or distribution of diet supplements.

67. Defendant John Doe has used spurious designations that are identical with, or substantially indistinguishable from, the FOX NEWS Marks on goods and/or services covered by the federal registrations for such marks including, for example, fraudulent websites designed to replicate Fox News' legitimate news and entertainment websites.

68. Defendant John Doe has used these spurious designations knowing they are counterfeit in connection with the advertisement, promotion, sale, offering for sale and distribution of goods and/or services.

69. Defendant John Doe's use of the counterfeit FOX NEWS Marks on fraudulent websites to advertise, promote, offer for sale, distribute and sell goods and/or services was, and is, without the consent of Fox News.

70. Defendant John Doe's unauthorized use of the counterfeit FOX NEWS Marks on fraudulent websites in connection with advertisement, promotion, sale, offering for sale and distribution of goods and/or services constitutes use of the FOX NEWS Marks in commerce.

71. Defendant John Doe's unauthorized use of the FOX NEWS Marks as set forth above is likely to: (a) cause confusion, mistake and deception; (b) cause the public to believe that the products and/or services sold by Defendant John Doe are authorized, sponsored or approved by Fox News or that Defendant John Doe is affiliated, connected or associated with or in some way related to Fox News; and (c) result in Defendant John Doe unfairly benefiting from Fox News' advertising and promotion and profiting from the reputation of Fox News and the FOX NEWS Marks all to the substantial and irreparable injury of the public and Fox News.

72. Defendant John Doe's aforesaid acts constitute willful trademark counterfeiting in violation of Sections 32 and 34 of the Lanham Act, 15 U.S.C. § 1114 and 1116(d)(1).

COUNT THREE:
(Trademark Infringement)

73. Fox News repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

74. Defendant John Doe is using the FOX NEWS Marks in commerce and has no valid rights in the FOX NEWS Marks.

75. Defendant John Doe has actual and/or constructive notice, pursuant to Section 22 of the Lanham Act, 15 U.S.C. § 1072, of the existence of Fox News' superior rights in its FOX NEWS Marks by reason of the existence of Fox News' aforementioned federal trademark rights.

76. Use of the FOX NEWS Marks by Defendant John Doe is without the permission or authorization of Fox News.

77. The aforesaid acts by Defendant John Doe have caused and/or are likely to cause confusion, mistake and/or deception among consumers and the public, leading the public falsely to believe that the products advertised and sold by Defendant John Doe are those of, are sponsored or approved by, or are in some way connected with Fox News.

78. The aforesaid acts by Defendant John Doe constitutes direct infringement of Fox News' trademark rights in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114.

79. The aforesaid acts have caused, and are causing, great and irreparable harm to Fox News and the public. The harm to Fox News includes harm to the value and goodwill associated with the FOX NEWS Marks that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

COUNT FOUR:
(Copyright Infringement)

80. Fox News repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

81. Fox News is the author and owner of certain copyright protected images and websites consisting of creative and original expressions (the “Fox News Works”).

82. The Fox News Works include without limitation the Fox News masthead, logos, menu structure, color schemes, and other materials and copyright protected content and software code published online at Fox News’ official website www.FoxNews.com, as well as in advertisements for legitimate Fox News products.

83. These materials are covered by U.S. Copyright Registration No. TX0005647280. A true and correct copy of U.S. Copyright Registration No. TX0005647280 is attached hereto as Exhibit F.

84. At all times relevant hereto, Fox News Network LLC has been and still is the owner and proprietor of all right, title, and interest in and to the Fox News Works.

85. The Fox News Works contain creative material wholly original to Fox News and are copyrightable subject matter under the copyright laws of the United States.

86. Defendant John Doe has infringed and continues to infringe Fox News’ copyrights by copying, distributing, altering, and/or displaying the Fox News Works through the Defendant Domain Names and the Doe Domain Names.

87. Such copying, distributing, altering, and/or displaying of the Fox News Works was done by Defendant John Doe without the consent, approval, or license of Fox News.

88. The foregoing actions of Defendant John Doe have been knowing, deliberate, willful, and in utter disregard of Fox News’ rights.

89. The above acts by Defendant John Doe violate Fox News' exclusive rights under § 106 of the Copyright Act, 17 U.S.C. § 106, and constitute willful infringement of Fox News' copyrights under § 501 of the Copyright Act, 17 U.S.C. § 501.

PRAYER FOR RELIEF

WHEREFORE, Fox News respectfully requests of this Court:

1. That judgment be entered in favor of Fox News on its claims of cybersquatting, trademark counterfeiting and infringement, and copyright infringement.

2. That the Court order the Defendant Domain Names be transferred to Fox News through transfer by VeriSign, Inc. of the Defendant Domain Names from the current domain name registrar to Fox News' domain name registrar of choice and by such registrar's change of the registrant to Fox News.

3. That any other domain names registered by the registrant of the Defendant Domain Names that resemble or include the FOX NEWS Marks be transferred to Fox News.

4. That Defendant John Doe be required to pay Fox News statutory damages pursuant to 15 U.S.C. § 1117(c) and 17 U.S.C. § 504(c);

5. That actual, compensatory, and statutory damages, be awarded against Defendant John Doe;

6. That Defendant John Doe be required to disgorge all revenues earned from the operation of fraudulent websites containing counterfeit FOX NEWS Marks and/or Fox News Works;

7. That the Court permanently enjoin Defendant John Doe, its officers, directors, principals, agents, servants, employees, successors and assigns, and all those in active concert or participation with them, jointly and severally, from:

a. Copying, distributing, altering, displaying, hosting, selling and/or promoting the Fox News Works;

b. Using any copy or colorable imitation of the FOX NEWS Marks in connection with the promotion, advertisement, display, sale, offering for sale, manufacture, printing, importation, production, circulation, or distribution of any product or service, in such fashion as to relate or connect such product in any way to Fox News, or to any goods sold, manufactured, sponsored, approved by, or connected with Fox News;

c. Using Facebook or other social media platforms to copy, distribute, alter, display, host, sell, and/or promote the FOX NEWS Marks or the Fox News Works; and

d. Engaging in any other activity constituting unfair competition with Fox News, or constituting an infringement of the FOX NEWS Marks or the Fox News Works, or constituting any damage to Fox News' name, reputation, or goodwill.

8. That those in active concert or participation with Defendant Doe and those with notice of the injunction, including without limitation any Internet search engines, web hosting and Internet service providers, domain name registrars, and domain name registries, cease facilitating access to any or all domain names and websites or accounts through which Defendant Doe engages in unlawful access to, use, reproduction, and distribution of the FOX NEWS Marks or Fox News Works;

9. That the domain name registries and registrars for the Doe Domain Names and websites, or their administrators, place the domain names on registryHold/serverHold or such other status to render the names/sites non-resolving;

10. That the Court order an award of costs and reasonable attorneys' fees, pursuant to 15 U.S.C. § 1117(a), 17 U.S.C. § 505, or as otherwise permitted by law, incurred by Fox News in connection with this action;

11. That Fox News be awarded pre-judgment interest and post-judgment interest on the above damages awards; and

12. That the Court order an award to Fox News of such other and further relief as the Court may deem just and proper.


Dated: February 12, 2020

By: /s/ Attison L. Barnes, III
Attison L. Barnes, III (VA Bar No. 30458)
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and Fox Media LLC*

VERIFICATION

I, Lesley A. West, Vice President, Legal & Business Affairs, of Fox News Network, LLC, declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the facts contained in the foregoing Verified Complaint are true and correct.



Lesley A. West

2/12/20

Date