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Signature: Marie Sinkfield  
Name: Marie Sinkfield Date: October 24, 2003


**TRADEMARK**

**UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Application Serial No. 76/401734  
Published in the Official Gazette on October 29, 2002

ACTION SOFTWARE INC., )  
 )  
Opposer, )  
 )  
vs. )  
 )  
RIGHT ASCENSION, INC., )  
 )  
Applicant. )

Opposition No.  
Mark: ADE

  
10-24-2003  
U.S. Patent & TMO/TM Mail Rcpt Dt. #78

**OPPOSER ACTION SOFTWARE INC.'S MOTION TO SUSPEND PROCEEDINGS  
PENDING OUTCOME OF CIVIL ACTION**

Commissioner for Trademarks  
Box TTAB  
2900 Crystal Drive  
Arlington, VA 22202-3514

Attention: Trademark Trial and Appeal Board

Action Software Inc. ("Opposer") respectfully moves this Trademark Trial and Appeal Board (the "Board") to suspend the registration proceedings for the mark shown in the application of Right Ascension, Inc. ("Applicant"), Serial No. 76/401734, because Opposer and

Applicant are involved in a prior related civil action that will likely be dispositive of the issues before this Board.

Applicant seeks to register ADE as a service mark for "computerized on-line retail services in the field of audio and audio-visual recordings, audio and audio-visual DVDs, audio-visual CD-ROMs, VHS recordings, electronic games, and novelties" in International Class 35 (the "Disputed Mark").

Shortly after seeking to register the Disputed Mark, on or about April 12, 2001, Applicant filed Civil Action No. 01-CV-0666 (the "Prior Related Action") in the United States District Court for the Western District of Pennsylvania against Opposer and other defendants. The Prior Related Action is an action for alleged copyright infringement, unfair competition and other torts, including without limitation, alleged false designation of origin and trademark dilution respecting the Disputed Mark.

Applicant has alleged in the Prior Related Action that the Disputed Mark is inherently distinctive and has come to be closely and uniquely associated with Applicant's products and services offered for sale on Applicant's web site. *See* Paragraph 37 of Applicant's Amended and Supplemental Complaint which was filed in the Prior Related Action (for purposes of this Motion, the "Prior Related Complaint"), a true and correct copy of which (without exhibits) is attached hereto and made a part hereof as Exhibit 1.

On or about November 27, 2002, Opposer filed its Notice of Opposition opposing the registration of the Disputed Mark on various grounds. Approximately ten months later, on September 29, 2003, Opposer and other parties filed a dispositive motion in the Prior Related Action. That motion is currently pending before the federal court in the Western District of Pennsylvania and concerns the same issues before this Board. Opposer now respectfully

requests that this Board suspend the within proceedings until final determination of the Prior Related Action.

A true and correct copy of Opposer's motion for summary judgment in the Prior Related Action (for purposes of this Motion, the "Prior Related Dispositive Motion") is attached hereto and made a part hereof as Exhibit 2. Among the issues to be resolved in the Prior Related Action and the Prior Related Dispositive Motion are whether (i) Applicant has used and is using the Disputed Mark in a manner that would be readily perceived as identifying the services recited in Applicant's service mark application, (ii) consumers regard the Disputed Mark as a designation of source of the services recited in Applicant's service mark application, and (iii) the Disputed Mark even meets the requirements for a service mark. *See* Exhibit 2, at pp. 16-19.

Similarly, the issues before this Board are whether (i) the Disputed Mark has been used and is currently being used in a manner that would be readily perceived as identifying the services recited in Applicant's service mark application, (ii) consumers regard the Disputed Mark as a designation of source of the services recited in Applicant's service mark application, and (iii) the Disputed Mark even meets the requirements for a service mark. *See* Opposer's Notice of Opposition, at ¶¶ 4,5.

Since the issues before the federal district court in the Prior Related Action and before the Board in the within proceedings are *exactly* the same, the district court's disposition of them in the Prior Related Action is binding upon the Board. *See, e.g. Goya Foods, Inc. v. Tropicana Products, Inc.*, 846 F.2d 848, 6 USPQ 2d 1950 (2d Cir. 1988); *American Bakeries Co. v. Pan-O-Gold Baking Co.*, 650 F.Supp. 563, 2 USPQ 2d 1208 (D. Minn. 1986). Whenever it comes to the attention of the Board that the parties to a case pending before it are involved in a civil action which may be dispositive of the Board case, proceedings before the Board may be suspended

until final determination of the civil action. *See, e.g.*, 37 CFR 2.117(a); *General Motors Corp. v. Cadillac Club Fashions Inc.*, 22 USPQ2d 1933 (TTAB 1992); *Toro Co. v. Hardigg Industries, Inc.*, 187 USPQ 689 (TTAB 1975), rev'd on other grounds, 549 F.2d 785, 193 USPQ 149 (CCPA 1977); *Other Telephone Co. v. Connecticut Nat'l Telephone Co.*, 181 USPQ 125 (TTAB 1974), petition denied, 181 USPQ 779 (Comm'r 1974); *Tokaido v. Honda Associates Inc.*, 179 USPQ 861 (TTAB 1973); *Whopper-Burger, Inc. v. Burger King Corp.*, 171 USPQ 805 (TTAB 1971); *Squirrel Brand Co. v. Barnard Nut Co.*, 101 USPQ 340 (Comm'r 1954); *Townley Clothes, Inc. v. Goldring, Inc.*, 100 USPQ 57 (Comm'r 1953).

Suspension of a Board proceeding pending the final determination of another proceeding is solely within the discretion of the Board. *See Opticians Ass'n of America v. Independent Opticians of America Inc.*, 734 F.Supp. 1171, 14 USPQ2d 2021 (D.N.J. 1990). However, ordinarily the Board *will* suspend proceedings in the case before it if the final determination of the other proceeding will have a bearing on the issues before the Board. *See, e.g., Other Telephone Co. v. Connecticut Nat'l Telephone Co.*, 181 USPQ 125 (TTAB 1974), petition denied, 181 USPQ 779 (Comm'r 1974); *Tokaido v. Honda Associates Inc.*, 179 USPQ 861 (TTAB 1973); *Whopper-Burger, Inc. v. Burger King Corp.*, 171 USPQ 805 (TTAB 1971); *Martin Beverage Co. v. Colita Beverage Corp.*, 169 USPQ 568 (TTAB 1971).

When a motion to suspend pending the outcome of a civil action is filed, the Board normally will require that a copy of the pleadings from the civil action be submitted, so that the Board can ascertain whether the final determination of the civil action will have a bearing on the issues before the Board. *See SCOA Indus. Inc. v. Kennedy & Cohen, Inc.*, 188 USPQ 411 (TTAB 1975). Accordingly, in addition to the Prior Related Complaint and the Prior Related Dispositive Motion, a true and correct copy of Opposer's Answer, Affirmative Defenses, and



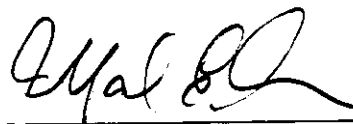
Counterclaims with Jury Demand from the Prior Related Action is attached hereto and made a part hereof as Exhibit 3 so that the Board has all the relevant pleadings from the Prior Related Action in its possession.

Here, those papers and the papers filed in connection with the within proceedings clearly demonstrate that *all* of the issues currently pending before this Board will be decided in the Prior Related Action.

**WHEREFORE**, for the reasons and legal precedents set forth herein, Opposer respectfully requests that the Board exercise its discretion and suspend the within proceedings pending the Pennsylvania court's final determination of the Prior Related Action.

DATED: October 24, 2003

Respectfully submitted,



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Steven M. Auvil

Mark E. Avsec

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

2300 BP Tower

200 Public Square

Cleveland, Ohio 44114-2378

(216) 363-4500


Attorneys for Opposer

**ACTION SOFTWARE INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon the following counsel of record by United States Mail, first class service, this 24th day of October, 2003.

Roy E. Leonard  
Stonecipher, Cunningham, Beard & Schmitt, P.C.  
125 First Avenue  
Pittsburgh, PA 15222  
Counsel for Applicant Right Ascension, Inc.



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Mark E. Avsec, Esq.

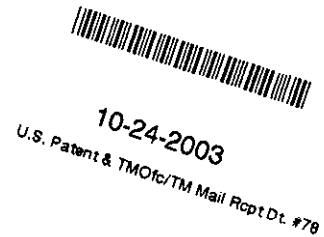


TTAB

Mark E. Avsec  
Writer's Direct Dial (216) 363-4151

October 24, 2003

Commissioner for Trademarks  
Box TTAB  
2900 Crystal Drive  
Arlington, VA 22202-3514



Re: Application of Right Ascension, Inc.  
For the Mark – ADE  
Serial No. 76/401,734  
Opposition No. 91154431

To Whom It May Concern:

Enclosed for filing in the captioned matter is the following:

1. Opposer Action Software Inc.'s Motion to Suspend Proceedings Pending Outcome of Civil Action;
2. Exhibits to same; and
3. Return Receipt Post Card.

Thank you for your attention to this matter.

Sincerely,

**BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP**

Mark Avsec

MEA:mas  
Enclosures

cc: Roy Leonard (w/enclosures)  
Steven Auvil (w/o enclosures)  
Docket

Cleveland: 2300 BP Tower ▶ 200 Public Square ▶ Cleveland, Ohio 44114-2378 ▶ Phone: (216) 363-4500 ▶ Fax: (216) 363-4588

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RIGHT ASCENSION, INC.,  
t/d/b/a DVDEMPIRE.COM,

Civil Action No. 01-CV-0666

Plaintiff,

Judge William L. Standish

v.

COPY

ACTION-DVD.COM, INC., ACTION  
SOFTWARE, INC., WEBIMAGE2000, INC.,  
ALEXANDER BELFER, and OLEG MINKO,

Defendants.

**AMENDED AND SUPPLEMENTAL COMPLAINT**

NOW COMES Plaintiff, Right Ascension, Inc., t/d/b/a DVDEmpire.com ("Plaintiff"), by and through its undersigned counsel, and for its Amended and Supplemental Complaint against Defendants Action-DVD.com, Inc., Action Software, Inc., WebImage2000, Inc., Alexander Belfer and Oleg Minko (hereinafter collectively referred to as "Defendants"), sets forth the following claims and averments, to wit:

**THE PARTIES**

1. Plaintiff Right Ascension, Inc., t/d/b/a DVDEmpire.com ("Plaintiff"), is a Pennsylvania corporation with its principal place of business at 2140 Woodland Road, Warrendale, Allegheny County, Pennsylvania 15086.

2. Upon information and belief, Defendant Action-DVD.com, Inc. (“Action-DVD”) is an Ohio corporation with its principal place of business at 34574 Lake Shore Blvd., Eastlake, Ohio 44095.

3. Upon information and belief, Defendant Action Software, Inc. (“Action Software”) is an Ohio corporation with its principal place of business at 34574 Lake Shore Blvd., Eastlake, Ohio 44095.

4. Upon information and belief, Defendant WebImage2000, Inc. (“WebImage”) is a Florida corporation with its principal place of business at 6801 Lake Worth Road, #126, Lake Worth, Florida 33467.

5. Upon information and belief, Defendant Alexander Belfer (“Mr. Belfer”) is an adult individual and maintains an address at 74233 Essex Drive, Mentor, Ohio 44060. Upon further information and belief, Mr. Belfer directly controls the operation of Action-DVD, Action Software, and WebImage.

6. Upon information and belief, Defendant Oleg Minko (“Mr. Minko”) is an adult individual and maintains an address at 34574 Lake Shore Blvd., Eastlake, Ohio 44095. Upon further information and belief, Mr. Minko directly controls the operation of Action-DVD, Action Software, and WebImage in combination with Mr. Belfer.

#### **JURISDICTION AND VENUE**

7. This Court has subject matter jurisdiction of this dispute, including pendent state law claims, as it contains more than one federal question and arises between citizens of different states. The numerous bases for jurisdiction include 28 U.S.C. §§ 1331, 1332, 1338, and 1367, as well as 15 U.S.C. § 1121(a) based on activities implicating the United States trademark laws.

8. The amount in controversy in this action is in excess of \$75,000.00 exclusive of interest and costs.

9. Venue of the within dispute is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and (c), as well as pursuant to 28 U.S.C. § 1400(a) based on activities implicating the United States copyright laws.

10. This Court has personal jurisdiction over each defendant pursuant to Pa. Stat. Ann. Tit. 42, § 5301, Pa. Stat. Ann. Tit. 42, § 5322, and/or Fed.R.Civ.P. 4(k).

### **FACTS COMMON TO ALL COUNTS**

11. This is an action for copyright infringement, unfair competition and other torts, which arises from Defendants' regular and systematic theft of copyrighted works from Plaintiff's Internet web site to augment the content of Defendants' web site. Defendants have stolen dozens if not hundreds of copyrighted works and placed them on their Internet web site, without authorization from Plaintiff, for the express purpose of selling motion pictures and other audiovisual works on Digital Video Discs ("DVDs").

12. Since approximately November 1997, Plaintiff has been selling motion pictures and other audio and audiovisual works on DVDs to the public directly and exclusively through its Internet web sites at [www.dvdempire.com](http://www.dvdempire.com) (hereinafter the "dvdempire.com" site) and [www.adultdvdempire.com](http://www.adultdvdempire.com) (hereinafter the "adultdvdempire.com" site). The [adultdvdempire.com](http://www.adultdvdempire.com) web site is a site through which Plaintiff sells DVDs of adult entertainment motion pictures. As a result of the popularity of DVD motion pictures and Plaintiff's web sites, Plaintiff has become one of the leading on-line retailers of motion picture DVDs both in this country and internationally.

13. Defendants, all of which have engaged directly and/or indirectly in infringements of Plaintiff's U.S. copyrights in Pennsylvania and throughout the United States, operate a web site located at [www.action-dvd.com](http://www.action-dvd.com) (hereinafter the "action-dvd.com" site). Defendants market and sell DVDs of adult entertainment motion pictures to the public directly through the action-dvd.com web site. Defendant Action Software owns the action-dvd.com domain name.

14. The profitability and success of the [adultdvdempire.com](http://adultdvdempire.com) web site is based, in part, on the unique and original images, screenshots, photographs and other pictorial and textual works, including movie synopses, personal and biographical information of the motion picture actors, that Plaintiff has created, developed, collected, selected, organized, framed and/or formatted, and displays on the [adultdvdempire.com](http://adultdvdempire.com) web site (the "copyrighted works"). Through the use of its copyrighted works, Plaintiff has developed a brand identity and global reputation that has resulted in it being a leading on-line retailer of adult entertainment motion picture DVDs.

15. Plaintiff is the copyright owner, or the legal or beneficial owner of exclusive rights under the Copyright Act, of the copyrighted works on the [dvdempire.com](http://dvdempire.com) and [adultdvdempire.com](http://adultdvdempire.com) web sites. Plaintiff has secured the exclusive rights to the copyrighted works on both the [dvdempire.com](http://dvdempire.com) and [adultdvdempire.com](http://adultdvdempire.com) web sites and has received, from the Register of Copyrights, Certificates of Registration dated and identified as: Registration No. VA1-059-874 ([dvdempire.com](http://dvdempire.com)) and Registration No. VA1-059-873 ([adultdvdempire.com](http://adultdvdempire.com)). (Copies of these Certificates of Registration are attached collectively hereto as Exhibit "1").

16. Plaintiff subsequently published and registered the contents of its web sites as an automated group database. Once that registration has been processed fully by the Register of Copyrights, Plaintiff will receive a new Certificate of Registration dated October 2, 2001.



17. At all relevant times herein, a valid copyright notice appeared at the bottom of every page of Plaintiff's web sites.

18. Moreover, at all relevant times herein, Plaintiff notified users of the adultdvdempire.com web site of its exclusive rights in the copyrighted works by posting "Terms of Use" that provide, in pertinent part:

" . . . all information, images, text, messages, illustrations, graphics, logos, designs, icons, photographs, programs, data, software, music, sound, video, or other materials that are part of this Website (collectively, the "Content") are protected by copyrights, trademarks, service marks, publicity rights, or other proprietary rights and laws owned, controlled or licensed by DVD Empire or by third parties (the "Third Party Providers") who have provided materials to DVD Empire, and these rights are valid and protected in all forms, media and technologies, existing now or hereinafter developed. All Content is copyrighted as a collective work under the U.S. Copyright laws, and DVD Empire owns a copyright in the selection, coordination, arrangement, and enhancement of such Content. . . .

"Except as set forth herein, none of the Content may be copied, reproduced, framed, modified, removed, sold, distributed, republished, downloaded, displayed, posted, transmitted, or otherwise exploited, in whole or in part, in any form or by any means . . . without the express written permission of DVD Empire or the Third Party Provider. No part of this Website may be reproduced or retransmitted in any way, or by any means, without the express written permission of DVD Empire. . . ."

19. Attached hereto as Exhibit "2" are examples of works, infringed by Defendants, in which Plaintiff owns a copyright, or in which Plaintiff was a legal or beneficial owner of exclusive rights under the Copyright Act at the time Defendants used and displayed the copyrighted works on the action-dvd.com web site. Each such work is an original pictorial, graphic or textual work fixed in a tangible medium of expression. Each such work is copyrightable subject matter within the meaning of the Copyright Act, 17 U.S.C. § 102, and each has been registered with the United States Copyright Office.

20. The Copyright Act grants to owners the exclusive right to determine whether to license their works for public display through any medium, to whom they will grant such

licenses, and the terms on which they are willing to grant such licenses. Plaintiff has not granted any license, permission, or authorization of any kind whatsoever to Defendants with respect to any of Plaintiff's copyrighted works (or works in which Plaintiff was, at all relevant times, a legal or beneficial owner of exclusive rights under the Copyright act), much less granted Defendants permission to publicly display the copyrighted works on the Internet.

21. Plaintiff wrote to Defendants to demand that they cease violating, among other things, Plaintiff's U.S. copyrights. Defendants rejected Plaintiff's request. Upon information and belief, however, as of the date of this Amended Complaint, it appears that various copyrighted works belonging to Plaintiff have been removed by the Defendants from the action-dvd.com site.

22. Beginning at a time unknown by Plaintiff, but believed to be shortly before the effective date of initial registration of the works on Plaintiff's web sites (January 18, 2001) and prior to the registration of Plaintiff's automated group database (October 2, 2001), Defendants infringed Plaintiff's exclusive rights under 17 U.S.C. § 106 in dozens if not hundreds of copyrighted works. Among other things, Defendants, without authorization, published Plaintiff's copyrighted works on the action-dvd.com web site and, further, created unauthorized derivative works by, among other things, deleting Plaintiff's "ADE" (Adult DVD Empire) mark, selecting, arranging, and editing copied portions of the copyrighted works, which Defendants then posted on the action-dvd.com web site. For example, a sampling of the images, cover art, photographs, screenshots and text that Defendants copied wholesale and posted to the action-dvd.com web site appear on Exhibit "2" along with the very same works that originated on Plaintiff's adultdvdempire.com web site.

23. The Copyright Act grants this Court the authority to issue both preliminary and permanent injunctive relief to halt infringements such as those committed by Defendants. 17 U.S.C. § 502. The Act also provides for awards of statutory damages of up to \$150,000 per work for willful infringements such as those committed by Defendants, for awards of attorneys' fees to the prevailing party, and for other relief.

24. Defendants' piracy of the copyrighted works from the adultdvdempire.com web site was driven by Defendants' desire to increase profits from the sale of DVDs via Defendants' action-dvd.com web site.

25. By reproducing, copying, publishing, displaying, distributing and otherwise placing the copyrighted works on the action-dvd.com web site, Defendants have willfully and deliberately sought to benefit from and trade upon, and have, in fact, benefited from and traded upon, the good works, name and reputation of Plaintiff, all to Plaintiff's damage and detriment.

26. Defendants' reproduction and publication of the copyrighted works falsely and misleadingly implied to the general public that the copyrighted works on the action-dvd.com web site were sponsored by, affiliated with or otherwise authorized by Plaintiff. Increasing the likelihood of public confusion is the fact that many of the works which were copied from Plaintiff's web site, and which subsequently appeared on Defendants' web site, continued to display Plaintiff's "ADE" mark. Through their unauthorized use of Plaintiff's marks and copyrighted works, Defendants violated federal and state trademark laws.

27. Plaintiff has been irreparably injured by all of the violations described herein, and has no adequate remedy at law. Unless Defendants are restrained by this Court, Defendants will be free to continue to irreparably harm Plaintiff through their unlawful actions.

**COUNT I**  
**COPYRIGHT INFRINGEMENT**  
**(17 U.S.C. § 101 et seq.)**

28. Plaintiff incorporates each and every averment contained in paragraphs 1 through 27, above, as though fully rewritten herein.

29. Plaintiff is the copyright owner of, or the legal or beneficial owner of exclusive rights in, the copyrighted works contained in Exhibit "2", as well as many other copyrighted works that appear on the adultdvdempire.com web site. (See Exhibit "2" attached hereto).

30. Plaintiff has not authorized Defendants to make any use whatsoever of Plaintiff's copyrighted works or to make unauthorized derivative works based on them by, among other things, deleting Plaintiff's "ADE" mark, selecting, arranging and editing copied portions of the copyrighted works, and incorporating Plaintiff's original works – including those which still display Plaintiff's "ADE" mark – into the action-dvd.com web site. (See Exhibit "2" attached hereto.)

31. Defendants have violated the exclusive rights of Plaintiff under 17 U.S.C. § 106. Among other things, and without limitation, Defendants have (a) reproduced Plaintiff's copyrighted works on the Internet without Plaintiff's consent, (b) created unauthorized derivative works based on Plaintiff's copyrighted works, and (c) publicly displayed Plaintiff's copyrighted works on the Internet without Plaintiff's consent.

32. By their course of conduct, Defendants have demonstrated a willingness and an intention to continue, without authorization, to reproduce Plaintiff's copyrighted works on the Internet, to create derivative works based on Plaintiff's copyrighted works, to publicly display unauthorized copies and derivative works, and otherwise to infringe Plaintiff's copyrights, all of which would result in additional irreparable harm to Plaintiff, while profiting Defendants.

33. The acts of Defendants, as described above, were willful.

## COUNT II

### FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

34. Plaintiff incorporates each and every averment contained in paragraphs 1 through 33, above, as though fully rewritten herein.

35. Through the acts described above and the false and misleading representations made by Defendants as presented on the action-dvd.com web site, Defendants have publicly conveyed the false and misleading representation that Defendants and Plaintiff are somehow affiliated, connected or associated with each other, when in fact they are not.

36. Plaintiff owns the “ADE” (AdultDVDEmpire) mark which it places on many of the works that appear on its adultdvdempire.com web site.

37. The “ADE” mark is inherently distinctive and has come to be closely and uniquely associated with Plaintiff’s products and services offered for sale to the public on the adultdvdempire.com web site. Plaintiff has expended time, effort and money developing and promoting the “ADE” mark as a symbol of its products and services worldwide.

38. Plaintiff began using its “ADE” mark in commerce, not only in Pennsylvania but throughout the United States and worldwide, in October 2000, which is prior to the time when Defendants began to misuse the “ADE” mark. Plaintiff is therefore the senior user of the mark.

39. As of October 2000, Plaintiff enjoyed exclusive use of the “ADE” mark to sell DVD products and services on the Internet. Plaintiff’s use of the “ADE” mark in Internet commerce remained continuous and, for a period of time, unchallenged.

40. Subsequently, Defendants began copying works off the adultdvdempire.com web site and placing these works on Defendants' web site, leaving the "ADE" mark displayed on these works. These copyrighted works included original images, screenshots, photographs and other pictorial and textual works, and text, including movie synopses, personal and biographical information of the motion picture actors, used by Plaintiff – and subsequently also used by Defendants – to advertise and sell DVD products and services to the general public.

41. Because Plaintiff and Defendants are in direct competition to sell DVD products and services on the Internet, Defendants' displaying of Plaintiff's mark in connection with the sale of DVDs on Defendants' web site has created a likelihood of consumer confusion as to the origin of the DVD products and services appearing on Defendants' web site.

42. The acts of Defendants, as described above, were willful.

43. Defendants' actions were contrary to honest commercial practices and were likely to deceive customers in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

44. As a result of Defendants' false, misleading and deceptive practices, Plaintiff has been irreparably harmed and is without an adequate remedy at law. The harms suffered by Plaintiff include, but are not limited to, injury to Plaintiff's reputation and goodwill, and to the reputation of its products and services, injury to the uniqueness and effectiveness of Plaintiff's marks, and damage to Plaintiff's commercial and business interests.

**COUNT III**

**TRADE DRESS INFRINGEMENT**  
**(15 U.S.C. § 1125(a))**

45. Plaintiff incorporates each and every averment contained in paragraphs 1 through 44, above, as though fully rewritten herein.

46. In violation of the Copyright Act, Defendants have falsely represented to consumers that Defendants owned Plaintiff's copyrighted works that appeared on the action-dvd.com web site, when in fact Defendants had no such ownership interest or other rights in such materials. In violation of the Lanham Act, 15 U.S.C. § 1125(a), Defendants have falsely represented to consumers that Defendants and Plaintiff are somehow affiliated, connected or associated with each other, when in fact they are not.

47. Defendants' unlawful actions were not limited to the unauthorized copying of Plaintiff's copyrighted works and protected marks, but also included mimicking the styles, colors, and designs found on Plaintiff's web site, as well as the format that Plaintiff uses to display its unique and original images, screenshots, photographs and other pictorial and textual works, and text, including movie synopses, personal and biographical information of motion picture actors.

48. The foregoing violations, taken together, demonstrate that Defendants displayed on their web site, without authorization, subject matter amounting to trade dress which is inherently distinctive and uniquely indicative of Plaintiff's web site, advertisements, products, and services.

49. Defendants' misappropriation of Plaintiff's trade dress – including, but not limited to, Plaintiff's advertising materials, displays, photographs, marks, and other on-line sales presentation materials – for use on Defendants' web site, most likely has confused both

customers and the general public, who erroneously may have believed they were viewing products and services being offered and/or endorsed by Plaintiff. Ultimately, Defendants' misappropriation of Plaintiff's trade dress also tended to mislead customers into believing they were purchasing products or services that were being sold and/or endorsed by Plaintiff, when in fact it was Defendants who were profiting from their misappropriation of Plaintiff's trade dress.

50. Defendants' actions, as described above, are a further violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

51. Defendants' actions, as described above, were willful.

52. Defendants' infringement of Plaintiff's trade dress has resulted in irreparable harm to Plaintiff, while profiting Defendants.

#### COUNT IV

#### TRADEMARK DILUTION (15 U.S.C. § 1125(c))

53. Plaintiff incorporates each and every averment contained in paragraphs 1 through 52, above, as though fully rewritten herein.

54. Defendants' unauthorized and intentional misappropriation of Plaintiff's "ADE" mark to promote and sell Defendants' DVD products and services on Defendants' web site has diluted the distinctive, favorable, and unique quality of Plaintiff's "ADE" mark, in violation of the Lanham Act, 15 U.S.C. § 1125(c).

55. Given the direct competition between Plaintiff and Defendants to sell the same types of products and services on the Internet, Defendants' actions are accurately characterized as predatory in nature.



56. The blurring effect caused by Defendants' misuse of Plaintiff's "ADE" mark has been harmful to Plaintiff's ability to market its own products and services using its mark. Unless the Defendants are enjoined from further misuse, public and customer confusion ultimately will render Plaintiff's "ADE" mark useless as a unique and distinctive identifier of Plaintiff's adultdvdempire.com web site and the products and services offered for sale on that web site.

57. Defendants' actions, as described above, are a further violation of the Lanham Act, 15 U.S.C. § 1125(c).

58. Defendants' actions, as described above, were both willful and predatory.

59. Defendants' dilution of Plaintiff's trademark has resulted in irreparable harm to Plaintiff, while profiting Defendants.

#### **COUNT V**

##### **COMMON LAW TRADEMARK INFRINGEMENT** **(54 Pa. Cons. Stat. § 1126; Pennsylvania Common Law)**

60. Plaintiff incorporates each and every averment contained in paragraphs 1 through 59, above, as though fully rewritten herein.

61. By engaging in the conduct described above, Defendants infringed Plaintiff's "ADE" mark in violation of Plaintiff's common law rights and good faith interest in that mark.

62. Plaintiff has used its "ADE" mark in commerce, not only in Pennsylvania but throughout the United States and worldwide, since October 2000. The "ADE" mark has acquired a secondary meaning associated exclusively with Plaintiff's products and services.

63. Unless Defendants are enjoined from further unauthorized actions, public and customer confusion ultimately will render Plaintiff's "ADE" mark useless as a unique and

distinctive identifier of Plaintiff's adultvdempire.com web site and the products and services offered for sale on that web site.

64. Plaintiff has been irreparably harmed by Defendants' conduct and is without an adequate remedy at law.

65. Unless the relief requested herein by Plaintiff is granted, Plaintiff may suffer further serious and irreparable harm.

### **COUNT VI**

#### **INJURY TO BUSINESS OR REPUTATION; DILUTION** **(54 Pa. Cons. Stat. § 1124)**

66. Plaintiff incorporates each and every averment contained in paragraphs 1 through 65, above, as though fully rewritten herein.

67. By engaging in the conduct described above, Defendants have diluted and blurred Plaintiff's distinctive "ADE" mark in violation of the anti-dilution provision of the Pennsylvania Trademark Act (54 Pa. Cons. Stat. § 1124), causing injury to Plaintiff's business and reputation.

68. Plaintiff has used its "ADE" mark in commerce, not only in Pennsylvania but throughout the United States and worldwide, since October 2000. The "ADE" mark has acquired a secondary meaning associated exclusively with Plaintiff's products and services.

69. Unless Defendants are enjoined from further unauthorized actions, public and customer confusion ultimately will render Plaintiff's "ADE" mark useless as a unique and distinctive identifier of Plaintiff's adultvdempire.com web site and the products and services offered for sale on that web site.

70. By their conduct, as alleged herein, Defendants have willfully intended to trade on Plaintiff's reputation or to cause dilution of Plaintiff's "ADE" mark.

71. Plaintiff has been irreparably harmed by Defendants' conduct and is without an adequate remedy at law.

72. Unless the relief requested herein by Plaintiff is granted, Plaintiff may suffer further serious and irreparable harm.

## COUNT VII

### UNFAIR COMPETITION (Pennsylvania Common Law)

73. Plaintiff incorporates each and every averment contained in paragraphs 1 through 72, above, as though fully rewritten herein.

74. By engaging in the conduct described above, Defendants have unlawfully and without privilege engaged in unfair competition in violation of the laws of the Commonwealth of Pennsylvania to the detriment of Plaintiff.

75. For example, by misusing Plaintiff's "ADE" mark and trade dress, Defendants falsely "passed off" their DVD products and services, offered on the action-dvd.com web site, as if these products and services were being offered and/or endorsed instead by Plaintiff.

76. Additionally, Plaintiff has expended substantial resources to obtain and maintain a large volume of highly effective on-line sales materials of which Plaintiff is not the author and for which Plaintiff claims no copyright. Defendants' theft of these sales materials off Plaintiff's web site has given Defendants an unfair competitive advantage, as they expended little or no time, effort and money to start up their business and begin competing with Plaintiff's business.

77. Plaintiff has been irreparably harmed by Defendants' conduct and is without an adequate remedy at law.

78. Unless the relief requested herein by Plaintiff is granted, Plaintiff may suffer further serious and irreparable harm.

**COUNT VIII**

**CIVIL CONSPIRACY**  
**(Pennsylvania Common Law)**

79. Plaintiff incorporates each and every averment contained in paragraphs 1 through 78, above, as though fully rewritten herein.

80. On information and belief, by engaging in the conduct alleged herein, Defendants intentionally and willfully entered into a combination or agreement with the intent to engage in unlawful and tortious business activities. Defendants' unlawful and tortious business activities included, but are not limited to, infringing Plaintiff's copyrights and diluting Plaintiff's "ADE" mark, as alleged herein.

81. Defendants Alexander Belfer and Oleg Minko combined and/or agreed to engage in the unlawful and tortious business activities alleged herein. Moreover, using their power and influence as owners/officers of the corporate defendants, Defendants Belfer and Minko caused employees and/or representatives to engage in the unlawful activities alleged herein.

82. Defendants committed one or more overt acts in furtherance of their conspiracy, which acts included copying materials off Plaintiff's web site and using those materials, many of which continued to display Plaintiff's "ADE" mark, to sell Defendants' products and services on Defendant's action-dvd.com web site.

83. The above acts were committed by Defendants to advance the business interests of Defendants and to harm the business interests of Plaintiff.

84. Defendants' activities constitute both direct and contributory infringement of Plaintiff's copyrights and marks. Under the law of the Commonwealth of Pennsylvania, Defendants are joint tortfeasors and may be held liable for all consequences of their conspiracy.

85. As a result of Defendants' conduct, as alleged herein, Plaintiff has suffered actual legal damage for, among other things, loss of business, loss of future business, and loss of good will. Unless Defendants are enjoined from further unauthorized actions, serious and irreparable harm, for which Plaintiff has no adequate remedy at law, may result.

86. Defendants acted, as alleged herein, with a bad motive and/or with reckless indifference to the interests of others, including both the general public and Plaintiff. As a consequence, Defendants are liable for punitive damages, in accordance with Pennsylvania law.

#### **REQUESTED RELIEF**

WHEREFORE, Plaintiff Right Ascension, Inc., t/d/b/a DVDEmpire.com, hereby demands that judgment be entered in its favor and against Defendants, as follows:

- a. the Court adjudge and declare that Defendants have infringed Plaintiff's copyrights in violation of 17 U. S. C. § 101, et seq.; have engaged in unfair competition in violation of 15 U.S.C. §§ 1125(a) and (c), as well as similar state laws and the common law; have conspired to unfairly compete against Plaintiff; and have otherwise injured Plaintiff in the manner complained herein;
- b. the Court permanently enjoin Defendants, their officers, agents, servants, and employees and those persons in active concert or participation with them, from

infringing by any means any of Plaintiff's exclusive rights under the Copyright Act;


- c. the Court permanently enjoin Defendants, their officers, agents, servants, and employees and those persons in active concert or participation with them, to take appropriate action to prevent all persons from accessing the action-dvd.com web site, or any other internet web site operated or controlled by Defendants, whether currently in operation or otherwise, so long as such web site includes Plaintiff's copyrighted works, without Plaintiff's authorization;
- d. the Court permanently enjoin Defendants their officers, agents, servants, and employees and those persons in active concert or participation with them from making false representations or otherwise violating Section 43(a) of the Lanham Act, engaging in unfair competition against Plaintiff, and conspiring to unfairly compete with Plaintiff;
- e. that all of Plaintiff's copyrighted works in the possession of the Defendants bearing the word, term, name, symbol, device, combination thereof, designation, description, or representation as complained of in this Complaint, or any reproduction, counterfeit, copy, or colorable imitation thereof, and all matrices, masters, tapes, discs, film negatives, digital files and other articles or media whereby the copyrighted works have been or may be reproduced, in the possession, custody or control of Defendants, their agents, affiliates, partners or

licensees, be delivered to Plaintiff and/or destroyed as the Court may direct pursuant to 15 U. S. C. § 1118;

- f. the Defendants be required to file with the Court and to serve on Plaintiff's counsel within thirty (30) days after the service of any order enjoining or restraining Defendants from infringing on Plaintiff's exclusive rights under the Copyright Act or making false representations under Section 43(a) of the Lanham Act, or within a reasonable time as the Court may direct, a report in writing and under oath setting forth in detail the manner and form in which Defendants have complied with such order;
- g. the Court award Plaintiff statutory damages under the Copyright Act in the amount of \$150,000.00 per work infringed;
- h. the Court award Plaintiff actual, treble, and other damages under the Lanham Act, the Copyright Act, and other applicable laws;
- i. the Court award Plaintiff the profits derived by Defendants from the wrongful use of Plaintiff's copyrighted works, including images, cover art, screenshots, and photographs, and other works developed, created, displayed and/or published by Plaintiff;

- j. the Court award Plaintiff punitive or exemplary damages on the basis of Defendants' willful, malicious and intentional conduct;
- k. the Court award Plaintiff its costs and disbursements, including reasonable attorneys' fees; and
- l. the Court grant such further and additional relief as this Court may deem just and proper.

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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CCCV

RIGHT ASCENSION, INC., )  
)  
Plaintiff, )  
)  
v. )  
)  
ACTION SOFTWARE, INC., ACTION- )  
DVD.COM, INC., ALEXANDER BELFER, )  
WEBIMAGE2000, INC. and OLEG MINKO, )  
)  
Defendants. )

Civil Action No.: 01-CV-0666

Judge William L. Standish

**MOTION OF DEFENDANTS ACTION SOFTWARE, INC., ACTION-DVD.COM, INC.,  
AND ALEXANDER BELFER FOR SUMMARY JUDGMENT**

Defendants Action Software, Inc., Action-DVD.com, Inc., and Alexander Belfer (collectively, the "Action Defendants") hereby move this Court pursuant to Rule 56(c) of the Federal Rules of Civil Procedure for an order granting summary judgment in its favor on all claims asserted by plaintiff Right Ascension, Inc., d/b/a DVDEmpire.com ("Right Ascension"). The detailed bases for this Motion are set forth in the Memorandum that accompanies this Motion.

For context, it is important to note that this action was filed by Right Ascension in April 2001. Although some merits discovery occurred mid-2001, little has occurred since that time. Moreover, Right Ascension belatedly attempted to join defendants Oleg Minko and WebImage 2000, Inc. in July 2002, and those defendants filed motions to dismiss for lack of personal jurisdiction on August 26, 2002. These motions are fully briefed and are pending before the Court. Finally, Right Ascension cancelled a planned mediation ordered by the Court, but has shown little interest in prosecuting this action in the past two years.

The Action Defendants believe that Right Ascension's claims, in light of the record developed to date, are meritless and can and should be disposed of on summary judgment. An

order to that effect is earnestly solicited. A proposed order granting the Action Defendants' motion for summary judgment is attached.

DATED: September 26, 2003

Respectfully submitted,



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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIGHT ASCENSION, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 01-CV-0666
	)	
ACTION SOFTWARE, INC., ACTION-	)	Judge William L. Standish
DVD.COM, INC., ALEXANDER	)	
BELFER, WEBIMAGE2000, INC. and	)	
OLEG MINKO,	)	
	)	
Defendants.	)	

**ORDER GRANTING SUMMARY JUDGMENT IN FAVOR OF DEFENDANTS  
ACTION SOFTWARE, INC., ACTION-DVD.COM, INC., AND ALEXANDER  
BELFER AND AGAINST PLAINTIFF RIGHT ASCENSION, INC.**

WHEREAS, the Court, having reviewed the Motion of Defendants Action Software, Inc., Action-DVD.com, Inc., and Alexander Belfer for Summary Judgment and all submissions filed in connection with this Motion, and having concluded that good and sufficient grounds exist to support this Motion,

**IT IS HEREBY ORDERED** that said Motion is GRANTED, and each of the claims of plaintiff Right Ascension, Inc., d/b/a DVDEmpire.com is dismissed with prejudice.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
Honorable William L. Standish  
United States District Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RIGHT ASCENSION, INC., )  
)  
Plaintiff, )  
)  
v. ) Civil Action No.: 01-CV-0666  
)  
ACTION SOFTWARE INC., ACTION- ) Judge William L. Standish  
DVD.COM, INC., ALEXANDER BELFER, )  
WEBIMAGE2000, INC. and OLEG MINKO, )  
)  
Defendants. )

MEMORANDUM IN SUPPORT OF MOTION OF DEFENDANTS ACTION  
SOFTWARE, INC., ACTION-DVD.COM., INC., AND ALEXANDER BELFER  
FOR SUMMARY JUDGMENT

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## I. INTRODUCTION

The Amended and Supplemental Complaint (“the Complaint”) of Right Ascension, Inc., d/b/a DVDEmpire.com (“Right Ascension”) contains a series of accusations that Action Software, Inc. (“Action Software”), Action-DVD.com, Inc. (“Action DVD”), and Alexander Belfer (“Belfer” and, together with Action Software and Action DVD, the “Action Defendants”) regularly and systematically stole Right Ascension’s copyrighted works from Right Ascension’s adult DVD web site to augment its own adult DVD web site.<sup>1</sup> Besides copyright infringement, Right Ascension asserted that the Defendants infringed and diluted an unregistered word designation known as “ADE” (“the ADE designation”), infringed trade dress associated with its web site, and violated both federal and state unfair competition laws. Right Ascension also alleged that the Defendants conspired to engage in all of these activities.

Applying federal and Pennsylvania law to the undisputed facts of this case, the Action Defendants neither appropriated Right Ascension’s overall selection, coordination, or arrangement of content on Right Ascension’s adult DVD web site, nor did they misappropriate the web site’s trade dress. Right Ascension has not established that it is the legal or beneficial owner of even one single piece of protectable, original content that was allegedly copied by the Defendants from Right Ascension’s adult DVD web site. Right Ascension’s unregistered ADE designation has never functioned as an indicator of source (let alone as a famous indicator of source), and the trade dress claims are patently vacuous. The unfair competition and conspiracy claims are also baseless and/or preempted by federal copyright law.

This Memorandum is made in support of the Motion of Defendants Action Software, Inc., Action-DVD.com, Inc., and Alexander Belfer for Summary Judgment, which motion is also

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<sup>1</sup> Right Ascension also named Oleg Minko (“Minko”) and WebImage2000, Inc. (“WebImage”) as defendants. Hereinafter the term “the Defendants” will collectively refer to the Action Defendants, Minko, and WebImage.

supported by, among other things, the deposition testimony of Belfer ("Belfer Dep. Tr."), true and correct copies of relevant pages of which are made a part hereof as Exhibit A and are being concurrently filed with the Court under seal pursuant to Section 6 of the Protective Order Concerning Confidential Information ("the Protective Order"); the deposition testimony of Minko ("Minko Dep. Tr."), true and correct copies of the relevant pages of which are made a part hereof as Exhibit B and are being concurrently filed with the Court under seal pursuant to Section 6 of the Protective Order; and the deposition testimony of Mr. Jeffrey Rix, the Chief Executive Officer of Right Ascension ("Rix Dep. Tr."), true and correct copies of the relevant pages of which are made a part hereof as Exhibit C and are being concurrently filed with the Court under seal pursuant to Section 6 of the Protective Order.

## II. UNDISPUTED FACTS

Since approximately November 1997, plaintiff Right Ascension has been selling motion pictures and other audio visual works on DVDs to the public through its Internet web sites at [www.dvdempire.com](http://www.dvdempire.com) and [www.adultdvdempire.com](http://www.adultdvdempire.com). The [www.adultdvdempire.com](http://www.adultdvdempire.com) web site (hereinafter "the Right Ascension Site") is the web site through which Right Ascension sells DVDs of adult motion pictures, and is the subject of this lawsuit.<sup>2</sup>

Defendant Action Software markets and sells DVDs of adult entertainment motion pictures to the public through the [www.action-dvd.com](http://www.action-dvd.com) web site ("the Action Site"). Defendant Belfer is president of Action Software and a fifty percent (50%) shareholder in WebImage, the company that designed and maintains the Action Site. Defendant Minko is the other fifty percent (50%) shareholder in WebImage and serves as its president and chief designer. Both WebImage

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<sup>2</sup> Right Ascension also has an affiliated web site, [www.pornstar.com](http://www.pornstar.com), that Mr. Rix has testified is part of the Right Ascension Site. "It is part of adultdvdempire.com." (Rix Dep. Tr. p. 19, line 13, Ex. C).

and Minko filed motions to dismiss for lack of personal jurisdiction in this case, and those motions are pending before the Court.

To facilitate sales, both the Right Ascension Site and the Action Site display images of the DVD box covers in which the adult movies are packaged; still shots from the movies; synopses of the movies; movie reviews; images of the actors and actresses; film anthologies; and biographies and interviews of actors and actresses.

In fact, the overwhelming majority of content on both the Right Ascension Site and the Action Site are images of copyrighted works that were authored by the movie studios who produced and sold the adult films that Right Ascension and Action Software resell. Messrs. Rix and Minko testified that both Right Ascension and Action Software received oral permission from the approximately 40 movie studios to use the movie studios' images and text as a way of promoting sales. (Rix Dep. Tr. pp. 122-123, Ex. C); (Minko Dep. Tr. p. 29, lines 16-22, Ex. B).

The movie studios' images and text on both the Right Ascension Site and the Action Site were essentially obtained or created in the same way: (i) DVD box covers were scanned onto the Right Ascension Site and the Action Site after having been downloaded from the movie studios' web sites or uploaded from CDs provided to Right Ascension and Action Software by the movie studios (Rix Dep. Tr. p. 108, lines 13-25, Ex. C); (Belfer Dep. Tr. p. 92, lines 14-16, Ex. A); (Minko Dep. Tr. p. 26, lines 8-24, Ex. B); (ii) screen shots were taken directly from the movie studios' films and uploaded to the Right Ascension Site and the Action Site using commercially available computer programs (Rix Dep. Tr. p. 69, lines 23-25, p. 70, lines 1-18, Ex. C); (Belfer Dep. Tr. p. 193, lines 6-9, Ex. A); (iii) film anthologies were compiled using commercially available software (Rix Dep. p. 155, Ex. C); (iv) movie synopses were copied from the DVD box covers or other sources provided by the movie studios (Rix Dep. Tr. p. 149, lines 21-25, p. 150,

lines 1-7, p. 158, Ex. C) (Belfer Dep. Tr. p. 183, lines 17-18, Ex. A); (Minko Dep. Tr. p. 28, lines 22-25, p. 29, lines 1-23, Ex. B); (v) biographical information for the actors and actresses were provided by the movie studios (Rix Dep. Tr. p. 112, lines 18-20, Ex. C); and (vi) photographs of the actors and actresses were provided by the movie studios or were taken with permission from the actors or actresses or other industry web sites (Rix Dep. Tr. p. 111, lines 5-9, Ex. C); (Belfer Dep. Tr. p. 171, lines 18-20, p. 173, lines 6-8, Ex. A); (Minko Dep. Tr. p. 30, lines 1-22, Ex. B).<sup>3</sup>

Right Ascension received from the Register of Copyrights a Certificate of Registration No. VA1-059-873, with a registration date of January 18, 2001 (the "Registration Certificate"). A true and correct copy of the Registration Certificate is attached hereto and made a part hereof as Exhibit D. The material that Right Ascension deposited with the Library of Congress in connection with Registration Certificate contains facsimiles of 26 screen displays from both the Right Ascension Site and the PornStar Site. (Rix Dep. Tr. p. 87, lines 3-24, Ex. C). True and correct copies of these images, which were submitted as Defendants' Exhibit 3 to the Rix Deposition (Rix Dep. Tr. p. 87, lines 3-4, Ex. C), are attached hereto and made a part hereof as Exhibit E. Mr. Rix admitted during his deposition that *none* of the Registration Certificate deposit material contained in Exhibit E was found on the Action Site. (Rix Dep. Tr. p. 94, lines 8-25, p. 95, lines 1-21, Ex. C).

After Mr. Rix's deposition, Right Ascension registered the contents of the Right Ascension Site as an automated group database. Right Ascension avers in the Complaint that the effective date of that certificate, Registration No. TX 5-586-184 (the "Subsequent Registration Certificate"), is October 2, 2001.

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<sup>3</sup> Mr. Rix testified that some of the actors' and actresses' photographs, biographical information, and interviews that appeared on the Right Ascension Site were created independently by Right Ascension. (Rix Dep. Tr. p. 113, lines 3-9, Ex. C).

Moreover, well after commencing this action, Right Ascension filed two federal trademark applications for the registration of its ADE designation, one application for the ADE designation and one for a design incorporating the ADE designation. The Complaint alleges that Right Ascension first used the ADE designation in October of 2000. (Complaint at ¶ 38.) However, both federal trademark applications state that Right Ascension did not use the ADE designation until November 1, 2000, shortly before this suit was filed. True and correct copies of web pages of the United States Patent and Trademark Office (“PTO”) relating to these trademark applications are attached hereto and made a part hereof as Exhibit F.<sup>4</sup>

While the ADE designation was purportedly used on a limited number of T-shirts and stickers (Rix Dep. Tr. p. 45, lines 21-25, p. 46, line 1, Ex. C), samples have never been provided to the Action Defendants to corroborate this. Mr. Rix testified that the ADE designation’s primary function is to identify images that may have been misappropriated from the Right Ascension Site, particularly Right Ascension’s scans of the movie studios’ DVD box covers. (Rix Dep. Tr. p. 184, lines 1-9, Ex. C). The ADE designation appears at the bottom right hand corner of these scanned DVD box cover images on the Right Ascension Site, similar to a watermark.<sup>5</sup> See Exhibit J.

### **III. LAW AND ARGUMENT**

#### **A. THE STANDARD FOR GRANTING SUMMARY JUDGMENT**

Rule 56(c) of the Federal Rules of Civil Procedure provides that summary judgment

. . . shall be rendered forthwith if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show

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<sup>4</sup> On November 27, 2002, Defendant Action Software filed a Notice of Opposition with the Trademark Trial and Appeal Board (“TTAB”), opposing the registration of the ADE designation on the grounds that Right Ascension has not used and is currently not using the ADE designation in a manner that would be readily perceived by consumers as a service mark.

<sup>5</sup> A “watermark” is defined as a translucent design impressed on paper during manufacture and visible when the paper is held to the light. The New Merriam-Webster Dictionary (1989).



that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.

As the moving parties, the Action Defendants bear the burden of demonstrating the absence of a genuine issue of material fact. *Chipollini v. Spencer Gifts, Inc.*, 814 F.2d 893, 896 (3d Cir. 1987). The United States Supreme Court has held that, to establish entitlement to summary judgment, the moving party need not “produce evidence showing the absence of a genuine issue of material fact”; rather, the burden on the moving party may be discharged by “showing” – *i.e.*, pointing out to the district court – that there is an absence of evidence to support the nonmoving party’s case. *Celotex Corp. v. Catrett*, 477 U.S. 317, 325 (1986).

**B. THIS COURT LACKS SUBJECT MATTER JURISDICTION OVER THE COPYRIGHT INFRINGEMENT CLAIM BECAUSE RIGHT ASCENSION LACKS A VALID CERTIFICATE OF REGISTRATION**

Count I of the Complaint is captioned as a claim for copyright infringement. Right Ascension has not fulfilled a basic prerequisite for this Court to have subject matter jurisdiction over this copyright claim under the Copyright Act:<sup>6</sup> a properly registered copyright. 17 U.S.C. § 411(a). The Copyright Act states that “no action for infringement in any work shall be instituted until registration of the copyright claim *has been made in accordance with this title.*” *Id.* (emphasis added). In other words, failure to comply with this provision deprives this Court of jurisdiction to hear Right Ascension’s copyright infringement claim. *See, e.g., Raquel v. Education Management Corp.*, 196 F.3d 171, 175 (3d Cir. 1999).

Right Ascension has consistently claimed to own a copyright in the Right Ascension Site as a “collective work.” A collective work is defined in the Copyright Act as “work, such as a periodical issue, anthology, or encyclopedia, in which a number of contributions, constituting separate and independent works in themselves, are assembled into a collective whole.”

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<sup>6</sup> The term “Copyright Act” will hereinafter mean 17 U.S.C. §§ 101-810.

17 U.S.C. § 101. The Copyright Act further provides that the term 'compilation' includes "collective works." *Id.* A compilation is defined in the Copyright Act as "a work formed by the collection and assembling of preexisting materials or of data that are selected, coordinated, or arranged in such a way that the resulting work as a whole constitutes an original work of authorship." *Id.* Mr. Rix testified at deposition that the Right Ascension Site is a collective work.<sup>7</sup> The Right Ascension Site's own Terms of Use corroborate this. Paragraph 18 of the Complaint recites:

Plaintiff notified users of the *adultdvdempire.com* web site of its exclusive rights in the copyrighted works by posting "Terms of Use" that provide, in pertinent part: . . . "All Content is copyrighted as a collective work under the U.S. Copyright laws, and DVD Empire owns a copyright in the selection, coordination, arrangement, and enhancement of such Content. . . ."

In light of this plain and unmistakable admission by Right Ascension that the Right Ascension Site is a collective work, and thus a compilation, registration of Right Ascension's copyright claim was not made in accordance with 17 U.S.C. § 411(a). Specifically, the Registration Certificate omits any disclosure that the Right Ascension Site was (1) a compilation or that (2) it was based upon preexisting material *owned by others*. Indeed, it is undisputed that the overwhelming majority of the Right Ascension Site's content, *e.g.*, the DVD box cover images, the movie screen shots, talent photographs and movie synopses, was comprised of preexisting works owned by others at the time of the alleged infringement. Mr. Rix also knew that the compilation of the preexisting materials was the essence of Right Ascension's copyright claim. (Rix Dep. Tr. p. 98, lines 1-16, Ex. C). Yet, Right Ascension<sup>8</sup> never advised the

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<sup>7</sup> See, *e.g.*, Rix Dep. Tr. p. 98, lines 1-25, Ex. C.

<sup>8</sup> See, *e.g.*, Rix Dep. Tr. p. 96, lines 23-25, p. 97, lines 1-2, Ex. C ("Q. Who prepared this document marked as Defendant's Exhibit 4 [the Registration Certificate]? A. Roy Leonard. Q. And he is your counsel; correct? A. Um-hum."). Moreover, besides preparing the document, Mr. Leonard was listed on the Registration Certificate as the person with whom the Copyright Office should correspond about the application. See Exhibit D. Mr. Leonard

Copyright Office of this. Indeed, the Registration Certificate does not identify the Right Ascension Site as a compilation, does not identify “any preexisting works,” nor does it provide a “statement of the material that has been added to this work . . . .” as is required when registering compilations of third party works. See Sections 6(a) and 6(b) of Exhibit D. Moreover, Right Ascension lists itself as the sole author in Section 2(a) of the Registration Certificate. These omissions and misstatements go to the very core of the Registration Certificate.

While inadvertent and immaterial errors in copyright registration forms may be excused,<sup>9</sup> Right Ascension intentionally mischaracterized the *nature* of the copyright in the Right Ascension Site and concealed the contributions of third parties. Under these circumstances, the copyright and Registration Certificate should be declared invalid and unenforceable as a matter of law.

In *Raquel*, the Third Circuit Court of Appeals ruled in a case just like this that the plaintiff’s copyright registration was insufficient to register the copyright in a song where the registration was for an “audiovisual work” instead of for a performance of the song. The case was dismissed for lack of subject matter jurisdiction because the mischaracterization of the work was material, related to the nature of the work itself, and there was no evidence that the misstatement was inadvertent. *Raquel*, 196 F.3d at 178.

To be sure, there are numerous cases suggesting that many kinds of inadvertent and immaterial errors in copyright registration forms will be excused. . . . However, *Raquel* has not cited, nor have we found, a case in which the misstatement to be excused is as fundamental as the one in this case. Here, *Raquel* misidentified the *nature* of the work in such a way as to suggest an attempted registration in a work not authored by the registrant, namely, the commercial advertisements authored, as the parties agree, by Elias/Salvion. In all of the cases excusing immaterial errors the registrant had the right to

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resisted submitting voluntarily to a deposition regarding his involvement in preparing and filing the Registration Certificate.

<sup>9</sup> See, e.g., *Data Gen. Corp. v. Grumman Sys. Support Corp.*, 36 F.3d 1147, 1161 (1<sup>st</sup> Cir. 1994); *Eckes v. Card Prices Update*, 736 F.2d 859, 861-62 (2d Cir. 1984).

the work described in the registration form. Raquel, however, does not have the right to the audiovisual work described in the registration form.

*Id.* (Citations omitted.)

As in *Raquel*, Right Ascension knowingly mischaracterized the nature of the copyright for the Right Ascension Site in its Registration Certificate. Right Ascension's copyright registration is not limited to the selection, coordination, or arrangement of content on the Right Ascension Site. Instead, it purports to cover all content in the Right Ascension Site, the vast majority of which Right Ascension admits it did not create. Therefore, Right Ascension's misstatements and omissions in the Registration Certificate are fundamental and material, and there is nothing in the record to indicate that they were innocent. Accordingly, as in *Raquel*, Right Ascension does not have a registered copyright in the Right Ascension Site that would entitle it to bring suit in compliance with § 411(a) of the Copyright Act. Therefore, Count I of the Complaint should be dismissed for lack of subject matter jurisdiction.

**C. EVEN IF RIGHT ASCENSION HAS A VALID REGISTRATION CERTIFICATE, THIS COURT SHOULD STILL REJECT RIGHT ASCENSION'S COPYRIGHT INFRINGEMENT CLAIM AS A MATTER OF LAW BECAUSE THE SIMILARITY BETWEEN THE WEB SITES CONCERNS ONLY NONCOPYRIGHTABLE ELEMENTS OR THIRD PARTY ELEMENTS IN WHICH RIGHT ASCENSION HAS NO EXCLUSIVE RIGHTS**

**1. The Action Defendants Did Not Appropriately Right Ascension's "Selection, Coordination, And Arrangement" Of Text And Images On The Right Ascension Site**

Putting aside the invalidity of Right Ascension's Registration Certificate, summary judgment is still appropriate as to Count I. It is settled that a court in a proper case may determine noninfringement as a matter of law when the similarity between two works concerns only noncopyrightable elements or when no reasonable jury could find that the two works are substantially similar. See, e.g., *Warner Bros. Inc. v. American Broadcasting Co., Inc.*, 720 F.2d

231, 239 (2d Cir. 1983). A “‘collective work’ is infringed if any copyrightable portion of work which is original to copyright holder is improperly copied by another.” *Playboy Enterprises, Inc. v. Starware Pub. Corp.*, 900 F.Supp. 433, 436 (S.D. Fla. 1995). Therefore, summary judgment is appropriate if a visual comparison reveals that the web sites at issue are so dissimilar that no question of fact is presented. *Harvey Cartoons v. Columbia Pictures Indus., Inc.*, 645 F.Supp. 1564, 1570 (S.D.N.Y. 1986) (“The power of a court to grant summary judgment dismissing copyright infringement claims is appropriate where, as here, the parties are able to put their work before the court in concrete form . . .”).

Attached hereto and made a part hereof as Exhibit G are true and correct copies of the materials that Right Ascension submitted as Exhibit 2 to its Complaint. The materials consist of web pages from both the Action Site and the Right Ascension Site, and purport to evidence examples of Right Ascension’s copyright in its “selection, coordination, and arrangement” allegedly infringed by the Defendants. It is undisputed that the overwhelming majority of the works on the Right Ascension Site and the Action Site are unprotectable as to any party in this lawsuit. In fact, both web sites represent compilations of works owned by others.

As a matter of law, more than substantial similarity is required in cases involving compilations of unprotectable works or when the range of protectable expression is narrow, as is the case here. *Apple Computer, Inc. v. Microsoft Corp.*, 35 F.3d 1435, 1439 (9<sup>th</sup> Cir. 1994) (“When the range of protectable and unauthorized expression is narrow, the appropriate standard for illicit copying is virtual identity.”) In other words, if it has anything, Right Ascension possesses a razor thin copyright in its “selection, coordination, and arrangement” that protects against only identical copying. *See, e.g., Ets-Hokin v. Skyy Spirits Inc.*, 323 F.3d 763, 766 (9<sup>th</sup> Cir. 2003) (“When we apply the limiting doctrines, subtracting the unoriginal elements,

Ets-Hokin is left with . . . a ‘thin’ copyright, which protects against only virtually identical copying.”).

Even a cursory examination of the Action Site web pages and Right Ascension Site web pages contained in Exhibit G evidences that the Action Defendants did not appropriate anything proprietary to Right Ascension with respect to Right Ascension’s selection, coordination, and arrangement, *i.e.*, its layout of content.<sup>10</sup> In fact, Mr. Rix testified that he had “no problem” with the layout of the Action Site.<sup>11</sup>

Clearly, the layouts of the two web sites are not substantially similar, let alone virtually identical. In fact, the content for both the Action Site and the Right Ascension Site appears to have been selected, coordinated, and arranged consistent with industry custom and practice, *i.e.*, in ways that were not dissimilar from virtually all other adult-oriented web sites that sell adult DVD products. Attached hereto and made a part hereof collectively as Exhibit I are true and correct copies of pages from several other adult web sites that sell adult DVD products.<sup>12</sup> It cannot be disputed that an ordinary lay observer would recognize that each of these adult web sites arranges and coordinates displays of movie DVD box covers, reviews, screen shots, and actor information in similar ways.<sup>13</sup> Thus, the Action Defendants could not have copied Right

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<sup>10</sup> In ¶ 18 of the Complaint, Right Ascension quotes the “Terms of Use” policy that is posted on the Right Ascension Site and admits that it owns a copyright merely in the selection, coordination, arrangement and enhancement of content on the Right Ascension Site.

<sup>11</sup> “Q. But the problem that your company has with Action Software’s web site is not with its layout of its home page and the way it is – A. Not with the layout. Q. Okay. I just want to make sure that I’m clear about what the scope of the claim is.” (Rix Dep. Tr. p. 189, lines 14-19, Ex. C).

<sup>12</sup> Attached hereto and made a part hereof as Exhibit H is the Declaration of Duncan Poirier (hereafter “Poirier”), a legal assistant in the law firm of Benesch, Friedlander, Coplan & Aronoff LLP, who researched and produced the hard copy pages of these adult web sites.

<sup>13</sup> In the Third Circuit, as in other federal circuits, the criterion for determining whether there is substantial similarity between a copyrighted work and the allegedly infringing work is whether an ordinary lay observer would detect a substantial similarity between the two works. *Universal Athletic Sales Co. v. Salkeld*, 511 F.2d 904 (3d Cir. 1975).

Ascension's *exclusive* "selection, coordination, and arrangement" of content. Therefore, summary judgment in favor of the Action Defendants is appropriate with respect to the Action Defendants' defense that they did not copy Right Ascension's "selection, coordination, and arrangement" of text and images on the Right Ascension Site.

**2. Right Ascension Lacks Standing To Sue For Any Specific Works On The Right Ascension Site That Are Based On "Third Party Works"**

Right Ascension alleges in ¶ 22 of the Complaint that the Defendants "infringed Plaintiff's exclusive rights . . . in dozens if not hundreds of copyrighted works." The term "copyrighted works" is defined in ¶ 14 of the Complaint as "images, screenshots, photographs and other pictorial and textual works, including movie synopses, personal and biographical information of the motion picture actors, that Plaintiff has created, developed, collected, selected, organized, framed and/or formatted, and displays on the adultdvdempire.com web site." Further, Right Ascension claims in ¶ 15 of the Complaint that it secured the "exclusive" rights to such copyrighted works, and in ¶ 29 of the Complaint that it is the "legal or beneficial owner of exclusive rights in" the copyrighted works. These statements are profoundly false.

Indeed, Mr. Rix testified that any screen shots (Rix Dep. Tr. p. 69, lines 2-9, Ex. C) and box cover art (Rix Dep. Tr. p. 149, lines 19-25, p. 150 lines 1-6, Ex. C) found on both the Right Ascension Site and the Action Site were merely copied from the movie studio's copyrighted works. Mr. Rix admitted that the synopses were slavish copies of the synopses found on the DVD movie box covers. (Rix Dep. Tr. p. 158, lines 3-12, Ex. C).

For these reasons, Right Ascension lacks standing to bring this action for copyright infringement. At best, Right Ascension is a *non-exclusive licensee* of the licensor movie studios who own the underlying works from which almost all of the images and text on the Right Ascension Site were derived. Exclusive licenses must be in writing under §§ 202 and 204 of the

Copyright Act, and Mr. Rix testified that all of Right Ascension's agreements to use third parties' content were oral agreements. (Rix Dep. Tr. pp. 122 - 25, Ex. C). *See also MacLean Assoc., Inc. v. WM. M. Mercer-Meidinger-Hansen, Inc.*, 952 F.2d 769 (3d Cir. 1991) (owner of copyright can transfer ownership of copyright by selling or by exclusively licensing it; exclusive licenses must, however, be in writing). Therefore, despite Right Ascension's allegation in ¶ 15 of the Complaint that it "has secured the exclusive rights to the copyrighted works" on the Right Ascension Site, Right Ascension by its own admission lacks an *exclusive license* from any of the third party content providers, many of whom supplied the exact same content to other resellers of adult video products.

For these reasons, Right Ascension lacks standing to bring suit against the Action Defendants for copying any DVD box covers, screen shots, and/or DVD movie synopses. *See Eden Toys, Inc. v. Florelee Undergarment Co.*, 697 F.2d 27 (2d Cir. 1982) (plaintiff lacked standing to bring suit for copying portions of a derivative work based upon underlying copyrighted works). Accordingly, summary judgment should be granted in favor of the Action Defendants for non-infringement of any third party content on the Right Ascension Site.

**D. THIRD PARTY COPYRIGHTED WORKS THAT RIGHT ASCENSION REPRODUCED ON THE RIGHT ASCENSION SITE ARE NOT SUBJECT TO COPYRIGHT PROTECTION BY PLAINTIFF**

**1. Third Party Copyrighted Works That Right Ascension Reproduced On The Right Ascension Site Are Not Subject To Copyright Protection Because They Lack The "Originality" Requirement**

Setting aside Right Ascension's lack of standing, none of the images of DVD box covers, screen shots, movie synopses, third party-authored photographs, and third party-authored biographical pieces on the Right Ascension Site possess the requisite originality to qualify for copyright protection.



Copyright protection is available for “*original works* of authorship fixed in any tangible medium of expression.” *Southco, Inc. v. Kanebridge Corp.*, 258 F.3d 148, 151 (3d Cir. 2001) (emphasis added). “Originality means that the work owes its creation to the author and this in turn means that the work must not consist of *actual copying*.” *L. Batlin & Son, Inc. v. Snyder*, 536 F.2d 486, 490 (2d Cir. 1976) (emphasis added).

The Copyright Act defines derivative works as being “based upon one or more preexisting works, such as a translation, musical arrangement, dramatization, fictionalization, motion picture version, sound recording, art reproduction, abridgement, condensation, or any other form in which a work may be recast, transformed, or adapted.” 17 U.S.C. § 101. For a derivative work to qualify for copyright protection, the work must still meet the originality requirement. *See Feist Publ’n, Inc. v. Rural Tel. Serv. Co., Inc.*, 499 U.S. 340, 345 (1991). A change in medium does not create the requisite originality to protect a derivative work. *See L. Batlin & Son, Inc.*, 536 F.2d at 491; *Dunham Indus., Inc. v. Tomy Corp.*, 630 F.2d 905, 910-911 (2d Cir. 1980).

The Right Ascension Site arguably falls under the definition of a derivative work, but it is not sufficiently original to be protected by copyright. The images of box covers, screen shots, movie synopses, third party-authored photographs, and third party-authored biographical information are simply “changes in media,” *i.e.*, slavish copies of works owned by others. The DVD movie box covers were merely scanned by Right Ascension employees and converted to digital images before being sized and placed on the Right Ascension Site. (Rix Dep. Tr. p. 108, lines 13-25, Ex. C). The screen shots were digital reproductions of individual frames of the movie studios’ movies that were made with the use of a commercially available computer program. (Rix Dep. Tr. p. 69, lines 22-25, p. 70, lines 1-18, Ex. C). The movie synopses were

merely copied from the DVD movie box covers. (Rix Dep. Tr. p. 158, lines 3-17, Ex. C). Even Right Ascension's film anthologies for the individual actors, *i.e.*, the lists of films that actors previously appeared in, were *automatically* compiled and updated through the use of a commercially available computer program. (Rix Dep. Tr. p. 155, lines 1-14, Ex. C).

Clearly, Right Ascension's slavish reproduction of third party content involved no creative spark, merely the use of digital technology to automatically generate *exact* copies. To provide copyright protection for producing *exact* copies of copyrighted works would "simply put a weapon for harassment into the hands of mischievous copiers." *Durham Indus.*, 630 F.2d at 910. As in *Feist*, such works are not sufficiently *original* for copyright protection.<sup>14</sup>

Because the third party content that Right Ascension reproduced on the Right Ascension Site were not "original works" entitled to protection under the Copyright Act, they were not infringed as a matter of law by the Action Defendants. Accordingly, summary judgment should be granted in favor of the Action Defendants for non-infringement of all third party content on the Right Ascension Site.

## **2. Third Party Copyrighted Works That Right Ascension Reproduced On The Right Ascension Site Are Not Subject To Copyright Protection Because They Are Infringing Works**

Putting aside Right Ascension's "originality" problem, the Right Ascension Site is unprotected under copyright law for another reason. "[I]f the underlying work [upon which the derivative work is based] is itself protected by copyright, then he [the maker of the derivative work] will receive no protection at all; on the contrary, he is a copyright infringer, because in

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<sup>14</sup> "The raw data . . . is not original in any way. Rural's selection of listings . . . could not be more obvious and lacks the modicum of creativity necessary to transform mere selection into copyrightable expression." *Feist*, 499 U.S. at 341.

order to create his work he has copied the underlying work.” See *Dam Things From Denmark, a/k/a Troll Co. ApS v. Russ Berrie & Co. Inc.*, 290 F.3d 548, 563 (3d Cir. 2002).

For compilations based on pre-existing works, the copyright “does not extend to any part of the work in which such [pre-existing] material has been used unlawfully.” 17 U.S.C. § 103(a). This is true even when the copyright holder of the underlying work has not affirmatively objected to the use of its work. See *Pamfiloff v. Giant Records, Inc.*, 794 F.Supp. 933, 938 (N.D. Cal. 1992).

While Right Ascension contends that it received oral permission from the movie studios to use the box covers, the screen shots, and other content on the Right Ascension Site, this was not corroborated. Moreover, Right Ascension neglected to identify the Right Ascension Site as a compilation or a derivative work in the Registration Certificate and concealed the copyrighted works that the site was based upon. Therefore, Right Ascension is itself a copyright infringer and has unclean hands.

Accordingly, for all of the reasons and authorities cited herein, summary judgment should be granted in favor of the Action Defendants for non-infringement of all third party content on the Right Ascension Site.

**E. RIGHT ASCENSION’S TRADEMARK INFRINGEMENT CLAIM IS BASELESS BECAUSE THE ADE DESIGNATION IS NOT A DESIGNATION OF SOURCE**

Right Ascension claims in Count II of the Complaint that the Defendants’ alleged use of Right Ascension’s unregistered ADE designation on the Action Site constitutes a violation of the Lanham Act § 43(a), 15 U.S.C. § 1125(a). In the Third Circuit, trademark infringement is established if the plaintiff proves that “(1) the marks are valid and legally protectable; (2) the marks are owned by the plaintiff; and (3) the defendant’s use of the marks to identify goods or services is likely to create confusion concerning the *origin* of the goods or services.”

*Opticians Ass'n of America v. Independent Opticians of America*, 920 F.2d 187, 192 (3d Cir. 1990) (emphasis added).

Right Ascension's trademark infringement claim fails because the undisputed facts are clear that Right Ascension used the ADE designation *as a security device* — not as a source identifier. A designation is only protectable as a trademark or service mark “if the public recognizes it as identifying the claimant's goods or services and distinguishes them from those of others.” *A.J. Canfield Co. v. Honickman*, 808 F.2d 291, 296 (3d Cir. 1986) (quoting 1 J. Thomas McCarthy, *Trademarks and Unfair Competition*, § 15:1, at 6576 (2d ed. 1984).

“A source identifying mark . . . quickly and easily assures the potential customer that this item . . . the item with this mark . . . is made by the same producer as other similarly marked items that he or she liked (or disliked) in the past. It is the source distinguishing ability of the mark — not its ontological status as color, shape, fragrance, word, or sign — that permits it to serve these basic purposes.” *Qualitex Co. v. Jacobson Products Co., Inc.*, 514 U.S. 159, 164 (1995).

For a designation to become a trademark or service mark, “it must be used in such a manner that its nature and function [as a mark] are readily apparent and recognizable without extended analysis or research and certainly without legal opinion.” *Ex Parte National Geographic Soc'y*, 83 U.S.P.Q. 260, 260 (Comm'r Pat. & Trademarks 1949). Common indicators that a word, phrase or picture is being used as a trademark include large-sized print style, color, and a prominent position on label or advertising copy. *See In re Post Properties, Inc.*, 227 U.S.P.Q. 334 (T.T.A.B. 1985). The ultimate question is whether “the designation claimed as a protectable mark [has] been used in such a way as to make such a visual impression that the viewer would see it as a symbol of origin separate and apart from everything else.”

1 J. Thomas McCarthy, *McCarthy on Trademarks and Unfair Competition*, Vol. 2, § 3:3 (West Group 2003); *see also Scholastic Inc. v. Speirs*, 28 F.Supp.2d 862 (S.D.N.Y. 1998).

It cannot be disputed that Right Ascension's use of the ADE designation fails the standards required for trademark or service mark protection. The ADE designation is not a registered mark (Rix Dep. Tr. p. 44, lines 20-25, p. 45, lines 1-9, Ex. C) and, therefore, has no presumption of validity. *Cf.* 15 U.S.C. § 1115(a) (federal trademark registration is presumptively valid). By its own admission, Right Ascension used the ADE designation *not* as an indicator of source, but instead as a security device to identify when "other companies" copied works off of its web sites. "The reason we started putting ADE on there is to be able to identify what other companies have been taking our works." (Rix Dep. Tr. p. 184, lines 7-9, Ex. C).

A review of Right Ascension's Exhibit 2 to its Complaint, reattached hereto as Exhibit G, evidences that the ADE designation was not used prominently on the Right Ascension Site. Instead, the designation was superimposed in small, faint text over the bottom right hand corners of the DVD movie box cover images that were displayed on the Right Ascension Site. For example, on the DVD movie box cover titled "Commercial World" (for the Court's convenience, a true and correct copy of this page from Exhibit G is separately attached hereto and made a part hereof as Exhibit J), the ADE designation is one of eight: there are two "Vivid" DVD text marks; there is one "Vivid" DVD circle logo mark; there is the "Dolby" noise reduction logo; there is the phrase "5.1 digital stereo sound"; there is the word "Vivid" at the bottom right hand corner of the box cover; there is the phrase "Multiple Angles"; there is the movie title itself; and then, finally, there is the ADE designation, set in the smallest text of all. Manifestly, the ADE designation's nature and function are not *readily apparent and recognizable*.

Moreover, the ADE designation has not been consistently used on the Right Ascension Site so as to create service mark rights. Right Ascension's use of the ADE designation has been infrequent, intermittent, and inconsistent at best.

In short, the ADE designation is in reality a "sham mark" that is not protectable. In *Pirone v. MacMillan, Inc.*, 894 F.2d 579 (2d Cir. 1990), the court rejected plaintiff's attempt to use Lanham Act § 43(a) to protect photographs of Babe Ruth on a calendar, holding that those photographs did not serve as an origin-indicating function. The same result should be reached in this case. Right Ascension has not used the ADE designation as a prominent indicator of source or origin.

For these foregoing reasons, there can be no service mark infringement as a matter of law. Therefore, the Action Defendants respectfully request this Court to grant summary judgment in their favor as to Count II.

**F. RIGHT ASCENSION'S CLAIM FOR TRADE DRESS INFRINGEMENT IS BASELESS BECAUSE THE DESIGN OF THE RIGHT ASCENSION SITE IS FUNCTIONAL AND NON-DISTINCTIVE**

In support of its trade dress infringement claim, Right Ascension defined the trade dress of the Right Ascension Site as a combination of copyrighted works, protected marks, styles and colors, as well as the Right Ascension Site's format for the display of "unique and original images, screenshots, photographs and other pictorial and textual works . . . including movie synopses, personal and biographical information of motion picture actors." (Complaint at ¶ 47). Right Ascension alleged that these elements are "subject matter amounting to trade dress which is inherently distinctive and uniquely indicative of Plaintiff's web site, advertisements, products, and services." (Complaint at ¶ 48).

To succeed in its claim for trade dress infringement under Lanham Act § 43(a), 15 U.S.C. § 1125(a), Right Ascension must prove by a preponderance of the evidence: (1) that the trade

dress in question contained in the Right Ascension Site is primarily nonfunctional, (2) that the trade dress in question contained in the Right Ascension Site is distinctive in the market place, thereby indicating Right Ascension as its source, and (3) that the trade dress contained in the Action Site is confusingly similar to any trade dress contained in the Right Ascension Site. *See Wal-Mart Stores, Inc. v. Samara Bros., Inc.*, 529 U.S. 205, 210 (2000); *Merchant & Evans, Inc. v. Roosevelt Bldg. Prods. Co.*, 963 F.2d 628, 633 (3d Cir. 1992); 15 U.S.C. 1125(a)(3). “The first two elements are the requirements for protectability, and the third element is the standard for evaluating infringement.” *Abercrombie & Fitch Stores, Inc. v. American Eagle Outfitters, Inc.*, 280 F.3d 619, 629 (6<sup>th</sup> Cir. 2002) (referring to the elements recited in *Wal-Mart Stores* that establish trade dress infringement).

A trade dress is functional if the feature or features claimed as trade dress are, as a whole, “essential to the use or purpose of the article or if it affects the cost or quality of the article.” *Qualitex*, 514 U.S. at 165. A trade dress is functional “if exclusive use of the feature would put competitors at a significant non-reputation related disadvantage.” *Id.* In other words, a trade dress is functional if there are no alternatives to the alleged trade dress feature, or available alternatives are too costly for competitors to employ in order to compete effectively in the marketplace. *See, e.g., Two Pesos, Inc. v. Taco Cabana, Inc.*, 505 U.S. 763, 774-75 (1992).

Here, the alleged imitated features of the Right Ascension Site are features common to all adult retail web sites. Right Ascension sells adult motion picture DVDs that are produced by movie studios. It is in the interest of all adult retailers, including Right Ascension and the Action Defendants, to provide prospective customers with as much information as possible about the adult movies to pique consumers’ interest and facilitate sales. These adult e-tailer web sites feature movie synopses, reviews, DVD box cover images, screen shots, photographic images,

and biographical information of the adult stars for one reason only: to entice prospective customers to purchase a DVD title. In short, all of the Right Ascension Site's features are essential to the purpose of the Right Ascension Site, which is to sell adult DVDs. *See Qualitex*, 514 U.S. at 165 (stating that a trade dress is functional if the features claimed within it are essential to the purpose of the article). Therefore, the trade dress contained in the Right Ascension Site is functional and not protectable.

In fact, the sheer functionality of the Right Ascension Site becomes even more obvious when one examines other adult e-commerce web sites. *See Exhibit I*. All such websites selling adult movies display DVD box cover images, movie reviews, screen shots, and adult star information to induce sales. In other words, these features are standard to all Internet retailers of adult DVD fare, they are not designed to distinguish a web site from its competition. To afford Right Ascension exclusive rights to such non-distinctive and functional features would unfairly chill competition and enable Right Ascension to monopolize the online adult DVD market. *See Two Pesos*, 505 U.S. at 775; *Bonito Boats, Inc. v. Thundercraft Boats, Inc.*, 489 U.S. 141 (1989) (recognizing that only patent law protects functional features of products). Therefore, Right Ascension's trade dress claim should be rejected as a matter of law because it is functional.

Regardless, and for the reasons stated above, the Right Ascension Site is not entitled to protection under the Lanham Act because it is not distinctive. *See Two Pesos*, 505 U.S. at 769 (stating that an identifying mark is "capable of being protected if it either (1) is inherently distinctive or (2) has acquired distinctiveness through secondary meaning") (internal citations omitted).

Each page of the Right Ascension Site features graphics of DVD box covers, movie synopses, screen shots, and adult star information, and is organized into an industry standard



consisting of columns with navigational links along a side column or at the bottom of the page. In addition, the Right Ascension Site pages have common adult-related titles with link buttons to these pages, banners advertising and promoting adult content, and other industry-standard pages with contact information, a help menu, terms and conditions, and other policies.<sup>15</sup>

Right Ascension alleges that these elements represent “subject matter amounting to trade dress which is inherently distinctive and uniquely indicative of Plaintiff’s web site, advertisements, products, and services.” (Complaint at ¶ 48). A trade dress is inherently distinctive only if the total appearance and image of a product or service alone can identify the source of the product or service. *See Two Pesos*, 505 U.S. at 768. Here, Right Ascension cannot meet its heavy burden of proving inherent distinctiveness because the features it seeks to protect form an industry standard and thus are generic.

The court in *Abercrombie & Fitch Co. v. Hunting World, Inc.*, 537 F.2d 4, 9 (2d Cir. 1976) set out a test that is widely followed in determining what types of marks may be protected, and under what showing. *See, e.g., Duraco Products, Inc. v. Joy Plastic Enterprises, Ltd.*, 40 F.3d 1431, 1440 (3d Cir. 1994). *Abercrombie* distinguished five categories into which a potential mark could fall, and set forth the accompanying requirements for gaining protection. *Abercrombie*, 537 F.2d at 9; *Duraco Products*, 40 F.3d at 1440. A generic term is one that is never protectable because it has become known as the product or service itself, not as a source

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<sup>15</sup> Moreover, literature on teaching web site design reveals a finite way of efficiently organizing a web page, consisting of columns with structural navigational links along a side column or at the top of every page, a title for every page, an advertising page with a banner running on the top portion of the page, an acknowledgment page with a copyright notice, and a home page with contact information. In the Internet environment, web site designers use common tools to create web pages, including without limitation link buttons, banners, image maps, and other graphics. Not only are designers using the same tools, but they also have developed uniform standards about how certain design elements should be presented. *See Jakob Nielsen, Designing Web Usability* 14 (2000) (arguing that customer usability is critical for the success of a web site because for many customers, the web site is their only contact with the company).

indicator. *Abercrombie*, 537 F.2d at 9; *Duraco Products*, 40 F.3d at 1440. A descriptive mark is one that describes a characteristic or quality of the product or service. *Abercrombie*, 537 F.2d at 9. A suggestive mark merely suggests to the consumer the nature of the product. *Id.* at 10. An arbitrary mark has no logical connection to the product or service itself. *Id.* at 11 n.12. A fanciful mark is one that is completely made up. *Id.* The U.S. Supreme Court has recognized that this same legal framework applies to trade dress. *Wal-Mart Stores*, 529 U.S. at 215; *Two Pesos*, 505 U.S. at 773.

Here, the Right Ascension Site's trade dress should be considered generic because its features are part of an industry standard common to adult e-commerce sites. In that event, the trade dress is not protectable as a matter of law.

If this Court finds that the design of the Right Ascension Site is descriptive and thus eligible for protection, Right Ascension must prove that the alleged trade dress has secondary meaning (or "acquired distinctiveness") in the minds of consumers. *Wal-Mart Stores*, 529 U.S. at 205. In other words, Right Ascension bears the burden of proving that its alleged trade dress associated with the Right Ascension Site has secondary meaning among consumers of adult DVD movies. *See Two Pesos*, 505 U.S. at 773. Secondary meaning is a consumer's mental association or recognition between a trade dress and the source of the product or service bearing the trade dress. *See id.* at 766 n.4 (noting that secondary meaning indicates that a mark or dress has been uniquely associated with a specific source). Right Ascension has not offered proof of secondary meaning, and the Action Defendants submit that there is none.

Moreover, courts often focus on the length and manner of use of the trade dress in connection with the sale of goods or provision of services in determining secondary meaning. *See, e.g., Rock & Roll Hall of Fame & Museum, Inc. v. Gentile Prods.*, 134 F.3d 749 (6<sup>th</sup> Cir.

1998) (denying protection to museum building design because the plaintiff failed to demonstrate that the design has been consistently in use as a source designator). Use of the trade dress must be consistent and continuous to create a distinct commercial impression as an indicator of a source. *See id* at 755. Here, the plaintiff has not only failed to demonstrate that the Right Ascension Site has been consistently in use as a source designator, in fact the plaintiff has admitted that it has not. “[T]he site is always changing.” (Rix Dep. Tr. p. 103, lines 16-17, Ex. C). Accordingly, Right Ascension cannot credibly argue that the Right Ascension Site has attained a secondary meaning because Right Ascension’s Chief Executive Officer has already acknowledged that the trade dress’s use has not been consistent and continuous enough to create a distinct commercial impression as an indicator of source. *See Rock & Roll Hall of Fame*, 134 F.3d at 755.

In short, the design of the Right Ascension Site is primarily functional and non-distinctive, failing the first and second elements of the test for trade dress protectability. In addition, Mr. Rix’s testimony that he had “no problem” with the layout of the Action Site negates the third factor that there is any likelihood consumers will confuse the Action Site with the Right Ascension Site. (Rix Dep. Tr. p. 189, lines 14-17, Ex. C). Inasmuch as Right Ascension cannot meet its burden as a matter of law as to any element required to establish trade dress infringement, the Action Defendants respectfully request that this Court grant summary judgment in their favor respecting Count III of the Complaint.

**G. RIGHT ASCENSION’S CLAIM FOR TRADEMARK DILUTION IS BASELESS BECAUSE THE ADE DESIGNATION IS NOT FAMOUS**

In Count IV of the Complaint, Right Ascension alleges that the Defendants diluted Right Ascension’s ADE designation. To establish a *prima facie* case under the Federal Trademark Dilution Act (the “FTDA”), Right Ascension must plead and prove that: (i) the ADE designation

is a “famous” mark in light of the totality of eight factors listed in 15 U.S.C. § 1125(c)(a); (ii) the Defendants are making commercial use of the ADE designation in interstate commerce; (iii) the Defendants’ use of the ADE designation began after the ADE designation became famous; and (iv) the Defendants’ use of the ADE designation has diluted the ADE designation by lessening its capacity to identify and distinguish goods or services. *See generally Moseley v. V Secret Catalogue, Inc.*, 537 U.S. 418 (2003); *Times Mirror Magazines, Inc. v. Las Vegas Sports News, L.L.C.*, 212 F.3d 157, 163 (3d Cir. 2000).

Right Ascension has not and cannot demonstrate by consumer surveys or other means that the ADE designation has actually been diluted as a result of the Defendants’ alleged actions, as required by *Moseley*. More fundamentally, the ADE designation is not now and never has been famous, and Right Ascension *has not even alleged* that it is.

To be successful in a claim for trademark dilution, “plaintiff must supply evidence and proof of the timing of two events: when the plaintiff’s mark achieved the elevated status called ‘fame’ and when the defendant made first use of the mark.” *Chatam Int’l, Inc. v. Bodum, Inc.*, 157 F.Supp.2d 549, 560 (E.D.Pa. 2001) (citing 4 J. Thomas McCarthy, *McCarthy on Trademarks and Unfair Competition*, § 24:96 Vo. 3 (West Group 2003)). “[T]he statute looks to the mark’s fame at the time of the mark’s first commercial use, not when the first use occurs that the mark’s owner find objectionable.” *Chatam Int’l*, 157 F.Supp.2d at 560.

The FTDA provides eight non-exclusive factors in determining the famousness or not of a mark:

- (A) the degree of inherent or acquired distinctiveness of the mark;
- (B) the duration and extent of the use of the mark in connection with the goods or services with which the mark is used;
- (C) the duration and extent of advertising and publicity of the mark;
- (D) the geographical extent of the trading area in which the mark is used;
- (E) the channels of trade for the goods and services for which the mark is used;

- (F) the degree of recognition of the mark in the trading areas and channels of trade used by the mark's owner and the person against whom injunction is sought;
- (G) the nature and extent of the use of the same and similar mark by third parties;
- (H) whether the mark was registered under the Act of March 3, 1881, or the Act of February 20, 1905, or on the principal register.

15 U.S.C. § 1125(c)(1)(A)-(H). "The FTDA does not require that courts strictly apply every factor in the statute." *Times Mirror*, 212 F.3d at 166.

As stated above, Right Ascension never alleged in the Complaint that its ADE designation was or is a "famous" mark. Moreover, the ADE designation patently fails to meet the stringent standards for "fame" set forth in 15 U.S.C. § 1125(c)(1)(A)-(H).

As to factor (A) of the FTDA, as stated in Section III.E. of this Memorandum, the ADE designation was not used in such a way so as to warrant trademark status and protection at the time of its alleged misappropriation. Thus, not only is it not a highly distinctive mark, it is not even a valid mark worthy of *any* protection. For these reasons, this factor weighs heavily in the Action Defendants' favor. Furthermore, numerous other entities own federally registered marks incorporating the ADE designation. A true and correct list of those marks is attached hereto and made a part hereof as Exhibit K.<sup>16</sup>

As to factor (B) of the FTDA, Right Ascension could not have been using the ADE designation for more than a few months at the time of the Defendants' alleged misappropriation. In fact, Mr. Rix testified that Right Ascension had been using it only for about "four or five months." (Rix Dep. Tr. p. 46, lines 1-5, Ex. C). Federal courts have held that marks with much longer periods of use failed to meet the standard for famousness under the FTDA. *See, e.g., Network Network v. CBS, Inc.*, 54 U.S.P.Q.2d 1150 (C.D. Cal. 2000) (mark in use nationally for eight years not "famous" in terms of FTDA); *Washington Speakers Bureau, Inc. v. Leading*

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<sup>16</sup> Poirier researched and produced the hard copy pages from the PTO web site evidencing that numerous other entities own federally registered marks incorporating the ADE designation. *See* Exhibit H.

*Auth., Inc.*, 33 F.Supp. 2d 488 (E.D.Va. 1999) (mark in use for 20 years, in conjunction with other marks, not famous under FTDA). Therefore, this factor weighs heavily in the Action Defendants' favor.

As to factor (C) of the FTDA, it cannot be disputed that Right Ascension's purported use of the ADE designation on a small number of promotional items, in addition to the ADE designation's primary use as a security device, does not constitute a significant "advertising and publicity" campaign. In fact, other than perhaps using the ADE designation on a few stickers and T-shirts, Right Ascension has alleged no set of facts that could reasonably be described as any attempt whatsoever to educate the public as to the significance of the ADE designation. Therefore, this factor weighs heavily in the Action Defendants' favor.

As to factor (F), Right Ascension has not produced any consumer survey or other evidence indicating that even a small percentage of the relevant purchasing public is even remotely aware that the designation exists, let alone is aware that the source of the designation is Right Ascension.<sup>17</sup> In a case decided by the Ninth Circuit, the court concluded that the marks "Avery" and "Dennison" were not famous in part because of a consideration that Avery Dennison did not produce any significant evidence that "consumers in general have any brand association with 'Avery' and 'Avery Dennison,' and no evidence of product awareness relates specifically to the 'Dennison' trademark." *Avery Dennison Corp. v. Sumpton*, 189 F.3d 868, 879 (9<sup>th</sup> Cir. 1999).

As to factor (G), as stated above and shown in Exhibit K, numerous third parties incorporate the ADE designation in their federally-registered trademarks. As to factor (H), the

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<sup>17</sup> As stated numerous times herein, arguably the designation is not even being used as a service mark. Moreover, some commentators have called for a clear percentage cut-off for consumer recognition in order for a mark to be considered "famous." McCarthy, for example, recommends that a plaintiff's mark be known by more than 50% of the defendant's potential customers in order to be considered "famous." See McCarthy § 24:92 at 24-164.

ADE designation was an unregistered mark at the commencement of this litigation, and remains so.<sup>18</sup> Each of these factors weighs heavily in the Action Defendants' favor.

Therefore, it is submitted that at least six of the eight fame factors under the FTDA favor the Action Defendants, and the other factors are arguably irrelevant. "Dilution is a cause of action invented and reserved for a select class of marks – those marks with such *powerful consumer associations* that even non-competing uses can impinge their value." *Avery Dennison*, 189 F.3d at 875 (emphasis added). As a result, "to meet the famousness element of protection under the dilution statutes a mark must be truly prominent and renowned." *Id.* (quoting *I.P. Lund Trading ApS v. Kohler Co.*, 163 F.3d 27, 46 (1<sup>st</sup> Cir. 1998) (internal quotations omitted)).

The legislative history of the FTDA evidences that Congress intended courts to be highly selective in determining which marks are famous. "We believe that a limited category of trademarks, those which are truly famous and registered, are deserving of national protection from dilution[.]"<sup>19</sup> Examples of truly famous marks cited in a House Report on the FTDA included "Buick," "Dupont," and "Kodak."<sup>20</sup>

Not only is the ADE designation not a "Buick" or "Dupont," it is also not a "Playboy," "Hustler," or "Vivid." Because Right Ascension's ADE designation is not famous, an analysis of the remaining factors required for a *prima facie* claim for relief under the FTDA and a consideration of any direct evidence of dilution as required by the United States Supreme Court is unnecessary. The Action Defendants respectfully request that this Court grant summary judgment in their favor as to Count IV of the Complaint.

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<sup>18</sup> Defendant Action Software has filed a Notice of Opposition with the TTAB opposing registration of the ADE designation on the grounds that Right Ascension has not used and is not using the ADE designation in a manner that would be readily perceived as identifying the recited services.

<sup>19</sup> Trademark Review Commission, Report & Recommendations, 77 *Trademark Rep.* 375, 455 (1987).

<sup>20</sup> See H.R.Rep. No. 104-374, at 4 (1995), reprinted in 1995 U.S.C.C.A.N. 1029, 1031.

**H. RIGHT ASCENSION'S CLAIM FOR COMMON LAW TRADEMARK INFRINGEMENT UNDER PENNSYLVANIA LAW FAILS FOR THE SAME REASON AS RIGHT ASCENSION'S LANHAM ACT INFRINGEMENT CLAIM DOES**

In Count V of the Complaint, Right Ascension alleges that the Defendants have violated its common law trademark rights in the ADE designation. "Pennsylvania jurisprudence with respect to unfair competition and the Lanham Act, 15 U.S.C. § 1125(a), are identical except for the federal requirement of interstate commerce. The test for unfair competition is the existence of secondary meaning and the likelihood of confusion." *Artus Corp. v. Nordic Co., Inc.*, 512 F.Supp. 1184, 1187 (W.D. Pa. 1981).

Because Right Ascension's common law trademark infringement claim is substantially duplicative of its trademark infringement claim under 15 U.S.C. § 1125(a), this Court may address the common law claim as part of its analysis of the federal claim. According to the Third Circuit, "[o]ur review of these cases and Pennsylvania decisions . . . leads us to conclude that except for the element of interstate commerce required to support a claim under the Lanham Act, the two causes of action are sufficiently similar to permit us to restrict our discussion to the federal claim alone." *Standard Terry Mills*, 803 F.2d at 780 (citations omitted).

For the reasons and authorities cited herein, the ADE designation was not used as a designation of source, *i.e.*, the ADE designation has not created an association in the minds of consumers as to the source of the services provided by Right Ascension. Accordingly, as under the Lanham Act, the ADE designation is ineligible for protection under Pennsylvania common law, and the Action Defendants are entitled to a judgment of non-infringement as a matter of Pennsylvania law respecting Count V of the Complaint.



**I. RIGHT ASCENSION'S CLAIM FOR TRADEMARK DILUTION UNDER PENNSYLVANIA LAW IS BASELESS AS THE ADE DESIGNATION WAS NOT FAMOUS AT THE TIME OF THE ALLEGED MISAPPROPRIATION**

In Count VI of the Complaint, Right Ascension alleges misappropriation of the ADE designation in violation of Pennsylvania's injury to business or reputation and dilution statute. Like the FTDA, for a claim to be successful under Pennsylvania's statute, the alleged use must occur "after the mark has become famous." 54 Pa. Cons. Stat. § 1124. In determining whether a mark is distinctive and famous, a court may consider the following factors:

1. The degree of inherent or acquired distinctiveness of the mark in this Commonwealth;
2. The duration and extent of the use of the mark in connection with the goods and services which the mark is used;
3. The duration and extent of the advertising and publicity of the mark in this Commonwealth;
4. The geographical extent of the trading area in which the mark is used;
5. The channels of trade for the goods or services with which the mark is used;
6. The degree of recognition of the mark in the trading areas and channels of trade in this Commonwealth used by the mark's owner and the person against whom the injunction is sought;
7. The nature and extent of the use of same or similar marks by third parties;
8. Whether the mark is the subject of a registration in this Commonwealth, or a Federal registration under the act of March 3, 1881 (21 Stat. 502) or the act of February 20, 1905 (33 Stat. 724), repealed by the Trademark Act of 1946 (60 Stat. 427, 15 U.S.C. § 1051 *et seq.*) or on the principal register.

The above factors are nearly identical to those outlined under the FTDA, except that the second and third factors are to be evaluated solely within Pennsylvania. In addition to federal registration, the mark may be registered in Pennsylvania as one indicator of the mark's fame.

Right Ascension's claim for dilution under Pennsylvania law fails for the same reasons as its FTDA claim does: (i) ADE is not registered as a mark in Pennsylvania; (ii) Right Ascension has never used the ADE designation as an indicator of source so as to warrant service mark protection; (iii) third parties use the ADE designation in commerce; (iv) Right Ascension did not advertise or otherwise publicize the ADE designation during the relevant time period; and

(v) according to Right Ascension's own averment to the PTO, it did not begin using the ADE designation until November 2000, shortly before this suit was filed. Thus, even assuming the truth of all of Right Ascension's allegations, Right Ascension's claim for dilution fails under Pennsylvania law. Accordingly, the Action Defendants respectfully request that this Court grant summary judgment in their favor as to Count VI.

**J. RIGHT ASCENSION'S STATE UNFAIR COMPETITION CLAIM IS BASELESS AND/OR PREEMPTED BY FEDERAL COPYRIGHT LAW**

In Count VII of the Complaint, and specifically at ¶ 75, Right Ascension alleges unfair competition under Pennsylvania's common law as a result of the Defendants' alleged misappropriation of Right Ascension's trade dress and the alleged use of the ADE designation. This claim fails for the same reasons as Right Ascension's federal trademark infringement and trade dress infringement claims fail: the ADE designation and the alleged trade dress are unprotectable and, therefore, their alleged misappropriation, even if true, would not constitute unfair competition anyway.

Right Ascension also alleges unfair competition under Pennsylvania's common law as a result of the Defendants' alleged theft of "sales materials of which Plaintiff is not the author and for which Plaintiff claims no copyright." (Complaint at ¶ 76.) Here, Right Ascension is patently attempting to resurrect copyright-like claims already asserted in Count I. Right Ascension is, however, barred from doing so under the doctrine of federal preemption.

Courts in Pennsylvania and other jurisdictions<sup>21</sup> have established a two-part test for analyzing preemption under § 301 of the Copyright Act. "Section 301(a) establishes a two step test for preemption: a state law cause of action is preempted by federal copyright law if (1) the subject matter of the state law claim falls within the subject matter of the copyright laws, and

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<sup>21</sup> See, e.g., *Computer Mgmt. Assistance Co. v. Robert F. DeCastro, Inc.*, 220 F.3d 396, 404 (5<sup>th</sup> Cir. 2000).

(2) the state law right asserted is equivalent to the exclusive right federal law protects.” *Fundamental Too, Ltd. v. Universal Music Group, Inc.*, 43 U.S.P.Q.2d 1595, 1597 (E.D. Pa. 1997). “Thus, under § 301(a), when a state law is violated by an action that also violates the right the Copyright Act grants in § 106, state law is preempted.” *Id.* at 1597.

In order for a state law not to be preempted by § 301(a) of the Copyright Act, the right protected by the state law must “be qualitatively different from the rights the Copyright Act grants, as evidenced by the addition of an extra element that alters the nature of the state law action.” *Fundamental Too, Ltd.*, 43 U.S.P.Q.2d at 1597. For example, breach of contract and breach of fiduciary duty claims contain an extra element that defeat preemption under § 301. *Daboub v. Gibbons*, 42 F.3d 285, 290 (5<sup>th</sup> Cir. 1995).

The gravamen of Right Ascension’s state unfair competition claim is that the Defendants allegedly took Right Ascension’s property off of the Right Ascension Site and used it to compete with Right Ascension, thereby enjoying an “unfair competitive advantage.” (Complaint at ¶ 76.) This represents a claim for “reverse passing off.” “In reverse passing off, the wrongdoer sells plaintiff’s products as its own.” *Fundamental Too, Ltd.*, 43 U.S.P.Q.2d at 1599. The essence of an unfair competition claim grounded in reverse passing off is “the bad faith misappropriation of the labors and expenditures of another” for the purpose of competing “against the plaintiff’s use of the same property.” *Id.* (internal citations omitted); *see also Computer Assocs. Int’l, Inc. v. Computer Automation, Inc.*, 678 F.Supp. 424, 429 (S.D.N.Y. 1987) (stating that the essence of a claim of unfair competition grounded in reverse passing off is the bad faith misappropriation of the labors and expenditures of another likely to cause confusion or to deceive purchasers as to the origin of goods).

Courts, including courts in the Third Circuit, uniformly hold that unfair competition based on reverse passing off<sup>22</sup> does not contain the requisite extra element and is, therefore, preempted by the Copyright Act. “The Copyright Act preempts an unfair competition claim premised on a misappropriation theory, that is, ‘reverse passing off,’ because such a claim, which is grounded in the alleged unauthorized copying and use of another’s copyrighted expression, fails the extra element test.” *Fundamental Too, Ltd.*, 43 U.S.P.Q.2d at 1597.

Thus, failing the extra element test, Right Ascension’s “reverse passing off” unfair competition claims in Count VII of the Complaint are preempted by federal copyright law. When federal copyright law preempts a state cause of action, the state cause of action ceases to exist, and any claims must be brought as violations of copyright law. 17 U.S.C. § 301; *Daboub*, 42 F.3d at 290 n. 8. Accordingly, for the reasons and authorities cited herein, the adjudication of the unfair competition issues in the Action Defendants’ favor can and should be rendered by way of summary judgment, and the Action Defendants respectfully request that this Court grant summary judgment in their favor as to Count VII of the Complaint.

**K. RIGHT ASCENSION’S ALLEGATION OF CIVIL CONSPIRACY UNDER PENNSYLVANIA COMMON LAW IS BASELESS AND PREEMPTED BY FEDERAL COPYRIGHT LAW**

In Count VIII of the Complaint, Right Ascension alleges that Minko, Belfer, and the other defendants conspired to infringe Right Ascension’s copyrights and dilute Right Ascension’s ADE designation. (Complaint at ¶ 81.) As to the latter, inasmuch as the ADE designation was not used as a designation of source, let alone a famous designation of source, there was no dilution and, therefore, no conspiracy to dilute the designation can be found as a

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<sup>22</sup> “‘Passing off’ (or palming off, as it is sometimes called) occurs when a producer misrepresents his own goods or services as someone else’s. See, e.g., *O. & W. Thum Co. v. Dickinson*, 245 F. 609, 621 (C.A.6 1917). ‘Reverse passing off,’ as its name implies, is the opposite: The producer misrepresents someone else’s goods or services as

matter of law. *In Re: Orthopedic Bone Screw Products Liability Litigation*, 193 F.3d 781, 789 (3d Cir. 1999) (reciting the established rule that a cause of action for civil conspiracy requires a separate underlying tort as a predicate for liability).

As to Right Ascension's claim that there was a conspiracy to infringe Right Ascension's copyrights, like Right Ascension's state unfair competition claim, the rights protected by this claim are not "qualitatively different from the rights the Copyright Act grants." *Fundamental Too, Ltd.*, 43 U.S.P.Q.2d at 1597. Moreover, when compared with the underlying federal action, the "conspiracy to infringe" lacks the requisite "extra element that alters the nature of the state law action." *Id*; see also *Brown v. McCormick*, 23 F.Supp.2d 594, 608 (D. Md. 1998) (concluding that the "right protected by [a civil conspiracy claim] would serve merely to vindicate the same right as under the Copyright Act"); *Aqua Bay Concepts, Inc. v. Grosse Point Bd. of Realtors*, 24 U.S.P.Q.2d 1372 (E.D. Mich. 1992) (dismissing civil conspiracy claim in copyright case because relief sought was "essentially the same as the underlying federal copyright claim"); *Hoey v. Dixel Sys. Corp.*, 716 F.Supp. 222 (E.D. Va. 1989) (same); *Sado v. Ellis*, 882 F.Supp. 1401, 1408 (S.D.N.Y. 1995) (same).

Thus, Right Ascension's claim of civil conspiracy to infringe copyrights is preempted by federal copyright law. This rule has already been adopted in several jurisdictions. Accordingly, the adjudication of the conspiracy issues in the Action Defendants' favor can and should be rendered by way of summary judgment. Therefore, the Action Defendants respectfully request that this Court grant summary judgment in their favor as to Count VIII of the Complaint.

---

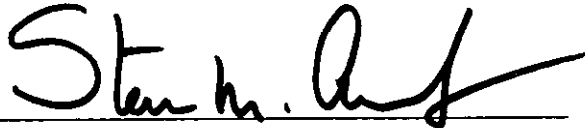
his own. See, e.g., *Williams v. Curtiss-Wright Corp.*, 691 F.2d 168 (C.A.3 1982)." *Dastar Corp. v. Twentieth Century Fox Film Corp.*, 123 S.Ct. 2041, 2045 n. 1 (2003).

**IV. CONCLUSION**

For the foregoing reasons, the Action Defendants respectfully request that the Court grant their motion for summary judgment as to Right Ascension's eight-Count Complaint in its entirety.

DATED: September 26, 2003

Respectfully submitted,



Steven M. Auvil (*pro hac vice*)

OH Bar No. 0063827

Mark E. Avsec (*pro hac vice*)

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Attorneys for Defendants

**ACTION SOFTWARE, INC., ACTION-  
DVD.COM, INC., and ALEXANDER BELFER**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing **MOTION OF DEFENDANTS ACTION SOFTWARE, INC., ACTION-DVD.COM., INC., AND ALEXANDER BELFER FOR SUMMARY JUDGMENT AND MEMORANDUM IN SUPPORT THEREOF** was served via Federal Express, on September 26, 2003, upon the following:

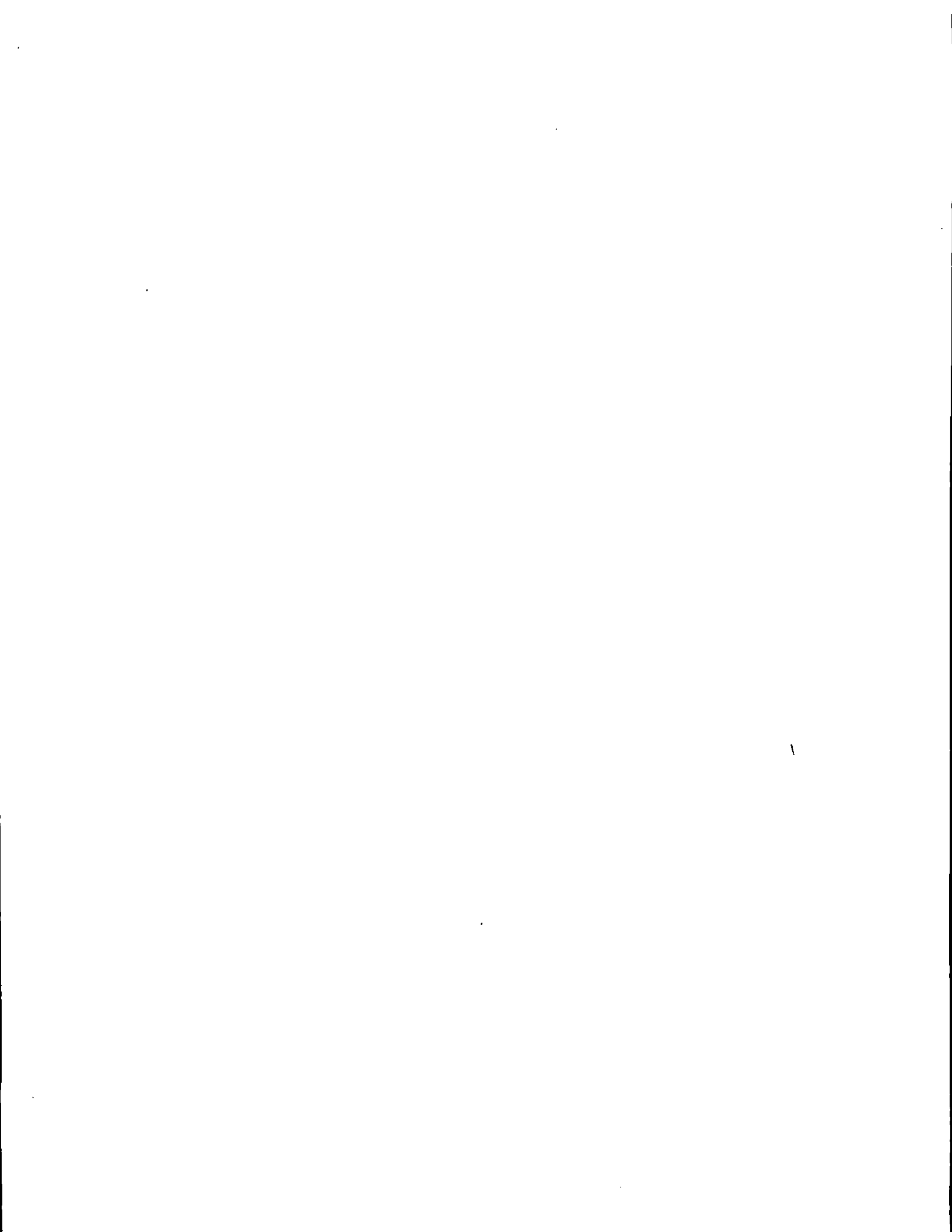
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**STONECIPHER, CUNNINGHAM,  
BEARD & SCHMITT**  
125 First Avenue  
Pittsburgh, PA 15222

Attorneys for Plaintiff  
**RIGHT ASCENSION, INC.**



---

Attorney for Defendants  
**ACTION SOFTWARE, INC., ACTION-  
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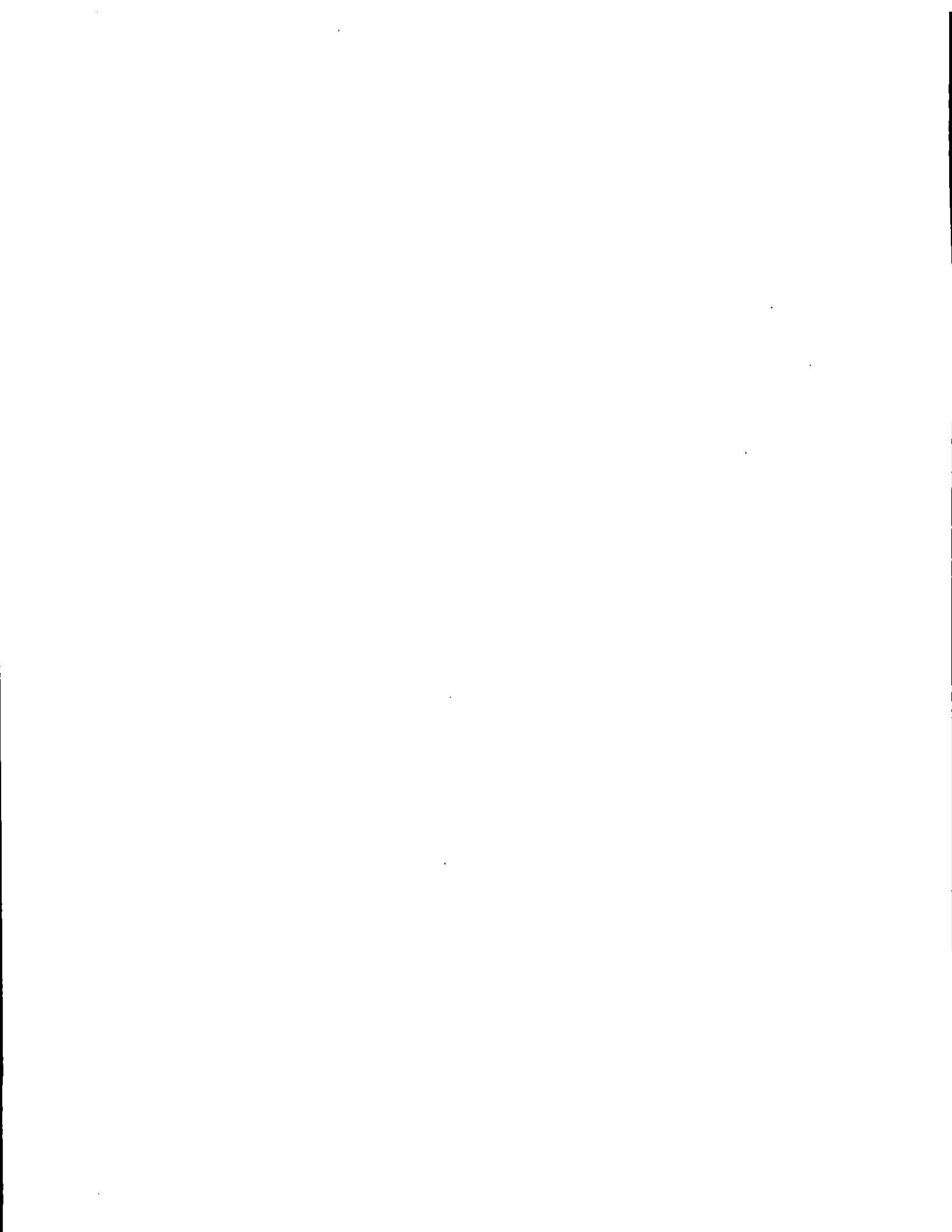


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If published in a periodical or serial give: Volume Number Issue Date On Page

NAME OF AUTHOR

Right Ascension, Inc.

DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?

Yes No

Author's Nationality or Domestic Name of Country

Citizen of United States

Was This Author's Contribution to the Work

Anonymous? Pseudonymous? Yes No Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

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Reproduction of work of art Jewelry design Architectural work

NAME OF AUTHOR

DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?

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Citizen of

Was This Author's Contribution to the Work

Anonymous? Pseudonymous? Yes No Yes No

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2-Dimensional artwork Photograph Text  
Reproduction of work of art Jewelry design Architectural work

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Date and Nation of First Publication of This Particular Work

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Month November

Day 15

Year 1997

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1037-1 Mars Pivans City Road  
Mars, PA 16046

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**CORRESPONDENCE** Give name and address to which correspondence about this application should be sent.

Roy B. Leonard, Esq.  
313 Sixth Ave., 2nd Floor  
Pittsburgh, PA 15222

Local and daytime telephone number ( ) 412 263-5445

mail rlconard@leonarddively.com

Fax number ( ) 412 263-5400

**CERTIFICATION** I, the undersigned, hereby certify that I am the

- check only one ( )
- ( ) author
  - ( ) other copyright claimant
  - ( ) owner of exclusive right(s)
  - ( ) authorized agent of Right Ascension, Inc.

the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

signed as printed name and date Y If this application gives a date of publication in space 3, do not sign and submit it before that date.

Roy A. Rix

Handwritten signature (X) [Signature]

Date 12/21/00

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Number/Street/Apt           

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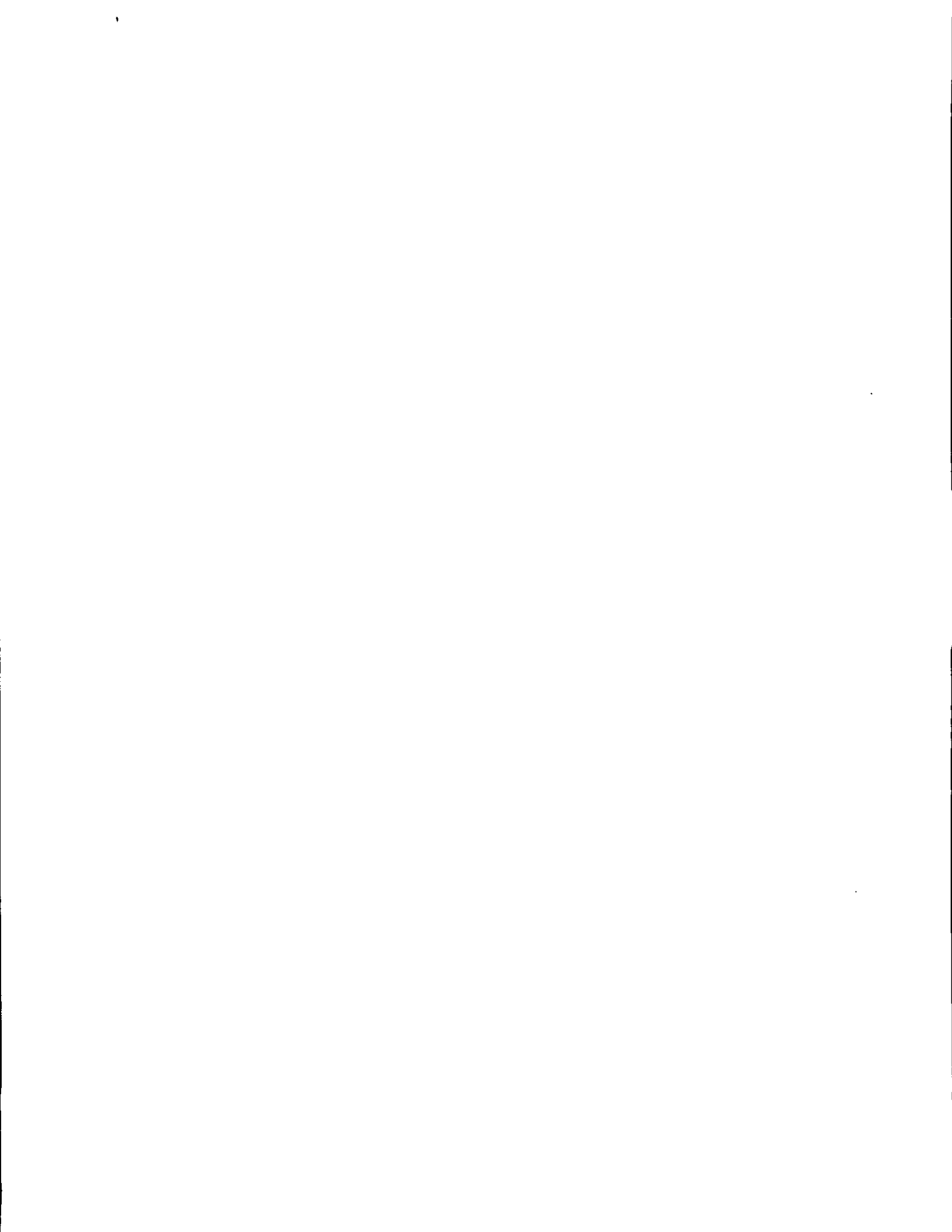
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 Fresh-faced Alysin Chaynes was just a senior in high school when she and her boyfriend entered an adult-friendly contest looking for adult performers. They made their first video together the same week (Clip and Cummers #25), and since then, the post-sized spitfire has appeared in over 60 adult films. Her most notable and paying appearances are in [Sex Letter](#) and [Bliss](#).

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### BIOGRAPHY

Freshfaced Alysin Chaynes was just a senior in high school when she and her boyfriend answered an ad from Randy West looking for adult performers. They made their first video together the same week (Lip and Cummers #15), and since then, the pint-sized spitfire has appeared in over 60 adult films. Her most notable and popular appearances are in the 'Kelly the Cook' series, where she doles out pleasure to everyone from frat boys, to spunky sisters, to professors!

When she's not steaming up the screen, everybody's favorite Valley Girl spends her time studying to be a personal trainer and dreams of ultimately becoming a nutritionist. With plans for some mammary expansion (but not too big), Alysin intends to begin feature dancing in 2001, shedding some of that little girl image (along with her clothes) and taking the jazz biz by storm. Look for this talented, doe-eyed beauty in the future in salacious films everywhere, both hard and softcore.

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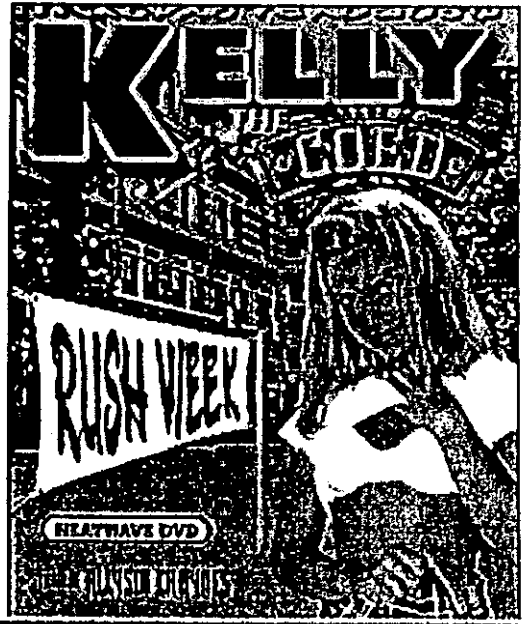
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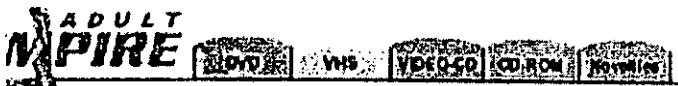
4.98 out of 5.00 - Film: 5 Features: 5 Video: 4 Audio: 4 - R21/1998

Wow, I haven't even started the movie and I've already been reviewing for nearly an hour. By the way, while I didn't want to blow by now the whole bonus issue, I will say that the two scenes aren't half bad and worth a look. I've seen this title at the top of just about every DVD sales chart of late. It's not really a shock to me. Ever since I saw the preview for this title, I have been waiting for it to come out. Add to that, the incredibly sexy shot on the cover of pornstar Alyssa Chaynes in her plaid skirt and you have the sort of movie that will have re-enrollments skyrocketing as horny ticklers like me go back to school looking for our own little Kelly's. Knowing that Jim Powers has such a twisted mind only makes the anticipation all the greater.

Kelly strolls across campus in her belly shirt, short plaid skirt and knee stockings. She is the picture of coed perfection and immediately catches the eyes of a couple of frat boys who invite her to a party. Her roommate Holly (Queen Summers) is just as cute and convinces Kelly that she has to go to the party. Before she goes to the party, Kelly stops by to see her study buddy, Jay Ashley. He coaches her in the fine art of quaders. Meanwhile, somewhere else in the dorm, some guy is thoroughly enjoying the wonderful tits of De'ia. This girl looks like a fresh faced college girl and thankfully fucks like a full fledged stud. Great close ups as she lies across her bed taking every inch of cock into her mouth. As made up as she is, De'ia looks like something right out of a Britney Spears video. (Well, except for that tight shot of her pussy as she grinds away on his cock.) Into the room walks Tyce Burn and before you can say, 'Pussy is good food', he shames the dude right back into his clothes. Those of you who think Tyce is just looking to score some of the prime pussy for himself, raise your hand first THAT hand six-as) Already warmed up, De'ia just slips down on his cock and picks up where she left off. Nothing quite like a cute girl with no sense of sexual morals whatsoever to make the college experience complete. Trying to stick to his role as marionette, Tyce teaches De'ia a new way to keep men happy, he fucks her in her tight asshole.

We cut away from that scene with no cumshot, back to Kelly and her pal Jay quickly turns the game of quarters to his advantage and has Kelly sucking on his cock. You know, with all those lame ass sexual harassment seminars they make kids take in college now, nothing has gotten better. Maybe if all fratmen girls had to go through quarters and cocksucking seminars instead, the world would be a better place. What do you think? After munching on his muff for a bit, Jay sits down and lets Kelly play her part as the bouncing slutlet on a stick. Check out how she eats pizza while fucking, very nice touch. (By the way, the knee tights stay on while she fucks if that matters.) Jay gives her a very solid fuck on the couch, breaking Kelly in and prepping her, no doubt, for the hot party. He massages somewhat on the facial, but it looks good anyway.





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### IN HOUSE REVIEWS

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4.88 out of 5.00 - Film: 4 Features: 5 Video: 4 Audio: 3 - 6/21/99

Synopsis It's Rush Week at the neighborhood College and Alyson Chaynes along with her fellow coeds get a chance to explore the campus. They also explore the parts won by the big men on campus in this "educational" entry from the folks at Heatwave DVD.

Features This Disc features Full Motion Chapter Search, Multiple Angles, Behind The Scenes Footage, Meet The Stars (in live action and stills), Solo Scenes (watch the girls perform just for you), Coming Attractions and a Bonus Flick - "I love You, Suck My Dick"

Commentary Remember those days when you lived on campus and every night was party night? Yeah, well, I don't either but watching this fact will help restore or create those memories for you. Kelly (Alyson Chaynes) is a college freshman who is nursing for a severity and rushing to fill all her holes with man meat. She's not alone in this venture, in fact, it's her roommate Debbie (Daria) that actually starts off the sex in the fact by playing ball with one of the school's jocks. Daria is one sexy chick and the dude can't seem to get enough of her meat curtains as he lays face on her ass and eats her asshole (check out the set up for this in the behind the scenes footage section). She climbs on top and rides him reverse straddle but before he cum, they are interrupted by her tutor. The football player leaves as the tutor harasses poor Daria. She teases him with her tight body (if I like) and they do eventually get down to some work. Dirty work. The passing grade in these studies would be if you get an orgasm or not. It takes some real serious anal to make it happen, but it does and they pass the test as he cums inside her ass.

Kelly is playing a drinking game with Drew (Jay Ash). Loser of each round has to remove an article of clothing. Chmo, surely you've played that one! When he takes off his pants, she pounces on his hard college diploma (no vagina needed). Nice 1st person camerawork and other nice angles contribute to a hot scene as he eats her sweet and moist pink place. What a tight little body she has. Great camerawork as she slides up and down his cock. After a variety of positions, he shoots all over her face.


Guess what's next? Why it's a beer guzzling TOGA party. Toga, toga, toga. Even though it's filled with lots of Great Guys, it's lucky JJ and Mark that get to take Kelly the Coed upstairs. On the way, we get to watch an awesome scene as HAZZI sucks on 3 campus studs at the same time. This is a very hot triple cock suck session that is very well photographed. A certain use of college pride. Kudos to the director, Jen Powers. Once upstairs, JJ rips and engers Kelly as the other guy works her tits and mouth. Kelly's body is as smooth as butter and JJ seems to really enjoy tongue fucking her poop shoot. There is lots of penetration here that culminates in some intense double penetration (again, check out the behind the scenes footage for some insights).

There's lots more sex on campus and on this DVD. Included is roommate Holly (Owen Summers) hooking up with the literal "big man on campus" and sucking his shaved meat till he cums. There's a fun scene with Alyson and a sleepwalking fat boy. Finally, a sexy, young Asian name Annabel Chang services two of the guys at the party. She does it with mouth and pussy. Lucky guys and lucky you if you watch this disc.










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**Featured Interview**



**Stacy Valentine**  
 In 1990, Stacy Valentine metamorphosed from Oklahoma housewife to quintessential porn star. Join Stacy as she reflects upon her experience in the top of her career.  
 "I'd never made any post. People ask me if I did now, or if to keep it a secret, and I say absolutely not, cause I'm not ashamed of what I did. I'm so happy." (Stacy Valentine)

	<b>Stacy Valentine</b> Interview Date: 12-04-2000	VCA Girl	Girl Wicked
	<b>Michelle Flavin</b> Interview Date: 11-24-2000		Girl Wicked
	<b>Mimi Hiram</b> Interview Date: 11-21-2000		Girl Wicked
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	<b>Syren</b> Interview Date: 10-31-2000	Metro Girl	Girl Wicked
	<b>Lisa Lopes</b> Interview Date: 10-30-2000		Girl Wicked
	<b>Alfreda Charles</b> Interview Date: 10-24-2000		
	<b>Dyanne Larkin</b> Interview Date: 10-20-2000		Girl Wicked
	<b>Lori Michaels</b> Interview Date: 10-20-2000	VHM Girl	Girl Wicked

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### Alysin Chaynos Filmography

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3	College 13 Year Old Princess (2003)				EMERALD
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5	Halcyon Hermines Vol.1 (2003)				EMERALD
6	Lick My (2003)				EMERALD
7	Little Mary Vol.1 (2003)				EMERALD
8	Vitamin In Control (2003)				EMERALD
9	Betsy Legal #1 Headed (1999)				EMERALD
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**Exclusive Interview:**



**Stacy Valentine**  
 Adult film's golden girl has said farewell to porn for now, but she will not be soon forgotten by her many fans. The girl from Tulsa, Oklahoma made the jump into the adult world in the 80's, and has been the highlight of many an adult production, including the popular *Chasing Sissy* and *143*.

**Featured Stars:**



**Bridgette Kerkovics**  
 You won't be hard-pressed to find a movie with this hot blonde gracing it. *Bridgette* has proved to be a real trouper since starting in adult film, and has performed in hundreds of sex scenes in just a short period of time. Some of *Bridgette's* films include *Bottom's Bottom*, *XXX* and *There's Something About Jane*.



**Suzanne Cozza**  
*Suzanne* has always given the fans what they wanted. Even though she started in the business doing only lesbian scenes, she quickly expanded both for willingness to try straight scenes and her breast size, and her fans reacted by making her one of the more popular stars in the industry. Check out *Suzanne* in *Black Trap* and *Escapade*.

**Featured Website:**



**Dasha**  
 Born in the Czech Republic, this Viad girl has quickly become one of the hottest blondes in American porn. You can find out all about this blonde beauty on her website at [www.dashaaa.com](http://www.dashaaa.com), or take a look at some of her movies like *Slutty Body* and *Action Sports*.  
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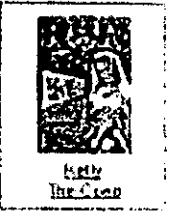
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## Interview With Allysin Chaynes



"Little girl", Allysin Chaynes (*Bushy's Busty Legs!*, *Herb's Hot Lips!* & *?*) has appeared in over 60 adult films in the past three years. A San Fernando native, she still spends her time in the Valley, where she studies to be a personal trainer and performs at bachelor parties with *je-bis-tuddy*, Ken Windsor. This fre-toe cutie had plenty to say about the industry, her co-workers, and her impending job when she spoke to pornstarempire.com on 10/24/00



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Interviewed By JCW  
PornstarEmpire.com: Where are you from?  
Allysin: I'm from the Valley. I grew up in California.

PornstarEmpire.com: How did you get started in the adult business?  
Allysin: I started in the business by answering an ad from Randy West with my boyfriend. We just went in for an interview and within a week, we did our first video.

PornstarEmpire.com: How do you feel when you watch yourself perform?  
Allysin: I don't know, it's kind of weird, sometimes I guess I think, "Oh God, why did I do that?"

PornstarEmpire.com: Like what?  
Allysin: I mean, I can tell it wasn't into it, and I think, "God, I should have at least faked it."

PornstarEmpire.com: But you don't feel embarrassed or bummed out about it?  
Allysin: Not unless I did something stupid. Not really, it's just like watching - me, I guess.

PornstarEmpire.com: Would you say that you enjoy the business?  
Allysin: Yeah - there's negatives and positives to it, just like any other business.

PornstarEmpire.com: What do you like about it?  
Allysin: I think the money - the sex can be good too - sometimes the person is not somebody you would pick in your personal life. My opinion is, we need more good looking guys in the industry. I'm pretty picky, as far as who I work with, and it's really hard sometimes to even find anybody that I would actually do it with.

PornstarEmpire.com: Well, check this out. When I was dancing in Yui Nuts, Tony Tadesch came into the club. It was funny, cause he was with his friend, who kept saying, "Don't you know who this is?" But I didn't. So Tony explained who he was and he asked me out, but I had a boyfriend at the time and I was being really good. Now that I have this job, I have to watch all this porn and I'm like, "OH MY GOD, I CAN'T BELIEVE I DIDN'T GO OUT WITH THAT GUY!"

Allysin: Yeah, he actually worked with him - I forget what it was for. Somebody recommended him to me, like, "Oh, you should work with this guy, he's really good."





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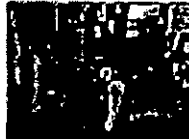


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## Serenity's View

### Celebrity Reviewer



Serenity is a terrific individual. Whether it be AVN award winning performances in adult film, a veritable plethora of mainstream television appearances, or her own line of adult novelty products, Serenity is a jack-of-all-trades. Recently, she decided to put her journalism talents to use (she holds a degree in journalism, too!) by lending her expert opinion to our site for a series of featured reviews. Enjoy!

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### Pornographic

5.00 out of 5.00 - from *Wicked Pictures* | reviewed by Serenity



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Although most people would choose a horror flick in the Halloween season, I truly believe that this is a movie for all seasons. *Pornographic* is a vampire movie consisting of intrigue, agony, love lost, love found, battles of power, and life-altering decisions. When this project was first presented to me by Jonathan Morgan, I didn't hesitate in committing to it. Written by award winning screenwriter Martin Brimmer, who also wrote *Crazy*, *Indigo Ocelot*, and *Double Feature*, I fell in love with the story. Jonathan Morgan and I worked for days on building an all-star cast to play the roles. Pre-production was no easy task. Red Hopkins, award winning art director, started right away on setting up the feel of this movie. Jonathan Morgan immediately booked his Director of Photography, Jake Jacobs. I took a trip to mainstream special effects genius SPFX where we did castings of my facial features and teeth for the prosthetics used while I'm in vampire form. Then, I was off to music writer Fat Cat in the City, to record my voice for the music developed specially for this project. As you can tell, we exerted a lot of effort to make this a very special project. During production we worked extremely long hours in unusually cold and damp weather. Of course, this made suffering easy to emulate! Editing was a work of art achieved by SCSIPost. Overall, this is one of my favorite productions, and the result is not to be missed!

*Pornographic* starts off with a cat and mouse chase. Vampires have selected their victim and are having great fun at the hunt. One vampire (your truly) has neither the heart to kill nor the thirst to drink blood. This does not go over well with the vampire spleen (Sharna McCullough). Next, we are introduced to a down and out police detective (Brad Armstrong). Always getting drunk, as well as laid by a prostitute (Stephanie Swift), he seems quite the loser. The sex scene between Stephanie and Brad is very nasty and raw, and one worth watching. A call comes in for him to investigate a mysterious homicide. The dead body is completely drained of blood. On his way to follow up on a possible lead we learn the source of his depression. His lover, who had disappeared while they were at a club and was found several days later dead - and drained of blood. Eventually, he ends up at Club *Pornographic* to investigate the most recent murder. Unbeknownst to him, the all-female owners of the club (Sharna McCullough, Asia Carrera, Missy and myself) are vampires who use the club to attract their prey.

Vampire Asia has decided she is a bit thirsty and chooses her next victim, Katie Gold (who won Best Supporting Actress for this role). Katie is suffering emotionally from a fight with her boyfriend at the club, and goes to the ladies room where she is waiting for a friend. She is attacked by a vampire who drains her of blood.



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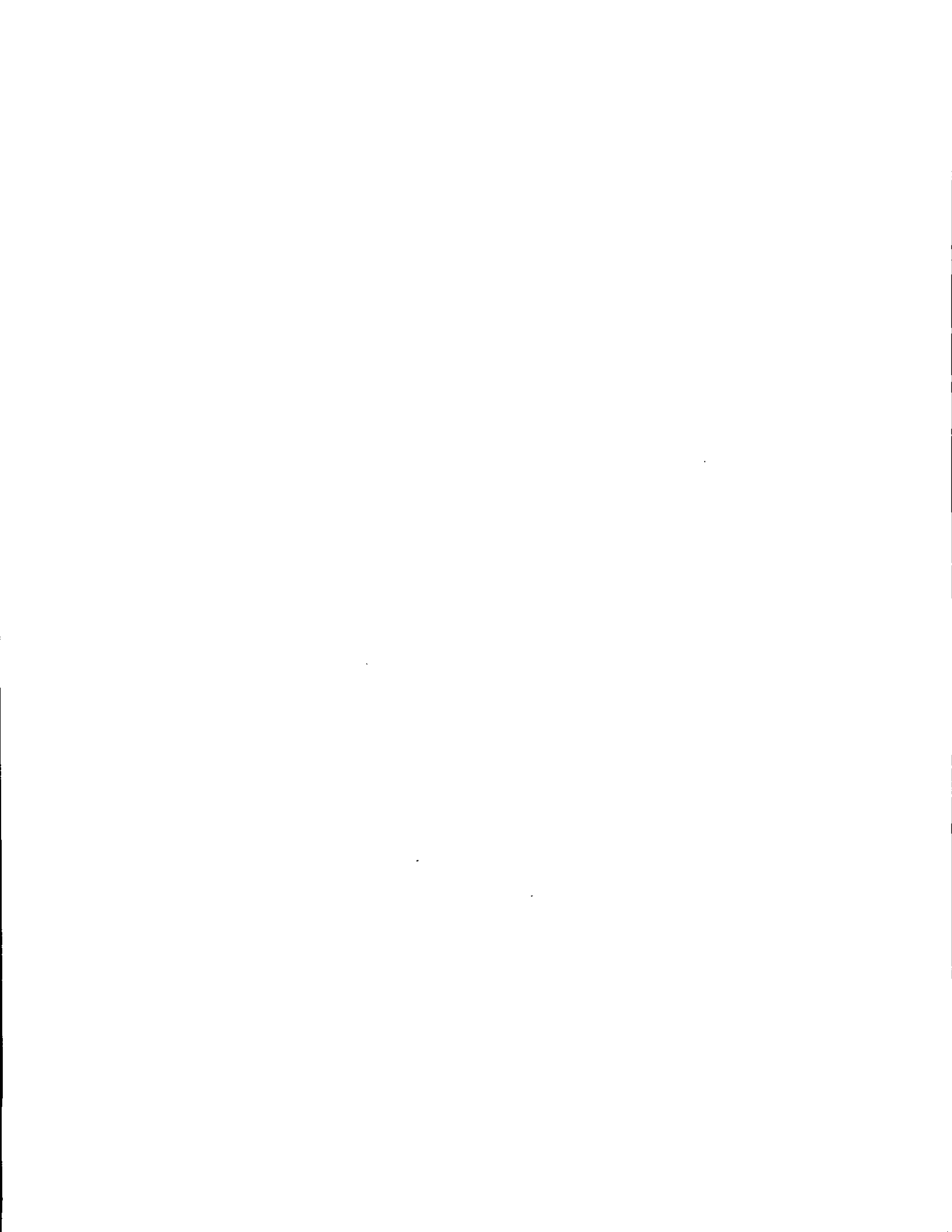


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**Mark Drawing Code** (1) TYPED DRAWING

**Serial Number** 76401734

**Filing Date** April 30, 2002

**Published for Opposition** October 29, 2002

**Owner** (APPLICANT) Right Ascension, Inc. CORPORATION PENNSYLVANIA 2140 Woodland Road Thornhill Industrial Park Warrendale PENNSYLVANIA 15086

**Attorney of Record** Roy E. Leonard, Esquire

**Type of Mark** SERVICE MARK

**Register** PRINCIPAL

**Live/Dead Indicator** LIVE

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**Design Search Code** 260102 260108

**Serial Number** 76401736

**Filing Date** April 30, 2002

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**Realities**

Studio: **Zane DVD**



large covers  
front back

List Price: \$39.95  
Our Price: \$11.95  
You Save: \$28.00 (70.08%)

- Genre: **Straight**
- More Straight titles from Zane DVD
- Media: **DVD** (DVD-Video)
- More DVD-Video titles from Zane DVD

Rated: **[XXX]** Length:  
Produced in (Not Specified)  
Released on DVD in 2001

Fantasies Materialized. Inquire Within.

Zane and director A.J. Lane are proud to present the steamiest video. Ashlyn's back doing the things you need she only dreamed she'd do. We're talkin' her first ever in for a close shave as well. Realities 2. Would Ashlyn le

**Starring:**  
 Ashlyn Gere Bionca Melanie Moore Teri Diver  
 Marc Wallace T.T. Boy

**Director:** A.J. Lane



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## United Colors of Private

Studio: [Priv](#)



large  
front!

Hardcore

Private bri

**Starring:**

- [Ambar](#)
- [Sands](#)

**DVD**

**HARDCORE ACTION**

**UNITED COLORS OF PRIVATE**

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- [Interactive](#)
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  - ★★☆☆☆
  - ★★★☆☆
  - ★★★★☆
  - ★★★★★
- 

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### Commercial World

Studio: **Vivid Interactive**



large covers  
front:

Act now and...  
our commerci...  
in to the hidd...

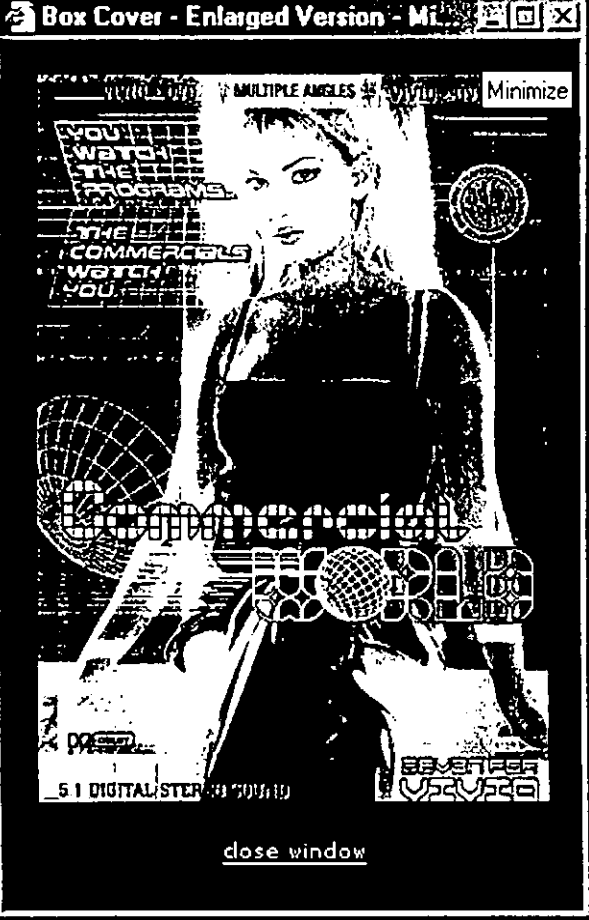
**Bonus DVD v...**

**Starring:**

[E. Devon](#)

**Director:** [Dyan...](#)

**Customer Rating:**



[close window](#)

- 4 HOURS + 4 HOURS BONUS DISC (8 HOURS TOTAL)
- NEW Virtual Reality Environment
- Interactive Bonus Rooms
- Meet The Girls
- Previews of Upcoming Releases
- Multiple Angles
- AVN Award Winning Scenes
- 5.1 Dolby Digital Surround Sound
- Full Motion Chapters

**Action-DVD.com customers who bought this title also bought:**

- [AVN Award Winners, The \(Bundle of 3 DVDs\) \(Vivid\)](#)
- [Country Comfort \(Vivid\)](#)

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k no one is watching! Tune...  
Commercial World

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- ★☆☆☆☆
- ★★☆☆☆
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- ★★★★★

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- Night 90
- Studios
- Sam & Eve 90
- ia
- D-Game 90

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# Blue Monday

Studio: [Vivid Interactive](#)



large cover  
front

Sky is on the  
Something is  
broadcasting  
up in the he  
about sex. M

**Bonus DVD**

**Starring:**

- [Anita Can](#)
- [Bobby Vit.](#)

**Director:** [Mich](#)

**Customer Rating:** ★☆☆☆☆ - 2 customers voted.

- 4 HOURS + 4 HOURS BONUS DISC
- NEW Virtual Reality Environment
- Interactive Bonus Rooms
- Meet the Girls
- Previews of Upcoming Releases
- Multiple Angles
- AVN Award Winning Scenes
- 5.1 Dolby Digital Surround Sound
- Full Motion Chapters



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- Already Seen It?
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  - ★★★★★
  - ★★★★★
  - ★★★★★
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### Diary of D... Box Cover - Enlarged Version - Mi...

Studio: **Vivid Ir**



large covers:  
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Vivid's first titl

Bonus DVD w

Starring:

[Cassidey](#)

Customer Rating



[close window](#)

- 4 Hours + 4 Hours Bonus Movie
- Virtual Reality
- Interactive Bonus Rooms
- 5.1 Digital Surround Sound
- Full Motion Chapters
- Previews
- No Regional Coding

#### Action-DVD.com customers who bought this title also bought:

- [Club Godiva \(Legend\)](#)
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D-Game

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## Working Girl

Studio: [Wicked Pictures](#)



List Price: \$39.95  
Our Price: \$25.95  
You Save: \$14.00 (35.04%)

**STILLS**

- Genre: **Straight**
- [More Straight titles from Wicked Pics](#)
- Media: **DVD** (DVD-Video)
- [More DVD-Video titles from Wicked Pics](#)
- Rated: **XXX** Length: 90 mins
- Produced in 2001
- Released on DVD in (Not Specified)

**Buy It Now!**

In Stock: Ships within 2-4 days  
You must be a legal adult (18/21+) to buy this title  
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In the Story of a Girl who Gets Down 'n' Dirty for a Livin'!

**Dirty Work?**  
It's a Dirty Job, but someone has to do it!  
Hey, She was Built For It!

**Starring:**

[Devinn Lane](#) [Keri Windsor](#) [Sydney Steele](#) [T.J. Hart](#) [Temptress](#)

[Chris Cannon](#) [Devon Wolf](#) [Dillion Day](#) [Mark Davis](#) [Mickey G.](#) [Randy Spears](#)

**Director:** [Brad Armstrong \(Dir.\)](#)

- Interactive Menus
- Making of
- Slide Show
- Company Profile
- Web Site Information
- DVD-ROM Compatible
- Chapter Selection
- Wicked Casino
- AVN Awards Winners and Nominations
- Trailers
- Parental Lock
- Audio Cast Biographies

**Action-DVD.com customers who bought this title also bought:**

[Blonde on Fire \(Private\)](#)

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Not yet

★

★★

★★★

★★★★

★★★★★

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## Adrenaline

Studio: [Sin City Video](#)



List Price: \$39.95  
Our Price: \$24.95  
You Save: \$15.00 (37.54%)

- Genre: **Straight**
- [More Straight titles from Sin City](#)
- Media: **DVD (DVD-Video)**
- [More DVD-Video titles from Sin City](#)
- Rated: **XXX** Length: 100 mins
- Produced in 2001
- Released on DVD in (Not Specified)

**Buy It Now!**



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- [Sequels](#)

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Adam & Eve:  go

Media

D-Game:  go

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large covers.  
[front](#) [back](#)

Head cross country with Evan and Jessica on a route that leads into a lot of trouble... and a lot of naughty fun!

### Starring:

- [Ava Vincent](#) [Jessica Drake](#) [Julie Meadows](#)
- [Alec Metro](#) [Dillion Day](#) [Evan Stone](#)

**Director:** [Michael Raven \(Dir.\)](#)

**Customer Rating** ★★★★★ - 4 customers voted.

### Features & Extras

- Interactive Menus
- DVD-ROM Compatible
- Previews
- Chapter Selection
- Photo Gallery
- Web Site Information
- Int. Tel. Sex
- Behind The Scenes

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## Inside Sex 1

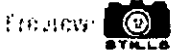
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List Price: \$39.95  
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- Genre: **Straight**
- [More Straight titles from Vivid](#)
- Media: **DVD (DVD-Video)**
- [More DVD-Video titles from Vivid](#)

large covers:

Rated: **XXX** Length: 110 mins  
Produced in 2000  
Released on DVD in 2001

Dayton, Inside The Bunny Ranch In Reno, NV

It's her first feature for Vivid, and cute little Dayton's inside the actual, infamous Bunny Ranch in Reno, Nevada. Now, you can finally find out what goes on in America's best known legal brothel! With hot new Vivid Girl Cheyenne, getting the inside scoop on what it's like to be a 'ho in Hicksville! This is docuporn. All real. The hookers, the johns, and new Vivid Girl Dayton.

Bonus DVD with full "secret" movie giving you 8 hours of total video

Starring:

- [Chennin Blanc](#) [Cheyenne Silver](#) [Dayton Rains](#) [Serena Tiger J.](#)
- [Cheyne Collins](#) [Gene Mark Davis](#) [Parker](#)

Director: [Craig Santy](#)

FEATURES & EXTRAS

- Interactive Menus
- Meet The Girls
- Trailers
- DVD-ROM/Playstation2/MS X-Box Compatible
- Multiple Angles
- Bonus Scenes
- Chapter Selection
- Web Site Information

Action-DVD.com customers who bought this title also bought:

- [Hayride Honeys \(Raw\)](#)
- [Mission Phenomenal \(Pleasure\)](#)
- [She'll Be Mine \(Raw\)](#)



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## Debbie Does Iowa

Studio: [Vivid Interactive](#)



large covers  
front: back:



List Price: \$39.95  
Our Price: \$24.95  
You Save: \$15.00 (37.54%)



- Genre: **Classic**
- More Classic titles from Vivid
- Media: **DVD (DVD-Video)**
- More DVD-Video titles from Vivid

Rated: **[XXX]** Length: 85 mins  
Produced in **2001**  
Released on DVD in **2001**

**Buy It Now!**



**In Stock! Ships Immediately**  
You must be a legal adult (18/21+) to buy this title  
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Height

Diets

Adam & Eve

Actress

D-Game

The Classic Returns

### Debbie's Not In Dallas Anymore

It's Debbie on the prairie, and you know what happens there... football, drinking, brawling and balling. It's a Midwestern ho down and Sky's the cheerleader to watch for! The classic returns... And you're goin' long and deep. One thing's for sure, this game won't end without a few scores!

**Bonus DVD with full "secret" movie giving you 8 hours of total video**

**Starring:**

- [Alexandra Nice](#) [Blair Seegal](#) [Regan Starr](#) [Sky](#) [Temptress](#) [Tiger Lilly](#) [Vivian Valentine](#)
- [Bobby Vitale](#) [Chris Cannon](#) [Devon Wolf](#) [Dillion Day](#) [Erik Everhard](#) [Sergio Tyce](#) [Bune](#)

**Director:** [Paul Thomas \(Dir.\)](#)

**Customer Rating** ★★☆☆ - 7 customers voted.

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## Incognito

Studio: [Adam & Eve Productions](#)



large covers:  
[front](#) [back](#)

### Sale!

List Price: \$39.95  
Our Price: \$9.95  
You Save: \$30.00 (75.09%)

- Genre: **Straight**
- [More Straight titles from Adam & Eve](#)
- Media: **DVD (DVD-Video)**
- [More DVD-Video titles from Adam & Eve](#)

Rated: **[XXX]** Length: 90 mins  
Produced In 2001  
Released on DVD in (Not Specified)

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In Stock! Ships Immediately  
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Power... Intrigue... Passion... Someone's Hiding the Truth

How far would you go to uncover the truth? Thrust into a world of money, lust and deceit, two sisters must go deep undercover to reveal the truth about their past. Below the surface love is often disguised as lust. Questions lead to more questions, and secrets can destroy even the strongest souls. Sometimes, the ties that bind are better left alone...

### Starring:

- [Anita Cannibal](#) [Johnni Black](#) [Mandi Frost](#) [Sabrina Johnson](#) [Shanna McCullough](#)
- [Brick Majors](#) [John Decker](#) [Jonathan Morgan](#) [Steve Hatcher](#)

Director: [Bud Lee](#)

- Interactive Menus
- DVD-ROM Compatible
- Previews
- Chapter Selection
- Photo Gallery
- Cast Biographies
- Web Site Information

Action-DVD.com customers who bought this title also bought:

[Chameleon, The \(VCA\)](#)



**Studios SuperSale:**  
Wicked, Channel 69 and Legend!! ...ends very soon!



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Highlights

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Porn Stars

- Hot Porn Stars
- Star Gallery
- Star Bios

### Tempress: Info



### Tempress's Filmography

Heritage/Ethnicity: White  
 Hobbies: Baseball, roller coasters, writing poetry  
 Appearance: Hair Color: Brunette  
 Eye Color: Hazel  
 Bust Size: Medium

click on picture to enlarge



select



**Studios SuperSale:**  
Wicked, Channel 69 and Legend!! ...ends very soon!



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Highlights  
New DVDs  
New Award Winners  
New Adult Titles  
New Views  
New E-Cards

Porn Stars  
New Porn Stars  
New Star Gallery  
New Star Bios

### Alexa Rae: Info



#### Alexa Rae's Filmography

**Birthplace:** Atlanta, Georgia  
**Heritage/Ethnicity:** White  
**Hobbies:** Alexa loves to choreograph dance routines and put together costumes, but her true love is riding horses. In fact, she rode horses for fourteen years and even competed nationally.  
**Appearance:** Hair Color: Red  
Bust Size: Large

**More Info:** Alexa, who danced in Atlanta, GA under the name "Fantasy," believes that her career in adult entertainment is the best job in the world, and says that she has always wanted to be a XXX star. She loves that she has the opportunity to play different roles and seduce other people - both on and off screen. Her only complaint is that she would like to be able to travel to exotic locations to film.

Alexa loves to choreograph dance routines and put together costumes, but her true love is riding horses. In fact, she rode horses for fourteen years and even competed nationally. One of her dreams is to train with the United States Equestrian Team. It's no wonder her most memorable experience is having sex with her ex-boyfriend on top of her horse "Chance."

Long term plans for Alexa include opening a strip/night club and an Equestrian Center in Malibu. She has no plans to leave the industry until the "camera doesn't want to film" her. She loves appearing in music videos, recently appearing in the music clip "Complicated" for the wild all-girl punk band Lo-Ball. Alexa has also been featured in a TIME magazine piece about cybersex.

On this page you will continue to find more and more about...

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- Highlights
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- 11 Award Winners
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- stars
- ult E-Cards
- Porn Stars
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- m Star Bios

 **Alexa Rae: Filmography**

 - screen shots  
  - new item  
  - item on sale  
  - review  
 - highest rated  
  - current bestseller  
  - multiple angles

Page 1 of 1

**Adam & Eve Productions**



**Ass Angels (2000)**  
 Media: DVD-Video  
 Price: \$16.95  
[buy](#)



**Fire and Ice**  
 Media: DVD-Video  
 Price: \$15.95  
[buy](#)

**Digital Playground**



**Wet Dreams 3 (1999)**  
 Media: DVD & DVD-ROM Hybrid

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 Wicked, Channel 69 and Legend!! ...ends very soon!




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  - Sale Today
  - Reviews
  - Best Rated DVDs
  - Coming Soon
  - Interactive Titles
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Search filters:



Genre:  go

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1 & Eve:  go

Genre:  go

- Highlights
- 150 DVDs
  - N Award Winners
  - 100+ Adult Titles
  - Reviews
  - with E-Cards
- Porn Stars
- 250 Porn Stars
  - Porn Star Gallery
  - Porn Star Bios


 **Inari Vachs: Filmography** 

-  - screen shots
-  - new item
-  - item on sale
-  - review
-  - highest rated
-  - current bestseller
-  - multiple angles

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**Adam & Eve Productions**



   
**Nina Hartley's Cul...**  
 Media: DVD-Video  
 Price: \$15.95

**Al Borda Video**



  
**Chandler's Nasty...**  
 ... (2000)



   
**Fucking Up That...**  
 ... (2000)

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## Alexa (I)



### Biography:

A native of Atlanta, Georgia blonde Wicked contract beauty Alexa has made quite an impression on the adult entertainment industry. She's already performed in many features, including Dream Quest, Spellbound, and Say Aaah, and loves promoting her designer series of erotic novelty toys, Essensual Elements. Alexa, who danced in Atlanta, GA under 1 ([See Entire Bio](#))

### Quick Stats

**Bust Size:**  
Large  
**Hair Color:**  
Red  
**Ethnicity:**  
White

### Fan Club

Alexa Rae  
3940 Laurel Canyon  
Boulevard  
Suite 134  
Studio  
City, CA 91604

**Pornstar Search**

**Alphabetical Listing**  
C D E F G H I J  
K L M N O P Q R S  
T U V W X Y Z (ALL)

**Average Rating: 4.58 out of 5 - 32 Ratings**  
[Rate And Review Alexa \(I\)](#)

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[Blonde](#)  
[Brunette](#)

**Contract Girls**  
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### FEATURED TITLES

VHS - NTSC



Fair-0-Matic, 2000

DVD



Dream Quest

DVD



Cheeks I I

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  - Q
  - R
  - S
  - V
  - W
  - X
  - Y
  - Z
  - (ALL)



**Inari Vachs**  
 Bust Size: *Medium* Ethnicity: *White*

- agories
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  - ity

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  - al | Playground

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[T](#) [V](#) [W](#) [X](#) [Y](#) [Z](#) [\(ALL\)](#)

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**VIRTUAL SEX**  
*Jeri West*  
 Get It On DVD



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Known for: In May of 2000, just six months after her initiation into adult entertainment, Tera walked away from the Cannes Film Festival with the award for BEST NEW STARLET



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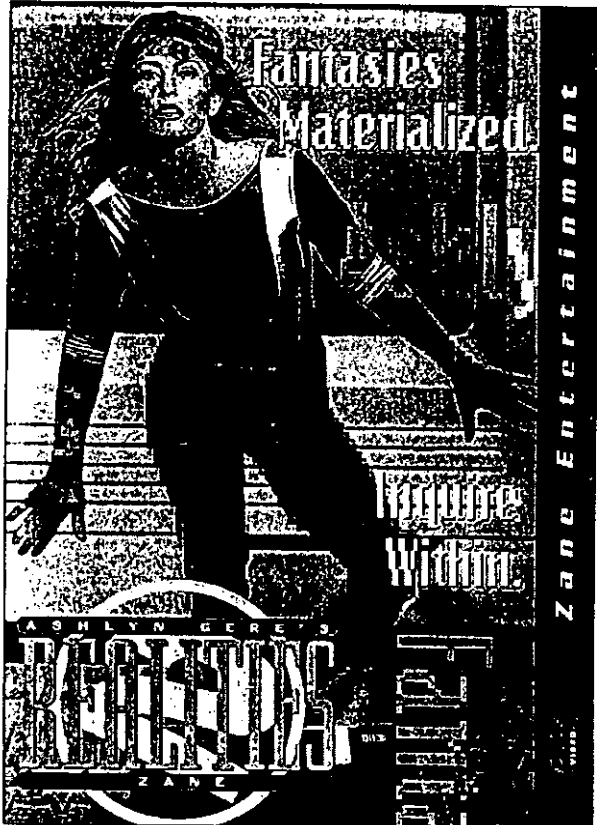
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**ADD TO WISHLIST** **BUY**

List Price: \$44.95  
 Our Price: **\$27.99**  
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- Sex
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**Series**

Girl

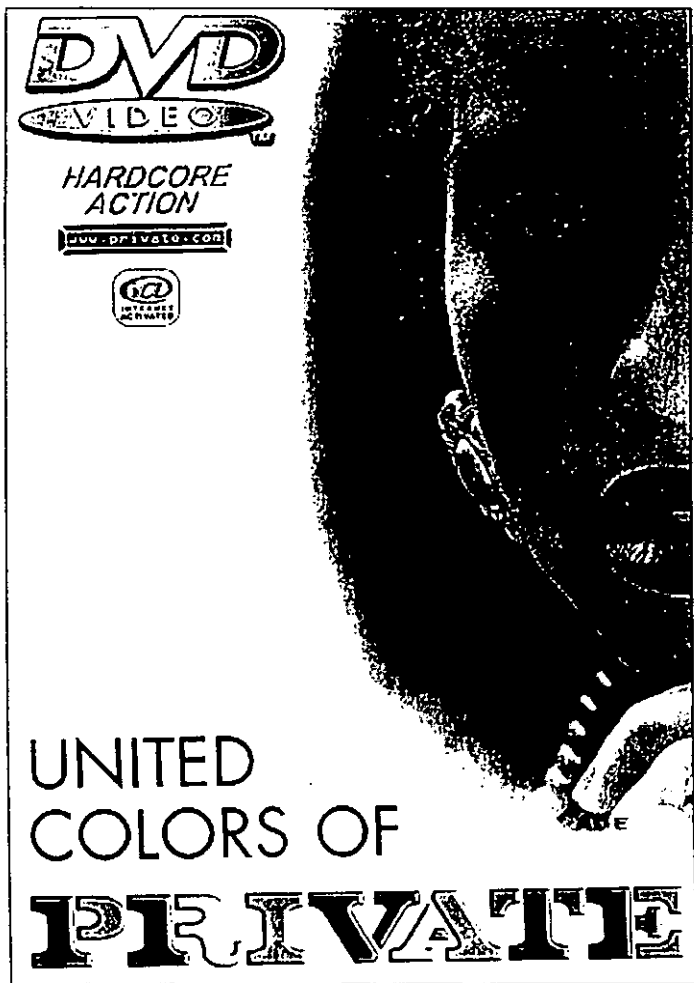
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- CAST INDEX

MUST BE 18 TO BUY

List Price: \$39.95  
 Our Price: **\$21.99**  
 You Save: \$17.96 (45%)

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Title  Performer

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- Categories
- Sex
  - Compilation
  - Feature
  - Flash
  - 120
  - Interactive
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Series

Girl

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  - Best Sellers



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### Blue Monday

DVD - Feature

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**Series**



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## Diary of Desire

DVD - Feature



*Her Life Was An Open Book.*

This is Vivid Girl Cassidy's DVD debut. The newest addition to the Vivid Girl Roster is making many waves with that fresh face and killer body. Seems shy but isn't. Athletic! Particularly in bed. Cassidy delivers two incredible scenes; one three way with Shelbee Myne and Billy Glide. Spears slams Tasha Hunter in a scorching anal scene. Shelbee Myne take a rare anal from Ian Daniels. Every scene has a facial and deep throating galore. Cassidy is here and Adult may never be the same.

**IN STOCK**  
 (ships immediately)  
**BESTSELLER**

Bonus Disc included with "Secret" Vivid feature. Giving you 8 hours of total video.

Search    
 Title  Performer  
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- Categories
- Index
- Compilation
- Genre
- Label
- Multi-Angle
- Multi-Angle
- Multi-Angle

**MUST BE 18 TO BUY**

List Price: \$39.95  
**Our Price: \$21.99**  
 You Save: \$17.96 (45%)

**RATING**  
**4.25**  
 out of 5.00

### FEATURES

- Interactive Menus
- Chapter Selections
- Bonus Scenes
- Meet The Girls
- Web Site Information
- DVD-ROM/Playstation 2/MS X-Box Compatible
- Previews

### PERFORMERS

- Cassidy
- Shelbee Myne
- Monique DeMoan
- Devon (I) - (610)
- Tasha Hunter

STUDIO  
Vivid

- Mark Davis
- Ian Daniels
- Randy Spears
- Billy Glide

### ORGANIZATION

GENRE(S)  
Multi-Angle  
Straight

CATEGORY  
Feature

WRITERS  
 Brittany

- Product Info
- Yes
- DVD Winners
- Scene Indexes
- Top Bestsellers

### DETAILS

LENGTH  
 82 mins

PRODUCTION YEAR  
 2000

RATING  
 XXX

RELEASE DATE  
 01-19-2001

PRODUCERS  
 Toni Brooks

DIRECTORS  
Jim Enright

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## Working Girl

DVD - Feature



*In the Story of a Girl who Gets Down 'n' Dirty for a Livin'!*  
 Dirty Work?  
 It's a Dirty Job, but someone has to do it!  
 Hey, She was Built For It!

**IN STOCK**  
 (ships immediately)

Advanced Search

Title  Performer

- Categories
- [Sex](#)
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- [TV](#)
- Series
- 
- 

**MUST BE 18 TO BUY**  
   
 List Price: \$39.95  
 Our Price: **\$20.99**  
 You Save: \$18.96 (47%)

**RATING**  
**4.50**  
 out of 5.00

### FEATURES

- Interactive Menus
- Chapter Selection
- Making of
- Wicked Casino
- Slide Show
- AVN Awards Winners and Nominations
- Company Profile
- Trailers
- Web Site Information
- Parental Lock
- DVD-ROM Compatible
- Audio Cast Biographies

### PERFORMERS

- [Temptress - \(bio\)](#)
- [Sydnee Steele - \(bio\)](#)
- [T.J. Hart - \(bio\)](#)
- [Keri Windsor - \(bio\)](#)
- [Devinn Lane - \(bio\)](#)
- [Mark Davis](#)
- [Chris Cannon](#)
- [Mickey G.](#)
- [Randy Spears](#)
- [Dillon Day](#)
- [Devin Wolf](#)

STUDIO  
[Wicked Pictures](#)

### ORGANIZATION

GENRE(S) **Straight**      CATEGORY **Feature**

DIRECTORS  
[Brad Armstrong](#)

### DETAILS

LENGTH **86 mins.**      RATING **XXX**  
 PRODUCTION YEAR **2000**      RELEASE DATE **02-14-2001**  
 STUDIO CODE

- Test Info
- [Reviews](#)
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GENERAL

## Adrenaline

DVD - Feature

- EMPIRE REVIEW
- COMMENTS
- SUGGESTIONS
- SCREENSHOTS
- BOXCOVER
- CAST INDEX



Head cross country with Evan and Jessica on a route that leads into a lot of trouble... and a lot of naughty fun!

A 2001 "Editor's Pick" Selection

**IN STOCK**  
(ships immediately)

Full Search

Titles Performer  
Advanced Search

### Categories

- Sex
- Compilation
- Feature
- Flash
- Onzo
- Interactive
- Multi-Angle
- Rated
- Gay

MUST BE 18 TO BUY

Add To Wish List

Click To BUY

List Price: \$39.95  
Our Price: **\$23.99**  
You Save: \$15.96 (40%)

RATING  
**4.50**  
out of 5.00

### FEATURES

- Interactive Menus
- Photo Gallery
- DVD-ROM Compatible
- Web Site Information
- Previews
- Int. Tel. Sex
- Chapter Selection
- Behind The Scenes

### PERFORMERS

- Evan Stone - (bio)
- Jessica Drake - (bio)
- Julie Meadows - (bio)
- Ava Vincent

- Alec Metro
- Dillion Day

PRODUCERS  
Jim Enright

DIRECTORS  
Michael Raven

STUDIO  
Sin City

### ORGANIZATION

GENRE(S)  
Straight

CATEGORY  
Feature

### DETAILS

LENGTH  
97 mins.

PRODUCTION YEAR  
2000

STUDIO CODE  
[None]

RATING  
XXX

RELEASE DATE  
02-27-2001

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## Inside Sex Vol. 1

DVD - All Sex



Dayton, Inside The Bunny Ranch In Reno, NV

It's her first feature for Vivid, and cute little Dayton's inside the actual, infamous Bunny Ranch in Reno, Nevada. Now, you can finally find out what goes on in America's best known legal brothel! With hot new Vivid Girl Cheyenne, getting the inside scoop on what it's like to be a ho in Hicksville! This is docuporn. All real. The hookers, the johns, and new Vivid Girl Dayton. Bonus Disc included with "Secret" Vivid feature. Giving you 8 hours of total video.

**IN STOCK**  
(ships immediately)

Word Search  
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 Title  Performer  
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- Categories
- Sex
- Implication
- Nature
- Fish
- Inzo
- eractive
- ulti-Angle
- Rated
- ly

MUST BE 18 TO BUY

List Price: \$39.95  
 Our Price: \$21.99  
 You Save: \$17.96 (45%)

RATING  
**3.75**  
 out of 5.00

Genres  
 Girl

studios  
 Digital Play

### FEATURES

- Interactive Menus
- Multiple Angles
- Meet The Girls
- Bonus Scenes
- Trailers
- Chapter Selection
- DVD-ROM/Playstation2/MS X-Box Compatible
- Web Site Information

### PERFORMERS

- Dayton Rainis - (bio)
- Chennin Blanc
- Cheyenne Silver - (bio)
- Tiger J
- Serena (II)
- Mark Davis
- Cheyne Collins
- Parker
- Gene (II)

STUDIO  
 Vivid

### ORGANIZATION

GENRE(S)  
 Straight

CATEGORY  
 All Sex

WRITERS  
 Craig Santy

### DETAILS

LENGTH  
 108 mins

PRODUCTION YEAR  
 2000

STUDIO CODE  
 [None]

RATING  
 XXX

RELEASE DATE  
 02-12-2001

PRODUCERS  
 Toni Brooks

DIRECTORS  
 Craig Santy

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## Debbie Does Iowa

DVD - Feature



*The Classic Returns*

Debbie's Not In Dallas Anymore  
 It's Debbie on the prairie, and you know what happens there... football, drinking, brawling and balling. It's a Midwestern ho down and Sky's the cheerleader to watch for! The classic returns. And you're goin' long and deep. One thing's for sure, this game won't end without a few scores!

**IN STOCK**  
 (ships immediately)

Bonus Disc Included with "Secret" Vivid Feature. Giving you 8 hours of total video.

Full Text Search

Find

Title  Performer

Advanced Search

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Add To Wish List

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List Price: \$39.95  
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RATING  
**3.25**  
 out of 5.00

- Categories
- 1 Sex
- Compilation
- Feature
- Flash
- Qnzo
- Interactive
- Multi-Angle
- Rated
- 3Y
- Genres
- 1 Girl
- Show Genre

### FEATURES

- Interactive Menus
- Multiple Angles
- Meet The Girls
- Chapter Selection
- Previews
- DVD-ROM/Playstation2/MS X-Box Compatible
- Web Site Information
- Bonus Scenes

### PERFORMERS

- Sky - (bio)
- Alexandra Nice - (bio)
- Temptress - (bio)
- Vivan Valentine
- Regan Starr
- Blair Segal
- Tiger Lilly
- Bobby Vitale
- Chris Cannon
- Tyce Bune
- Erik Everhard
- Dillion Clay
- Devin Wolf
- Sergio

### STUDIO

Vivid

### ORGANIZATION

GENRE(S)	CATEGORY
Multi-Angle	Feature
Straight	

### DETAILS

LENGTH	RATING
84 mins.	XXX
PRODUCTION YEAR	RELEASE DATE
2001	02-07-2001
STUDIO CODE	
[None]	

### WRITERS

David Stanley

### PRODUCERS

Paul Thomas

### DIRECTORS

- Test Info
- Reviews
- WIN DVD Winners
- Scene Indexes
- Current Bestsellers
- Top 50 of All Time
- Recent Reviews
- Recent Releases

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- Pornstars

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- GENERAL
- EMPIRE REVIEW
- COMMENTS
- BOXCOVER
- CAST INDEX

## Incognito

DVD - Feature



*Power... Inigue... Passion... Someone's Hiding the Truth*

How far would you go to uncover the truth? Thrust into a world of money, lust and deceit, two sisters must go deep undercover to reveal the truth about their past. Below the surface love is often disguised as lust. Questions lead to more questions, and secrets can destroy even the strongest souls. Sometimes, the ties that bind are better left alone...

**IN STOCK**  
(ships immediately)

**VD Search**

Find

Title Performer  
Advanced Search

**Categories**

- Il Sex
- ompilation
- eature
- atish
- onzo
- eractive
- ulti-Angle
- Rated
- ay

MUST BE 18 TO BUY

Add To Wish List

Click To **BUY**

List Price: \$39.95  
Our Price: **\$22.99**  
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RATING  
**3.75**  
out of 5.00

Interactive Menus  
DVD-ROM Compatible  
Previews  
Chapter Selection  
Photo Gallery  
Cast Biographies  
Web Site Information

**FEATURES**

STUDIO  
Ultimate

**ORGANIZATION**

GENRE(S)  
Straight

CATEGORY  
Feature

**DETAILS**

LENGTH  
90 mins.  
PRODUCTION YEAR  
1998  
STUDIO CODE  
[None]

RATING  
XXX  
RELEASE DATE  
02-07-2001

**PERFORMERS**

Johnni Black - (bio)  
Shanna McCullough - (bio)

Sabrina Johnson - (bio)  
Arita Cannibal  
Mandi Frost

John Decker  
Jonathan Morgan  
Steve Hatcher  
Brick Majors

**DIRECTORS**  
Bud Lea

**Series**

Il Girl  
Show Genre

**udios**

igital Play  
Show Studio

**Test Info**

- hives
- N DVD Winners
- Scene Indexes
- rent Bestsellers
- 50 of All Time
- ent Reviews
- ent Releases
- ure Releases

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## pornstar Search Pornstar Search - alexa (1)

Find

1 Matches Found

- [A](#) [B](#) [C](#) [D](#) [E](#) [F](#) [G](#) [H](#) [I](#) [J](#) [K](#) [L](#) [M](#) [N](#) [O](#) [P](#) [Q](#) [R](#) [S](#) [T](#) [U](#) [V](#) [W](#) [X](#) [Y](#) [Z](#) [\(ALL\)](#)



**Alexa (1)**  
Bust Size: Large Ethnicity: White

- Categories**  
[Blonde](#)  
[Ly](#)

- Direct Girls**  
[Vivid](#) [Wicked](#)  
[Playground](#)

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Get It On DVD

Photoshop

DVD Empire - Title - Debbie Does Iowa - Microsoft Internet Explorer

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Address http://www.adultdvdempire.com/Exec/Item.asp?Itemid=1001003795212&Itemid=25293&tab=4&page=2&iss=13

Links Adult DVD Empire DVD Empire - Home DVD Empire - Client MetaCrawler CoolMail Welcome

Search Find

Title Performer

Categories

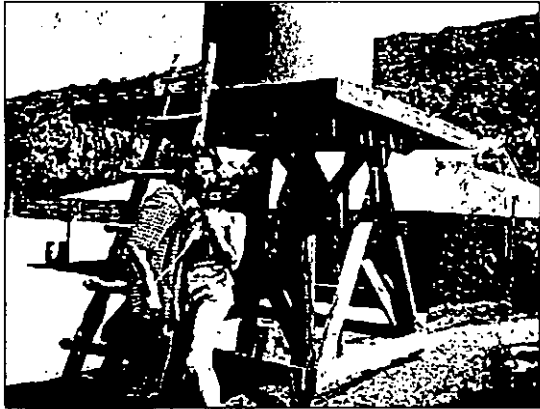
OS

Info

General DVD's you order

**VD Empire**

To 40% Off



Properties

General

Name: Debbie Does Iowa

URL: http://www.action-dvd.com/images/STDVD267213.jpg

OK Cancel

Microsoft Internet Explorer

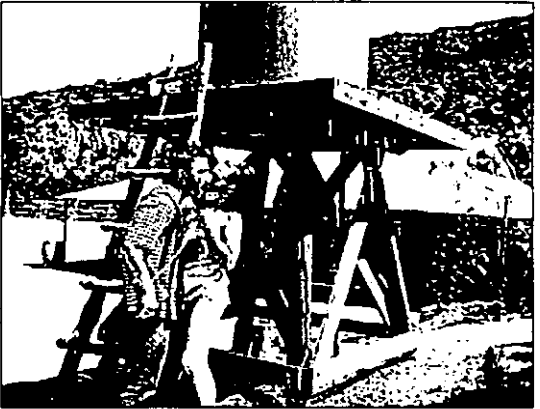
http://www.action-dvd.com/images/STDVD267213.jpg - Microsoft I...

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Title Performance

Categories

Series

Video Properties

Video Info

General

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Properties

General

Video Properties

Video Info

General



Properties

General

Video Properties

Video Info

General



Properties dialog box with fields for Name, Type, Address, URL, Size, Dimensions, Created, and Modified. Buttons for OK, Cancel, and Apply are visible at the bottom.



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www.action-dvd.com/images/sl/STDV1117s5.jpg



**Properties**

General

STDV1117s5.jpg

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Protocol: HyperText Transfer Protocol

Type: JPEG Image

Address (URL): <http://www.action-dvd.com/images/sl/STDV1117s5.jpg>

Size: 22791 bytes

Dimensions: 430 x 328 pixels

Empire Title: All Star... Microsoft Internet Explorer

Find

Performer

Search

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Store

Genre

**Properties**

General

19995\_5.jpg

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Protocol: HyperText Transfer Protocol

Type: JPEG Image

Address (URL): [http://www.actiondvdempire.com/Graphics/Movies/Screenshots/19995\\_5.jpg](http://www.actiondvdempire.com/Graphics/Movies/Screenshots/19995_5.jpg)

Size: 21265 bytes

Dimensions: 430 x 328 pixels



File Edit View Favorites Tools Help

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Address http://www.adultdvdempire.com/E-rec/sem.asp?userid=1001009795213&item\_id=25177&sb=4&page=1&sss=7

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Select Page ( 2 )

CAST INDEX

Screenshot(1)

DVD Search

Find

Title Performer

Categories

- All
- Comedy
- Feature
- Fetish
- Genre
- Interactive
- Multi-Angle
- R-Rate
- Gay

Genres

All Girl

Studios



Digital Play

Shows Studio

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- Adult DVD Minutes
- Sex Scene Index
- Current Bestsellers
- Top 50 of All Time
- Recent Releases
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Add General DVD to your order

Properties

Name	Adult DVD Empire
Protocol	http
Type	text/html
Address	http://www.adultdvdempire.com/E-rec/sem.asp?userid=1001009795213&item_id=25177&sb=4&page=1&sss=7
URL	http://www.adultdvdempire.com/E-rec/sem.asp?userid=1001009795213&item_id=25177&sb=4&page=1&sss=7
Size	1024 bytes
Created	11/11/2001 10:00:00 AM
Modified	11/11/2001 10:00:00 AM

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Address http://www.actiondvd.com/images/sl/STDV2729s7.jpg

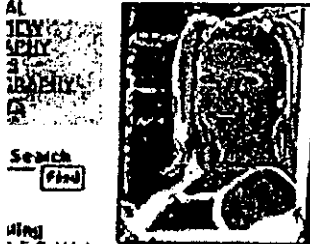
Links Adult DVD Empire DVD Empire - Home DVD Empire - Client



Properties

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URL	http://www.actiondvd.com/images/sl/STDV2729s7.jpg
Size	1024 bytes
Created	11/11/2001 10:00:00 AM
Modified	11/11/2001 10:00:00 AM

### Allysin Chaynes



**Biography:**  
Fresh-faced Allysin Chaynes was just a senior in high school when she and her boyfriend answered an ad from Randy West looking for adult performers. They made their first video together the same week (Up and Runners #50), and since then, the pit-sized spitfire has appeared in over 60 adult films. Her most notable and popular appearances are in *Sex Lingerie*

**Quick Stats**

Bust Size: 32A Small  
Hair Color: Black  
Eye Color: Blue  
Ethnicity: White

Search

Find: A B C D E F G H I J K L M N O P Q R S T U V W X Y Z (ALL)

Average Rating: 4.32 out of 5 - 11 Ratings  
Rate And Review Allysin Chaynes

in: Models  
Girls: 12/12/2003

**FEATURED TITLES**

 DVD Kelly The Queen	 DVD Dirty Love 2: The Movie	 VHS - NTSC Hardcore Confessions 2
----------------------------	------------------------------------	--

4.5/5  
1/1

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**Listing**  
 Pornstarempire.com is the first FREE information source for your favorite adult stars. The concept is simple, combine a classy, professional Internet design with the latest database technologies to offer the most comprehensive resource for pornstar information.

**XY Z I III**  
 The support of actual talent, studios, and the knowledgeable staff of adultvdempire.com add to the wealth of information at your fingertips. Every aspect of the adult starlet can be found here whether they're today's hottest girls or yesterday's hot of lamers.

**See Models**  
 Did you ever wonder how big Jenna Jameson's tits really are? They're all here. Jenna, Jenna, Asia Carrera-the list goes on. Comprehensive biographies follow the stars' accolades, tastes, and sexual personality. For instance, did you know that Severity is a huge Rated Plant fan, or that Nikki Tyler was studying to be a clinical psychologist? Find out what your favorite star enjoys or what they absolutely can't stand.



**Girl**  
 Pornstarempire.com knows how hard it is to find reliable information that's easily accessible. At the core of Pornstarempire.com stands the adult star database in which all the information about the star can be found: bio, body stats, birthplace, contact info, website link, etc. We are also willing to provide a photo gallery of every star, showcasing their stunning beauty for all to see. Another useful feature is Pornstarempire's filmography page. The filmography is a listing of available titles in which the starlet has worked. The titles are chronological-a must for collectors-and are grouped by media (VCD, VHS, CD-ROM, etc.) as well.

**at**  
 We plan to continually upgrade Pornstarempire.com, while keeping it free to our visitors. Be on the watch for exciting new features as Pornstarempire.com continues to grow and expand into a multimedia library, catering to all your adult needs. We hope to propel the adult industry leading into the new information age!

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Title Containing:   
 Performers:  and   
performers separated by a comma, space, etc.  
 Category:   
 Genre:   
 Series:   
 Released:   
 Rating:   
 Price Less Than:

By

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and DVDs

All SEX genres

	Genres	Categories
• All Girl	• Classic	• Masturbation
• Amateur	• Czechoslovakia	• New Angle
• Anal	• Czechoslovakia	• Older Women
• Asian	• East Lay	• Oral
• Beach/Pool	• Erotic	• Scat
• Bl. XXX	• Gangbang	• Shitting
• Black	• Interracial	• Voyeurism
• Busty	• Magazine	

**Sodom was it...** Sodom, or the Sale of An...  
Minsk, Belarus, part of the former Soviet Empire, is the most desecrated place for ever been. There weren't very many girls and zero male actors (even though there was supposed to be)...

**Slut Franks!**  
We're in Rio De Janeiro for a minute, kickin' it with some Brazilian babes! Oh yes, they're bad Bitches love the dick. And then we're back for 2 nasty h's getting it & lovin' it...

**Assman!**  
Anabolic body goes where others wish they could. The Anabolic ASSMAN has captured incredibly pretty girls, and then stretched their Anus's to nearly impossible dimension...

- 1. All Girl
- 2. Czechoslovakia
- 3. New Angle
- 4. Older Women
- 5. Oral
- 6. Scat
- 7. Shitting
- 8. Voyeurism
- 9. Masturbation
- 10. Czechoslovakia



- 1. All Girl
- 2. Czechoslovakia
- 3. New Angle
- 4. Older Women
- 5. Oral
- 6. Scat
- 7. Shitting
- 8. Voyeurism
- 9. Masturbation
- 10. Czechoslovakia

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### ALYSIN CHAYNES BIOGRAPHY

STAR INFO  
BIRTH  
VIEW  
LAPHY  
DE PIZ  
HIGHLIGHTS



Height: 6 ft. 0 in.  
Eye Color: Hazel  
Measure: 32A-27-32  
Hair Color: Blonde  
Ethnicity: White

Search  
Rating  
E E E H I J  
Q R S T U  
X Y Z [ALL]

**BIOGRAPHY**  
Fresh-faced Alysia Chaynes was just a senior in high school when she and her boyfriend answered an ad from Randy West looking for adult performers. They made their first video together the same week (Up and Cummers #15), and since then, the pint-sized spitfire has appeared in over 60 adult films. Her most notable and popular appearances are in the "Valley the Good" series, where she does out pleasure to everyone from hot boys, to horny sisters, to professors!  
When she's not steaming up the screen, everybody's favorite Valley Girl spends her time studying to be a personal trainer and dreams of ultimately becoming a nutritionist. With plans for some mammary expansion (but not too big), Alysia intends to begin feature dancing in 2001, shedding some of that little girl image (along with her clothes) and taking the jizz biz by storm. Look for this talented, doe-eyed beauty in the future in delicious films everywhere, both hard and softcore.

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**Asia Carrera**  
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#### INDUSTRY COMMENTS

**Kelly The Coed**  
6.58 out of 6.00 - Film: 5 Features: 5 Video: 4 Audio: 4 - R2/1999

Wow, I haven't even started the movie and I've already been reviewing for nearly an hour. By the way, while I didn't want to blow by blow the wide bonus menu, I will say that the two scenes aren't half bad and worth a look. I've seen this title at the top of just about every DVD sales chart of late. It's not really a shock to me. Ever since I saw the preview for this title, I have been waiting for it to come out. Add to that, the incredibly sexy shot on the cover of adorable Allison Chaynes in her pink shirt and you have the sort of movie that will have re-enrollment skyrocketing as horny tickers like me go back to actual looking for our own little Kelly's. Knowing that Jim Powers has such a twisted mind only makes the anticipation all the greater.

Kelly strolls across campus in her belly shirt, short pleated skirt and knee stockings. She is the picture of coed perfection and immediately catches the eyes of a couple of hot boys who invite her to a party. Her roommate Hilly (Gwen Summers) is just as cute and convinces Kelly that she has to go to the party. Before she goes to the party, Kelly stops by to see her study buddy, Jay Ashley. He coaches her in the fine art of quarters. Meanwhile, somewhere else in the dorm, some guy is thoroughly enjoying the wonderful tits of De'la. This girl looks like a South Beach college girl and thankfully looks like a full bodied slut. Great close ups as she lies across her bed taking every inch of cock into her mouth. As made up as she is, De'la looks like something right out of a Disney Spears video. (Well, except for that tight shot of her pussy as she grinds away on his cock) In the room with Tyce Burn and before you can say, "Pussy is good food," he shames the dude right back into his clothes. Those of you who think Tyce is just looking to score some of the prettiest pussy for himself, raise your hand (I'd THAT hand sit-as) Already warmed up, De'la just steps down on his cock and picks up where she left off. Nothing quite like a cute girl with no sense of sexual morals whatsoever to make the college experience complete. Trying to stick to his role as manager, Tyce teaches De'la a new way to keep men happy, he fucks her in her tight asshole.

We cut away from that scene with no comment, back to Kelly and her pal. Jay quickly turns the game of quarters to his advantage and has Kelly sucking on his cock. You know, with all those lame ass sexual harassment seminars they make kids take in college now, nothing has gotten better. Maybe if all freshman girls had to go through quarters and cock-sucking seminars instead, the world would be a better place. What do you think? After munching on her muff for a bit, Jay sits down and has Kelly play her part as his bouncing slut on a stick. Check out how she eats pizza while fucking, very nice touch. (By the way, the knee tights stay on while she fucks if that matters.) Jay gives her a very solid fuck on the couch, breaking Kelly in and prepping her, no doubt, for the hot party. He rubs her somewhat on the facial, but it looks good anyway.

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**YOU will be Big Man On Campus watching this.**  
\$68 out of \$80 - Film: 4 Features: 9 Video: 4 Audio: 3 - R2/M1999

Synopsis: It's Rush Week at the neighborhood College and Alysia Chaynes along with her fellow coeds get a chance to explore the campus. They also explore the parts worn by the big man on campus in this "educational" entry from the folks at Heatwaves DVD

Features: This Disc Features Full Motion Chapter Search, Multiple Angles, Behind The Scenes Footage, Meet The Stars (in live action and subs), Solo Scenes (which the girls perform just for you), Coming Attractions and a Bonus Flick - "I Love You, Suck My Dick!"

Commentary: Remember those days when you lived on campus and every night was party night? Yeah, well, I don't either but watching this DVD will help restore or create those memories for you. Kelly (Alycia Chaynes) is a college freshman who is rushing for a sorority and rushing to fill all her holes with man meat. She's not alone in this venture, in fact, it's her roommate Debbie (Della) that actually starts off the sex in the fact by playing ball with one of the school's jocks. Della is one sexy chick and the dude can't seem to get enough of her meaty cunt as he lays face on her ass and eats her asshole (check out the cut up for this in the behind the scenes footage section). She climbs on top and rides him reverse stroke but before he cums, they are interrupted by his tutor. The football player leaves as the tutor berates poor Della. She teases him with her tight body (it kills) and they do eventually get down to some work. Dirty work. The passing grade in these studies would be if you get an orgasm or not. It takes some real serious anal to make it happen, but it does and they pass the test as he cums inside her ass.

Kelly is playing a drinking game with Dew (Jay Asly). Loser of each round has to remove an article of clothing. C'mon, surely you've played that one! When he takes off his pants, she pounces on his hard college diploma (no waga needed). Nice fat person camcorder and other nice camera to a hot scene as he eats her sweet and moist pink place. What a tight little body she has. Great camcorder as she slides up and down his cock. After a variety of positions, he shoots all over her face.

Guess what's next? Why it's a beer guzzling TOGA party. Toga, toga, toga. Even though it's filled with lots of Great Guys, it's lucky JJ and Mark that get to take Kelly the Coed upstairs. On the way, we get to watch an awesome scene as Klazzi sucks on 3 campus studs at the same time. This is a very fat triple cock suck session that is very well photographed. A complete use of college pride. Hudos to the director, Jim Powers. Once upstairs, JJ rips and fingers Kelly as the other guy works her tits and mouth. Kelly's body is as smooth as butter and JJ seems to really enjoy tongue fucking her poop shoot. There is lots of penetration here that culminates in some intense double penetration (again, check out the behind the scenes footage for some insights).

There's lots more sex on campus and on this DVD. Included is roommate Hilly (Owen Summers) hooking up with the literal "big man on campus" and sucking his shaved meat till he cums. There's a fun scene with Alysia and a sleepwalking fat boy. Finally, a sexy, young Asian name Arnold Chang services two of the guys at the party. She does it with mouth and pussy. Lucky guys and lucky you if you watch this disc.

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**Featured Interview**

**Stacy Valentine**  
 In 1993, Stacy Valentine metamorphosed from Oklahoma housewife to quintessential porn star. Jim Stacy as she reflects upon her experience of the top of her career.  
 "I'll never fade my past. People ask me if I feel now or try to keep it a secret, and I say absolutely not, cause I'm not ashamed of what I did. I'm so happy." (Read Full Interview)

	<b>Stacy Valentine</b> Interview Date: 12-04-2000	VCA Girl	View Website
	<b>Michelle Rocco</b> Interview Date: 11-24-2000		View Website
	<b>Himi Hiramni</b> Interview Date: 11-21-2000		View Website
	<b>Lemonheads</b> Interview Date: 11-08-2000	Wicked Girl	
	<b>Sylvia</b> Interview Date: 10-31-2000	Metro Girl	View Website
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### Exclusive Interview:



#### Stacy Valentine

Adult film's golden girl has said farewell to porn for now, but she will not be soon forgotten by her many fans. The girl from Tulsa, Oklahoma made the jump into the adult world in the 90s, and has been the highlight of many an adult production, including the popular *Cherry Slice* and *ESL*.

### Featured Stars:



#### Bridgette Borkovics

You won't be hard-pressed to find a movie with this hot blonde gracing it... *Bridgette* has proved to be a real trooper since starting in adult film, and has performed in hundreds of sex scenes in just a short period of time. Some of *Bridgette's* films include *Donna's Erotic 2000* and *There's Something About Jack*.



#### Shilpa Das

*Shilpa* has always given the fans what they wanted. Even though she started in the business doing only lesbian scenes, she quickly expanded both for willingness to try straight scenes and her breast size, and her fans reacted by making her one of the more popular stars in the industry. Check out *Shilpa* in *Booky Iran* and *EuroStar*.

### Featured Website:



#### Vasilis

Born in the Czech Republic, this Viad girl has quickly become one of the hottest blondes in American porn. You can find out all about this blonde beauty on her website at [www.vasilis.com](http://www.vasilis.com), or take a look at some of her movies like *Human Body* and *Action Sports Sex 99*.

### Popular Stars

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2. *Traci Lind*
3. *Cherry Lane*
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## Interview With Allysin Chaynes



"Little girl" Allysin Chaynes (*Baller's Bunches*, *Lesaf*, *With Her (and I)*) has appeared in over 60 adult films in the past three years. A San Fernando native, she still spends her time in the Valley, where she studies to be a personal trainer and performs at bachelor parties with j-r-bis-taddy, Ken Windsor. This free-bol cute had plenty to say about the industry, her co-workers, and her impending lab job when she spoke to pornstarempire.com on 10/24/00



Interviewed By Joss

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**pornstarempire.com:** Where are you from?  
 **Allysin:** I'm from the Valley. I grew up in California.

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**pornstarempire.com:** How did you get started in the adult business?  
 **Allysin:** I started in the business by answering an ad from Randy West with my boyfriend. We just went in for an interview and within a week, we did our first video.

**pornstarempire.com:** How do you feel when you watch yourself perform?  
 **Allysin:** I don't know, it's kind of weird, sometimes I guess I think, "Oh God, why did I do that?"

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**pornstarempire.com:** Like what?  
 **Allysin:** I mean, I can tell if I wasn't into it, and I think, "God, I should have at least faked it."

18 Girls  
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**pornstarempire.com:** But you don't feel embarrassed or bummed out about it?  
 **Allysin:** Not unless I did something stupid. But really, it's just like watching - me, I guess.

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**pornstarempire.com:** Would you say that you enjoy the business?  
 **Allysin:** Yeah - there's negatives and positives to it, just like any other business.

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**pornstarempire.com:** What do you like about it?  
 **Allysin:** I think the money... the sex can be good too - sometimes the person is not somebody you would pick in your personal life. My opinion is, we need more good-looking guys in the industry. I'm pretty picky, as far as who I work with, and it's really hard sometimes to even find anybody that I would actually do it with.

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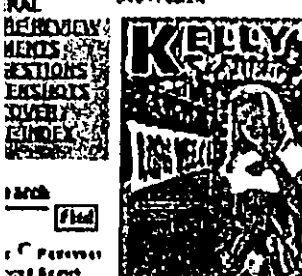
**pornstarempire.com:** Well, check this out. When I was dancing in Van Nuys, Tony Tedeschi came into the club. It was funny, cause he was with his friend, who kept saying, "Don't you know who this is?" But I didn't. So Tony explained who he was and he asked me out, but I had a boyfriend at the time and I was being really good. Now that I have this job, I have to watch all this porn and I'm like, "OH MY GOD, I CAN'T BELIEVE I DIDN'T GO OUT WITH THAT GUY!"  
 **Allysin:** Yeah, I've actually worked with him - I forget what it was for. Somebody recommended him to me, like, "Oh, you should work with this guy, he's really good."



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 LAZZI  
 Dala

Yara Baza  
 J.J. Michaels  
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**Babe And Brunette Allysin Chaynes**  
mp4 - Overall Rating: 4.75  
Sexual Energy: 4 Body: 5 Beauty: 5 Personality: 5  
Amazing! She better not get implanted!

Search **44673** - Overall Rating: 5  
Sexual Energy: 5 Body: 5 Beauty: 5 Personality: 5  
I just wish I could have met you in high school

**Sharon** - Overall Rating: 4.5  
Sexual Energy: 5 Body: 4 Beauty: 4 Personality: 5  
This pretty young thing has a fiery sensuality that gets me squiggly wet whenever I see her perform. She combines that high school or college girl cuteness with a smoldering erotic presence. I've seen her in such films as "No Man's Land", "Where the Oaks Play", "Four Finger Club", etc., and she never disappoints. She is the type of woman you'd like to spend the first half of the night snuggling with and the second half fucking each other's brains out. Allysin is awesome!

**Kelly** - Overall Rating: 4.75  
Sexual Energy: 4 Body: 5 Beauty: 5 Personality: 5  
I really loved Kelly the Cowd! & 2!

**Kissy** - Overall Rating: 5  
Sexual Energy: 5 Body: 5 Beauty: 5 Personality: 5  
What a fool!

**Spooky** - Overall Rating: 5  
Sexual Energy: 5 Body: 5 Beauty: 5 Personality: 5  
Hey, it's my favorite (active) porn star, Ms. Chaynes! Kelly The Cowd was one of my first adult DVD purchases, and I wouldn't dream of being without it. Allysin has that wonderful, petite, girl-next-door look that I really go for. While I don't look forward to the chest enhancement she is having (or perhaps already has) done, she'll still be at the top of my list both in beauty and sheer sexiness!

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	<u>John Wiley</u> <u>Mark West</u> <u>Lyx Blue</u>	1/2	Dom Room	Foreplay - Blowjob Foreplay - Oral Masturbation - Finger Sex - Anal Sex - Cowgirl Sex - Reverse Cowgirl	
<b>Scene 2 - Intercourse</b>					
	<u>Alexis (Nancy)</u> <u>Jax Arden</u>	1/1	Study Room	Foreplay - Blowjob Foreplay - Oral Sex - Cowgirl Sex - Missionary Sex - Reverse Cowgirl	External, Face
<b>Scene 3 - Blowjob</b>					
	<u>Martin Prince</u> <u>Queen Stephanie</u> <u>John Wiley</u> <u>Pat Adams</u>	1/3	Stairway	Foreplay - Blowjob	External, Face
<b>Scene 4 - Threesome</b>					



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ria Ehndel	 Alisa Star Bust Size: Large Ethnicity: White	Wid Grl
1 Girl Dad   Vols 2   Background	 Alexandra Rose Bust Size: Medium Ethnicity: White	
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## Serenity's View Celebrity Reviewer



Serenity is a kinetic individual. Whether it be AVN award winning performances in adult film, a veritable plethora of mainstream television appearances, or her own line of adult novelty products, Serenity is a jack-of-all-trades. Recently, she decided to put her journalistic talents to use (she holds a degree in journalism, too) by lending her expert opinion to our site for a series of featured reviews. Enjoy!

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**Serenity's Lust**

### Pornogothic

8.20 out of 6.00 - from *Wicked Pictures* (reviewed by Serenity)



Although most people would choose a horror flick in the Halloween season, I truly believe that this is a movie for all seasons. *Pornogothic* is a vampire movie consisting of intrigue, agony, love lost, love found, battles of power, and life-saving decisions. When this project was first presented to me by Jonathan Morgan, I didn't hesitate in committing to it. Written by award winning screenwriter Martin Dresner, who also wrote *Crazed*, *Indigo Delta*, and *Evil's Feature*, I fell in love with the story. Jonathan Morgan and I worked for days on building an all-star cast to play the roles. Pre-production was no easy task. Rod Hopkins, award winning art director, started right away on setting up the feel of this movie. Jonathan Morgan immediately booked his Director of Photography, Jake Jacobs. I took a trip to mainstream special effects genius SP FX where, we did castings of my facial features and teeth for the prosthetics used while I'm in vampire form. Then, I was off to music writer Fat Cat in the City, to record my voice for the music developed specially for this project. As you can tell, we exerted a lot of effort to make this a very special project. During production we worked extremely long hours in unusually cold and damp weather. Of course, this made suffering easy to emulate! Editing was a work of art achieved by GCS Post. Overall, this is one of my favorite productions, and the result is not to be missed!

*Pornogothic* starts off with a cat and mouse chase. Vampires have selected their victim and are having great fun at the hunt. One vampire (your lady) has neither the head to kill nor the throat to drink blood. This does not go over well with the vampire queen (Sharna McCullough). Next, we are introduced to a down and out police detective (Brad Armstrong). Always getting drunk, as well as hit by a prostitute (Stephanie Salt), he seems quite the loser. The sex scene between Stephanie and Brad is very nasty and raw, and one worth watching. A call comes in for him to investigate a mysterious homicide. The dead body is completely drained of blood. On his way to follow up on a possible lead we learn the source of his depression. His lovely wife had disappeared while they were at a club and was found several days later dead, and drained of blood. Eventually, he ends up at Club *Pornogothic* to investigate the most recent murder. Unbeknownst to him, the all female owners of the club (Sharna McCullough, Asia Carrera, Mandy and myself) are vampires who use the club to attract their prey.

Vampire Ana has decided she is a bit thirsty and chooses her next victim, Katie Gold (who won Best Supporting Actress for this role). Katie is suffering emotionally...



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FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

RIGHT ASCENSION, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.: 01-CV-0666
	)	
ACTION SOFTWARE, INC., ACTION-	)	Judge William L. Standish
DVD.COM, INC., ALEXANDER BELFER,	)	
WEBIMAGE2000, INC. and OLEG MINKO	)	
	)	
Defendants.	)	

**DECLARATION OF DUNCAN POIRIER**

I, Duncan Poirier, declare as follows:

1. This Declaration is in support of the Motion of Defendants Action Software, Inc., Action-DVD.com, Inc., and Alexander Belfer for Summary Judgment, as well as the Memorandum in Support filed concurrently therewith (collectively, the "Motion"). Except as otherwise stated, I make this Declaration based on my own personal knowledge and could competently testify to matters stated in this Declaration if called upon to do so.

2. I am currently employed as a legal assistant at the law firm of Benesch, Friedlander, Coplan & Aronoff LLP.

3. I have examined the substance of the web site pages attached to the Motion as Exhibit I. I personally researched and produced the hard copy page examples of adult web sites that are collectively attached to the Motion as Exhibit I. The Motion's Exhibit I contains true and correct copies of the hard copy page examples that I printed out.

4. I have examined the substance of the web site pages attached to the Motion as Exhibit K. I personally researched and produced the hard copy pages from the United States Patent & Trademark Office web site, collectively attached to the Motion as Exhibit K,

evidencing other entities that own federally registered trademarks incorporating an ADE designation. The Motion's Exhibit K contains true and correct copies of the hard copy page examples that I printed out.

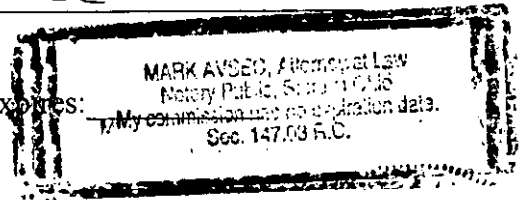
I declare under penalty of perjury under the laws of the State of Ohio that the foregoing is true and correct.

  
\_\_\_\_\_  
DUNCAN POIRIER

Sworn and subscribed to before me this 14<sup>th</sup> day of August, 2003.

MARK AVSEC  
Notary Public

My commission expires:









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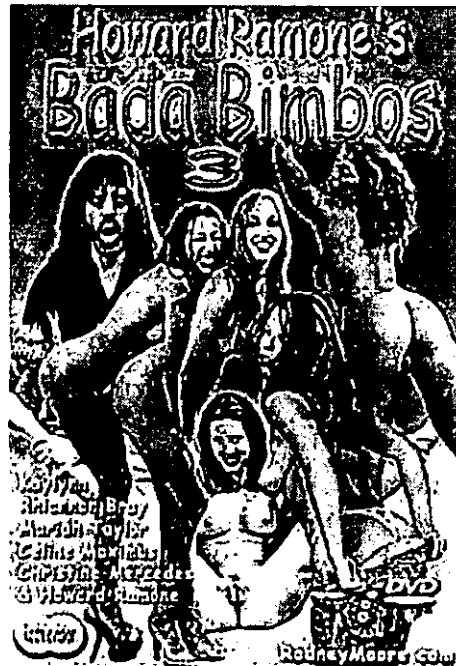
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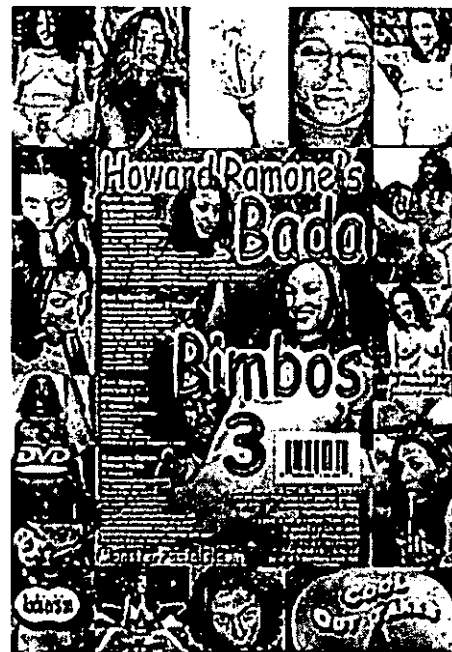
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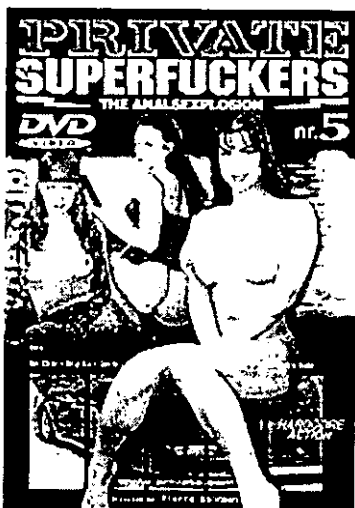
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## THE ANAL EXPLOSION



<b>LANGUAGES</b> [Icons for English, Spanish, French, German, Italian, Japanese, Korean, Portuguese, Russian, Thai, Vietnamese, Chinese, Hebrew, Hindi, Arabic, Indonesian, Malay, Tagalog, Vietnamese, Thai, Chinese, Hindi, Arabic, Indonesian, Malay, Tagalog]	<b>FEATURES</b> • Full interactive menu • Open & lock to chapters • Chapter lists • Digital stereo sound	<b>EXTRAS</b> • Trailers • Photo set • Production notes • Cast photo set
<b>SUBTITLES</b> [Icons for English, Spanish, French, German, Italian, Japanese, Korean, Portuguese, Russian, Thai, Vietnamese, Chinese, Hindi, Arabic, Indonesian, Malay, Tagalog, Vietnamese, Thai, Chinese, Hindi, Arabic, Indonesian, Malay, Tagalog]	<b>MOVIE &amp; EXTRAS</b> 2 hours 50 min. ALL REGION CODES NTSC	<b>EXTRAS</b> • Trailers • Photo set • Cast photo set • Production notes
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