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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROBERT J. LANG, NOBORU MIYAJIMA,
MANUEL SIRGO, NICOLA BANDONI,
TOSHIKAZU KAWASAKI, AND JASON KU

PLAINTIFFS,

V.

SARAH MORRIS,

DEFENDANT.

CASE NO.

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Robert Lang, Noboru Miyajima, Manuel Sirgo, Nicola Bandoni, Toshikazu Kawasaki, and Jason Ku ("Plaintiffs") allege the following.

I. NATURE OF THE ACTION

1. This is an action by six artists to recover damages and enjoin infringement of their copyrighted artworks by Sarah Morris, an internationally known artist and film maker.

II. PARTIES

2. Plaintiff Robert J. Lang ("Lang") is an individual residing in Alamo, California.
3. Plaintiff Noboru Miyajima ("Miyajima") is an individual residing in Japan.
4. Plaintiff Manuel Sirgo ("Sirgo") is an individual residing in Spain.
5. Plaintiff Nicola Bandoni ("Bandoni") is an individual residing in Italy.
6. Plaintiff Toshikazu Kawasaki ("Kawasaki") is an individual residing in Japan.
7. Plaintiff Jason Ku ("Ku") is an individual residing in Massachusetts.
8. Defendant Sarah Morris ("Morris" or "Defendant") is an individual residing in New York.

III. JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a) because this case arises under the Copyright Laws of the United States, 17 U.S.C. § 101 et seq. ("Copyright Act").
10. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(1) and 1400(a) because this is a judicial district in which Defendant resides.

IV. PLAINTIFFS' RIGHT TO COPYRIGHT PROTECTION

11. On the date of first publication of the relevant works, each Plaintiff was a national or domiciliary of the United States or a country with which the United States has a copyright treaty.
12. Each of Plaintiffs' relevant works was first published in the United States or in a country that is party to the Universal Copyright Convention.

V. BACKGROUND

13. The worldwide popularity of origami, the ancient art of paper folding, has increased dramatically in the past several decades. The application of mathematical

formulas has made it possible to design and create lifelike, three-dimensional figures from a single sheet of paper. Modern origami is a unique sculptural art with millions of enthusiasts (also known as “folders” or “origami artists”) who use the internet to share images and communicate about their interests. In addition, there are local and international folding groups, as well as conferences, publications, competitions, and art exhibits featuring origami.

14. Plaintiffs are among a small number of artists who are capable of designing highly complex origami models. Plaintiffs have created and published crease patterns for some of their models.

15. The lines of a crease pattern represent the folds needed to create a three-dimensional origami model from a sheet of paper, but the intricacy of these geometric diagrams gives crease patterns their own aesthetic appeal. Crease patterns thus lend themselves to derivative works, such as colorized versions.

16. Since the mid-1990s, Sarah Morris has been internationally recognized as an artist and film maker. In 2007, Morris debuted her “Origami series,” which consists of approximately 37 works. Morris has represented in interviews and promotional materials that the works in the Origami series are based on “found origami designs” or “traditional” patterns. In creating most of the works, Morris transferred crease patterns to canvas and applied household gloss paint to the spaces between the lines. Morris also created drawings by colorizing the lines of crease patterns.

17. Twenty-four of Morris’s works are substantially similar to copyrighted artworks belonging to Plaintiffs (“Plaintiffs’ Works”) because Morris has unlawfully copied Plaintiffs’ Works for commercial use. Attached as **Exhibit A** and incorporated herein by this reference is a chart showing each Plaintiff’s artwork and the corresponding Infringing Work.

18. On information and belief, the infringing works by Morris (collectively

"the Infringing Works") are titled: Angel [Origami] ("Angel"), Bat [Origami] ("Bat"), Calypte Anna [Origami] ("Calypte Anna"), Cat [Origami] ("Cat"), Cat [Origami] ("Cat (outline)")¹, Dragon [Origami] ("Dragon"), Falcon [Origami] ("Falcon"), Grasshopper [Origami] ("Grasshopper"), Grasshopper [Origami] ("Grasshopper (outline)"), June Beetle [Origami] ("June Beetle"), Kawasaki Cube [Origami] ("Kawasaki Cube"), Mommoth [Origami] ("Mommoth (outline)"), Parrot [Origami] ("Parrot"), Pegasus [Origami] ("Pegasus"), Pegasus [Origami] ("Pegasus (outline)"), Praying Mantis [Origami] ("Praying Mantis"), Rabbit [Origami] ("Rabbit"), Rhino Beetle [Origami] ("Rhino Beetle"), Rockhopper [Origami] ("Rockhopper"), Swan [Origami] ("Swan"), Swan [Origami] ("Swan (outline)"), Tarantula [Origami] ("Tarantula"), Weasel [Origami] ("Weasel (outline)"), and Wolf [Origami] ("Wolf").

19. Each of Plaintiffs' Works is the subject of a valid Certificate of Copyright Registration from the Register of Copyrights. Attached as **Exhibit B** and incorporated herein by this reference is a list of Plaintiffs' Works and the corresponding copyright information, including the dates of registration.

20. The works in the Origami series have been exhibited individually and in various combinations in the United States and all over the world, including New York, Miami, London, Berlin, Tokyo, Frankfurt, and Abu Dhabi. Images of the works have also been published in exhibition promotional materials, auction catalogs, and magazine articles, both in print and on the internet.

21. On information and belief, Morris is responsible for the creation of additional works that are derivative of the Infringing Works, including, but not limited to, a magazine cover and handmade rug derived from "Angel," and signed original prints

¹ Plaintiffs have used the word "outline" in parentheses to identify certain works in the series, based on the style of the work. The works so labeled appear to be drawings, rather than paintings.

of “Rockhopper.”

22. Morris actively promotes herself and her work nationally and internationally. On information and belief, Morris and/or her agents have sold or offered for sale the Infringing Works throughout the United States and internationally. Morris has promoted the Origami series extensively, through interviews and articles that are readily accessible on the internet, in videos, and in print. Morris and/or her agents have exhibited the Infringing Works in cities around the world.

23. Morris has willfully infringed Plaintiffs’ copyrights by reproducing, displaying, distributing, and utilizing for purposes of trade and promotion unauthorized derivative versions of Plaintiffs’ Works.

24. Morris has received substantial benefits in connection with the commercial promotion of the Infringing Works. On information and belief, Morris has derived significant income and advanced her reputation and career as a result of exhibiting, promoting, licensing, and selling the Origami series in general and the Infringing Works specifically.

25. Unless enjoined, Morris will continue the infringing activities and will continue to derive income and other benefits therefrom.

26. Morris has claimed in interviews and promotional materials that the Origami series is based on “found diagrams,” “found designs,” and “traditional origami diagrams.” During the same time period, Plaintiffs have continuously held themselves out as the authors of the crease patterns Morris copied.

27. Morris has created confusion as to the authorship of Plaintiffs’ Works and threatened their professional reputation by failing to attribute Plaintiffs and by making repeated, affirmative misrepresentations about the origins of the crease patterns she copied.

28. Morris’s actions have created competition for Plaintiffs by occupying the

market for colorized versions of their copyrighted artworks.

FACTS SPECIFIC TO ROBERT J. LANG

29. Lang has been an avid student of origami for over forty years and is recognized as one of the world's leading masters of the art.

30. Lang makes his living primarily by creating commissioned origami works for private and commercial use, writing and publishing books on origami, lecturing on the topic of origami, and consulting on the scientific and mathematical applications of origami. Lang's origami models have appeared in print and on television and have been placed on display in public venues and galleries.

31. Lang is the author of the book *Origami Design Secrets: Mathematical Secrets for an Ancient Art*, published on or about October 23, 2003, by A K Peters Ltd. The book's copyright was registered on December 1, 2003, which is within three months after first publication of the work. A copy of the Certificate of Registration of Copyright is attached as **Exhibit C** and incorporated herein by this reference.

32. Lang has exhibited his crease patterns as art on several occasions.

33. The artworks published in *Origami Design Secrets* that are relevant to this lawsuit are:

- "Grasshopper" (Figure 5.29 at page 113);
- "Hummingbird" (Figure 4.15 at page 66);
- "KNL Dragon" (Figure 6.12 at page 138);
- "Pegasus" (Figure 8.27 at page 246);
- "Praying Mantis" (Figure 8.49 at page 260);
- "Rabbit" (Figure 13.11 at page 530); and
- "Tarantula" (Figure 9.23(a) at page 300).

34. Lang has maintained a website at www.langorigami.com at all times relevant to this lawsuit.

35. Lang's artworks "Cooper's Hawk" and "Eupatorus gracilicornis" were published on Lang's website at all times relevant to this lawsuit. A copy of the Certificate of Registration of Copyright for "coopers_hawk_cp" (a.k.a. "Cooper's Hawk") is attached as **Exhibit D** and incorporated herein by this reference. A copy of the Certificate of Registration of Copyright for "Eupatorus gracilicornis CP" is attached as **Exhibit E** and incorporated herein by this reference.

36. Lang learned of Morris's infringement of his artworks on April 2, 2009, when he was contacted by another origami artist who had recognized crease patterns created by Lang and other Plaintiffs upon viewing Morris's work. After seeing examples of infringement of his work on the internet, Lang took action that same day, sending the first of three emails to galleries associated with Morris in an attempt to reach her. Lang informed the galleries that he wished to communicate with Morris because he had become aware that she had used his copyrighted artworks without authorization, colorized them, and represented them as her own for commercial purposes.

37. On June 23, 2009, Morris responded to Lang in a letter attached to an email. Morris wrote: "I referred to some of your instructions as inspiration for my paintings" Morris thereby admitted she had access to Lang's artworks at the time she created the Infringing Works. A true and correct copy of Morris's letter is attached as **Exhibit F** and incorporated herein by this reference.

FACTS SPECIFIC TO NOBORU MIYAJIMA

38. Miyajima is a professional origami artist and instructor. He has published origami models and crease patterns in *Origami Tanteidan Magazine* and *Origami Tanteidan Convention Book*.

39. Since 2002, Miyajima has maintained a website at <http://www.h5.dion.ne.jp/~origami/e/>.

40. The following artworks of Miyajima were published on Miyajima's website

at all times relevant to this lawsuit:

- "Bat,"
- "Cat,"
- "Mommoth,"
- "Penguin,"
- "Swan,"
- "Weasel," and
- "Wolf."

41. A copy of the Certificate of Registration of Copyright for each artwork is attached as **Exhibits G-M** and incorporated herein by this reference.

42. Miyajima learned of Morris's infringement of his artworks no earlier than August 4, 2009.

FACTS SPECIFIC TO MANUEL SIRGO

43. Manuel Sirgo, also known as Manuel Sirgo Alvarez, is an origami artist living in Spain. He is the president of the Spanish paperfolding association, *Asociacion Espanola de Papiroflexia*. Sirgo is the author of several origami books and is well known in the origami world.

44. Sirgo's artwork "Macaw" appears on page 27 of his book, *Origami Menagerie: 21 Challenging Models*, published in the United States in 2008 by Dover Publications, Inc. A copy of the Certificate of Registration of Copyright for "*Origami Menagerie*" is attached as **Exhibit N** and incorporated herein by this reference.

45. Sirgo learned of Morris's infringement of his artwork no earlier than October 12, 2009.

FACTS SPECIFIC TO NICOLA BANDONI

46. Bandoni is an origami artist living in Italy.

47. Bandoni's artwork "Cyclommatus metallifer" was published on the

internet at all times relevant to this lawsuit.

48. A copy of the Certificate of Registration of Copyright for "Cyclommatus metallifer" is attached as **Exhibit O** and incorporated herein by this reference.

49. Bandoni learned of Morris's infringement of his artwork no earlier than December 4, 2009.

FACTS SPECIFIC TO TOSHIKAZU KAWASAKI

50. Kawasaki is an origami artist living in Japan.

51. Kawasaki is the author of the artwork "Kawasaki Cube #1," appearing at page 30 of a book by Kunihiro Kasahara and Toshie Takahama, *Origami for the Connoisseur*, published in the United States in 1987 by Japan Publications, Inc.

52. A copy of the Certificate of Registration of Copyright for "Kawasaki Cube #1" is attached as **Exhibit P** and incorporated herein by this reference.

53. Kawasaki learned of Morris's infringement of his artwork no earlier than October 22, 2009.

FACTS SPECIFIC TO JASON KU

54. Ku is an origami artist living in Massachusetts.

55. Ku's artwork "Harpy" was published on the internet at all times relevant to this lawsuit.

56. A copy of the Certificate of Registration of Copyright is attached as **Exhibit Q** and incorporated herein by this reference.

57. Ku learned of Morris's infringement of his artwork no earlier than December 13, 2010.

FIRST CLAIM FOR RELIEF (BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)

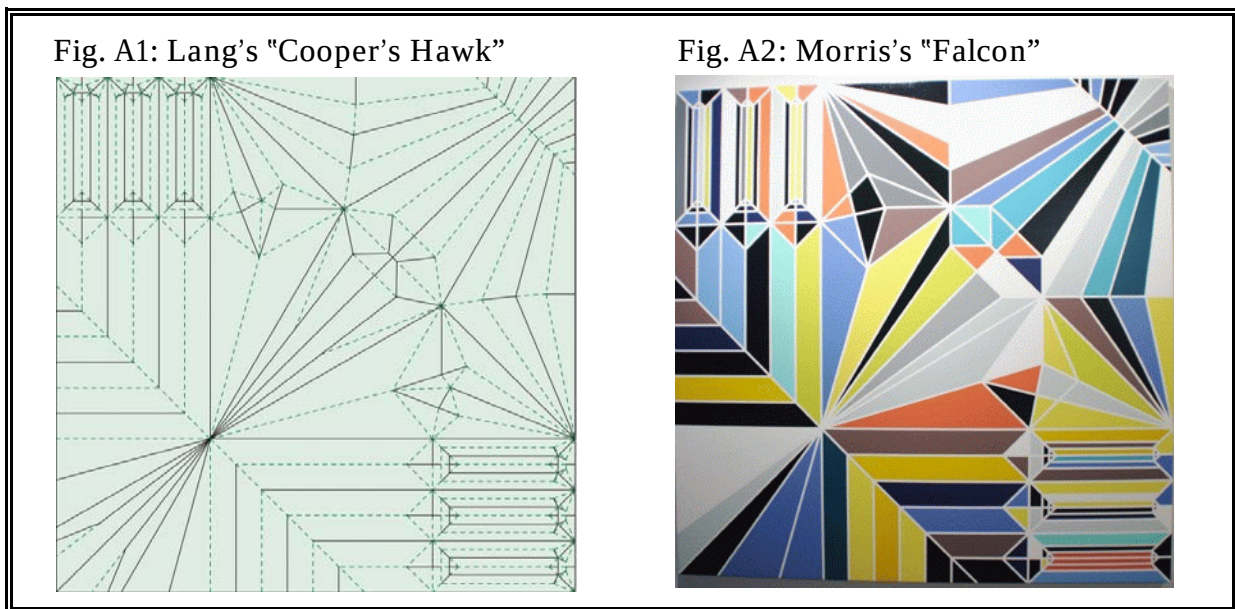
58. Lang re-alleges and incorporates by reference paragraphs 1 through 37 as though fully set forth herein.

59. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Cooper's Hawk."

60. Morris's painting "Falcon" (at Fig. A2, below) is substantially similar to Lang's artwork "Cooper's Hawk" (at Fig. A1, below).

61. Morris willfully and without permission copied Lang's artwork or its constituent elements.

62. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



**SECOND CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

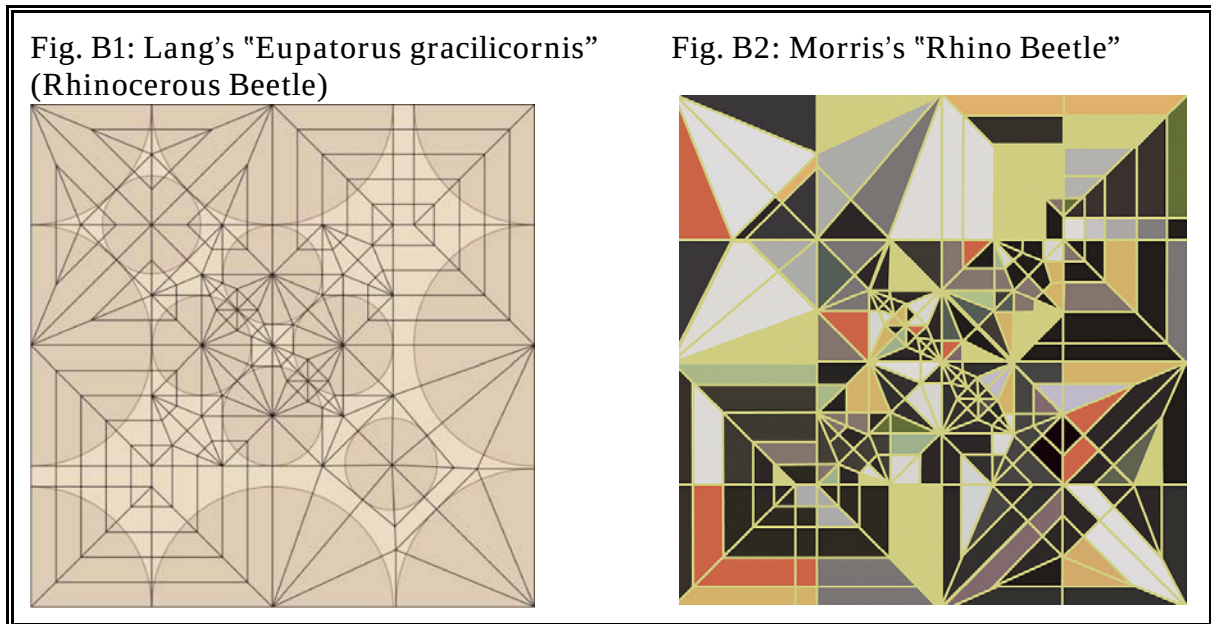
63. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 62, as though fully set forth herein.

64. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Eupatorus gracilicornis."

65. Morris's painting "Rhino Beetle" (at Fig. B2, below) is substantially similar to Lang's artwork "Eupatorus gracilicornis" (at Fig. B1, below).

66. Morris willfully and without permission copied Lang's artwork or its constituent elements.

67. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



**Third Claim for Relief
(By Robert J. Lang for Copyright Infringement)**

68. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 67, as though fully set forth herein.

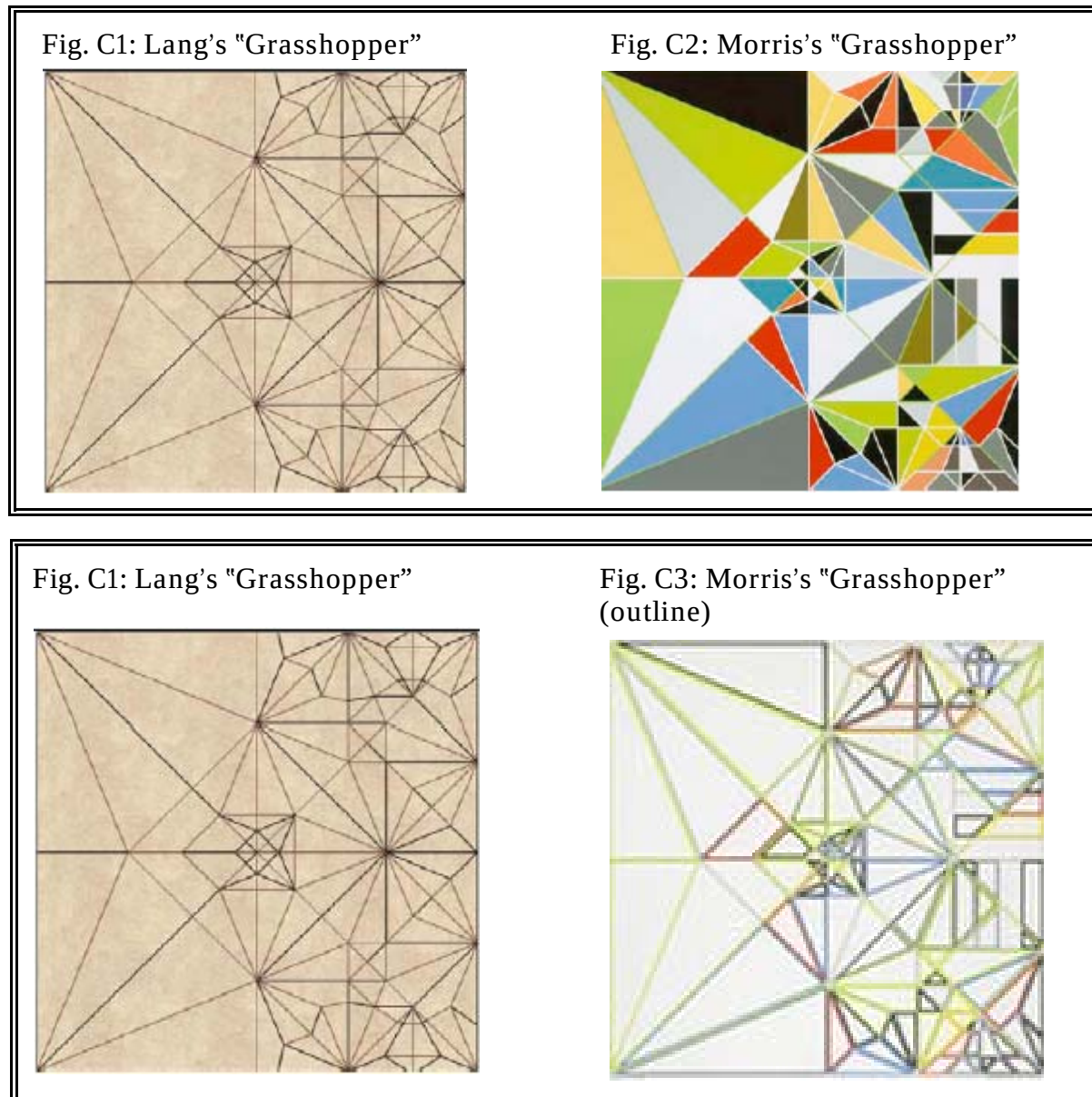
69. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Grasshopper."

70. Two of Morris's works titled "Grasshopper" (at Figs. C2 and C3, below) are substantially similar to Lang's artwork "Grasshopper" (at Fig. C1, below).

71. Morris willfully and without permission copied Lang's artwork or its

constituent elements.

72. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.



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**FOURTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

73. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 72, as though fully set forth herein.

74. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Hummingbird."

75. Morris's painting "Calypso Anna" (at Fig. D2, below) is substantially similar to Lang's artwork "Hummingbird" (at Fig. D1, below).

76. Morris willfully and without permission copied Lang's artwork or its constituent elements.

77. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.

Fig. D1: Lang's "Hummingbird"

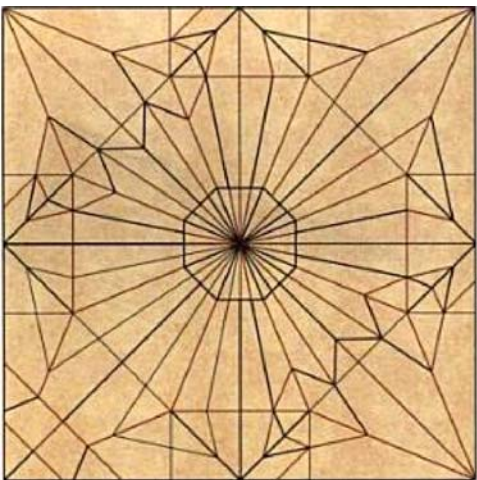
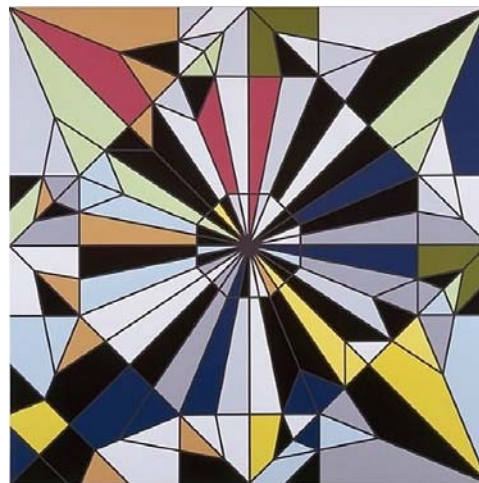


Fig. D2: "Calypso Anna"



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**FIFTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

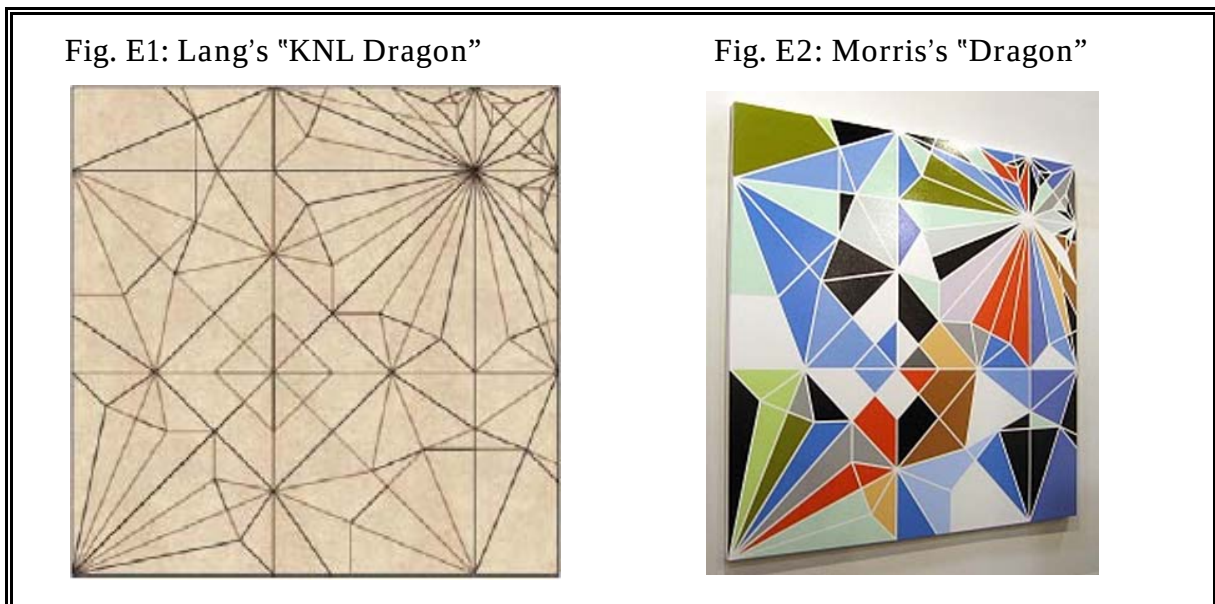
78. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 77, as though fully set forth herein.

79. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "KNL Dragon."

80. Morris's painting "Dragon" (at Fig. E2, below) is substantially similar to Lang's artwork "KNL Dragon" (at Fig. E1, below).

81. Morris willfully and without permission copied Lang's artwork or its constituent elements.

82. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.



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**SIXTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

83. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 82, as though fully set forth herein.

84. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Pegasus."

85. Two of Morris's works titled "Pegasus" (at Figs. F2 and F3, below) are substantially similar to Lang's artwork "Pegasus" (at Fig. F1, below).

86. Morris willfully and without permission copied Lang's artwork or its constituent elements.

87. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.

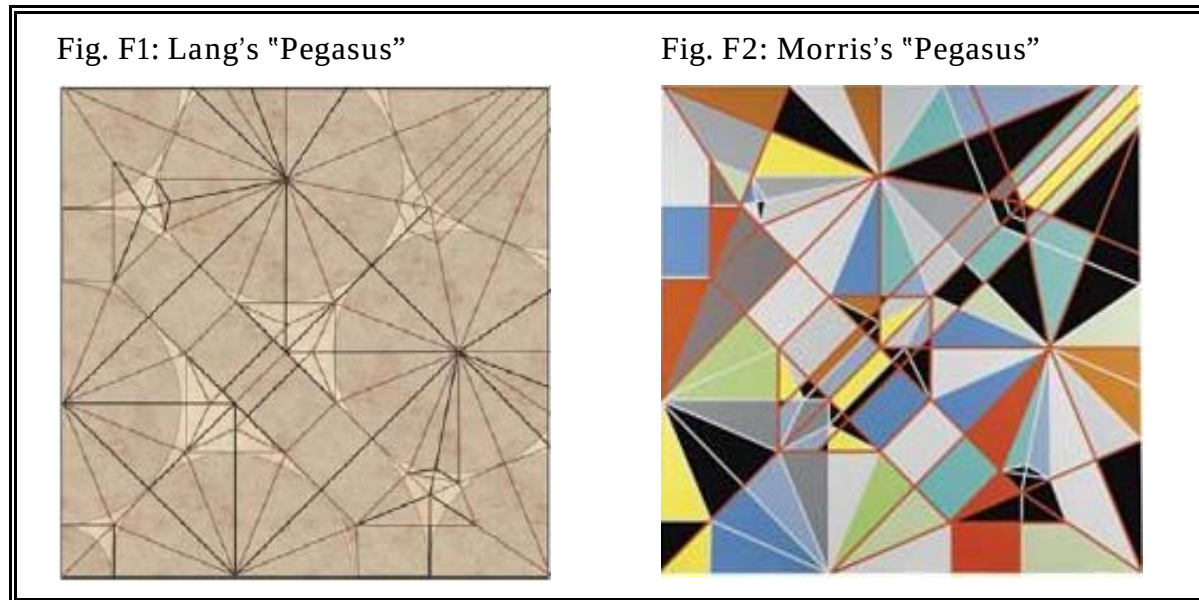


Fig. F1: Lang's Pegasus

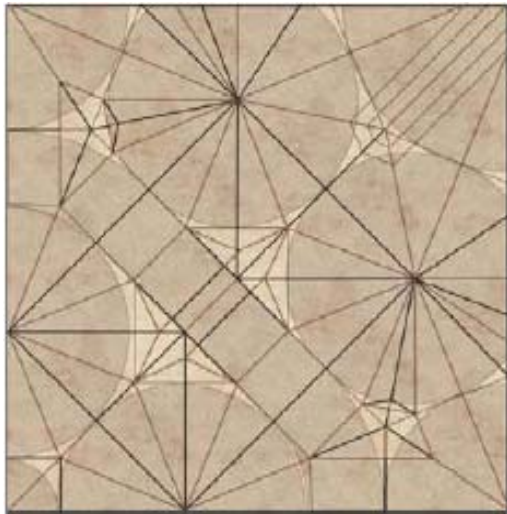
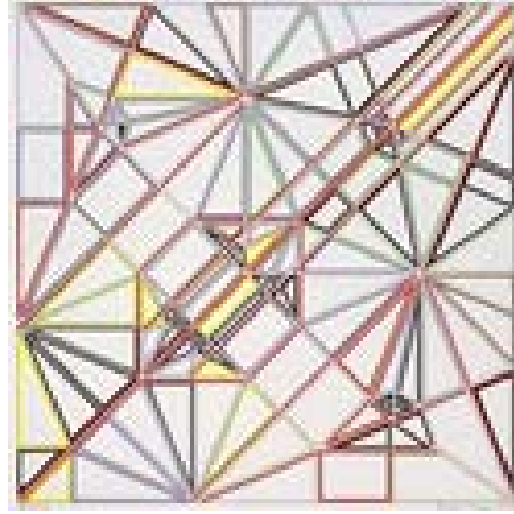


Fig. F3: Morris's "Pegasus" (outline)



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**SEVENTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

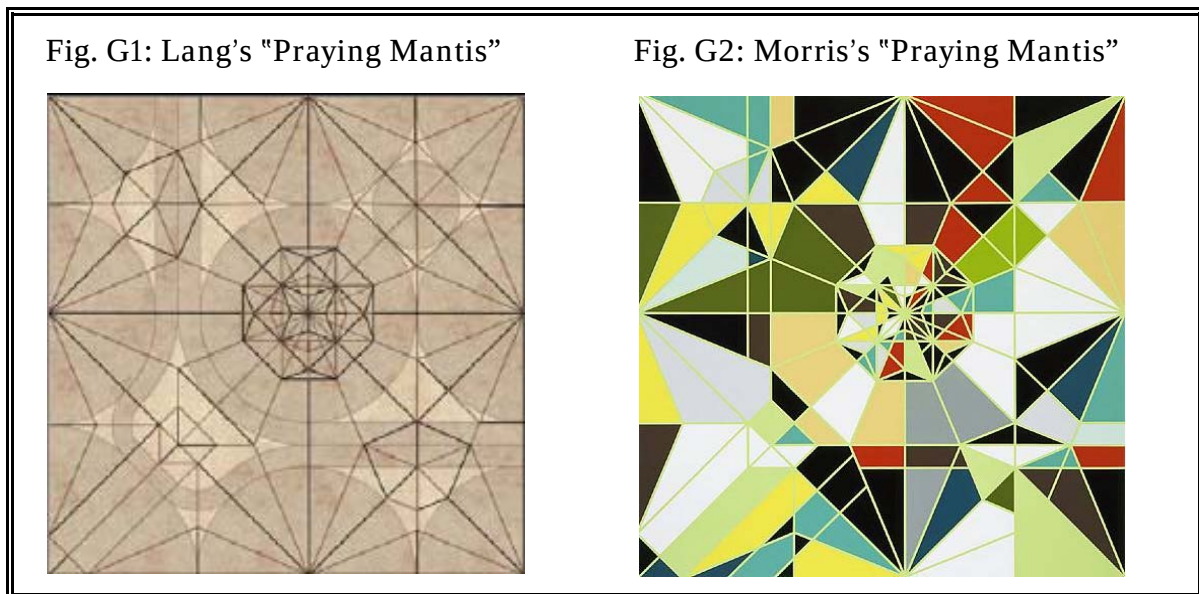
88. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 87, as though fully set forth herein.

89. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Praying Mantis."

90. Morris's painting "Praying Mantis" (at Fig. G2, below) is substantially similar to Lang's artwork "Praying Mantis" (at Fig. G1, below).

91. Morris willfully and without permission copied Lang's artwork or its constituent elements.

92. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.



**EIGHTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

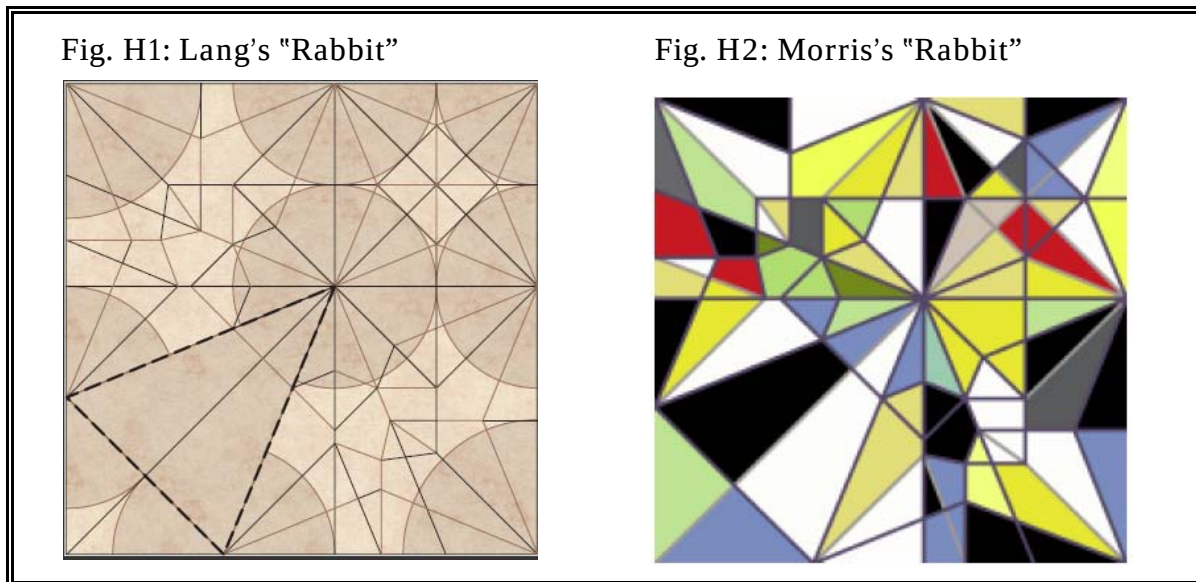
93. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 59 through 92, as though fully set forth herein.

94. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Rabbit."

95. Morris's painting "Rabbit" (at Fig. H2, below) is substantially similar to Lang's artwork "Rabbit" (at Fig. H1, below).

96. Morris willfully and without permission copied Lang's artwork or its constituent elements.

97. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.



**NINTH CLAIM FOR RELIEF
(BY ROBERT J. LANG FOR COPYRIGHT INFRINGEMENT)**

98. Lang re-alleges and incorporates by reference paragraphs 1 through 37, and paragraphs 58 through 97, as though fully set forth herein.

99. At all times relevant hereto, Lang has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Tarantula."

100. Morris's painting "Tarantula" (at Fig. I2, below) is substantially similar to Lang's artwork "Tarantula" (at Fig. I1, below).

101. Morris willfully and without permission copied Lang's artwork or its constituent elements.

102. Lang is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial. Alternatively, pursuant to 17 U.S.C. § 504, Lang has and reserves the right to elect statutory damages. Lang is furthermore entitled to attorney's fees and costs pursuant to 17 U.S.C. § 505.

Fig. I1: Lang's "Tarantula"

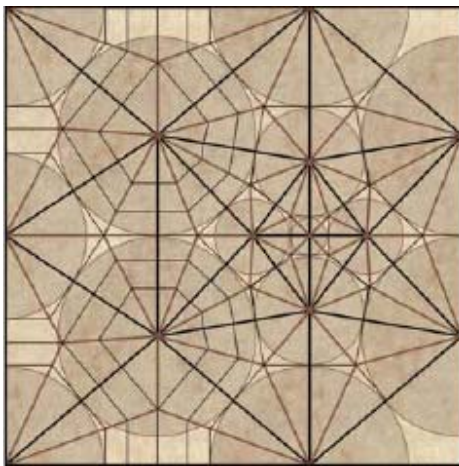
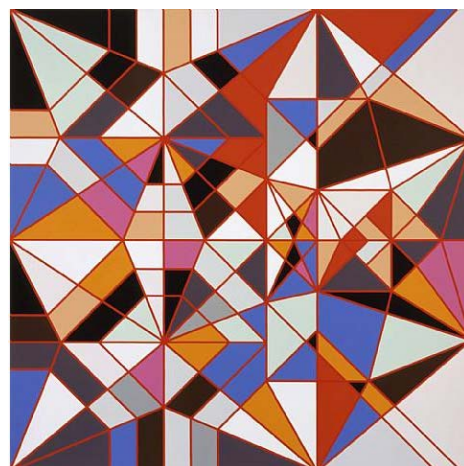


Fig. I2 : Morris's "Tarantula"



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**TENTH CLAIM FOR RELIEF
(BY NOBORU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

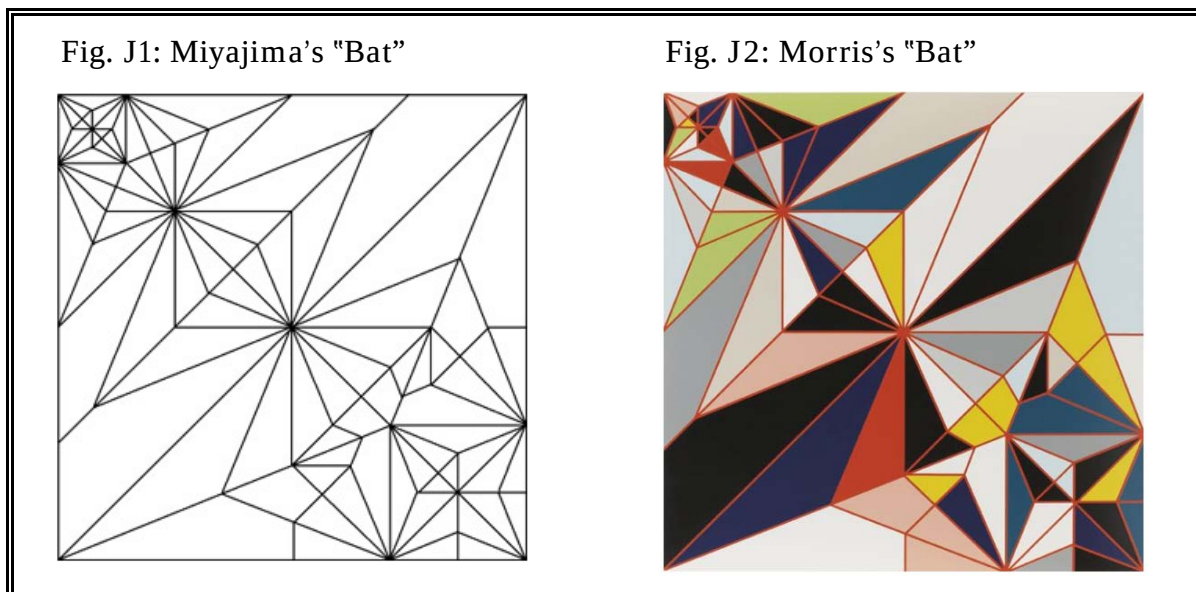
103. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, and paragraphs 38 through 42, as though fully set forth herein.

104. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Bat."

105. Morris's painting "Bat" (at Fig. J2, below) is substantially similar to Miyajima's artwork "Bat" (at Fig. J1, below).

106. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

107. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



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**ELEVENTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

108. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 107, as though fully set forth herein.

109. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Cat."

110. Two of Morris's works titled "Cat" (at Figs. K2 and K3, below) are substantially similar to Miyajima's artwork "Cat" (at Fig. K1, below).

111. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

112. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.

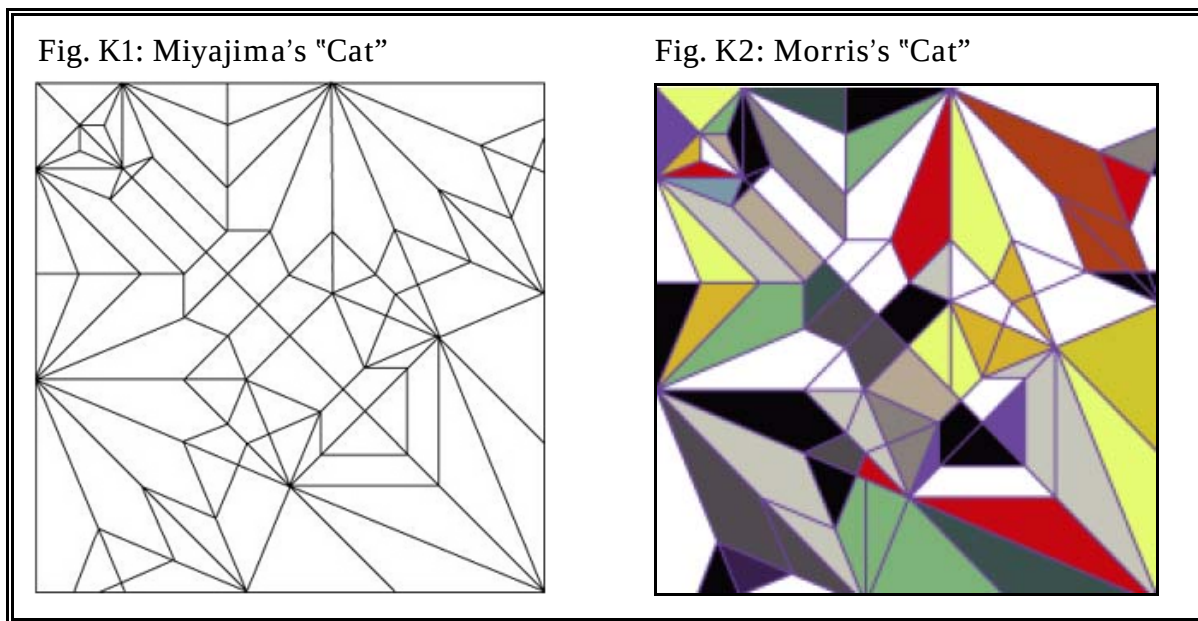


Fig. K1: Miyajima's "Cat"

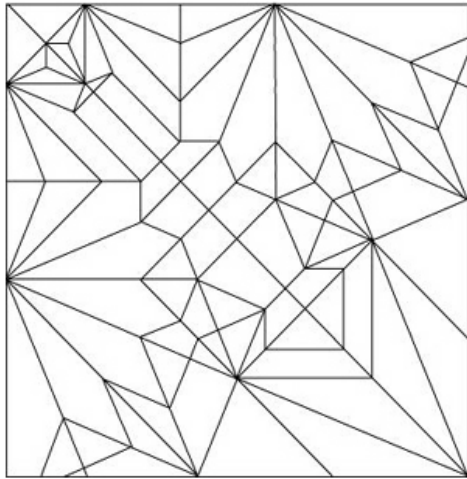
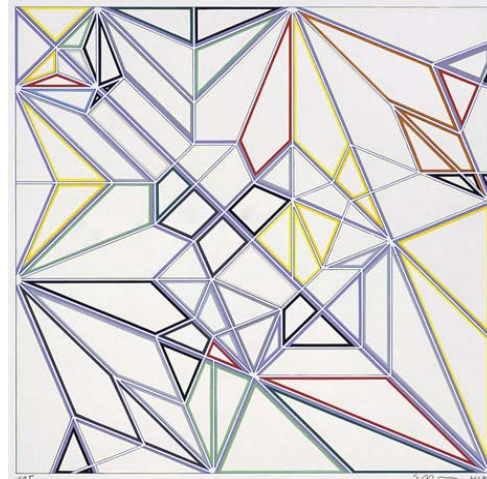


Fig. K3: Morris's "Cat" (outline)



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**TWELFTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

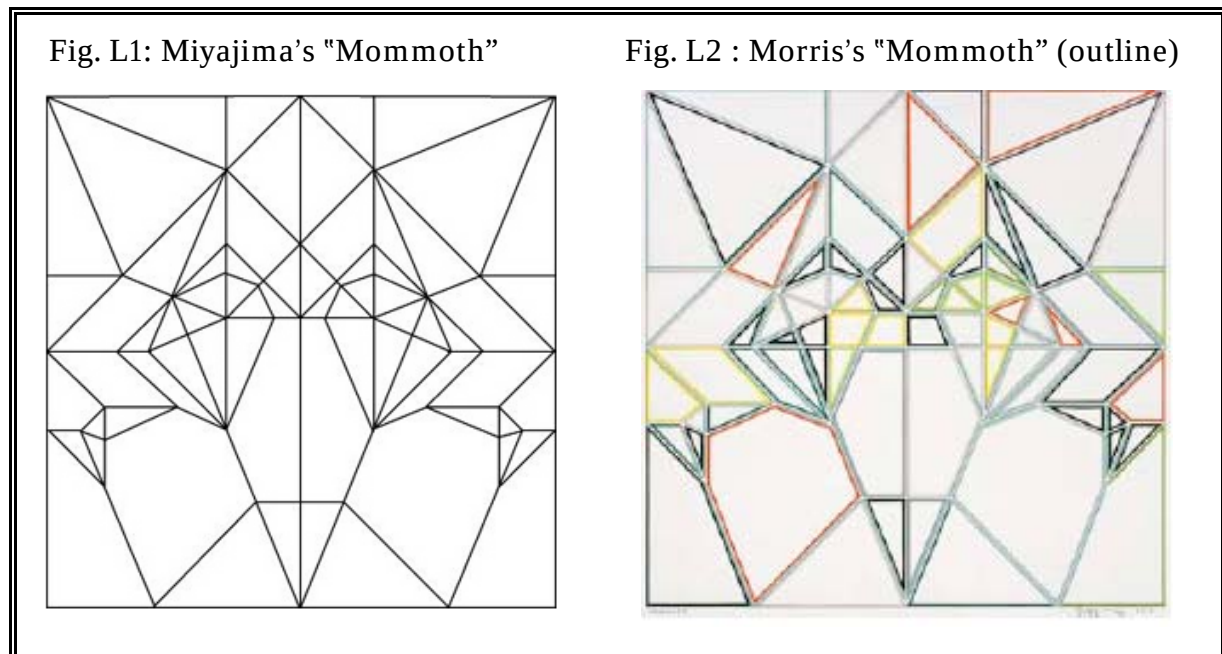
113. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 112, as though fully set forth herein.

114. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Mommoth."

115. Morris's work "Mommoth" (at Fig. J2, below) is substantially similar to Miyajima's artwork "Mommoth" (at Fig. J1, below).

116. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

117. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



**THIRTEENTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

118. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 117, as though fully set forth herein.

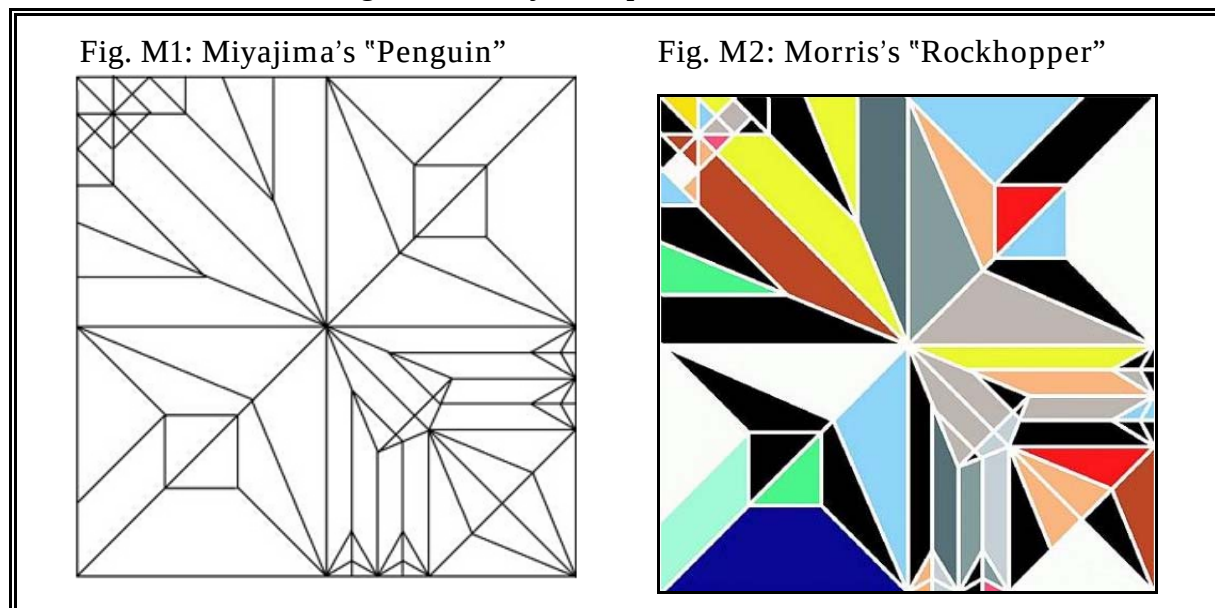
119. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Penguin."

120. Morris's painting "Rockhopper" (at Fig. M2, below) is substantially similar to Miyajima's artwork "Penguin" (at Fig. M1, below).

121. On information and belief, Morris authorized and signed a limited edition of fifty-five original prints of the painting "Rockhopper."

122. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

123. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



**FOURTEENTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

124. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 123, as though fully set forth herein.

125. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Swan."

126. Two of Morris's works titled "Swan" (at Figs. N2 and N3, below) are substantially similar to Miyajima's artwork "Swan" (at Fig. N1, below).

127. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

128. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.

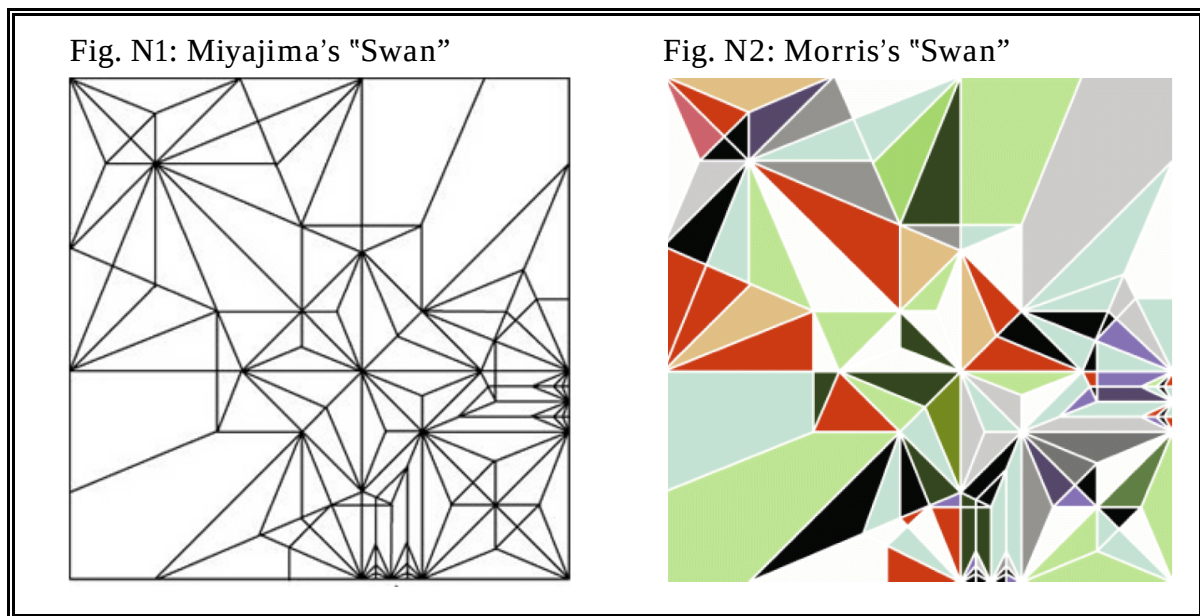


Fig. N1: Miyajima's "Swan"

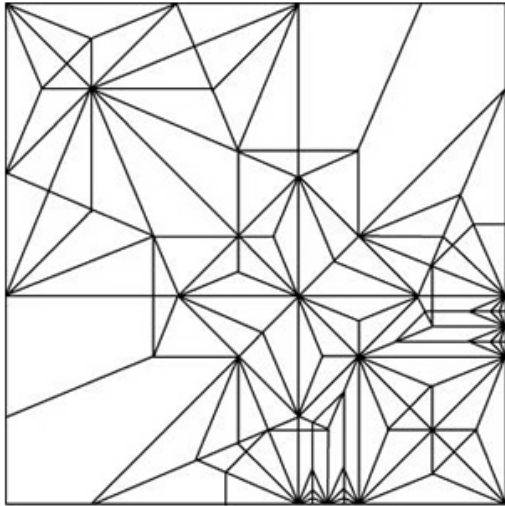
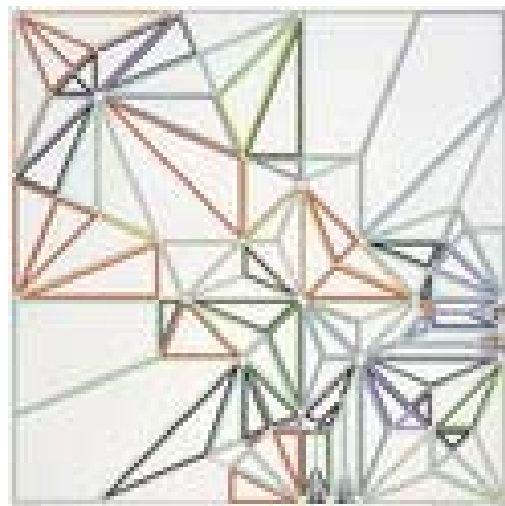


Fig. N3: Morris's "Swan" (outline)



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**FIFTEENTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

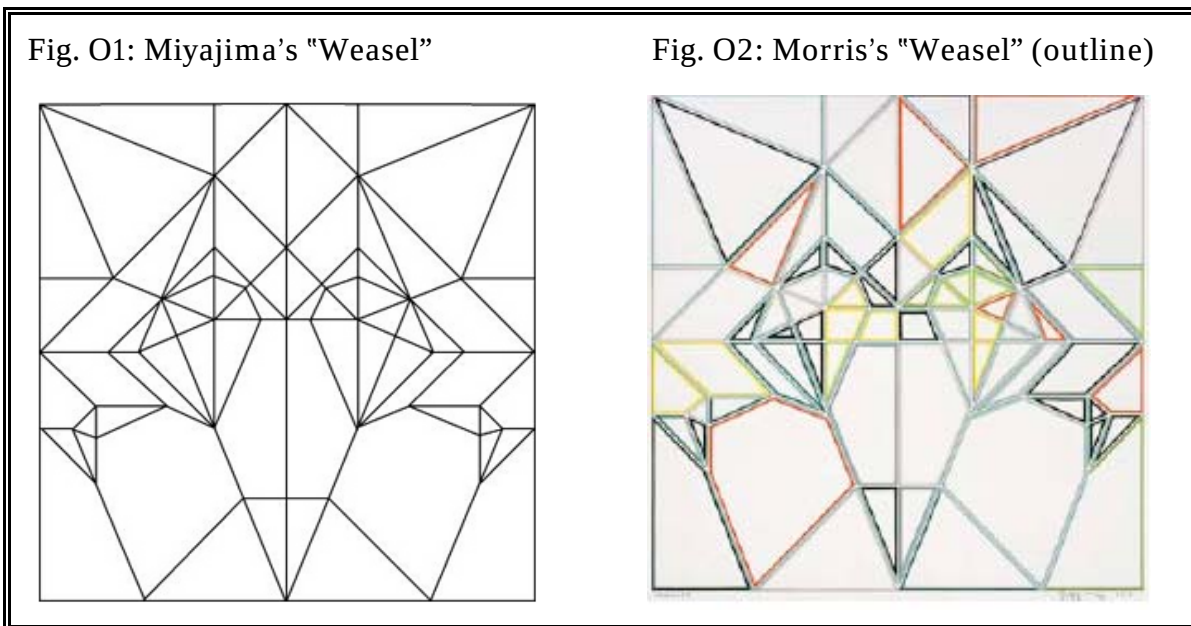
129. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 128 as though fully set forth herein.

130. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Weasel."

131. Morris's work "Weasel" (at Fig. O2, below) is substantially similar to Miyajima's artwork "Weasel" (at Fig. O1, below).

132. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

133. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



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**SIXTEENTH CLAIM FOR RELIEF
(BY NOBURU MIYAJIMA FOR COPYRIGHT INFRINGEMENT)**

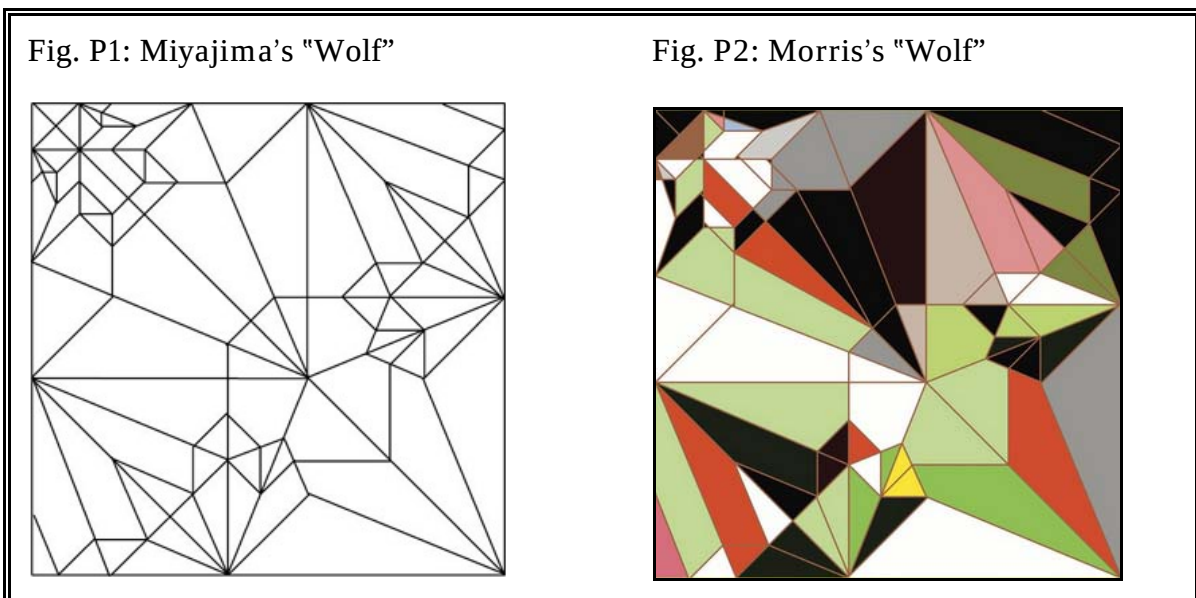
134. Miyajima re-alleges and incorporates by reference paragraphs 1 through 28, paragraphs 38 through 42, and paragraphs 103 through 133, as though fully set forth herein.

135. At all times relevant hereto, Miyajima has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Wolf."

136. Morris's painting "Wolf" (at Fig. P2, below) is substantially similar to Miyajima's artwork "Wolf" (at Fig. P1, below).

137. Morris willfully and without permission copied Miyajima's artwork or its constituent elements.

138. Miyajima is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



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**SEVENTEENTH CLAIM FOR RELIEF
(BY MANUEL SIRGO FOR COPYRIGHT INFRINGEMENT)**

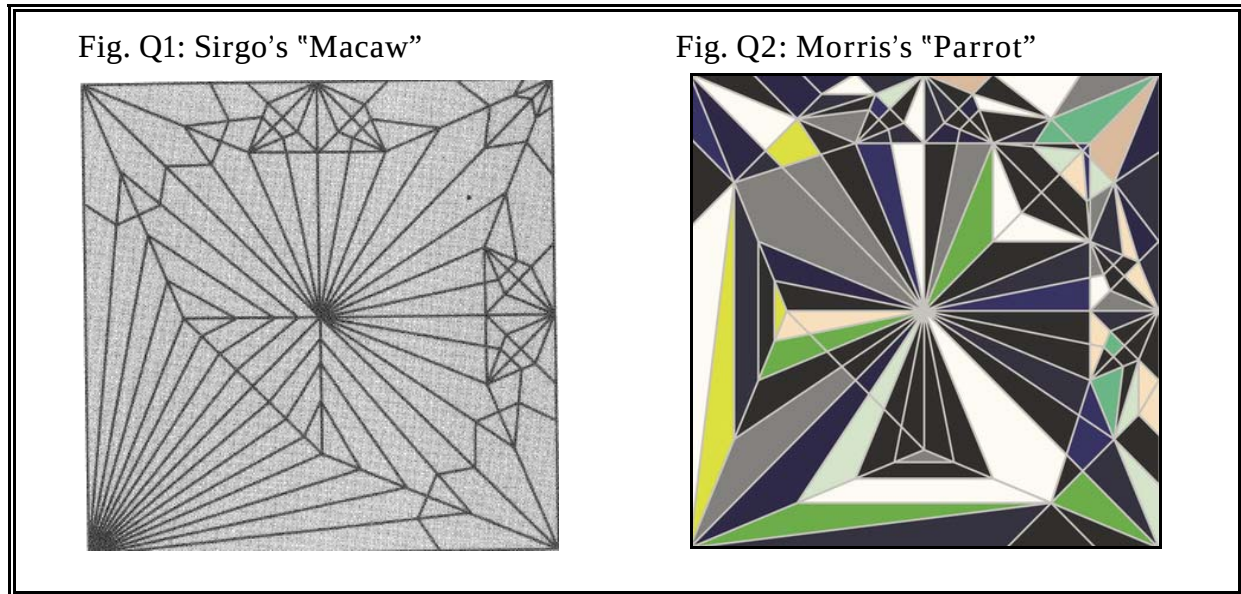
139. Sirgo re-alleges and incorporates by reference paragraphs 1 through 28 and paragraphs 43 through 45 as though fully set forth herein.

140. At all times relevant hereto, Sirgo has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Macaw."

141. Morris's painting "Parrot" (at Fig. Q2, below) is substantially similar to Sirgo's artwork "Macaw" (at Fig. Q1, below).

142. Morris willfully and without permission copied Sirgo's artwork or its constituent elements.

143. Sirgo is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



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**EIGHTEENTH CLAIM FOR RELIEF
(BY NICOLA BANDONI FOR COPYRIGHT INFRINGEMENT)**

144. Bandoni re-alleges and incorporates by reference paragraphs 1 through 28 and paragraphs 46 through 49 as though fully set forth herein.

145. At all times relevant hereto, Bandoni has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Cyclommatus metallifer."

146. Morris's painting "June Beetle" (at Fig. R2, below) is substantially similar to Bandoni's artwork "Cyclommatus metallifer" (at Fig. R1, below).

147. Morris willfully and without permission copied Bandoni's artwork or its constituent elements.

148. Bandoni is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.

Fig. R1: Bandoni's "Cyclommatus metallifer" (June Beetle)

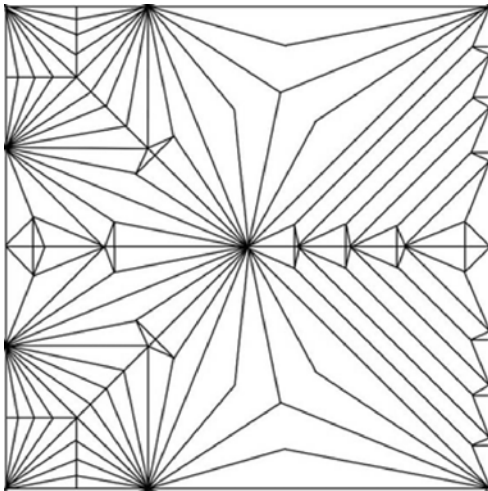


Fig. R2: Morris's "June Beetle"



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**NINETEENTH CLAIM FOR RELIEF
(BY TOSHIKAZU KAWASAKI FOR COPYRIGHT INFRINGEMENT)**

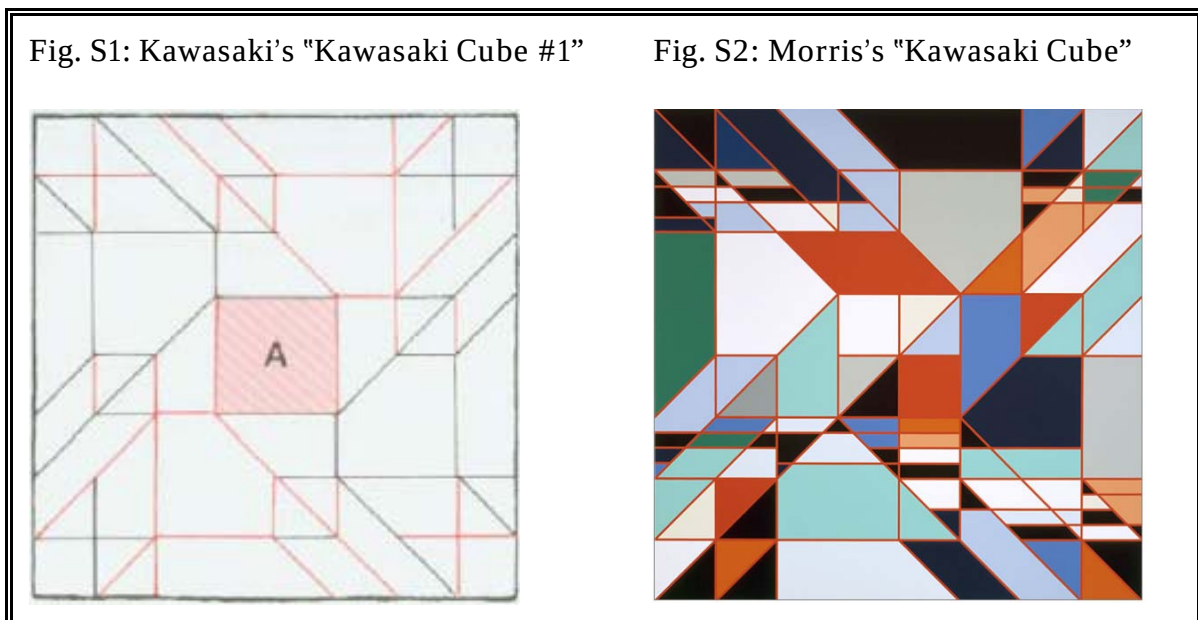
149. Kawasaki re-alleges and incorporates by reference paragraphs 1 through 28 and paragraphs 50 through 53, as though fully set forth herein.

150. At all times relevant hereto, Kawasaki has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Kawasaki Cube #1."

151. Morris's painting "Kawasaki Cube" (at Fig. S2, below) is substantially similar to Kawasaki's artwork "Kawasaki Cube #1" (at Fig. S1, below).

152. Morris willfully and without permission copied Kawasaki's artwork or its constituent elements.

153. Kawasaki is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.



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**TWENTIETH CLAIM FOR RELIEF
(BY JASON KU FOR COPYRIGHT INFRINGEMENT)**

154. Ku re-alleges and incorporates by reference paragraphs 1 through 28 and paragraphs 54 through 57 as though fully set forth herein.

155. At all times relevant hereto, Ku has held exclusive rights under the Copyright Act to reproduce, distribute, display, or produce derivative works of his artwork "Harpy"

156. Morris's painting titled "Angel" (at Fig. T2, below) is substantially similar to Ku's artwork "Harpy" (at Fig. T1, below).

157. Morris's "Angel" was featured as the cover of the April 2009 issue of Wallpaper* Magazine (trademarked with an asterisk in the title) (see Fig. T3, below).

158. To memorialize the magazine cover, Wallpaper* Magazine commissioned a handmade rug, which was exhibited in Italy (see Fig. T4, below).

159. Morris willfully and without permission copied Ku's artwork or its constituent elements.

160. Ku is entitled to recover his actual damages and Morris's profits attributable to such infringement, subject to proof at trial.

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Fig. T1: Ku's "Harpy"

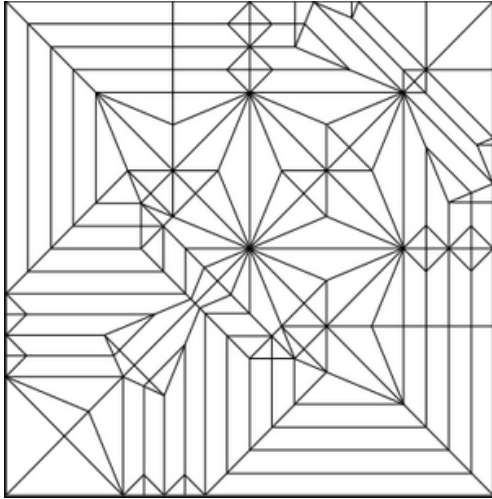


Fig. T2: Morris's "Angel"



Fig. T3: April 2009 cover of *Wallpaper** magazine



Fig. T4: Rug on exhibit



VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendant and for the following relief:

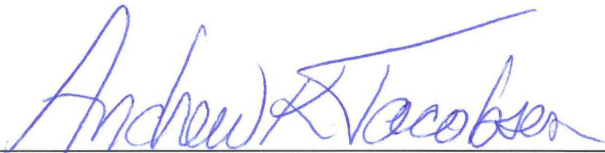
1. Compensatory damages and all gains, profits, and advantages derived by

Defendant through the acts of infringement, in an amount according to proof;

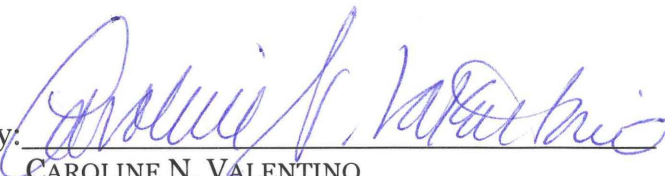
2. As to Robert J. Lang, alternatively and at Lang's election, statutory damages for Claims 3 through 9, as allowed by law;
3. Exemplary damages;
4. A full accounting for each Infringing Work that includes information about where and when each work was exhibited, published, sold, or licensed, and Morris's net income derived from such activities;
5. Permanent injunctive relief restraining Defendant and all those in concert with her from selling, exhibiting, publishing, licensing, or otherwise profiting from the Infringing Works;
6. Costs of suit, including attorney's fees, to the extent allowed by law;
7. Such other relief as the Court may deem proper.

Dated: December 1, 2011

BAY OAK LAW

By: 
ANDREW K. JACOBSON
Counsel for Plaintiffs

HAIMS VALENTINO LLP

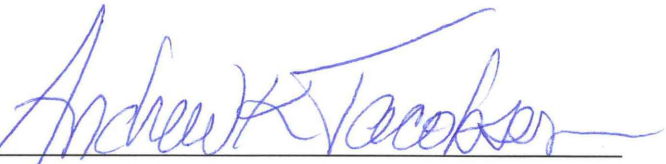
By: 
CAROLINE N. VALENTINO
Counsel for Plaintiffs

JURY TRIAL DEMANDED

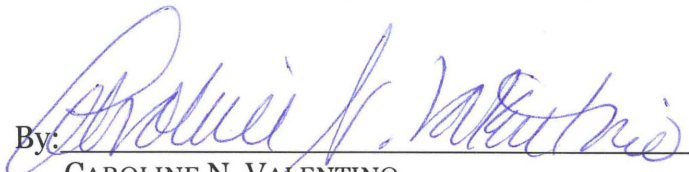
Plaintiffs hereby demand a trial by jury.

Dated: December 1, 2011

BAY OAK LAW

By: 
ANDREW K. JACOBSON
Counsel for Plaintiffs

HAIMS VALENTINO LLP

By: 
CAROLINE N. VALENTINO
Counsel for Plaintiffs