

1 PLAINTIFF ALLEGES AS FOLLOWS:
2

3
4 **INTRODUCTION**

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

11 **THE PARTIES**

12 2. Plaintiff Angelo Reno is an individual residing in the County of Los Angeles, State of
13 California. He is the present owner of the copyrighted written works which are the subject of this
14 action.

15 3. Defendant SCOTT HUBBELL ("HUBBELL") is an individual is residing in County
16 of Los Angeles, State of California.

17 4. Defendant GREGORY BONAN ("BONAN") is an individual residing in the County
18 of Los Angeles, State of California.

19 5. Defendant MICHAEL BERK ("BERK") is an individual residing in the County of Los
20 Angeles, State of California.

21 6. Defendant DOUGLAS SCHWARTZ ("SCHWARTZ") is an individual in the residing
22 County of Los Angeles, State of California.

23 7. Defendant DAVID HASSELHOFF ("HASSELHOFF") is an individual residing in the
24 County of Los Angeles, State of California.

25 8. Defendant HENRY HOLMES ("HOLMES") is an individual residing in the County of
26 Los Angeles, State of California.
27
28

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

4 15. Plaintiff owns all rights, titles, and interests in and to WORK.

5
6 16. In 1979, National Broadcasting Company ("NBC") granted Plaintiff a four-month
7 option to have Factor Newland Productions produce "Island High" as a television series as a lifeguard
8 surf and rescue drama.

9 17. During the four-month option period and production period of the "Island High" pilot
10 program, Plaintiff hired two local Los Angeles County lifeguards, namely HUBELL and BONAN, to
11 be extras in the background of scenes in "Island High" (aka "North Shore").

12 18. Eventually, NBC neglected to extend the four-month option to produce "Island
13 High" (aka "North Shore") as either a film or television program series.

14 19. Subsequently to creation of a pilot episode of "Island High," Plaintiff was diagnosed with
15 fast spreading melanoma skin cancer, which prevented him from surfing and socializing at Malibu
16 Surf Rider Beach where Plaintiff was well known, and where HUBELL and BONAN worked as a
17 lifeguard.

18
19 20. During his ongoing chemotherapy treatments for his cancer and absence from Malibu
20 Surf Rider Beach, in or about 1982, Plaintiff personally handed to HUBELL materials related to the
21 WORK, including but not limited to a written script with character breakdowns under the working
22 title called "North Shore," descriptions of rescue equipment to be used in production of the treatment,
23 cast member profiles, story lines, photos of ocean rescues, photos of the ocean, photos of girls, etc.,
24 because HUBELL seemed very interested in Plaintiff's television proposal and the treatment (i.e.
25 HUBELL had ACCESS to Plaintiff's PRIOR CREATION).

26 21. Based upon HUBELL's interest in Plaintiff's WORK, HUBELL approached Plaintiff to
27 work on Plaintiff's show as a background extra.

28 22. Unbeknownst to Plaintiff, HUBELL's interest in Plaintiff's work involved HUBELL's

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

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

7 24. Subsequent to Plaintiff's delivery of his WORK materials to HUBELL, Plaintiff was
8 hospitalized to aggressively treat his cancer. When HUBELL and BONAN eventually learned that
9 NBC had not renewed the four-month option to produce "Island High" (aka "North Shore"), combined
10 with knowledge that Plaintiff had been hospitalized for cancer treatment, Plaintiff alleges on
11 information and belief that HUBELL, BONAN and SCHWARTZ re-approached NBC with
12 Plaintiff's WORK, which resulted in a new deal with NBC based upon Plaintiff's original WORK, but
13 Plaintiff was not included in the new deal struck with NBC to produce the SHOW, EPISODE and/or
14 the MOVIE (the latter of which was licensed to Paramount Pictures without Plaintiff's consent or
15 participation).
16

17 25. When Plaintiff was released from the hospital in or about 1988, Plaintiff discovered
18 that HUBELL had secured a deal with NBC to produce a television show based upon Plaintiff's
19 WORK materials involving a lifeguard surf and rescue drama, which HUBELL captioned as
20 "Baywatch."

21 26. Plaintiff never validly assigned production rights of his WORK to CO-EXECUTIVE
22 PRODUCERS.

23 **Infringement of Plaintiff's Copyrighted Works**

24 27. Beginning in or about 1988 and continuing to this date, Plaintiff alleges that CO-
25 EXECUTIVE PRODUCERS reproduce, market, distribute, license, sell, produce laser discs, DVDs,
26 VHS cassettes, television shows in English and foreign languages in the United States and other
27 countries including Canada.
28

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.