

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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**Chris Scribe,**  
Plaintiff,

- against -

**COMPLAINT**

**Jury Trial Demanded**

**Pat Tracer,**  
dba **Cool Pumpkin Patterns on the Web,**  
an unincorporated business entity,  
Defendant.  
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I. Parties:

Plaintiff Chris Scribe resides at 123 Summit Avenue, #3, St. Paul, Minnesota.

Defendant Pat Tracer resides at 2878 Garfield Street N.E., Minneapolis, Minnesota.

II. The jurisdiction of the Court is invoked pursuant to a federal question arising under 17 U.S.C. §501 et. seq., and 28 U.S.C. §1338 and §1400. This is a claim for copyright infringement under the U.S. Copyright Law.

III. Statement of Claim.

Beginning on or about July 4, 2007 and continuing through the filing of this lawsuit, defendant willfully and knowingly appropriated an original image titled *Grim Reaper*, for which plaintiff holds the copyright and which copyright was registered on June 20, 2007. Defendant used this image for commercial benefit and continues to receive such commercial benefit despite plaintiff's demands to withdraw use of said image.

IV. Remedy.

1. Plaintiff demands actual damages and the profits earned by defendant from of the infringement.
2. In the alternative, plaintiff demands statutory damages in the amount of \$30,000 for infringement of plaintiff's copyright.
3. In the alternative, plaintiff demands statutory damages for willful infringement of plaintiff's copyright in the amount of \$150,000.
4. Plaintiff demands reimbursement of attorney's fees and cost incurred in this action.

Dated this 25<sup>th</sup> day of October, 2007

Defenders of Artists' Rights, LLP

By: \_\_\_\_\_

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