

for contributory infringement as they knowingly induce, cause, or materially contribute to the infringing conduct of others by facilitating the reproduction and distribution of Infringing Products. Plaintiff is forced to file this action to combat Defendants' infringement of Plaintiff's copyrights, as well as to protect unknowing consumers from purchasing the Infringing Products over the Internet. Plaintiff has been and continues to be irreparably harmed by Defendants' infringement of Plaintiff's copyrights; therefore, Plaintiff seeks injunctive relief to halt such infringement and irreparable harm. Plaintiff also seeks monetary relief for the injury it has sustained and is sustaining. In support thereof, Plaintiff states as follows:

NATURE OF THE ACTION

1. This action has been filed to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill, and valuable intellectual property by selling and/or offering for sale Infringing Products incorporating or using Plaintiff's registered, copyright-protected works without authorization or authority to engage in such activities.

2. TV Tokyo Corporation is a leading Japanese content producer and broadcaster of movies and videos with particular strength in animation and is headquartered at Roppongi Grand Tower, 3-2-1 Roppongi, Minato-ku, Tokyo 106-8007 Japan. Plaintiff develops, markets, and distributes GINTAMA-branded television series and theatrical films worldwide and globally manages the licensing of GINTAMA-branded products and services worldwide, having been appointed to do so exclusively by the manga-style comic series publisher, Shueisha Inc. TV TOKYO generates substantial revenue through various channels, including its official GINTAMA-related online platforms, such as: <https://www.anime-gintama.com/>.



3. TV TOKYO is the owner and sole rights holder in and to the work at issue in this action. Such work includes a 2006 episode of the Gintama television series entitled “Gintama: You Guys!! Do You Even Have Gintama?!”, which features characters and elements unique to the Gintama universe. TV TOKYO registered the work with the United States Copyright Office under registrations PA 2-532-838 (the “Copyrighted Work”).

	Plaintiff's Registered Work
Title of Work	Screenshots That Contain Certain Iconic Elements
Reg. Number PA 2-532-838 First Published April 4, 2006	