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CENTRAL DISTRICT
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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11
12 HOLLYWOOD NETWORK, INC., a) Case No.: ● CV08-01035
13 California corporation; CARLOS DE) COMPLAINT FOR DAMAGES AND
14 ABREU, an individual, ,) INJUNCTIVE RELIEF
15 Plaintiff,)
16 vs.)
17 CHRIS DAVIES, an individual,)
18 Defendant)

MRP
(FFMx)

19
20 Plaintiffs Hollywood Network, Inc. ("HNI") and Carlos De Abreu
21 ("De Abreu") bring this action against Defendant Chris Davies
22 ("Davies") and allege that:

23 NATURE OF THE ACTION AND JURISDICTION

24 1. This is a complaint for an injunction, damages and other
25 appropriate relief to stop Defendant from infringing Plaintiffs'
26 invaluable rights by registering Internet domain names that are identical
27 or confusingly similar to Plaintiffs' service marks, and by using those
28 domain names in bad faith to profit from Plaintiffs' marks. In this

1 action, Plaintiffs assert violations of the Anti-Cybersquatting Consumer
2 Protection Act ("ACPA"), 15 U.S.C. Section 1125(d); of section 32 of the
3 Lanham Act, 15 U.S.C. Section 1114(1) (Trademark Infringement) and
4 1125(a) (False Designation of Origin, False Advertising); and
5 California's unfair competition law, Business and Profession Code Section
6 17200.

7 2. This Court has subject matter jurisdiction over Plaintiffs'
8 claims pursuant to 15 U.S.C. Section 1121 and 28 U.S.C. Sections 1331,
9 1338 and 1367.

10 VENUE

11 3. Venue is proper in this Court pursuant to 28 U.S.C.
12 Section 1391(b) because a substantial part of the events or omissions
13 giving rise to Plaintiffs' claims occurred in this judicial district.

14 PARTIES

15 4. Plaintiff HNI is a corporation organized and existing under
16 the laws of the State of California, with its principal place of business
17 in Beverly Hills, California.

18 5. Plaintiff DE ABREU is an individual doing business in Beverly
19 Hills, California.

20 6. Defendant Chris Davies ("Davies") is an individual currently
21 residing in Los Angeles, California.

22 7. On information and belief, Defendant Davies has registered and
23 now owns the domain names "awardshollywood.com" and
24 "hollywoodmobileawards.com" that contain or incorporate Plaintiffs'
25 Marks.

26 8. Defendant Davies was employed by Plaintiffs as an independent
27 contractor to provide advertising, promotional and other related services
28 from 1997 through 2007. In conjunction with such services, Defendant

1 Davies was involved in the day-to-day business affairs of Plaintiffs,
2 including the annual Hollywood Film Festival and Hollywood Awards gala
3 celebration. Defendant Davies was exposed to and made aware of
4 confidential information concerning the marketing, production and
5 sponsorship sales relating to Plaintiffs' businesses. In addition, over
6 the past decade, Defendant Davies was apprised of and had personal
7 knowledge of Plaintiffs' Marks, the registration of said marks by
8 Plaintiffs with the USPTO, and Plaintiffs' use of the marks in
9 advertisements and promotions for the Hollywood Film Festival and
10 Hollywood Awards gala celebration.

11 PLAINTIFFS' BUSINESS AND TRADEMARKS

12 9. In 1997, Plaintiff De Abreu founded an annual film awards
13 festival held in Hollywood, California and known as the "Hollywood Film
14 Festival." The Hollywood Film Festival was established to advance the
15 motion picture arts and sciences, to promote cultural, educational and
16 technological achievements in the film-making and screen writing
17 businesses, and to honor persons who make outstanding contributions in
18 the global creative community.

19 10. In conjunction with and as an integral part of Plaintiffs'
20 annual multi-day Hollywood Film Festival, Plaintiffs also hold the annual
21 "Hollywood Awards" gala celebration. As an incentive for members of
22 the film industry and as a means of recognizing persons who make
23 outstanding contributions in their respective creative fields, the
24 Plaintiffs', based on the recommendations of a select committee of judges
25 from the film and entertainment industry, present the following annual
26 awards at the Hollywood Awards gala: HOLLYWOOD DISCOVERY AWARD; HOLLYWOOD
27 FILM AWARDS; HOLLYWOOD NETAWARDS; HOLLYWOOD BREAKTHROUGH AWARDS;
28 HOLLYWOOD MOBILE AWARDS, HOLLYWOOD MOVIE OF THE YEAR AWARDS; and

1 HOLLYWOOD WORLD AWARDS. The Hollywood Awards is an event that receives
2 national and international media coverage, with a combination of
3 broadcast and cable/network television, Internet, and print coverage.

4 11. Plaintiff De Abreu owns registrations for and licenses to
5 Plaintiff HNI a number of trademarks and service marks that are used in
6 conjunction with the Hollywood Film Festival and the Hollywood Awards
7 celebration to identify the Plaintiffs' products and services in the
8 marketplace. Among the marks owned by Plaintiff De Abreu and licensed to
9 Plaintiff HNI are the following registered marks: HOLLYWOOD FILM FESTIVAL,
10 HOLLYWOOD AWARDS; HOLLYWOOD DISCOVERY AWARDS; HOLLYWOOD FILM AWARDS;
11 HOLLYWOOD NETAWARDS; HOLLYWOOD BREAKTHROUGH AWARDS; HOLLYWOOD MOVIE
12 AWARDS; HOLLYWOOD WORLD AWARDS; HOLLYWOOD STAR AWARDS (collectively, the
13 "Registered Marks").

14 12. The mark HOLLYWOOD FILM FESTIVAL was registered with the U.S.
15 Patent and Trademark Office ("USPTO") on January 10, 2006, Registration
16 No. 3039716.

17 13. The mark HOLLYWOOD AWARDS was registered with the U.S. Patent
18 and Trademark Office ("USPTO") on October 3, 2006, Registration No.
19 3150407.

20 14. The mark HOLLYWOOD DISCOVERY AWARDS was registered with the
21 USPTO on January 13, 1998, Registration No. 2128687.

22 15. The mark HOLLYWOOD FILM AWARDS was registered with the USPTO
23 on August 15, 2006, Registration No. 3128570.

24 16. The mark HOLLYWOOD NETAWARDS was registered with the USPTO on
25 February 19, 2002, Registration No. 2539390.

26 17. The mark HOLLYWOOD BREAKTHROUGH AWARDS was registered with the
27 USPTO on April 13, 2004, Registration No. 2831493.

28

1 18. The mark HOLLYWOOD MOVIE AWARDS was registered with the USPTO
2 on October 17, 2006, Registration No. 3155897.

3 19. The mark HOLLYWOOD WORLD AWARDS was registered with the USPTO
4 on January 17, 2006, Registration No. 3044071.

5 20. The mark HOLLYWOOD STAR AWARDS was registered with the USPTO
6 on July 24, 2007, Registration No. 3267045.

7 21. All of the Registered Marks are valid and subsisting marks
8 and, as the owner of the Registered Marks, Plaintiffs have the rights to
9 their exclusive use. True and correct copies of the certificates of
10 registration for the Registered Marks are attached as Exhibits A through
11 I, inclusive, and incorporated herein by reference.

12 22. Plaintiffs have used one or more of the Registered Marks since
13 as early as January 1995. The Hollywood Discovery Awards mark was first
14 used in January 1995; the Hollywood Awards mark was first used in
15 September 1996; and, the Hollywood Film Awards mark was first used in
16 February 1997.

17 23. Since approximately April 10, 1997, Plaintiffs have used the
18 Registered Marks to designate their annual film festival held in
19 Hollywood, California, as well as the individual awards that are
20 presented at the annual Hollywood Awards gala celebration in recognition
21 of excellence in the fields of motion pictures, television, music and
22 radio. To date, Plaintiffs have invested hundreds of thousands of
23 dollars in cash and services developing goodwill and strong secondary
24 meaning for the Registered Marks in the minds of individuals and
25 companies in the entertainment industry throughout California, the United
26 States and internationally.

27 24. As a direct result of Plaintiffs continuing and exclusive use
28 of the Registered Marks from 1997 to the present, and as a result of

1 Plaintiffs' widespread advertising, as well as the media coverage on
2 television and on the Internet for the Hollywood Film Festival and
3 Hollywood Awards celebration, the names Hollywood Film Festival and
4 Hollywood Awards and in particular the word "Hollywood" now is closely
5 identified with Plaintiffs' festival and awards in the public's mind and
6 throughout the global motion picture industry. The names Hollywood Film
7 Festival and Hollywood Awards are understood not only to signify the
8 specific geographic location where the festival takes place, i.e., in
9 Hollywood, California, but further designate the Hollywood Film Festival
10 and Hollywood Awards distinctive qualities and excellence, such that the
11 Registered Marks have achieved widespread and favorable public acceptance
12 and recognition, and become assets of substantial value throughout this
13 district, the United States, and the world.

14 25. The Registered Marks are recognized nationally and
15 internationally as signifying the Plaintiffs' annual film awards and
16 film festival. The Registered Marks have achieved a strong secondary
17 meaning. The word "Hollywood" and Hollywood Film Festival and Hollywood
18 Awards have become so thoroughly identified with Plaintiffs' film awards
19 and film festival that now and for approximately the past 12 years,
20 filmmakers, entertainment and motion picture professionals, sponsors and
21 consumers have identified Plaintiffs' film festival and awards by the
22 words "Hollywood" and Hollywood Film Festival and Hollywood Awards.

23 **PLAINTIFFS' INTERNET PRESENCE**

24 26. Plaintiffs also maintain a substantial presence on the
25 Internet through which they advertise their products and services,
26 transact business with customers and film makers, disseminate
27 information about the annual Hollywood Film Festival and the Hollywood
28

1 Awards celebration, and promote their products and services to
2 consumers and other businesses.

3 27. In order to provide customers, film makers and the
4 entertainment community with easy access to and communications with
5 Plaintiffs, Plaintiffs have registered a number of Internet domain
6 names. Many of these domain names correspond to the Registered Marks.
7 A partial list of Plaintiffs' relevant, registered domain names is as
8 follows:

9 A. hollywoodawards.com, hollywoodawards.net,
10 hollywoodawards.org, hollywoodawards.biz, hollywoodawards.bz,
11 hollywoodawards.cc, hollywoodawards.co.uk, hollywoodawards.de,
12 hollywoodawards.info, hollywoodawards.mobi, hollywoodawards.name,
13 hollywoodawards.tv, hollywoodawards.us, hollywoodawards.ws;

14 B. hollywoodbreakthroughawards.com,
15 hollywoodbreakthroughawards.net, hollywoodbreakthroughawards.org;

16 C. hollywooddiscoveryawards.com, hollywooddiscoveryawards.net,
17 hollywooddiscoveryawards.org;

18 D. hollywoodmovieawards.com, hollywoodmovieawards.net,
19 hollywoodmovieawards.org;

20 E. hollywoodmobileawards.net, hollywoodmobileawards.org;

21 F. hollywoodnetawards.com, hollywoodnetawards.net,
22 hollywoodnetawards.org;

23 G. hollywoodfilmawards.com, hollywoodfilmawards.net
24 hollywoodfilmawards.org;

25 H. Hollywoodstarawards.com, Hollywoodstarawards.net
26 Hollywoodstarawards.org;

27 I. hollywoodworldawards.com, hollywoodworldawards.net
28 hollywoodworldawards.org;

1 J. hollywoodfilmfestival.com, hollywoodfilmfestival.net
2 hollywoodfilmfestival.org;

3 K. hollywoodfestival.com, hollywoodfestival.net
4 hollywoodfestival.org;

5 L. movieawards.com; and,

6 M. filmawards.com

7 28. Each of these domain names, as well as others registered to
8 Plaintiffs, connects the user to a website created by Plaintiffs and
9 provides the end-user with information related
10 to the annual Hollywood Film Festival, the Hollywood Awards
11 celebration, and to Plaintiffs' other products and services.

12 29. The Plaintiffs' websites are commercial in nature, generate
13 business for Plaintiffs, and allow Plaintiffs to maintain relationships
14 with their customers.

15 DEFENDANT'S UNLAWFUL ACTIONS

16 30. On information and belief, Davies registered the
17 "awardshollywood.com" domain name on or about May 13, 2007 using a
18 fictitious pseudonym or dba.

19 31. On information and belief, Davies registered the
20 "hollywoodmobileawards.com" domain name on or about May 13, 2007 using
21 a fictitious pseudonym or dba.

22 32. The domain names "awardshollywood.com" and
23 "hollywoodmobileawards.com" (the "Infringing Domain Names") are
24 identical or confusingly similar to Plaintiffs' Registered Marks.

25 33. The Infringing Domain Names do not connect to websites owned
26 or endorsed by Plaintiffs. Rather, they connect to websites controlled
27 by Defendant Davies that are devoid of any content whatsoever.

28

1 34. On January 4, 2008, in reply to Plaintiffs' good-faith
2 attempt to resolve this matter in an amicable fashion, by way of a
3 voluntary transfer of the Infringing Domain Names to Plaintiffs,
4 Defendant Davies offered to sell the Infringing Domain Names to
5 Plaintiff De Abreu. True and correct copies of these e-mail messages,
6 both of which are dated January 4, 2008, are attached collectively as
7 Exhibit "J."

8 35. Davies' attempt to sell the Infringing Domain Names
9 constitutes a commercial use of said domain names.

10 36. Davies' registered the Infringing Domain Names willfully and
11 with a bad faith intent to profit from the Registered Marks.

12
13 FIRST CLAIM FOR RELIEF

14 (Cybersquatting - 15 U.S.C. Section 1125(d) (1))

15 37. Plaintiffs reallege and incorporate by reference herein each
16 and every allegation contained in Paragraphs 1 through 36, above, as
17 though fully set forth at length.

18 38. Defendant's acts complained of herein constitute unlawful
19 cybersquatting, in that defendant has knowingly and with a bad faith
20 intent to profit therefrom registered, trafficked in, maintained or
21 used domain names (the Infringing Domain Names) that are identical or
22 confusingly similar to Plaintiffs' Registered Marks.

23 39. Plaintiffs' Registered Marks were distinctive at the time
24 Defendant registered the Infringing Domain Names and remain distinctive
25 today.

26 40. Defendant has no trademark or other intellectual property
27 rights in Plaintiffs' Registered Marks and has not made prior use of
28

1 the Infringing Domain Names in connection with the bona fide offering
2 of goods and services.

3 41. Defendant has offered to transfer and sell the Infringing
4 Domain Names to Plaintiffs for financial gain without having used, or
5 having an intent to use, the Infringing Domain Names in the bona fide
6 offering of any goods or services.

7 42. Defendant has also provided material and misleading false
8 contact information in respect to the registration of the Infringing
9 Domain Names.

10 43. Defendant's registration and use of the Infringing Domain
11 Names have caused and will continue to cause damage to Plaintiffs, in
12 an amount to be proved at trial, and have caused and will continue to
13 cause irreparable harm to Plaintiffs for which there is no adequate
14 remedy at law. Plaintiffs are, therefore, entitled to a preliminary
15 and permanent injunction restraining and enjoining each and every
16 defendant and their agents, servants and employees, and all persons
17 acting thereunder, in concert therewith or on their behalf, from
18 registering, transferring or using as a domain name the Registered
19 Marks, or any colorable imitations thereof.

20 44. Defendants' acts constitute unlawful cybersquatting.
21 Pursuant to 15 U.S.C. Section 1125(d) (1) (C), Plaintiffs are entitled
22 to an order transferring the Infringing Domain Names to Plaintiffs.

23 45. Pursuant to 15 U.S.C. Section 1117(d), Plaintiffs are
24 entitled to recover statutory damages from each defendant in an amount
25 not less than \$1,000.00 and not more than \$100,000.00 per domain name
26 registered, maintained and/or used by each defendant.

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SECOND CLAIM FOR RELIEF

(Trademark Infringement - 15 U.S.C. Section 1114(1))

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3 46. Plaintiffs repeat and incorporate by reference herein each
4 and every allegation of Paragraphs 1 through 45, above, as though fully
5 set forth at length.

6 47. Defendant is using Plaintiffs' Registered Marks on the
7 Internet in connection with the sale, offer for sale, distribution and
8 advertising of goods and services in a manner likely to cause
9 confusion, mistake or to deceive the public. The nature of the
10 Internet makes the registration or use of domain names containing the
11 Plaintiffs' Registered Marks by defendant likely to cause confusion and
12 to deceive the public and the public has been deceptively led to
13 believe that defendant's Internet address(es) and web site(s) originate
14 with or are sponsored by or otherwise authorized by the Plaintiffs.

15 48. Defendant's actions in this regard have at all times been
16 without the Plaintiffs' consent.

17 49. Defendants' acts constitute willful and deliberate
18 infringement of Plaintiffs' Registered Marks in violation of trademark
19 and unfair competition laws of the United States, including 15 U.S.C.
20 Section 1114(1).

21 50. Defendant's acts complained of herein have caused and will
22 continue to cause damage to Plaintiffs, in an amount to be proved at
23 trial, and have caused and will continue to cause irreparable harm to
24 Plaintiffs for which there is no adequate remedy at law. Plaintiffs
25 are, therefore, entitled to a preliminary and permanent injunction
26 restraining and enjoining each and every defendant and their agents,
27 servants and employees, and all persons acting thereunder, in concert
28 therewith or on their behalf, from registering, transferring or using

1 as a domain name the Registered Marks, or any colorable imitations
2 thereof. In addition, Plaintiffs are entitled to a preliminary and
3 permanent injunction restraining and enjoining each and every defendant
4 and their respective agents, servants and employees, and all persons
5 acting thereunder, in concert therewith or on their behalf, from
6 otherwise using the Plaintiffs' Registered Marks, or any colorable
7 imitations thereof, in connection with the sale, offering for sale and
8 advertising of products and services or in any manner likely to cause
9 confusion, mistake or to deceive the public as to the source or origin
10 of defendant's products and services.

11 51. Defendant has willfully used the Plaintiffs' Registered
12 Marks in a manner calculated to cause confusion in the sale, offering
13 for sale, and advertising of products and services. Accordingly,
14 Plaintiffs are entitled to recover statutory and treble damages, as
15 well as the costs of the suit and reasonable attorneys' fees, pursuant
16 to 15 U.S.C. Section 1117.

17 THIRD CLAIM FOR RELIEF

18 (False Designation of Origin and False Description -

19 15 U.S.C. Section 1125(a))

20 52. Plaintiffs repeat and incorporate by reference herein each
21 and every allegation of Paragraphs 1 through 51, above, as though fully
22 set forth at length.

23 53. Defendant's use of Plaintiffs' Registered Marks as domain
24 names on the Internet is a false designation of origin or a false
25 description or representation that wrongfully and falsely designates
26 the goods and services provided by defendant as originating from or
27 being connected with Plaintiffs and constitutes the utilization of a
28 false description or representation in interstate commerce.

1 54. By reason of the foregoing, Defendant has violated and
2 continues to violate 15 U.S.C. Section 1125(a).

3 55. Defendant's acts complained of herein have caused and will
4 continue to cause damage to Plaintiffs, in an amount to be proved at
5 trial, and have caused and will continue to cause irreparable harm to
6 Plaintiffs for which there is no adequate remedy at law. Plaintiffs
7 are, therefore, entitled to a preliminary and permanent injunction
8 restraining and enjoining each and every defendant and their agents,
9 servants and employees, and all persons acting thereunder, in concert
10 therewith or on their behalf, from registering, transferring or using
11 as a domain name the Registered Marks, or any colorable imitations
12 thereof. In addition, Plaintiffs are entitled to a preliminary and
13 permanent injunction restraining and enjoining each and every defendant
14 and their respective agents, servants and employees, and all persons
15 acting thereunder, in concert therewith or on their behalf, from
16 otherwise using the Plaintiffs' Registered Marks, or any colorable
17 imitations thereof, in connection with the sale, offering for sale and
18 advertising of products and services or in any manner likely to cause
19 confusion, mistake or to deceive the public as to the source or origin
20 of defendant's products and services.

21 56. Defendant has willfully used the Plaintiffs' Registered
22 Marks in a manner calculated to cause confusion in the sale, offering
23 for sale, and advertising of products and services. Accordingly,
24 Plaintiffs are entitled to recover statutory and treble damages, as
25 well as the costs of the suit and reasonable attorneys' fees, pursuant
26 to 15 U.S.C. Section 1117.

27 / / /

FOURTH CLAIM FOR RELIEF

(Trademark Infringement - Common Law of California)

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3 57. Plaintiffs repeat and incorporate by reference herein each
4 and every allegation of Paragraphs 1 through 56, above, as though fully
5 set forth at length.

6 58. Defendant's use of the Registered Marks on the Internet in
7 connection with the sale, offer for sale, distribution and advertising
8 of goods and services in a manner likely to cause confusion, mistake or
9 to deceive the public constitutes trademark infringement and a
10 violation of California law.

11 59. Defendant's acts complained of herein have caused and will
12 continue to cause damage to Plaintiffs, in an amount to be proved at
13 trial, and have caused and will continue to cause irreparable harm to
14 Plaintiffs for which there is no adequate remedy at law. Plaintiffs
15 are, therefore, entitled to a preliminary and permanent injunction
16 restraining and enjoining each and every defendant and their agents,
17 servants and employees, and all persons acting thereunder, in concert
18 therewith or on their behalf, from registering, transferring or using
19 as a domain name the Registered Marks, or any colorable imitations
20 thereof. In addition, Plaintiffs are entitled to a preliminary and
21 permanent injunction restraining and enjoining each and every defendant
22 and their respective agents, servants and employees, and all persons
23 acting thereunder, in concert therewith or on their behalf, from
24 otherwise using the Plaintiffs' Registered Marks, or any colorable
25 imitations thereof, in connection with the sale, offering for sale and
26 advertising of products and services or in any manner likely to cause
27 confusion, mistake or to deceive the public as to the source or origin
28 of defendant's products and services.

1 FIFTH CLAIM FOR RELIEF

2 (Unfair Business Practices -

3 California Bus. & Prof. Code Section 17200

4 60. Plaintiffs repeat and incorporate by reference herein each
5 and every allegation of Paragraphs 1 through 58, above, as though fully
6 set forth at length.

7 61. Defendant's use of the Registered Marks on the Internet in
8 connection with the sale, offer for sale, distribution and advertising
9 of goods and services in a manner likely to cause confusion, mistake or
10 to deceive the public constitutes a violation of California Business
11 and Professions Code Section 17200 et. seq.

12 62. Defendant's acts complained of herein have caused and will
13 continue to cause damage to Plaintiffs, in an amount to be proved at
14 trial, and have caused and will continue to cause irreparable harm to
15 Plaintiffs for which there is no adequate remedy at law. Plaintiffs
16 are, therefore, entitled to a preliminary and permanent injunction
17 restraining and enjoining each and every defendant and their agents,
18 servants and employees, and all persons acting thereunder, in concert
19 therewith or on their behalf, from registering, transferring or using
20 as a domain name the Registered Marks, or any colorable imitations
21 thereof. In addition, Plaintiffs are entitled to a preliminary and
22 permanent injunction restraining and enjoining each and every defendant
23 and their respective agents, servants and employees, and all persons
24 acting thereunder, in concert therewith or on their behalf, from
25 otherwise using the Plaintiffs' Registered Marks, or any colorable
26 imitations thereof, in connection with the sale, offering for sale and
27 advertising of products and services or in any manner likely to cause
28

1 confusion, mistake or to deceive the public as to the source or origin
2 of defendant's products and services.

3 PRAYER FOR RELIEF

4 WHEREFORE, Plaintiffs pray for judgment in their favor and
5 against each defendant as follows:

6 1. That each and every defendant, as well as all persons acting
7 under the direction, control, permission or authority of defendants, or
8 any of them, and all persons acting in concert therewith, be enjoined
9 during the pendency of this action, and permanently thereafter, from:

10 (a) registering, transferring (other than to Plaintiffs)
11 or using the Infringing Domain Names;

12 (b) infringing Plaintiffs' Registered Marks;

13 (c) registering, using, copying, reproducing or imitating
14 the Plaintiffs' Registered Marks, or any confusingly similar or
15 colorable imitation of such marks, in any manner on the Internet or
16 otherwise;

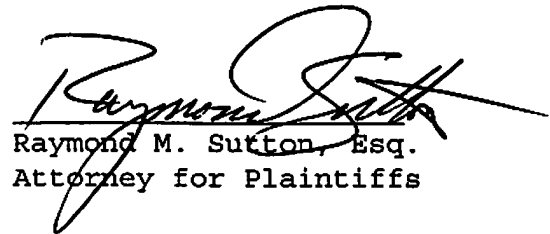
17 2. That the Court order the transfer of the Infringing Domain
18 Names to Plaintiffs;

19 3. That the Court award Plaintiffs actual damages, liquidated
20 damages and/or statutory damages, in an amount to be proven at trial;

21 4. That the Court award Plaintiffs treble damages, in an amount
22 to be proven at trial, as well as reasonable attorneys' fees, and the
23 costs of this action; and,

24 5. That the Court award Plaintiffs such other and further
25 relief as the Court deems just and proper.

26
27 Dated: February 13, 2008

28 
Raymond M. Sutton, Esq.
Attorney for Plaintiffs