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12 LARCO PRODUCTIONS, INC.

13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 CORDELL, LLC, a California Limited Liability Company,) CASE NO. 3:23-cv-01264-AGS-DEB
16)

17 Plaintiff,)

18 **DEFENDANT’S ANSWER**
19 **TO COMPLAINT**

20 vs.)

21 LARCO PRODUCTIONS, INC., a)
22 New York Corporation; and DOES 1-)
23 10,)

24 **DEMAND FOR JURY TRIAL**

25 Defendants.)
26)
27)
28)

1 Defendant LARCO PRODUCTIONS, INC. (“Defendant”) hereby answers
2 the Complaint of Plaintiff CORDELL, LLC (“Plaintiff”) as follows.

3 **PARTIES**

4 1. Defendant lacks knowledge or information sufficient to form a belief
5 about the truth of the allegations contained in this paragraph and on that basis
6 denies those allegations.

7 2. Defendant admits the allegations contained in this paragraph.

8 3. Defendant lacks knowledge or information sufficient to form a belief
9 about the truth of the allegations contained in this paragraph and on that basis
10 denies those allegations.

11 4. Defendant lacks knowledge or information sufficient to form a belief
12 about the truth of the allegations contained in this paragraph and on that basis
13 denies those allegations.

14 **BACKGROUND**

15 5. Defendant admits that the 1988 motion picture *Maniac Cop* was
16 written by the late Lawrence G. Cohen. Except as so admitted, Defendant denies
17 the allegations contained in this paragraph.

18 **JURISDICTION AND VENUE**

19 6. Defendant admits that Plaintiff’s Complaint alleges a claim that
20 involves a federal question. Defendant denies that Plaintiff’s Complaint asserts
21 any state law claims.

22 7. Defendant admits that it is subject to this Court’s personal
23 jurisdiction.

24 8. Defendants admits that this action was filed in the proper venue.
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FACTUAL BACKGROUND
FACTS COMMON TO ALL CLAIMS
Chain of Title For *Maniac Cop*

9. Defendant admits that a copyright registration for the 1988 motion picture *Maniac Cop* is attached as Exhibit 1 to the Complaint, which registration speaks for itself.

10. Defendant admits that it is a signatory to a July 1, 1987 Motion Picture Financing, Production, and Distribution Agreement with Marble Hall Productions, Inc. (the “FPD Agreement”), which is attached as Exhibit 2 to the Complaint, and which agreement speaks for itself.

11. Defendant admits the allegations contained in this paragraph.

12. Defendant admits that an “Exhibit 1” is attached to the FPD Agreement, which document speaks for itself.

13. Defendant admits that the motion picture *Maniac Cop* was released worldwide in 1988, and further admits that Defendant received compensation pursuant to the terms of the FPD Agreement.

14. Defendant admits that a copyright registration for the 1988 motion picture *Maniac Cop* is attached as Exhibit 1 to the Complaint, which registration speaks for itself.

15. Defendant admits the allegations contained in this paragraph.

16. Defendant admits that Exhibits 2 through 7 are attached to the Complaint, which documents speak for themselves. Except as so admitted, Defendant denies the allegations contained in this paragraph. This paragraph also consists of legal contentions to which no response is required. However, to the extent a response is required, Defendant denies the legal contentions.

17. Defendant admits that the document attached as Exhibit 4 to the Complaint speaks for itself. Except as so admitted, Defendant denies the allegations contained in this paragraph. This paragraph also consists of legal

1 contentions to which no response is required. However, to the extent a response is
2 required, Defendant denies the legal contentions.

3 18. Defendant admits that the document attached as Exhibit 4 to the
4 Complaint speaks for itself. Except as so admitted, Defendant denies the
5 allegations contained in this paragraph. This paragraph also consists of legal
6 contentions to which no response is required. However, to the extent a response is
7 required, Defendant denies the legal contentions.

8 19. Defendant admits that Larry Cohen died on March 23, 2019, and
9 further admits that the document attached as Exhibit 4 to the Complaint speaks
10 for itself. Except as so admitted, Defendant denies the allegations contained in
11 this paragraph. This paragraph also consists of legal contentions to which no
12 response is required. However, to the extent a response is required, Defendant
13 denies the legal contentions.

14 20. Defendant admits that the document attached as Exhibit 4 to the
15 Complaint speaks for itself. Except as so admitted, Defendant denies the
16 allegations contained in this paragraph. This paragraph also consists of legal
17 contentions to which no response is required. However, to the extent a response is
18 required, Defendant denies the legal contentions.

19 21. Defendant denies the allegations contained in this paragraph. This
20 paragraph also consists of legal contentions to which no response is required.
21 However, to the extent a response is required, Defendant denies the legal
22 contentions.

23 22. Defendant admits that it is a a signatory to the FPD Agreement,
24 which is attached as Exhibit 2 to the Complaint, and which agreement speaks for
25 itself. Except as so admitted, Defendant denies the allegations contained in this
26 paragraph. This paragraph also consists of legal contentions to which no response
27 is required. However, to the extent a response is required, Defendant denies the
28 legal contentions.

1 23. Defendant admits that the document attached as Exhibit 4 to the
2 Complaint speaks for itself. Except as so admitted, Defendant denies the
3 allegations contained in this paragraph. This paragraph also consists of legal
4 contentions to which no response is required. However, to the extent a response is
5 required, Defendant denies the legal contentions.

6 **FIRST CAUSE OF ACTION**

7 **(Declaratory Relief Re: Copyright Ownership As A Result Of Work Made**
8 **For Hire)**

9 24. Defendant restates, re-alleges and incorporates herein by reference
10 its responses contained in Paragraphs 1 through 23, inclusive, as if fully set forth
11 herein.

12 25. Defendant denies the allegations contained in this paragraph. This
13 paragraph also consists of legal contentions to which no response is required.
14 However, to the extent a response is required, Defendant denies the legal
15 contentions.

16 26. Defendant denies the allegations contained in this paragraph.

17 27. Defendant denies the allegations contained in this paragraph.

18 28. Defendant denies the allegations contained in this paragraph.

19 29. This paragraph is unintelligible as phrased, and thus Defendant lacks
20 knowledge or information sufficient to form a belief about the truth of the
21 allegations contained in this paragraph and on that basis denies those allegations.

22 30. Defendant admits that Plaintiff is seeking a judicial determination.

23 31. This paragraph consists of legal contentions to which no response is
24 required. However, to the extent a response is required, Defendant denies the
25 legal contentions.

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