

1 ROBBINS UMEDA LLP
2 BRIAN J. ROBBINS (190264)
3 brobbins@robbinsumeda.com
4 KEVIN A. SEELY (199982)
5 kseely@robbinsumeda.com
6 600 B Street, Suite 1900
7 San Diego, CA 92101
8 Telephone: (619) 525-3990
9 Facsimile: (619) 525-3991

10 Attorneys for Plaintiffs

11 [Additional Counsel on Signature Page]

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

CV09-0573E SVW (CWx)

15 ANNA MARIA ALBERGHETTI,
16 BONNIE POINTER, and JUDY
17 TENUTA, on Behalf of Themselves and
18 All Others Similarly Situated,

19 Plaintiffs,

20 v.

21 CORBIS CORPORATION,

22 Defendant.

) Case No.

) CLASS ACTION

) CLASS ACTION COMPLAINT

) DEMAND FOR JURY TRIAL

FILED
2009 AUG -5 PM 3:28
CLERK OF DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY FAX

18
19
20
21
22
23
24
25
26
27
28

1 Plaintiffs Anna Maria Alberghetti, Bonnie Pointer, and Judy Tenuta
2 (collectively "Plaintiffs"), individually, and on behalf of all others similarly
3 situated (referred to as the "Class" as defined in paragraph 28), by and through
4 their attorneys, allege as follows with respect to the above-captioned matter:

5 INTRODUCTION

6 1. Plaintiffs, for themselves and on behalf of similarly situated
7 individuals, seek redress for the unlawful exploitation of their names, images, and
8 likenesses by defendant Corbis Corporation ("Corbis") in violation of California
9 common law and Cal. Civ. Code §3344, *et seq.* ("Section 3344").

10 2. Defendant Corbis is a Nevada corporation that sells purported licenses
11 for the use of names, images, and likenesses of numerous individuals, including
12 celebrities, to consumers in California and elsewhere. Corbis sells these licenses
13 via its multiple websites and without the consent of the individuals depicted in the
14 images.

15 3. Plaintiffs are legendary entertainers and artists who reside in
16 California. Licenses for the names, images, and likenesses of the Plaintiffs, and of
17 numerous other individuals, have been unlawfully sold by Corbis over the internet
18 without their consent.

19 4. Through its unauthorized exploitation of the Plaintiffs' and other
20 individuals' names, images, and likenesses Corbis has reaped substantial profits.
21 At the same time, defendant Corbis' actions have caused irreparable harm to
22 Plaintiffs and the other Class members and will continue to do so unless Corbis is
23 permanently enjoined.

24 PARTIES

25 5. Plaintiff Anna Maria Alberghetti ("Alberghetti") is a world-renowned,
26 award-winning actress and singer. A former child prodigy, she began her singing
27 career at the age of six, and performed at Carnegie Hall in New York at the age of
28 thirteen. As a star on Broadway, she won the Tony Award in 1962 as Best Actress

1 (Musical) for her performance in *Carnival*. In addition to headlining several other
2 Broadway shows, Alberghetti has starred in several feature films, including *Ten*
3 *Thousand Bedrooms*, opposite Dean Martin; *Cinderfella*, opposite Jerry Lewis; and
4 *Here Comes the Groom*, opposite Bing Crosby. She graced the cover of *Life*
5 magazine twice, and sang on *The Ed Sullivan Show* more than fifty different times.
6 She has also appeared in various television programs and commercials.
7 Alberghetti has toured in many theatrical productions, and continues to feature in a
8 popular one-woman cabaret act. By reason of Alberghetti's painstaking efforts
9 over several decades to build public recognition of her voice, music, and acting
10 abilities, Alberghetti developed a proprietary interest in her name, public
11 personality, singing style, acting style, voice, and likeness. Alberghetti is a citizen
12 of California, residing in Los Angeles County, California.

13 6. Plaintiff Bonnie Pointer ("Pointer"), an accomplished R&B and disco
14 singer, is a former member of the world-famous singing group, The Pointer Sisters.
15 The Pointer Sisters had several hit songs, and won a Grammy Award in 1974 for
16 their crossover hit, "Fairytale." As a solo artist, Pointer has recorded several
17 popular hit songs, including a disco cover of The Elgins' "Heaven Must Have Sent
18 You," which became a U.S. top-20 hit in 1979 (reaching #11 on the Billboard Hot
19 100 Chart). Pointer has released three solo albums, and she appeared on *Soul*
20 *Train* in 1985. Pointer and her sisters have a star on the Hollywood Walk of Fame.
21 She continues to perform her unique brand of music today, on various tour stops
22 and in numerous venues. By reason of Pointer's painstaking efforts to build public
23 recognition of her voice and music, Pointer developed a proprietary interest in her
24 name, public personality, singing style, voice, and likeness. Pointer is a citizen of
25 California, residing in Los Angeles County, California.

26 7. Plaintiff Judy Tenuta ("Tenuta") is an actress, entertainer, author,
27 writer, producer, and award-winning comedienne. She has starred in her own
28 HBO, Showtime, and Lifetime television specials, and twice been nominated for a

1 Grammy Award. She has appeared in several feature films, and has featured
2 prominently on a variety of television programs and specials. She is also a widely-
3 known and coveted commercial spokesperson. Tenuta has a unique and off-beat
4 performance persona, which encourages fans to convert to her own personal
5 religion, "Judyism." By reason of her painstaking efforts to build public
6 recognition of her unique personality and public persona, Tenuta has developed a
7 proprietary interest in her name, public personality, and likeness. Tenuta is a
8 citizen of California, residing in Los Angeles County, California.

9 8. Defendant Corbis has been a Nevada corporation since August 2007.
10 Its headquarters and principal place of business are located in Seattle, Washington,
11 at 710 Second Avenue, Suite 200, zip code 98104. Corbis is engaged in the
12 business of selling licenses for the use of pictorial images of individuals over the
13 World Wide Web, through various websites it owns and maintains. Corbis has
14 offices located throughout the world, including in Los Angeles, California.

15 **JURISDICTION AND VENUE**

16 9. Jurisdiction is appropriate in this Court under 28 U.S.C. §1332(c)(1)
17 and (d), as amended by The Class Action Fairness Act of 2005. All named
18 Plaintiffs are citizens of California. Corbis, being currently incorporated in
19 Nevada, is a citizen of Nevada. Corbis is also a citizen of the State of Washington
20 because Corbis is headquartered in the State of Washington and no other state is
21 clearly Corbis' center of corporate activity. The aggregate claims of the individual
22 Class members will likely exceed the sum of \$5,000,000, exclusive of interest and
23 costs. The number of Class members will likely exceed 100 members.

24 10. This Court has personal jurisdiction over defendant Corbis because
25 Corbis: (a) by offering and selling licenses to people residing in California via its
26 websites, is conducting electronic commerce with residents of California and this
27 District; (b) maintains and has maintained continuous and systematic contacts with
28 California and this District over a period of years; (c) purposefully availed itself of

1 the benefits of doing business in California and this District. Accordingly, Corbis
2 maintains minimum contacts with California and this District that are more than
3 sufficient to subject Corbis to service of process in compliance with due process of
4 law.

5 11. Venue is proper in this District pursuant to 28 U.S.C. §1391(a) and (c)
6 because at all times relevant hereto: (a) defendant Corbis transacted business, was
7 found, or acted through subsidiaries or agents present in this District; (b) a
8 substantial part of Plaintiffs' and the Class' claims occurred in this District; and (c)
9 Corbis is a corporation and is subject to the personal jurisdiction of this District as
10 set forth above as of the commencement of this action.

11 **FACTUAL ALLEGATIONS**

12 *Examples of Plaintiffs' Wrongfully Appropriated Images*

13 12. Prior to the initiation of this litigation, Alberghetti was, and always
14 has been, the exclusive licensor of her rights of publicity, including for the pictorial
15 images attached hereto. *See* Exhibit A.

16 13. Prior to the initiation of this litigation, Pointer was, and always has
17 been, the exclusive licensor of her rights of publicity, including for the pictorial
18 images attached hereto. *See* Exhibit B.

19 14. Prior to the initiation of this litigation, Tenuta was, and always has
20 been, the exclusive licensor of her rights of publicity, including for the pictorial
21 images attached hereto. *See* Exhibit C.

22 *The Corbis Websites*

23 15. Corbis maintains several websites on the World Wide Web including
24 www.corbis.com, www.corbismotion.com, and www.corbisoutline.com.¹

25
26 _____
27 ¹ However, any reference to websites maintained by Corbis does not include
28 www.snapvillage.com, which appears to be substantively different from Corbis'
other websites and, thus, is not included in this action.

1 16. According to a Corbis website, available at
2 <http://www.corbis.com/corporate/overview/overview.asp>, Corbis provides images
3 on its websites that can be licensed for use in commercial products and
4 advertisements. Corbis portrays itself as a "creative resource for advertising,
5 marketing and media professionals" through the provision of "a comprehensive
6 selection of photograph, illustration, footage, typefaces and rights clearance
7 services."

8 17. Each website maintained by Corbis features a search images toolbar
9 prominently located on the main page of the website. By simply typing in the
10 name of a certain person or celebrity in the search toolbar, consumers can quickly
11 and easily access all the images of the individuals maintained on the website that
12 are returned as a result of their search query.

13 18. Corbis employees and agents control access to the posting of images
14 on its various websites. Corbis also controls and causes the matching of images to
15 the appropriate name of the person identified on the image, so that the image can
16 be found when a name search is conducted by a consumer on the various Corbis
17 websites.

18 19. Consumers can select any image they would like to license and, after
19 becoming a member of Corbis free-of-charge, they can receive price estimates
20 generated by Corbis based on: (1) the end-use of the image; (2) the duration of the
21 time period the image will be used; and (3) the size of the image used. Consumers
22 can then buy a license to use any image on the Corbis website so desired.

23 20. Corbis charges a varying rate for the licensing of each picture
24 depending on the intended end-use of the image. In order to determine the price of
25 an image, Corbis asks consumers to provide information regarding how the image
26 will be used. Possible options include, but are not limited to, advertising, retail,
27 editorial use, book publishing, and television or video. Corbis charges lower prices
28

1 for images to be used in newspaper articles and higher prices for the use of the
2 images in advertisements or other commercial purposes.

3 *Defendant's Wrongful Conduct*

4 21. At some unknown point in time within the applicable statute of
5 limitations, Corbis acquired images of Plaintiffs and other Class members and
6 placed the images on one or more of the Corbis websites, for the purpose of selling
7 purported licenses to consumers for the use of the images. Corbis did sell such
8 licenses without obtaining consent from any of the Plaintiffs or other Class
9 members to sell such licenses for the use of their respective names, images, or
10 likenesses. By selling the said licenses, Corbis has been using Plaintiffs' and the
11 other Class members' names, images, and likenesses.

12 22. During the applicable statute of limitations period, Corbis knowingly
13 placed the images of the Plaintiffs and other Class members on its websites to sell
14 purported licenses for the use of the images. During this process, Corbis
15 knowingly and intentionally matched the names of Plaintiffs and other Class
16 members with their respective images. Thus, the images could be easily located by
17 consumers by conducting a name search on the Corbis website, thereby allowing
18 the consumers to view the readily identifiable images of the Plaintiffs and other
19 Class members for which Corbis sold purported licenses for use of the images.

20 23. The images of the Plaintiffs and other Class members, which Corbis
21 placed on its websites without the consent of the Plaintiffs and other Class
22 members, are also used by Corbis to promote sales of purported licenses to
23 consumers for the use of such images, all for the financial advantage, benefit, and
24 profit, of Corbis.

25 24. The use of such images by Corbis is purely for commercial purposes.
26 Corbis sells the unauthorized licenses so that it can profit from the unauthorized
27 use of the names, images, and likenesses of the Plaintiffs and other Class members.
28 Corbis' use of the images is not connected with any news, public affairs, sports

1 broadcast or account, or any political campaign. Corbis' use of the images is
2 purely capitalistic in nature.

3 25. Plaintiffs first discovered Corbis' commercial exploitation of their
4 names, images, and likenesses, appearing on a Corbis website, for sale, without
5 their consent, on or about November 10, 2008. Plaintiffs had no reasonable ability
6 to discover the unauthorized use of their images before that time.

7 *Damages to Plaintiffs and the Class*

8 26. As a direct and proximate result of the defendant's wrongful conduct,
9 Plaintiffs and other Class members have been damaged. Among other things,
10 Plaintiffs and the Class have been damaged by the loss of their right to control the
11 commercial exploitation of their names, images, and likenesses.

12 27. Defendant Corbis' unauthorized use of the names, images, and
13 likenesses of Plaintiffs and the Class constitutes a violation of Section 3344. As a
14 direct and proximate result of Corbis' violation of Section 3344, Plaintiffs and the
15 Class are entitled to statutory damages in an amount equal to the greater of \$750 or
16 actual damages. Moreover, they are entitled to the profits from Corbis'
17 unauthorized use of their names, images, and likenesses, as well as to attorneys'
18 fees and costs.

19 **CLASS ACTION ALLEGATIONS**

20 28. Plaintiffs Alberghetti, Pointer, and Tenuta bring this action on behalf
21 of themselves and as a class action under Rule 23(a) and 23(b)(2)-(3) of the
22 Federal Rules of Civil Procedure on behalf of a plaintiff class ("Class") composed
23 of and defined as follows:

24 All California residents whose names, images, or likenesses have been
25 exploited by Corbis, without their permission, during the applicable
26 statute of limitations time period through Corbis' sale of purported
27 licenses to use said names, images, or likenesses to consumers, via the
28 Company's websites, including www.corbis.com,

1 www.corbismotion.com, or www.corbisoutline.com. Also included in
2 the Class are all non-residents of California who are United States
3 citizens and whose names, images, or likenesses have been exploited
4 by Corbis in the same manner as described in the preceding sentence,
5 but only to the extent that such exploitation occurred through sales of
6 purported licenses to California residents. Excluded from the Class
7 are defendant Corbis, and Corbis' officers, directors, employees,
8 representatives, parents, subsidiaries, and affiliates. Also excluded
9 from the Class are any federal, state, or local governmental entities,
10 any judicial officer presiding over this action and the members of
11 his/her immediate family and judicial staff, and any juror assigned to
12 this action.

13 29. There are questions of law and fact that are common to all members
14 of the Class, which questions predominate over any question affecting only
15 individual class members. These common questions include but are not limited to:

16 (a) Whether Corbis obtained consent before placing the names,
17 images, or likenesses of individuals on its websites;

18 (b) Whether Corbis' use of the names, images, or likenesses is for
19 Corbis' advantage, commercial or otherwise;

20 (c) Whether Corbis placed the images on its websites, knowing that
21 the images were of the Plaintiffs and the other Class members;

22 (d) Whether there is a direct connection between Corbis' use of the
23 images and a commercial purpose;

24 (e) Whether Corbis' unauthorized use of a Class members' name,
25 image, or likeness violates the individual's common law rights of publicity;

26 (f) Whether Corbis' unauthorized use of a Class members' name,
27 image, or likeness violates Section 3344;

28

1 (g) Whether injunctive relief is appropriate to stop Corbis'
2 continuing wrongful conduct;

3 (h) Whether Class members depicted in images found on Corbis'
4 websites are "readily identifiable" by virtue of the fact that the images were located
5 by the use of a name search;

6 (i) Whether Corbis' conduct caused damages to the Class
7 members;

8 (j) Whether the Class members are entitled to statutory damages
9 under Section 3344; and

10 (k) Whether Corbis was unjustly enriched through the unauthorized
11 use of an individual's name, image, or likeness.

12 30. Class members are identifiable from information and records in the
13 possession, custody, or control of defendant Corbis; thus, the Class is
14 ascertainable. There is no class certification issue as to the amount of Class
15 members' damages, as damages can also be determined from reviewing
16 information and records in Corbis' possession, custody, or control.

17 31. Plaintiffs are members of the Class. Plaintiffs' claims are typical of
18 the claims of the other members of the Class because all claims are based on the
19 same legal and remedial theories.

20 32. Plaintiffs will fairly and adequately protect the interests of all Class
21 members in the prosecution of this action and in the administration of all matters
22 relating to the claims stated herein. Plaintiffs' interests are aligned with, and not
23 antagonistic to, those of the other members of the Class. Plaintiffs are similarly
24 situated with, and have suffered similar injuries as, the members of the Class they
25 seek to represent. Plaintiffs believe they have been wronged, wish to obtain
26 redress for the wrong, and want defendant Corbis stopped from perpetrating and
27 continuing to profit from its unauthorized use of Plaintiffs' and the other Class
28 members' names, images, or likenesses.

1 33. Plaintiffs have retained experienced and competent legal counsel.
2 Neither the named Plaintiffs, nor their counsel, have any interest that may cause
3 them to not vigorously pursue this action.

4 34. The Class is so numerous as to make it impracticable to join all
5 members of the Class as plaintiffs. Based on defendant Corbis' large market share
6 and the thousands of images available on its websites, Plaintiffs estimate that the
7 Class likely exceeds at least 100 members. The exact number and identities of the
8 Class members are currently known only by defendant Corbis. It is contemplated
9 that the nature of the notice to the Class will be direct notice by mail or other
10 reasonable means.

11 35. A class action is superior to other available methods for the fair and
12 efficient adjudication of this controversy in that:

13 (a) Treatment as a class action will permit a large number of
14 similarly situated persons to adjudicate their common claims in a single forum
15 simultaneously, efficiently, and without the duplication of effort and expense that
16 numerous individual actions would engender;

17 (b) Class treatment will permit the adjudication of relatively small
18 claims by members of the Class who otherwise could not afford to litigate a right
19 of publicity claim such as is asserted in this Complaint;

20 (c) The individual Class members are not all aware that they have
21 been wronged and are thus unable to prosecute individual actions;

22 (d) A failure of justice will result from the absence of a class
23 action;

24 (e) The Class is moderate in size; and

25 (f) This class action presents no difficulties of management that
26 would preclude its maintenance as a class action.

27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT I

Common Law Rights of Publicity

36. Plaintiffs reallege each and every paragraph above as if fully stated herein.

37. Without obtaining consent to exploit the names, images, and likenesses of Plaintiffs and other Class members, Corbis obtained said images and likenesses, including those depicted in Exhibits A-C attached hereto.

38. For purposes of financial gain, commercial exploitation, and distribution to the general public, defendant Corbis placed the Plaintiffs' and other Class members' names, images, and likenesses on its websites and offered for sale and sold licenses to use the said names, images, or likenesses.

39. Defendant Corbis' unauthorized and unlawful use of Plaintiffs' and the other Class members' names, images, and likenesses for Corbis' own advantage constitutes a willful violation of Plaintiffs' common law rights to publicity.

40. The names, images, and likenesses of the Plaintiff and Class, as discussed above (including the examples of the Plaintiffs' images attached as Exhibits A-C) are available for commercial use in the State of California, and California has jurisdiction over defendant Corbis.

41. As a result of the unauthorized use of these images by defendant Corbis, Plaintiffs and other members of the Class have sustained and will continue to sustain damages, including loss of their right to control the commercial exploitation of their names, images, and likenesses.

42. Plaintiffs and the Class are also entitled to a permanent injunction to prevent future violations of Plaintiffs' and the Class members' rights under California common law.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COUNT II

Violation of Cal. Civ. Code §3344 *et seq.*

43. Plaintiffs reallege each and every paragraph above as if fully stated herein.

44. Without obtaining consent to exploit Plaintiffs' and the other Class members' names, images, and likenesses, Corbis obtained said images and likenesses, including those depicted in Exhibits A-C attached hereto.

45. Defendant Corbis knowingly used Plaintiffs' and the other Class members' names, images, and likenesses by placing the said names, images, and likenesses on its websites and, for purposes of financial gain, commercial exploitation, and distribution to the general public, offering for sale licenses to use the images. Corbis caused Plaintiffs' and the other Class members' names to be matched or linked to their respective images and likenesses, so that consumers could conduct a name search of said images and likenesses.

46. Defendant Corbis has engaged in these actions without consent of any Plaintiff or other Class member, and has done so to its own commercial advantage and benefit.

47. The relevant images and likenesses, including those attached as Exhibits A-C, are available for commercial use in the State of California, and California has jurisdiction over defendant Corbis.

48. Defendant Corbis' conduct alleged herein constitutes a violation of Plaintiffs' and the other Class members' rights to publicity under Section 3344.

49. As a result of the unauthorized use of these images by defendant Corbis, Plaintiffs and other members of the Class have sustained and will continue to sustain damages, including loss of their right to control the commercial exploitation of their names, images, and likenesses. Plaintiffs and the Class are entitled to statutory damages in an amount equal to the greater of \$750 or actual

1 damages. Moreover, they are entitled to the profits from Corbis' unauthorized use
2 of their names, images, and likenesses, as well as to attorneys' fees and costs.

3 50. Plaintiffs and the Class are also entitled to a permanent injunction to
4 prevent future violations of Plaintiffs' and the Class members' rights under Section
5 3344.

6 **COUNT III**

7 **Restitution/Unjust Enrichment**

8 51. Plaintiffs reallege each and every paragraph above as if fully stated
9 herein.

10 52. Defendant Corbis has used and is continuing to use Plaintiffs' and the
11 other Class members' names, images, and likenesses to its own commercial
12 advantage. Defendant Corbis has engaged in these actions wrongfully, without
13 Plaintiffs' and the other Class members' consent, and has done so to its own
14 advantage and benefit.

15 53. As a direct result of defendant Corbis' actions, Corbis has financially
16 benefitted through the use of Plaintiffs' and the Class members' names, images, and
17 likenesses, by selling their names, images, or likenesses on Corbis' websites.

18 54. Defendant Corbis has failed to compensate Plaintiffs or the Class in
19 any way, shape, or form for the exploitation of their respective names, images, or
20 likenesses.

21 55. As a direct and proximate result of defendant Corbis' conduct,
22 defendant Corbis has been unjustly enriched. Plaintiffs and the Class seek
23 restitution from defendant and seek an order of this Court disgorging all profits,
24 benefits and other compensation obtained by the defendant from its wrongful
25 conduct.

26 **PRAYER FOR RELIEF**

27 Wherefore, Plaintiffs pray for judgment and relief against defendant Corbis
28 as follows:

- 1 A. Declaring that this action is properly maintainable as a class action;
- 2 B. Naming Alberghetti, Pointer, and Tenuta as class representatives, and
3 Plaintiffs' counsel as class counsel;
- 4 C. Declaring and decreeing that defendant Corbis: (1) has no right to use,
5 exploit, publish, distribute, copy, advertise, license, or transmit in any form
6 Plaintiffs' and the other Class members' names, images, and likenesses; and (2) has
7 violated Section 3344 and California common law;
- 8 D. Awarding Plaintiffs and the Class members all damages they have
9 sustained as a consequence of defendant Corbis' acts complained of herein,
10 including, but not limited to, the authorized statutory damages of an amount equal
11 to the greater of \$750 per wrongful publication or actual damages suffered
12 pursuant to Section 3344 and California common law;
- 13 E. Awarding Plaintiffs and the Class profits from Corbis' unauthorized
14 use of their names, images, and likenesses, as well as to attorneys' fees and costs.
- 15 F. Awarding Plaintiffs and the other Class members punitive damages
16 from Corbis for its willful violations of Plaintiffs' and the other Class members'
17 common law and statutory right to publicity;
- 18 G. Awarding to Plaintiffs and Class restitution from defendant and
19 ordering disgorgement of all profits, benefits and other compensation obtained by
20 defendant;
- 21 H. Enjoining Corbis from continuing its practices as set forth in this
22 complaint;
- 23 I. Awarding Plaintiffs and the Class the costs of this suit, including
24 reasonable attorneys' fees and expenses; and
- 25 J. Awarding such other and further relief that this Court deems equitable
26 and just.
- 27
- 28

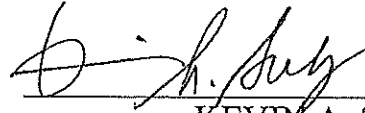
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JURY DEMAND

Plaintiffs demand a trial by jury.

Dated: August 5, 2009

ROBBINS UMEDA LLP
BRIAN J. ROBBINS
KEVIN A. SEELY



KEVIN A. SEELY

600 B Street, Suite 1900
San Diego CA 92101
Telephone: (619) 525-3990
Facsimile: (619) 525-3991

GOLD & COULSON
A Partnership of Professional and
Limited Liability Corporations
11 S. LaSalle St., Suite 2402
Chicago, IL 60603
Telephone: (312) 372-0777
Facsimile: (312) 372-0778

JAY B. ROSS & ASSOCIATES, P.C.
838 West Grand Avenue
Chicago, IL 60622
Telephone: (312) 633-9000
Facsimile: (312) 633-9090

Attorneys for Plaintiffs

417399

EXHIBIT A

English (US)

Browse images

Sign In
or Register

My Account 0 Items
My Lightboxes CART
Customer Service

alberghetti

Go MORE SEARCH OPTIONS

Search tips

Refine search

Results for alberghetti

SORT BY BEST MATCH

Reset

1 - 21 of 21 items

DISPLAY OPTIONS

Image previews

Page 1 of 1

Creative

Rights Managed (RM)
Royalty-Free (RF)

Editorial (EM)

Documentary
Fine Art
Archival
Current Events
Entertainment

No People

Photography
Illustration

Color
Black & White

Only Model-Released

Go



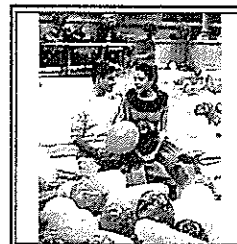
Archival
Bettmann
U1272944INP
RM



Archival
Bettmann
U1271856INP
RA



Entertainment
Corbis Entertainment
42-17153597
RA



Entertainment
Historical
JS1566975
RM



Entertainment
Bettmann
DM2225
RM



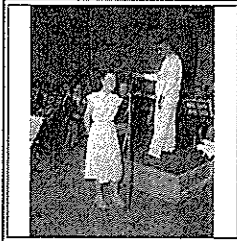
Entertainment
Bettmann
DM2219
RA



Entertainment
Corbis Entertainment
DWF15-1146004
RA



Entertainment
Historical
JS1262931
RM



Entertainment
Bettmann
DM2222
RM



Archival
Bettmann
DM2221
RA



Entertainment
Corbis Entertainment
DWF15-1146000
RA



Entertainment
Historical
HU046138
RA

			
<p>Archival Bettmann U1271860INP R/A</p>	<p>Archival Bettmann U1412652 R/A</p>	<p>Entertainment Corbis Entertainment DWF15-1146007 R/A</p>	<p>Archival Bettmann U1271856INP R/A</p>
			
<p>Archival Bettmann U1257470INP R/A</p>	<p>Entertainment Corbis Entertainment DWF15-1146005 R/A</p>	<p>Archival Bettmann U1271861INP R/A</p>	<p>Entertainment Bettmann BE025067 R/A</p>
			
<p>Entertainment Corbis Entertainment 0000317866-019 R/A</p>			

1 - 21 of 21 items

Page 1 of 1

Related Sites

- [Corbis Motion](#)
- [GreenLight](#)
- [Mobile](#)

Corporate

- [About Corbis](#)
- [Pressroom](#)
- [Employment](#)
- [Customer Service](#)

Legal

- [Site Usage Agreement](#)
- [Privacy Policy](#)
- [Licensing Terms & Conditions \(PDF\)](#)

Request Image Research

© 2001-2009 by Corbis Corporation. All visual media © by Corbis Corporation and/or its media providers. All Rights Reserved.

EXHIBIT B

English (US)

Browse images

Sign in
or Register

My Account
My Lightboxes
Customer Service

0 Items
CART

bonnie pointer

Go [MORE SEARCH OPTIONS](#)

[Search tips](#)

Refine search

Reset

Creative Commons

- [Rights Managed \(RM\)](#)
- [Royalty Free \(RF\)](#)

Historical Items

- [Documentary](#)
- [Fine Art](#)
- [Archival](#)
- [Current Events](#)
- [Entertainment](#)

People

Photography
Illustration

Color
Black & White

Only Model Released

Go

Results for bonnie pointer

VIEW BY BEST MATCH

1 - 7 of 7 Items

DISPLAY OPTIONS

Image previews

Page 1 of 1



Documentary /
Documentary
PH016176
RM



Archives
Bettmann
US203696
RM



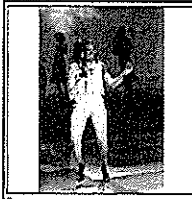
Documentary
Documentary Value
PH016180
RM



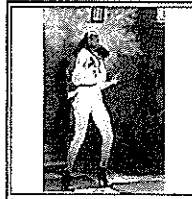
Documentary
Documentary Value
PH016177
RM



Documentary
Documentary Value
PH016179
RM



Documentary
Documentary Value
PH016200
RM



Documentary
Documentary Value
PH016201
RM

1 - 7 of 7 Items

Page 1 of 1

Related Sites

- [Corbis Media](#)
- [Greenlight](#)
- [Nebris](#)

Corporate

- [About Corbis](#)
- [Pressroom](#)
- [Employment](#)
- [Customer Service](#)

Legal

- [Site Usage Agreement](#)
- [Privacy Policy](#)
- [Licensing Terms & Conditions \(PDF\)](#)

Request Image Research

© 2009 Corbis Corporation. All visual media © by Corbis Corporation and/or its media providers. All Rights Reserved.

EXHIBIT C

English (US)

Browse images

Sign In
or Register

My Account 0 Items
My Lightboxes CART
Customer Service

judy tenuta

Go MORE SEARCH OPTIONS

Search tips

Refine search

Results for judy tenuta

SORT BY BEST MATCH

Reset

1 - 42 of 42 items

DISPLAY OPTIONS

Image previews

Page 1 of 1

Creative

Rights Managed (RM)
Royalty-Free (RF)

Editorial (RM)

Documentary
Fine Art
Archival
Current Events
Entertainment

No People





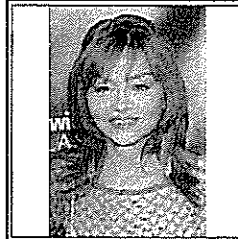
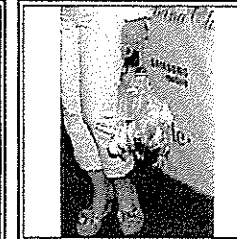
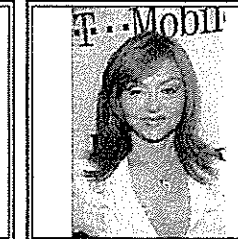
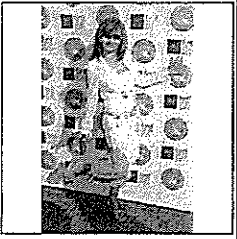
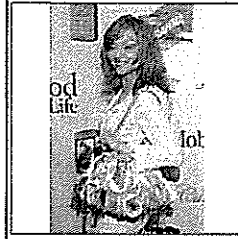
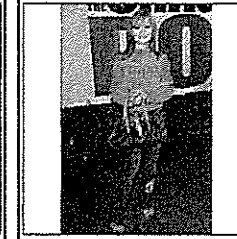


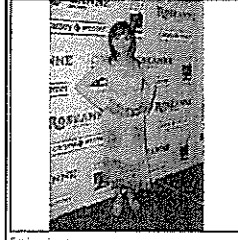


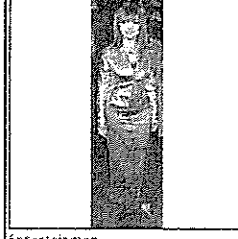
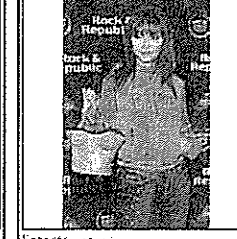

Photography
Illustration

Color
Black & White

Only Model-Released

Go

 Entertainment Corbis Entertainment 42-20951811 RM	 Entertainment Corbis Entertainment 42-20509599 RM	 Entertainment Corbis Entertainment 42-19477934 RM	 Entertainment Corbis Entertainment 42-19477937 RM
 Entertainment Corbis Entertainment 42-20106632 RM	 Entertainment Corbis Entertainment 42-20106638 RM	 Entertainment Corbis Entertainment 42-19945891 RM	 Entertainment Corbis Entertainment 42-19945889 RM
 Entertainment Corbis Entertainment 42-19477936 RM	 Entertainment Corbis Entertainment 42-19478033 RM	 Entertainment Corbis Entertainment 42-17973419 RM	 Entertainment Reuters 42-17575517 RM

			
Entertainment Reuters 42-17420964 RM	Entertainment Corbis Entertainment 42-16931243 RM	Entertainment Corbis Entertainment 42-17125939 RM	Entertainment Corbis Entertainment 42-17153689 RM
			
Entertainment Corbis Entertainment 42-17153893 RM	Entertainment Corbis Entertainment 42-17122196 RM	Entertainment Corbis Entertainment 42-16894855 RM	Entertainment Corbis Entertainment 42-16894061 RM
			
Entertainment Corbis Entertainment 42-16897191 RM	Entertainment Corbis Entertainment 42-16894862 RM	Entertainment Corbis Entertainment 42-16509769 RM	Entertainment Corbis Entertainment 42-15433867 RM
			
Entertainment Corbis Entertainment 42-15199053 RM	Entertainment Corbis Entertainment 42-15549449 RM	Entertainment Corbis Entertainment DWF15-1143572 RM	Entertainment Corbis Entertainment DWF15-1108783 RM
			
Entertainment Corbis Entertainment ZLC151280 RM	Entertainment Corbis Entertainment DWF15-1188762 RM	Entertainment Corbis Entertainment 42-15130172 RM	Entertainment Corbis Entertainment DWF15-1031053 RM

 Entertainment Corbis Entertainment 42-15548741 RMA	 Entertainment Corbis Entertainment DWF15-113621 RMA	 Entertainment Corbis Entertainment 42-15549450 RMA	 Entertainment Corbis Entertainment DWF15-1029676 RMA
 Entertainment Corbis Entertainment DWF15-1030024 RMA	 Entertainment Corbis Entertainment DWF15-1030022 RMA	 Entertainment Corbis Entertainment DWF15-1028617 RMA	 Entertainment Corbis Entertainment DWF15-42681 RMA
 Entertainment Corbis Entertainment DWF15-42676 RMA	 Entertainment Corbis Entertainment DWF15-42690 RMA		

1 - 42 of 42 items

Page 1 of 1

Related Sites

- Corbis Motion
- GreenLight
- Mobile

Corporate

- About Corbis
- Pressroom
- Employment
- Customer Service

Legal

- Site Usage Agreement
- Privacy Policy
- Licensing Terms & Conditions (PDF)

Request Image Research

© 2001-2009 by Corbis Corporation. All visual media © by Corbis Corporation and/or its media providers. All Rights Reserved