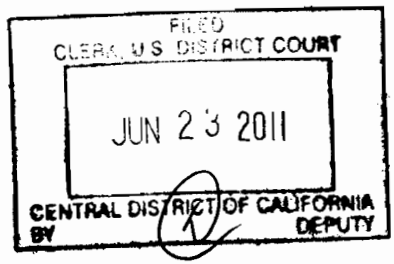


ORIGIN



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15 Attorneys for Plaintiff
16 GILBERT J. ARENAS, JR.

ILS
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CV-31
GIVEN

LN

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

LACV11-5279 RSWLMWx

13 GILBERT J. ARENAS, JR., an individual,
14 Plaintiff,

15 vs.

16 SHED MEDIA US INC., a Delaware
17 corporation; LAURA GOVAN,
18 an individual; and DOES 1 through 10,
19 inclusive,
20 Defendants.

CASE NO.

COMPLAINT FOR:

- (1) Trademark Infringement [15 U.S.C. § 1125(a)];
- (2) Trademark Dilution [15 U.S.C. § 1125(c)];
- (3) False Advertising [15 U.S.C. § 1125(a)];
- (4) False Endorsement [15 U.S.C. § 1125(a)];
- (5) California Common Law Misappropriation of Likeness and Right of Publicity;
- (6) Misappropriation of Likeness and Right of Publicity [Cal. Civ. Code § 3344];
- (7) Unfair Competition [Cal. Bus. & Prof. Code § 17200].

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27 Plaintiff GILBERT J. ARENAS, JR. ("Plaintiff" or "ARENAS") for his
28 Complaint alleges as follows:

1 (federal question) and 28 U.S.C. § 1338(a) (trademarks). This Court also has
2 supplemental jurisdiction over the state law claims.

3 8. Venue is proper in this Court under 28 U.S.C. § 1391(b)(2) in that a
4 substantial portion of the events giving rise to the claim occurred in this District.

5 **FACTUAL ALLEGATIONS**

6 9. Plaintiff is a professional athlete who plays basketball for the National
7 Basketball Association (“NBA”) team Orlando Magic. Plaintiff is one of the most
8 well-known players in the NBA.

9 10. Upon information and belief, Plaintiff is the natural father of four (4)
10 children (collectively “the Minor Children”).

11 11. Defendant GOVAN is the natural mother of the Minor Children.

12 12. On information and belief, Defendant GOVAN has been hired to star
13 in a VH1 reality television show titled “Basketball Wives: Los Angeles,” which is
14 produced by Defendant SHED MEDIA.

15 13. Though the reality television show is titled “Basketball *Wives*: Los
16 Angeles” (emphasis added), not all of the featured women in the show are the
17 wives of current NBA players. The show also follows the lives of women who are
18 *dating*, or who *dated*, NBA basketball players. As a June 20, 2011 press release
19 stated, the “Basketball Wives: Los Angeles” “will dive into the real-life locker
20 room of these leading ladies, giving viewers a never-before-seen look at what it
21 takes to live in La La Land *and be connected to a famous professional athlete*”
22 (emphasis added). The show thus provides these women with a vehicle and
23 worldwide platform to use, without permission or authorization, the names and/or
24 likenesses of famous NBA professional basketball players they know on a personal
25 level for their own commercial gain.

26 14. On information and belief, Defendant SHED MEDIA sought
27 Defendant GOVAN’s participation in its show “Basketball Wives: Los Angeles,”
28 primarily to enhance Defendants’ ability to market the show due to Defendant

1 GOVAN's prior personal relationship with Plaintiff and current relationship with
2 Plaintiff as mother of the Minor Children, and thus to use Plaintiff's name and/or
3 likeness for commercial gain, without Plaintiff's authorization.

4 15. Defendant GOVAN is attempting to promote her own commercial
5 brand and become a television personality and/or celebrity by exploiting (a) her
6 former relationship with Plaintiff, (b) the fact that Plaintiff is the father of the
7 Minor Children, (c) Plaintiff's name and/or likeness for commercial gain.
8 Defendant SHED MEDIA also intends to profit from Defendant GOVAN's
9 exploitation as described herein.

10 16. The reference to Plaintiff's likeness by Defendants is primarily
11 commercial and not communicative and not transformative, as the challenged uses
12 are Defendants' uses of Plaintiff's likeness in the advertising and the promotion of
13 the "Basketball Wives: Los Angeles" show.

14 17. As Defendants' uses of Plaintiff's name and/or likeness and trade-
15 marks amount to little more than the appropriation of Plaintiff's and or Plaintiff's
16 trademarks' economic value, Defendants' uses do not amount to protected
17 expression under the First Amendment. Defendants are not "expressing" anything
18 other than their attempt to profit from Plaintiff's fame. Moreover, the "Basketball
19 Wives: Los Angeles" show does not involve or address matters of public
20 significance nor encourage public participation therein.

21 18. In a good faith effort to avoid legal proceedings, Plaintiff's counsel
22 contacted Defendant SHED MEDIA's counsel regarding Defendant GOVAN's
23 participation in the "Basketball Wives: Los Angeles" reality show. Despite such
24 contact, Defendants SHED MEDIA and GOVAN have proceeded with "Basketball
25 Wives: Los Angeles."

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1 **FIRST CLAIM FOR RELIEF**

2 (Trademark Infringement, 15 U.S.C. § 1125(a))

3 19. Plaintiff incorporates by reference all of the paragraphs of this
4 Complaint as though fully stated herein.

5 20. Plaintiff is the owner of valid, distinctive marks in GILBERT J.
6 ARENAS, JR., GILBERT ARENAS, and GIL ARENAS (and any variants
7 sufficient to identify Plaintiff) (the “Marks”) as to, *inter alia*, videos depicting
8 events in Plaintiff’s life and his involvement with young children, insofar as
9 promoting education, encouraging foster care and speaking out against homeless-
10 ness is concerned. Plaintiff offers these videos through www.gilbertarenas.com
11 and www.zerotwohero.com, the website for the Arenas Foundation’s “Gilbert
12 Arenas’ Zero Two Hero” which was an Official Honoree for Best Website in
13 Celebrity category for the “Webby Awards.” Through such usage and through
14 extensive publicity and news coverage of Plaintiff’s professional career and
15 performance, the Marks have acquired distinct-iveness and secondary meaning.
16 The Marks are strong and well-known and are entitled to a broad scope of
17 protection.

18 21. Plaintiff’s name, identity and persona serves as his trademark for
19 purposes of, *inter alia*, endorsements.

20 22. The level of recognition that Plaintiff has among the segment of the
21 society for whom the advertisements of the “Basketball Wives: Los Angeles” show
22 are aimed is extremely high; it is precisely Defendant GOVAN’s connection to
23 Plaintiff that Defendants are attempting to exploit for commercial gain.

24 23. The fame and success of Plaintiff are highly related to the advertise-
25 ments of the “Basketball Wives: Los Angeles” show.

26 24. While Defendants use care to avoid explicit reference to Plaintiff’s
27 name in the advertisements for the “Basketball Wives: Los Angeles” show, the
28 very presence of Defendant GOVAN and the title of the show is an obvious

1 reference to Plaintiff and use of Plaintiff's likeness. Many reporters and potential
2 viewers of the show have picked up on this reference and likeness; for example, on
3 June 20, 2011, the same day that Defendant SHED MEDIA issued a press release
4 through VH1, the Washington Post published a story titled, "Laura Govan, Gilbert
5 Arenas's Ex, Joins Cast of 'Basketball Wives LA.'"

6 25. Defendants are using Plaintiff's likeness and, on information and
7 belief, are using and/or have threatened to use the Marks in commerce in connec-
8 tion with the "Basketball Wives: Los Angeles" show advertising and promotion,
9 and such use is likely to cause confusion or to cause mistake, or to deceive as to
10 the affiliation, connection, or association of Defendants with Plaintiff, or as to the
11 origin, sponsorship, or approval of Defendants' show and/or services. Defendants'
12 use of the Marks and Plaintiff's likeness has not been authorized by Plaintiff.
13 Viewers of "Basketball Wives: Los Angeles" are likely to believe that Defendant
14 GOVAN's involvement in the show indicates an affiliation, connection, associ-
15 ation with, and/or sponsorship or approval of Plaintiff. This is especially true
16 because of the nature and title of the "Basketball Wives: Los Angeles" show, the
17 former relationship between Defendant GOVAN and Plaintiff, and the fact that at
18 least one wife of another NBA player will be featured on the show.

19 26. As a result of Defendants' infringing acts, Plaintiff has been injured in
20 an amount not yet fully determined, but believed to be in excess of \$75,000,
21 exclusive of costs and interests. In addition, as a result of Defendant's infringing
22 acts, Plaintiff has suffered and will continue to suffer irreparable harm, and
23 Plaintiff has no adequate remedy at law with respect to this injury. Unless
24 Defendants' infringing acts are enjoined by this Court, Plaintiff will continue to
25 suffer a risk of irreparable harm.

26 27. On information and belief, Defendants' infringing acts have been
27 knowing, intentional, wanton, and willful, entitling Plaintiff to treble damages,
28 profits, attorneys fees, and costs pursuant to 15 U.S.C. § 1117.

1 **SECOND CLAIM FOR RELIEF**

2 (Trademark Dilution, 15 U.S.C. § 1125(c))

3 28. Plaintiff incorporates by reference all of the paragraphs of this
4 Complaint as though fully stated herein.

5 29. Plaintiff is the owner of the Marks, which are famous and distinctive.

6 30. Plaintiff is the owner of his likeness and celebrity, which are famous
7 and distinctive.

8 31. On information and belief, Defendants are using identical or nearly
9 identical trademarks and/or Plaintiff's likeness.

10 32. Defendants' use began after Plaintiff's Marks and likeness became
11 famous.

12 33. Defendants' use of Plaintiff's Marks and likeness in their advertising
13 of the "Basketball Wives: Los Angeles" show (a spin-off of the "Basketball
14 Wives" show) is likely to cause dilution by blurring or tarnishment of the Marks,
15 as Plaintiff will be associated with the embarrassing behavior and antics often
16 associated with such shows, including the show "Basketball Wives."

17 34. As a result of Defendant's infringing and/or threatened acts, Plaintiff
18 has suffered and/or will continue to suffer irreparable harm, and Plaintiff has no
19 adequate remedy at law with respect to this injury. Unless Defendants' acts are
20 enjoined by this Court, Plaintiff will continue to suffer a risk of irreparable harm.

21 35. On information and belief, Defendants willfully intended to trade on
22 Plaintiff's reputation and/or to cause dilution of Plaintiff's famous Marks and
23 likeness. Defendants' willfulness entitles Plaintiff to recover monetary damages
24 believed to be in excess of \$75,000, exclusive of costs and interests. On
25 information and belief, Defendants' acts have been knowing, intentional, wanton,
26 and willful, and therefore Plaintiff is further entitled to treble damages, profits,
27 attorneys fees, and costs pursuant to 15 U.S.C. § 1117.

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1 **THIRD CLAIM FOR RELIEF**

2 (False Advertising, 15 U.S.C. § 1125(a))

3 36. Plaintiff incorporates by reference all of the paragraphs of this
4 Complaint as though fully stated herein.

5 37. On information and belief, in commerce, Defendant SHED MEDIA
6 advertises its “Basketball Wives: Los Angeles” show using the title of the show
7 and touting the participation of Defendant GOVAN based on her relationship with
8 Plaintiff; and (ii) Defendant GOVAN also and independently advertises her
9 services as a television personality based on her appearance on the “Basketball
10 Wives: Los Angeles” show and use of Plaintiff’s likeness. The references and uses
11 of Plaintiff’s likeness, as strongly implied by the title of the show and the involve-
12 ment of Defendant GOVAN, are likely to mislead or confuse consumers that
13 Defendant GOVAN is either married to Plaintiff and/or has special insight into
14 Plaintiff’s current life. The June 20, 2011 press release specifically states that
15 “Basketball Wives: Los Angeles” “will dive into the real-life locker room of these
16 leading ladies, giving viewers a never-before-seen look at what it takes to live in
17 La La Land *and be connected to a famous professional athlete*” (emphasis added).

18 38. On information and belief, Defendants’ use in commerce of the title of
19 the “Basketball Wives: Los Angeles” show in conjunction with advertising and
20 promotion of Defendant GOVAN’s involvement and connection to Plaintiff,
21 together have deceived or have the tendency to deceive a substantial segment of
22 Defendants’ audience.

23 39. On information and belief, said deception is material in that it is likely
24 to influence consumers to watch the “Basketball Wives: Los Angeles” show. In
25 fact, on information and belief, the entire premise of the show is to entice viewers
26 and potential viewers to watch the program by suggesting or encouraging them to
27 believe that they may thus learn “insider” or confidential facts and information
28 about NBA players such as Plaintiff.

1 harm through, without limitation, the loss of goodwill, and Plaintiff has no
2 adequate remedy at law with respect to this injury. Unless Defendants are enjoined
3 by this Court, Plaintiff will continue to suffer a risk of irreparable harm.

4 47. On information and belief, Defendants' false endorsement has been
5 knowing, intentional, wanton, and willful, entitling Plaintiff to treble damages,
6 profits, attorneys fees, and costs pursuant to 15 U.S.C. § 1117.

7 **FIFTH CLAIM FOR RELIEF**

8 (California Common Law Misappropriation of Likeness and Right of Publicity)

9 48. Plaintiff incorporates by reference all of the paragraphs of this
10 Complaint as though fully stated herein.

11 49. Plaintiff owns an enforceable right in his own identity and likeness.

12 50. Defendants, without permission, have used Plaintiff's identity,
13 likeness, and/or persona in such a way that Plaintiff is identifiable from such use.

14 51. Specifically, Defendants appropriated Plaintiff's likeness in associ-
15 ation with the "Basketball Wives: Los Angeles" reality show. On information and
16 belief, this appropriation was made to draw a larger audience for the show.

17 52. Plaintiff did not consent to Defendants' appropriation of Plaintiff's
18 name and/or likeness.

19 53. Such use by Defendants is likely to cause damage to the commercial
20 value of Plaintiff's persona.

21 54. As a result of Defendants' misappropriation, Plaintiff has been injured
22 in an amount not yet fully determined, but believed to be in excess of \$75,000,
23 exclusive of costs and interests. The damage suffered by Plaintiff includes without
24 limitation damage to reputation, personal feelings, and loss of publicity value.

25 55. In addition, as a result of Defendants' misappropriation, Plaintiff has
26 suffered and will continue to suffer irreparable harm through, without limitation,
27 the loss of goodwill, and Plaintiff has no adequate remedy at law with respect to

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1 this injury. Unless Defendants' misappropriation is enjoined by this Court,
2 Plaintiff will continue to suffer a risk of irreparable harm.

3 56. On information and belief, Defendants' misappropriation has been
4 knowing, intentional, wanton, and willful, entitling Plaintiff to treble damages,
5 profits, attorneys fees, and costs.

6 **SIXTH CLAIM FOR RELIEF**

7 (Misappropriation of Likeness and Right of Publicity, Cal. Civ. Code § 3344)

8 57. Plaintiff incorporates by reference all of the paragraphs of this
9 Complaint as though fully stated herein.

10 58. Plaintiff owns an enforceable right in his own identity and likeness.

11 59. Defendants, without permission, have used Plaintiff's identity,
12 likeness, and/or persona for commercial and/or business purposes in such a way
13 that Plaintiff is identifiable from such use.

14 60. Specifically, Defendants appropriated Plaintiff's likeness in
15 association with the "Basketball Wives: Los Angeles" reality show. On
16 information and belief, this appropriation was made to draw a larger audience for
17 the show.

18 61. Plaintiff did not consent to Defendants' appropriation of Plaintiff's
19 name and/or likeness.

20 62. Such use by Defendants is likely to cause damage to the commercial
21 value of Plaintiff's persona.

22 63. As a result of Defendants' misappropriation, Plaintiff has been injured
23 in an amount not yet fully determined, but believed to be in excess of \$75,000,
24 exclusive of costs and interests. The damage suffered by Plaintiff includes without
25 limitation damage to reputation, personal feelings, and loss of publicity value.

26 64. In addition, as a result of Defendants' misappropriation, Plaintiff has
27 suffered and will continue to suffer irreparable harm through, without limitation,
28 the loss of goodwill, and Plaintiff has no adequate remedy at law with respect to

1 this injury. Unless Defendants' misappropriation is enjoined by this Court,
2 Plaintiff will continue to suffer a risk of irreparable harm.

3 65. On information and belief, Defendants' misappropriation has been
4 knowing, intentional, wanton, and willful, entitling Plaintiff to treble damages,
5 profits, attorneys fees, and costs.

6 SEVENTH CLAIM FOR RELIEF

7 (Unfair Competition, Cal. Bus. & Prof. Code § 17200 *et seq.*)

8 66. Plaintiff incorporates by reference all of the paragraphs of this
9 Complaint as though fully stated herein.

10 67. Defendants' acts described above as to their trademark infringement,
11 trademark dilution, false advertising, false endorsement, and misappropriation of
12 likeness and right of publicity, constitute unlawful, unfair, and/or fraudulent
13 business practices in violation of Section 17200 *et seq.* of the California Business
14 and Professions Code.

15 68. As a direct and proximate result of Defendants' wrongful acts,
16 Plaintiff has suffered and will continue to suffer irreparable injury. Therefore,
17 Plaintiff's remedy at law is not adequate to compensate for injuries inflicted by
18 Defendants. Accordingly, Plaintiff is entitled to preliminary and permanent
19 injunctive relief.

20 PRAYER FOR RELIEF

21 WHEREFORE, Plaintiff prays judgment against Defendants as follows:

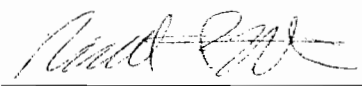
- 22 1. For all compensatory, special, punitive/treble, and statutory damages
23 allowed by law according to proof;
- 24 2. For disgorgement of Defendants' profits acquired by their wrongful
25 acts;
- 26 3. For a preliminary and permanent injunction enjoining and restraining
27 Defendants, and each of them, and all of their agents, officers,
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- employees, affiliates, and all persons acting for or on behalf of Defendants from infringing on Plaintiff's Trademarks and likeness;
- 4. For a preliminary and permanent injunction enjoining and restraining Defendants, and each of them, and all of their agents, officers, employees, affiliates, and all persons acting for or on behalf of Defendants from diluting Plaintiff's Trademarks and likeness;
- 5. For a preliminary and permanent injunction enjoining and restraining Defendants, and each of them, and all of their agents, officers, employees, affiliates, and all persons acting for or on behalf of Defendants from falsely advertising the "Basketball Wives: Los Angeles" reality show, including the use of said title;
- 6. For a preliminary and permanent injunction enjoining and restraining Defendants, and each of them, and all of their agents, officers, employees, affiliates, and all persons acting for or on behalf of Defendants from falsely suggesting that Plaintiff endorses the "Basketball Wives: Los Angeles" reality show;
- 7. For a preliminary and permanent injunction enjoining and restraining Defendants, and each of them, and all of their agents, officers, employees, affiliates, and all persons acting for or on behalf of Defendants from misappropriating Plaintiff's name and/or likeness;
- 8. For reasonable attorney's fees and costs of suit herein; and
- 9. For such other and further relief as the court may deem proper.

Dated: June 23, 2011

Respectfully submitted,
GORDON & REES LLP

by 
 C. Anthony Mulrain
 Richard P. Sybert
 Yuo-Fong C. Amato
 Attorneys for Plaintiff
 GILBERT J. ARENAS, JR.

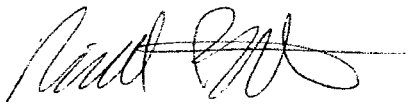
DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury for all claims triable by a jury.

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Dated: June 23, 2011

Respectfully submitted,
GORDON & REES LLP

by 

C. Anthony Mulrain
Richard P. Sybert
Yuo-Fong C. Amato
Attorneys for Plaintiff
GILBERT J. ARENAS, JR.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself)
Gilbert J. Arenas, Jr., and individual

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)
C. Anthony Mulrain, Richard P. Sybert
Yuo-Fong C. Amato
101 West Broadway, Suite 1600
San Diego, CA 92101
Tel: 619-696-6700 Fax 619-696-7124

DEFENDANTS – Shed Media US Inc., a Delaware corporation; and Laura Govan. and individual; and Does 1 through 10, inclusive

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

1 U.S. Government Plaintiff 3 Federal Question (U.S. Government Not a Party)

2 U.S. Government Defendant 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.)

Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input checked="" type="checkbox"/> 6	<input type="checkbox"/> 6

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify): 6 Multi-District Litigation 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ 75,000.00

VI. CAUSE OF ACTION (Cite the U. S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
15 U.S.C. § 1125

VII. NATURE OF SUIT (Place an X in one box only.)

<p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce/ICC Rates/etc.</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Act</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Info. Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>	<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p> <p>REAL PROPERTY</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p>TORTS PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Fed. Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury-Med Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury-Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury-Product Liability</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus-Alien Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>TORTS PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p> <p>BANKRUPTCY</p> <p><input type="checkbox"/> 22 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 444 Welfare</p> <p><input type="checkbox"/> 445 American with Disabilities - Employment</p> <p><input type="checkbox"/> 446 American with Disabilities - Other</p> <p><input type="checkbox"/> 440 Other Civil Rights</p>	<p>PRISONER PETITIONS</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p><input type="checkbox"/> 540 Mandamus/Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p>FORFEITURE / PENALTY</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. & Truck</p> <p><input type="checkbox"/> 650 Airline Regs</p> <p><input type="checkbox"/> 660 Occupational Safety /Health</p> <p><input type="checkbox"/> 690 Other</p>	<p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input checked="" type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 61 HIA(1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923) 405(g)</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS-Third Party 26 USC 7609</p>
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LACV11-5279

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes

If yes, list case number(s): No, but please see Notice of Related Cases filed concurrently herewith relating to case no. 11-cv-3782

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Virginia – Gilbert J. Arenas, Jr.

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles - Shed Media US Inc.	Virginia - Laura Govan

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District *	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties
 Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date June 23, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))