Ca	e 2:20-cv-11756-VAP-MRW Document 1	Filed 12/28/20 Page 1 of 10 Page FIRST 10 URT DEC 28 2020
1	Angelo Reno, Pro Se	BY:RSDEPUTY
2	33570 Mullholland Hwy Malibu, CA 90265	
3	805-409-5440 Telephone	
4	310-317-1282 Telephone	
5	Attorney for Plaintiff Angelo Reno	
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10	UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA	
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15		Case No: 2:20-CV-11756-VAP-MRWx
16	ANGELO RENO,	(Unlimited Civil)
17	Plaintiff,	COMPLAINT FOR VIOLATIONS OF THE
18	V.	UNITED STATES COPYRIGHT ACT
19	SCOTT HUBBELL; GREGORY BONAN;) JURY TRIAL DEMAND
20	MICHAEL BERK, DOUGLAS SCHWARTZ, DAVID HASSELHOFF,)
21	BAYWATCH PRODUCTION	
22	COMPANY, INC;HENRY HOLMES;DOES 1-100 Inclusive,)
23)
24	Defendants)
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PLAINTIFF ALLEGES AS FOLLOWS:

INTRODUCTION

This is a civil action for damages and injunctive relief in which it is alleged Defendants have committed, and continue to commit, copyright infringement in connection with their unauthorized exploitation of a television series entitled "Baywatch" (hereinafter "SHOW"), an episode or special entitled "Forbidden Paradise" (hereinafter "EPISODE"), and/or a motion picture entitled "Baywatch" (hereinafter "MOVIE") which is derived from Plaintiff's copyrighted screenplays and book of the same name.

THE PARTIES

- 2. Plaintiff Angelo Reno is an individual residing in the County of Los Angeles, State of California. He is the present owner of the copyrighted written works which are the subject of this action.
- Defendant SCOTT HUBBELL ("HUBBELL") is an individual is residing in County of Los Angeles, State of California.
- 4. Defendant GREGORY BONAN ("BONAN") is an individual residing in the County of Los Angeles, State of California.
- Defendant MICHAEL BERK ("BERK") is an individual residing in the County of Los Angeles, State of California.
- Defendant DOUGLAS SCHWARTZ ("SCHWARTZ") is an individual in the residing County of Los Angeles, State of California.
- 7. Defendant DAVID HASSELHOFF ("HASSELHOFF") is an individual residing in the County of Los Angeles, State of California.
- Defendant HENRY HOLMES ("HOLMES") is an individual residing in the County of Los Angeles, State of California.



- 9. Defendant BAYWATCH PRODUCTION COMPANY, INC. ("BAYWATCH") is a CA limited liability company with its principal place of business located in the County of Los Angeles, State of California. Plaintiff alleges that BAYWATCH distributes, disseminates and/or produces television shows, and motion pictures released on VHS cassettes, DVDs, laser discs and/or Blu-ray discs.
- Defendants sued as Does 1 through 10 are unknown to Plaintiff, who, therefore, sue them by such fictitious names. When their true names and capacities have been ascertained, Plaintiff will seek leave of the Court to amend this Complaint accordingly. In information and belief, Plaintiff alleges that each of Does 1 through 10 are liable to Plaintiff in connection with one or more claims sued upon here and are responsible in some manner for the wrongful acts and conduct alleged here.
- At all times mentioned in this Complaint each Defendant was the agent, servant, and employee of each other Defendant, acting within the course and scope of his, her or its agency, partnership and/or employment with the other, and with full knowledge, consent, and ratification of each other Defendant.
- 12. HUBBELL, BONAN, BERK, SCHWARTZ, HASSELHOFF, HOLMES, and BAYWATCH are sometimes collectively referred to as "CO-EXECUTIVE PRODUCERS."

GENERALALLEGATIONS

Plaintiff's Copyrighted Works Include: "ISLAND HIGH"; "ISLAND SIDE";

and "NORTH SHORE" (hereinafter collectively "WORK")

- At all times herein, mentioned Plaintiff was and is now in the business of creating and developing ideas for television programming and writing original teleplays for exhibition on television. Plaintiff is also a world champion surfer, former Hollywood stuntman, and accomplished television and film writer.
- 14. In 1978, Plaintiff developed the concept for a television series then entitled "Island High," and thereafter wrote an original series treatment ("treatment") then entitled "North Shore,"



which treatment was registered in 1994 with the Writer's Guild of America, and which treatment was copyrighted and registered with the United States Copyright Office as Registration No. Paul 1930645 (i.e., a PRIOR CREATION).

- 15. Plaintiff owns all rights, titles, and interests in and to WORK.
- 16. In 1979, National Broadcasting Company ("NBC") granted Plaintiff a four-month option to have Factor Newland Productions produce "Island High" as a television series as a lifeguard surf and rescue drama.
- 17. During the four-month option period and production period of the "Island High" pilot program, Plaintiff hired two local Los Angeles County lifeguards, namely HUBELL and BONAN, to be extras in the background of scenes in "Island High" (aka "North Shore").
- 18. Eventually, NBC neglected to extend the four-month option to produce "Island High" (aka "North Shore") as either a film or television program series.
- 19. Subsequently to creation of a pilot episode of "Island High," Plaintiff was diagnosed with fast spreading melanoma skin cancer, which prevented him from surfing and socializing at Malibu Surf Rider Beach where Plaintiff was well known, and where HUBELL and BONAN worked as a lifeguard.
- During his ongoing chemotherapy treatments for his cancer and absence from Malibu Surf Rider Beach, in or about 1982, Plaintiff personally handed to HUBELL materials related to the WORK, including but not limited to a written script with character breakdowns under the working title called "North Shore," descriptions of rescue equipment to be used in production of the treatment, cast member profiles, story lines, photos of ocean rescues, photos of the ocean, photos of girls, etc., because HUBELL seemed very interested in Plaintiff's television proposal and the treatment (i.e. HUBELL had ACCESS to Plaintiff's PRIOR CREATION).
- 21. Based upon HUBELL's interest in Plaintiffs WORK, HUBELL approached Plaintiff to work on Plaintiffs show as a background extra.
 - 22. Unbeknownst to Plaintiff, HUBELL's interest in Plaintiffs work involved HUBELL's



24.

participation).

procurement of copyrighted materials from Plaintiffs writing partner, Peter Dixon, who unwittingly provided such materials to HUBELL.

Plaintiff alleges on information and belief that, prior to his hand delivery of Work-related materials to HUBELL, that HUBELL had very little experience in television production, film production, and that HUBELL was not working on any script or screenplay, especially one related to Plaintiffs WORK.

Subsequent to Plaintiff's delivery of his WORK materials to HUBELL, Plaintiff was

- hospitalized to aggressively treat his cancer. When HUBELL and BONAN eventually learned that NBC had not renewed the four-month option to produce "Island High" (aka "North Shore"), combined with knowledge that Plaintiff had been hospitalized for cancer treatment, Plaintiff alleges on information and belief that HUBELL, BONAN and SCHWARTZ re-approached NBC with Plaintiff's WORK, which resulted in a new deal with NBC based upon Plaintiff's original WORK, but Plaintiff was not included in the new deal struck with NBC to produce the SHOW, EPISODE and/or the MOVIE (the latter of which was licensed to Paramount Pictures without Plaintiff's consent or
- 25. When Plaintiff was released from the hospital in or about 1988, Plaintiff discovered that HUBELL had secured a deal with NBC to produce a television show based upon Plaintiff's WORK materials involving a lifeguard surf and rescue drama, which HUBELL captioned as "Baywatch."
- 26. Plaintiff never validly assigned production rights of his WORK to CO-EXECUTIVE PRODUCERS.

Infringement of Plaintiff's Copyrighted Works

27. Beginning in or about 1988 and continuing to this date, Plaintiff alleges that CO-EXECUTIVE PRODUCERS reproduce, market, distribute, license, sell, produce laser discs, DVDs, VHS cassettes, television shows in English and foreign languages in the United States and other countries including Canada.



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