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19 Attorneys for Plaintiffs Larry C. Flynt and LFP Video Group, LLC

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 **LARRY C. FLYNT, and**
23 **LFP VIDEO GROUP, LLC,**
24
25 Plaintiffs,

26 vs.

27 **FLYNT MEDIA CORPORATION,**
28 a Delaware Corporation; **JIMMY**
FLYNT, II; DUSTIN FLYNT; and
DOES 1 through 10 inclusive,

Defendants.

Case No.: 2:09-cv-00048-AHM-RZx

**FIRST AMENDED
COMPLAINT FOR:**

**1. FEDERAL INFRINGEMENT
OF UNREGISTERED
TRADEMARK/FALSE
ENDORSEMENT**

**2. FEDERAL TRADEMARK
DILUTION**

**3. FEDERAL STATUTORY
UNFAIR COMPETITION**

**4. CALIFORNIA COMMON
LAW UNFAIR COMPETITION**

**5. CALIFORNIA
STATUTORY RIGHT OF
PUBLICITY**

**6. WRONGFUL
APPROPRIATION OF NAME**

1 Plaintiffs Larry C. Flynt and LFP Video Group, LLC, by and through their
2 attorneys, herein allege:
3

4 **NATURE OF THE ACTION**

5 1. This is an action for preliminary and permanent injunctive relief and
6 damages arising from Defendants’ infringement of the federal and California state
7 statutory and common law rights of Plaintiff Larry C. Flynt and his famous
8 FLYNT name and common law trademark, as well as the common law trademark
9 of Plaintiff LFP Video Group, LLC in the FLYNT common law trademark for
10 adult videos, in the adult entertainment industry, specifically including adult-
11 themed motion pictures distributed via DVD and possibly other forms of media.
12 The individual Defendants, Jimmy Flynt, II and his brother Dustin Flynt, are
13 nephews of Plaintiff Larry C. Flynt; together with their company, Defendant Flynt
14 Media Corporation, they seek to distribute their own adult motion pictures under
15 the “Flynt” mark, intentionally and willfully trading off on the famous FLYNT
16 name and mark of their uncle, Plaintiff Larry C. Flynt.
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22 **JURISDICTION AND VENUE**

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24 2. This is a civil action seeking injunctive relief and damages for federal
25 trademark infringement/false endorsement, federal trademark dilution, and federal
26 statutory unfair competition under the Lanham Act, 15 U.S.C. § 1051, *et seq.* (the
27
28

1 “Lanham Act”), and specifically 15 U.S.C. § 1125, and California state common
2 law unfair competition and statutory right of publicity.
3

4 3. This Court has subject matter jurisdiction of this action over the federal
5 claims pursuant to 28 U.S.C. § 1331 and 28 U.S.C. §§ 1338(a) and (b), and
6 supplemental jurisdiction over the state law claims pursuant to 28 U.S.C.
7 § 1367(a).
8

9 4. This Court has personal jurisdiction over the corporate Defendant Flynt
10 Media Corporation, which is authorized to do business in the State of California
11 with an office and place of business in Beverly Hills, and over the individual
12 Defendants who, upon information and belief, have an office and place of business
13 at the Flynt Media Corporation headquarters in Beverly Hills, and in Chatsworth,
14 and who do business in this district.
15

16 5. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b), (c),
17 in that Defendant Flynt Media Corporation has an office and place of business in
18 this district, the principal events complained of have or will occur in this District,
19 and upon information and belief, the individual Defendants have an office and
20 place of business in this District.
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1 **PARTIES**

2 6. At all times herein relevant, Plaintiff Larry C. Flynt was and is an
3 individual residing and doing business in this district, with a principal office and
4 place of business at 8484 Wilshire Boulevard, Beverly Hills, California 90210.
5

6
7 7. At all times herein relevant, Plaintiff LFP Video Group, LLC (“LFP”)
8 was and is a Delaware limited liability company, authorized to do business in the
9 State of California, with an office and place of business at 8484 Wilshire
10 Boulevard, Beverly Hill, California 90210.
11

12 8. Upon information and belief, Defendant Flynt Media Corporation is a
13 Delaware corporation authorized to do business in the State of California, with
14 places of business located at 468 North Camden Drive, Beverly Hills, California
15 90210, and at 9144 Deering Avenue, Chatsworth, California 91311.
16
17

18 9. Upon information and belief, Defendant Jimmy Flynt, II is an
19 individual and principal of Flynt Media Corporation, with an office and place of
20 business located at 468 North Camden Drive, Beverly Hills, California 90210, and
21 at 9144 Deering Avenue, Chatsworth, California 91311.
22

23
24 10. Upon information and belief, Defendant Dustin Flynt is an individual
25 and principal of Flynt Media Corporation, with an office and place of business
26 located at 468 North Camden Drive, Beverly Hills, California 90210 and at 9144
27 Deering Avenue, Chatsworth, California 91311.
28

1 11. The true names and capacities, whether individual, corporate, affiliate,
2 or otherwise, of Defendants Does 1-10, inclusive, are presently unknown to
3 Plaintiff, and for that reason, those Defendants are sued by such fictitious names.
4 Plaintiff Larry C. Flynt is informed and believes and thereon alleges that each of
5 the Doe Defendants is in some way responsible for the damages herein alleged.
6 Plaintiff will amend this Complaint when the true names and capacities of the Doe
7 Defendants become known to him.
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11 12. Upon information and belief, each of the Defendants, including the
12 fictitiously named Doe Defendants, was and is the agent and representative of the
13 other Defendants, acting within the purpose and scope of said agency and
14 representation. Plaintiff is further informed and believes that each of the
15 Defendants, including the fictitiously named Doe Defendants, authorized and
16 ratified the conduct therein alleged of each of the other Defendants.
17
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20 **FACTS COMMON TO ALL CAUSES OF ACTION**

21 13. Since the early 1970's, through his various "LFP" (originally Larry
22 Flynt Publishing) companies, Plaintiff Larry C. Flynt has used the FLYNT name
23 and common law mark in connection with his registered trademark HUSTLER for
24 sexually explicit adult magazines and other similar publications, has produced and
25 distributed numerous sexually explicit motion pictures in video cassette and DVD
26 format under his various affiliated companies, and he and his companies have
27
28

1 owned and operated various Internet Websites, adult-content stores, and related
2 adult entertainment vehicles.

3
4 14. Plaintiff has even obtained trademark registrations from the United
5 States Patent and Trademark Office [the “PTO”] for his famous name “Larry
6 Flynt” for his non-adult businesses, including PTO registration no. 3285198 for
7 “Larry Flynt’s Bar & Grill” registered August 28, 2007 to LFP CasinoIP, LLC;
8 “Larry Flynt’s Grand Slam of Poker” no. 3006902 registered October 18, 2005 to
9 LFP Casino IP, LLC; and “Larry Flynt’s Poker Challenge Cup” no. 2909711
10 registered December 14, 2004 to LFP Casino IP, LLC.

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14 15. Plaintiff Larry C. Flynt and his Flynt surname have become personally
15 famous throughout the United States and much of the world under the FLYNT
16 name and mark.

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18 16. In addition, Plaintiff was the principal subject of a well-known 1996
19 Columbia Pictures feature motion picture entitled “The People vs. Larry Flynt,”
20 by internationally acclaimed director Milos Forman, depicting Plaintiff as
21 heroically championing the rights of free expression under the First Amendment to
22 the United States Constitution.

23
24
25 17. In sum, Plaintiff Larry C. Flynt has become internationally known and
26 symbolic of adult, sexually explicit entertainment magazines, motion pictures,
27 Internet Websites, and the like.
28

1 18. Plaintiff's FLYNT name and mark has become famous, has acquired
2 secondary meaning to the public, and he is entitled to protect the Intellectual
3
4 Property rights associated with the name and mark FLYNT.

5 19. Plaintiff LFP is a an adult entertainment company affiliated with and
6 controlled by Plaintiff Larry C. Flynt, that in part distributes sexually explicit
7 motion pictures on behalf of Plaintiff Larry C. Flynt under the LARRY FLYNT
8 name and mark. A copy of the front cover of an adult-themed motion picture
9 (slightly redacted) entitled "LARRY FLYNT'S Private Collection" Volume #7
10 copyrighted by LFP in 2006 and distributed by Plaintiff LFP is attached hereto and
11 incorporated herein as "**EXHIBIT A.**"
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14

15 20. With the permission of Plaintiff Larry C. Flynt, Plaintiff LFP has used
16 and distributed DVDs bearing the mark LARRY FLYNT since at least as far back
17 as 2004.
18

19 21. The individual Defendants, Jimmy Flynt, II, and Dustin Flynt, are
20 nephews of Plaintiff Larry C. Flynt, who formerly worked for said Plaintiff's
21 companies, but whose association with said companies has been terminated.
22

23 22. Upon information and belief, Defendants Jimmy Flynt, II, and Dustin
24 Flynt have now formed their company, Flynt Media Corporation and other Doe
25 Defendants, to enter the adult entertainment business on their own, seeking to trade
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1 off and usurp the famous FLYNT name and mark of their uncle, Plaintiff Larry C.
2 Flynt.
3

4 23. Upon information and belief, Jimmy Flynt, II and Dustin Flynt,
5 together with Flynt Media Corporation and the Doe Defendants, are now seeking
6 to distribute various sexually explicit adult entertainment films using the “FLYNT”
7 name and mark associated with Plaintiff Larry C. Flynt to confuse the public into
8 buying their inferior products, believing them to be genuine products of Plaintiff
9 Larry C. Flynt or genuine products endorsed by Plaintiff Larry C. Flynt.
10
11

12 24. Upon information and belief, Defendants, through their Internet
13 Websites, <http://www.flyntdistribution.com/distribution.php> have advertised and
14 announced the following “FLYNT” adult-themed motion picture titles and release
15 dates: “Xtreme Jugs”, 1/12/09; “Waiting for Mr. Dick”, 1/19/09; “Sex At Your
16 Service”, 1/26/09; “Lucky”, 2/2/09; “Positive Exposure”, 2/2/09; “The Anal Files”,
17 2/16/09; and “An Irresistible Urge To Share A Dick”, 2/23/09. A true copy of said
18 Website page dated as of January 2, 2009 is attached hereto and incorporated
19 herein as “**Exhibit B**”; the “FLYNT” name on the covers of all seven titles is very
20 prominently displayed in all capital letters in a large font.
21
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23 25. Upon information and belief, Defendants also operate the Website,
24 <http://www.flyntcorp.com>, that also prominently displays the FLYNT mark and
25 name, and also directs consumers to the flyntdistribution.com website. A true copy
26
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1 of the first page of said Website is attached hereto and incorporated herein as
2 “**Exhibit C.**”
3

4 26. Upon information and belief, Defendants have started to distribute
5 DVD (digital versatile disks) that prominently display the name and mark FLYNT
6 in bold capital letters on the box cover. A true copy of the box cover for the
7 motion picture entitled “Extreme Jugs” scheduled for release January 12, 2009 ” is
8 depicted on “**Exhibit B**” supra, and incorporated herein by reference.
9
10

11 27. Defendants have announced that they intend to advertise their new
12 “FLYNT” adult video line at the AVN Adult Entertainment Expo 2009 in Las
13 Vegas, which opened on or about January 8, 2009.
14

15 28. Defendants are already advertising their “FLYNT” infringing mark on
16 the Internet and elsewhere, causing confusion among the general consuming public
17 as to the origin of Defendants’ motion pictures, since consumers associate the
18 FLYNT name with Plaintiff Larry C. Flynt.
19
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21 29. By letter dated December 23, 2008, counsel for Plaintiffs sent a “cease
22 and desist” letter to Defendants, demanding that they stop all further exploitation
23 of the FLYNT name and mark with regard to their proposed distribution of adult
24 motion pictures, but said letter has been rejected by Defendants, who have
25 continued their attempt to exploit the FLYNT name of their famous uncle, Plaintiff
26
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1 Larry C. Flynt. A true copy of said letter is attached hereto and incorporated
2 herein as “**Exhibit D.**”
3

4 30. Upon information and belief, the foregoing conduct by Defendants
5 Flynt Media Corporation, Jimmy Flynt, II and Dustin Flynt, and each of them, has
6 been willful and deliberate, specifically intended by said Defendants to trade off on
7 the goodwill, fame and secondary meaning associated with Plaintiff Larry C.
8 Flynt’s famous FLYNT name and mark, and to “palm off” their adult motion
9 pictures as being those of Plaintiff, while Defendants Jimmy Flynt, II and Dustin
10 Flynt have not achieved any fame or secondary meaning for their own names.
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14 31. Unless Defendants are preliminarily and permanently enjoined by this
15 Court, Plaintiffs will suffer irreparable injury and lost goodwill associated with the
16 FLYNT name and mark by the Defendants’ willful and deliberately infringing
17 conduct as aforesaid.
18

19
20 **COUNT I**

21 **INFRINGEMENT OF UNREGISTERED TRADEMARK/**
22 **FALSE ENDORSEMENT**

23 (15 U.S.C. § 1125(a))

24 32. Plaintiffs incorporate by reference the allegations contained in
25 Paragraphs 1 through 31 of this First Amended Complaint as if fully set forth
26 herein.
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1 33. Plaintiffs' FLYNT common law trademark is widely recognized by the
2 general consuming public of the United States as designating the source of various
3 goods and services originating with said Plaintiffs.
4

5 34. Plaintiffs' FLYNT common law trademark has become famous and has
6 acquired secondary meaning to the consuming public.
7

8 35. By intentionally using the "FLYNT" common law trademark in
9 commerce on the adult-themed motion pictures which they are currently
10 advertising and/or distributing on their Websites without Plaintiffs' permission,
11 and which upon information and belief they intend to continue to advertise and
12 distribute as aforesaid, Defendants are deliberately, intentionally and willfully
13 infringing upon Plaintiffs' common law trademark, and the goodwill associated by
14 the public with the FLYNT name and mark, and falsely making it appear that
15 Plaintiffs are endorsing, sponsoring, or are otherwise affiliated with Defendants.
16
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18 36. Upon information and belief, if not preliminarily and permanently
19 enjoined by this Court, Defendants will continue to advertise and display, and will
20 sell, distribute and otherwise exploit Plaintiffs' FLYNT common law trademark for
21 their own commercial use in violation of Plaintiffs' rights under the Lanham Act,
22 15 U.S.C. § 1125(a).
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25 37. Plaintiffs also seek monetary damages and attorneys' fees for
26 Defendants' willful use and advertising of Plaintiffs' FLYNT common law
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1 trademark and name on their <flyntdistribution.com> and <flyntcorp.com>
2 Internet Websites which Defendants own and/or operate.

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4 38. The foregoing conduct of Defendants further constitutes a false
5 designation of origin in violation of 15 U.S.C. § 1125(a).

6
7 39. Plaintiffs have no adequate remedy at law.

8 **COUNT II**

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10 **DILUTION OF UNREGISTERED TRADEMARK**

11 (15 U.S.C. § 1125 (c))

12 40. Plaintiffs incorporate by reference the allegations contained in
13 Paragraphs 1 through 39 of this First Amended Complaint as if fully set forth
14 herein.

15
16 41. Plaintiff Larry C. Flynt has become nationally and internationally
17 known as a spokesman for the right of free expression, particularly in the field of
18 adult entertainment, and his FLYNT name and mark has become famous and
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21 distinctive, having acquired secondary meaning to the consuming public.

22 42. By deliberately, intentionally and willfully displaying the “FLYNT”
23 name and mark on their Internet Websites in commerce without Plaintiff Larry C.
24 Flynt’s permission, and threatening to distribute their own adult-themed motion
25 pictures as aforesaid, Defendants Flynt Media Corporation, Jimmy Flynt, II and
26
27
28 Dustin Flynt have advertised and threatened to further use Plaintiff Larry C.

1 Flynt's FLYNT name and mark, which has already resulted in actual dilution
2 thereof by blurring and tarnishment, in violation of 15 U.S.C. § 1125(c).
3

4 43. By selling knock-off goods bearing the FLYNT name and mark in a
5 large font of capital letters, Defendants have blurred and tarnished the distinctive
6 quality and goodwill of the FLYNT name and mark in the adult entertainment
7 industry.
8

9 44. By reason of the foregoing, Defendants have deliberately, willfully and
10 knowingly diluted and threatened to further dilute the rights of Plaintiff Larry C.
11 Flynt in his common law trademark in commerce, in order to intentionally deceive
12 and mislead consumers and the public at large, and to willfully usurp the goodwill
13 and reputation associated with the FLYNT name and mark.
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16 45. Upon information and belief, unless preliminarily and permanently
17 enjoined by this Court, Defendants will continue to dilute, and to cause serious and
18 irreparable harm and damage to the reputation and goodwill associated with
19 Plaintiff Larry C. Flynt's FLYNT mark.
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22 46. Plaintiff Larry C. Flynt has no adequate remedy at law.
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COUNT III

FEDERAL UNFAIR COMPETITION

(15 U.S.C. § 1125(a))

47. Plaintiffs incorporate by reference the allegations contained in paragraphs 1 through 46 of this First Amended Complaint as if fully set forth herein.

48. The Plaintiffs' FLYNT common law trademark is widely recognized by the general consuming public of the United States as a designation of the source of goods sold utilizing said mark by Plaintiffs.

49. Plaintiff Larry C. Flynt has become famous throughout the United States and much of the world by reason of his advocacy of free expression, his well-known publication of *Hustler* Magazine, and the production and distribution of adult-themed motion pictures and other adult entertainment vehicles.

50. Defendants have advertised, and are threatening to utilize the "FLYNT" mark without Plaintiffs' permission, with the intent to create an association and affiliation with Plaintiff Larry C. Flynt, and to trade-off on his fame by usurping the goodwill of his FLYNT name and mark.

51. The continued use by Defendants of the "FLYNT" mark will continue to result in deception and confusion of the public as to the source of their motion pictures and possibly other goods as genuine products of Plaintiffs, and constitutes

1 unfair competition and violation of the federal Lanham Act, 15 U.S.C. § 1125(a),
2 and violation of the Plaintiffs' exclusive rights to exploit said famous name and
3 mark.
4

5 52. Upon information and belief, unless preliminarily and permanently
6 enjoined by this Court, Defendants will continue to unlawfully advertise and
7 exploit the Plaintiffs' famous FLYNT name and mark, causing them irreparable
8 damage and injury.
9
10

11 53. Plaintiffs have no adequate remedy at law

12 **COUNT IV**

13 **COMMON LAW TRADEMARK INFRINGEMENT**

14 (California Common Law)

15
16 54. Plaintiffs incorporate by reference the allegations contained in
17 paragraphs 1 through 53 of this First Amended Complaint as if fully set forth
18 herein.
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21 55. This cause of action under California state common law is separate and
22 independent of the federally-based causes of action previously set forth herein, but
23 it is between the same parties and is based on the same operative facts as set forth
24 in the prior causes of action; this Court accordingly has supplemental jurisdiction
25 over said claim.
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1 56. As set forth above, Plaintiff Larry C. Flynt resides and does business in
2 the State of California, where he owns and enjoys common law trademark rights
3 throughout the United States in the FLYNT name and mark for adult
4 entertainment, including magazines, DVD's, the Internet, and other adult
5 entertainment vehicles. Plaintiff LFP owns and enjoys common law trademark
6 rights in the Flynt name and mark throughout the United States and California for
7 DVDs.
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11 57. The use of the FLYNT name and mark by Defendants in connection
12 with the advertising, sale and distribution of their adult-themed motion pictures
13 products under their <flyntdistribution.com> Internet Website and possibly other
14 venues without Plaintiff's permission, in the State of California and elsewhere in
15 the United States, is likely to cause and has caused confusion among consumers as
16 to the source of Defendants' products, and purchasers thereof will likely associate
17 such products as originating with Plaintiffs, all to the detriment of said Plaintiffs.
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21 58. Upon information and belief, unless preliminarily and permanently
22 enjoined by this Court, Defendants will continue their aforesaid willful and
23 deliberate infringement of Plaintiffs' FLYNT name and mark.
24

25 59. Plaintiffs have no adequate remedy of law.
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1 **COUNT V**

2 **VIOLATION OF PLAINTIFF'S RIGHT OF PUBLICITY**

3
4 (California Civil Code § 3344)

5 60. Plaintiffs incorporate by reference the allegations contained in
6 paragraphs 1 through 59 of this First Amended Complaint as if fully set forth
7 herein.
8

9 61. Defendants Flynt Media Corporation, Jimmy Flynt, II, and Dustin
10 Flynt have knowingly, deliberately and willfully used Plaintiff Larry C. Flynt's
11 famous FLYNT name by advertising "FLYNT" on their adult motion pictures and
12 on their Internet Website for the purposes of commercially selling and distributing
13 their adult-themed motion pictures to the consuming public.
14
15

16 62. Defendants did not have Larry C. Flynt's consent to use the name and
17 mark FLYNT in connection with the aforementioned commercial enterprise
18 distributing adult-themed motion pictures.
19
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21 63. Defendants' use of the name and mark FLYNT was and is directly
22 connected to Defendants' commercial purpose.
23

24 64. Defendants' actions have and will continue to cause harm to Plaintiff
25 Larry C. Flynt.
26

27 65. By reason of the foregoing, Defendants are liable to Plaintiff Larry C.
28 Flynt for his actual damages sustained, and any profits realized by Defendants, as

1 well as punitive damages and Plaintiff Larry C. Flynt's reasonable attorneys' fees
2 and costs, pursuant to § 3344(a) of the California Civil Code.
3

4 **COUNT VI**

5 **WRONGFUL APPROPRIATION OF NAME**

6
7 (California Common Law)

8 66. Plaintiff incorporates by reference the allegations contained in
9 paragraphs 1 through 65 of this First Amended Complaint as if fully set forth
10 herein.
11

12 67. Defendants Flynt Media Corporation, Jimmy Flynt, II, and Dustin
13 Flynt have appropriated Plaintiff's famous FLYNT name in connection with the
14 advertising and selling of commercial products. Defendants did not have Larry C.
15 Flynt's consent to use the name FLYNT in connection with the aforementioned
16 commercial enterprise distributing adult-themed motion pictures.
17
18

19 64 By reason of the foregoing, Defendants are liable to Plaintiff Larry C.
20 Flynt for his actual damages sustained, and any profits realized by Defendants, as
21 well as punitive damages.
22

23 WHEREFORE, Plaintiffs Larry C. Flynt and LFP Video Group, LLC
24 demand judgment against Defendants as follows:
25

26 (1) Restraining and enjoining Defendants Flynt Media Corporation, Jimmy
27 Flynt, II, and Dustin Flynt, permanently and preliminarily during the pendency of
28

1 this action, together with Defendants' officers, agents, employees, successors and
2 assigns, and all those in privity and/or acting in concert with them, from
3 advertising or otherwise using Plaintiffs' FLYNT name and mark, or any
4 confusingly similar name or mark, or from selling or otherwise distributing adult-
5 themed motion pictures or other goods bearing the Plaintiffs' FLYNT name and
6 mark, or any other confusingly similar name or mark, including Internet Websites
7 owned, operated or controlled by Defendants, without Plaintiffs' permission, or
8 from passing off Defendants' goods or services as those of Plaintiffs;
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12 (2) Awarding Plaintiffs their monetary damages, including their actual
13 damages sustained as a result of the Defendants' infringement of Plaintiffs'
14 common law trademark and other unlawful conduct set forth herein, together with
15 an accounting of Defendants' profits, as provided in 15 U.S.C. § 1117, California
16 common law and California's right of publicity under Civil Code § 3344, all in
17 amounts to be determined at trial;
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21 (3) Directing Defendants to surrender for destruction all goods, labels,
22 advertising material and other items containing or including the FLYNT name and
23 mark without authorization of Plaintiffs;
24

25 (4) Awarding Plaintiffs punitive damages against Defendants for their
26 willful misconduct in an amount to be determined at trial;
27

28 (5) Awarding Plaintiffs their costs and reasonable attorneys' fees and expert
witness fees in this action; and

1 (6) Granting Plaintiffs such other and further relief as the Court may deem
2 just and equitable.
3

4 Dated: January 9, 2009
5

6 /s/ Jonathan W. Brown
7

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21 Attorneys for Plaintiffs Larry C. Flynt
22 and LFP Video Group, LLC
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1 **REQUEST FOR JURY TRIAL**

2 Plaintiff hereby demands a jury trial of all issues so triable, pursuant to Rule
3
4 38 of the Federal Rules of Civil Procedure.

5
6 Dated: January 9, 2009

7
8 /s/ Jonathan W. Brown

9
10 Jonathan W. Brown, Esq.
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21 Attorneys for Plaintiffs Larry C. Flynt
22 and LFP Video Group, Inc.
23
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EXHIBIT A



EXHIBIT B

FLYNT CORP. DISTRIBUTION



Xtreme Jugs
Volume 1



Release Date:
1/12/09



Sex At Your Service
Volume 1



Release Date:
1/26/09



Waiting For
Mr. Dick
Volume 1



Release Date: 1/19/09



Lucky
Volume 1



Release Date: 2/2/09



Positive Exposure
Volume 1



Release Date: 2/19/09



The Anal Files
Volume 1



Release Date: 2/16/09



An Incestible Urge
To Share
A Dick
Volume 1



Release Date: 2/23/09

F L Y N T G O R P
D I S T R I B U T I O N

9144 Downing Avenue
Quincy, CA 95111

EXHIBIT C



FLYNT™

FLYNT MEDIA CORP.
468 N. CAMDEN DR.
SUITE 225
BEVERLY HILLS, CA 90210

FOR DISTRIBUTION CONTACT:
DUSTIN FLYNT
310-860-5133
DISTRIBUTION@FLYNTCORP.COM
FLYNTDISTRIBUTION.COM

FOR SALES CONTACT:
BILL RIX
310-860-5133
BRIX@FLYNTCORP.COM



FLYNT CORP™

EXHIBIT D

2020.07.17.17533

CERTIFICATE MAIL: RETURN RECEIPT REQUESTED UNDELIVERED MAIL

NY 10014
New York
USA
New York
New York

NY 10014

NY 10014

My name is (name) and I am the (person) authorized to receive (NAME) at (address) (NY 10014). I am hereby accepting this (mail) as belonging to (NAME) and I hereby accept responsibility for its delivery. I have signed this certificate to certify that (NAME) is (name) of (address) (NY 10014).

My name is (name) and I am the (person) authorized to receive (NAME) at (address) (NY 10014). I am hereby accepting this (mail) as belonging to (NAME) and I hereby accept responsibility for its delivery. I have signed this certificate to certify that (NAME) is (name) of (address) (NY 10014). I am hereby accepting this (mail) as belonging to (NAME) and I hereby accept responsibility for its delivery. I have signed this certificate to certify that (NAME) is (name) of (address) (NY 10014). I am hereby accepting this (mail) as belonging to (NAME) and I hereby accept responsibility for its delivery. I have signed this certificate to certify that (NAME) is (name) of (address) (NY 10014).

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