COWAN, LIEBOWITZ & LATMAN, P.C. 114 West 47th Street New York, NY 10036-1525 (212) 790-9200 Kieran G. Doyle (kgd@cll.com) Thomas Kjellberg (txk@cll.com)

Paul D. Polidoro (ppolidor@jw.org) Watch Tower Bible and Tract Society of Pennsylvania 100 Watchtower Drive Patterson, NY 12563 (845) 306-1000

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA,

Plaintiff,

-against-

THE TRUTH AND TRANSPARENCY FOUNDATION, RYAN C. McKNIGHT, and ETHAN G. DODGE,

Defendants.

No. 20-cv-3366

COMPLAINT

Plaintiff Watch Tower Bible and Tract Society of Pennsylvania, by its attorneys, Cowan, Liebowitz & Latman, P.C., for its Complaint against Defendants The Truth and Transparency Foundation, Ryan C. McKnight, and Ethan G. Dodge alleges:

NATURE OF THE ACTION

1. This is a civil action for copyright infringement in violation of the Copyright Act, 17 U.S.C. § 101 *et seq*. This litigation seeks relief against the ongoing wholesale infringement of

Plaintiff's registered copyrights in 74 original motion pictures. Defendants, without authorization or permission from Plaintiff, have made unauthorized copies of Plaintiff's motion pictures, and are reproducing, publicly displaying, publicly performing and distributing Plaintiff's works online. Plaintiff, accordingly, seeks injunctive relief and statutory damages for willful copyright infringement.

PARTIES

- 2. Plaintiff Watch Tower Bible and Tract Society of Pennsylvania ("Watch Tower") is a Pennsylvania non-profit corporation with its principal place of business at 200 Watch Tower Drive, Patterson, New York 12563.
- 3. Upon information and belief, Defendant The Truth and Transparency Foundation ("TTF") is a Nevada non-profit corporation with its principal place of business at 109 Cascade Meadow Court, Henderson, Nevada 89011.
- 4. Upon information and belief, Defendant Ryan C. McKnight ("McKnight") is an individual residing in Henderson, Nevada. Mr. McKnight is the President and Executive Director and a founding owner of TTF.
- 5. Upon information and belief, Defendant Ethan G. Dodge ("Dodge") is an individual residing in Pleasant Grove, Utah. Mr. Dodge is the Secretary and Technical Director and a founding owner of TTF.
- 6. Upon information and belief, McKnight and Dodge had and still have primary responsibility for the control, management and operation of the affairs of TTF, with the right and ability to supervise the infringing activities complained of in this Complaint.
- 7. Upon information and belief, Defendants, while engaging and participating in the unlawful acts set forth herein, were agents of and collaborators with one another.

8. Upon information and belief, Defendants operate and control websites located at www.faithleaks.org and www.truthandtransparency.org.

JURISDICTION AND VENUE

- 9. This Court has original jurisdiction over claims arising under the Copyright Act pursuant to 28 U.S.C. §§ 1331 and 1338.
 - 10. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) and (c).
- 11. This Court has personal jurisdiction over Defendants because, on information and belief, Defendants, in person or through an agent,
 - (a) have transacted business, and have offered to supply goods, in New York, including through their interactive website located at *truthandtransparency.org*, on which merchandise is offered for sale to, and donations solicited from, New York residents; and/or
 - (b) have committed tortious acts both within and outside New York, causing injury to Watch Tower in New York.

FACTUAL BACKGROUND

12. Watch Tower over decades has created and published thousands of original works of authorship, including literary works, works of visual art, musical works, and motion pictures, and has secured over 3,300 federal copyright registrations for its original works. Under the Copyright Act, Watch Tower has the exclusive rights, among other things, to "reproduce the copyrighted work[s]," to "distribute copies or phonorecords of the copyrighted work[s] to the public," and in the case of its "motion pictures and other audiovisual works, to perform the copyrighted work[s] publicly," as well as to authorize or license others to engage in such

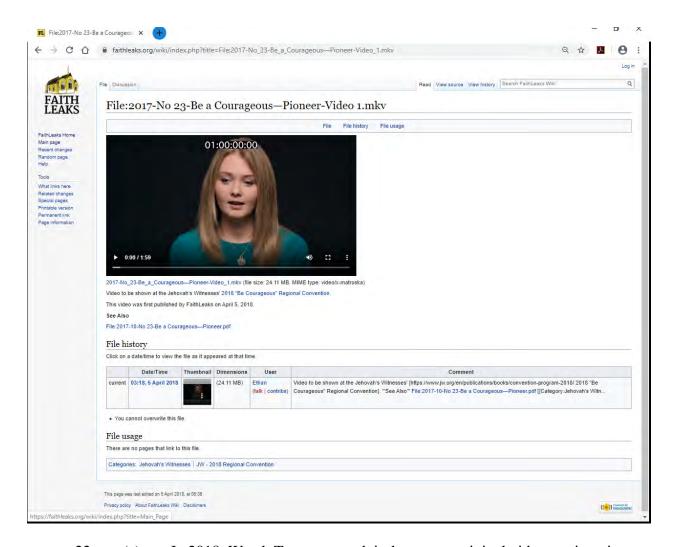
activities. 17 U.S.C. § 106.

- 13. In mid-2018, Watch Tower learned that 487 of its copyrighted literary works were being reproduced, displayed and distributed without license or permission by Defendants on the *faithleaks.org* website.
- 14. On December 31, 2018, Watch Tower's counsel notified Defendants that their unauthorized publication of Watch Tower's literary works on the *faithleaks* site was in violation of Watch Tower's exclusive rights under the Copyright Act, and demanded that such infringing materials be removed from the *faithleaks* site.
- 15. Defendants, through counsel, declined Watch Tower's demand that its literary works be removed from the *faithleaks* site. Defendants did not contest Watch Tower's ownership of valid copyrights, or its *prima facie* case of infringement of those copyrights, but instead asserted "the defense found in 17 U.S.C. § 107," claiming that Defendants' wholesale reproduction and distribution of complete works, unaltered and unaccompanied by new matter, was protected as fair use.
- 16. In May 2019, Watch Tower learned that a large number of motion pictures created by Watch Tower, including the 74 motion pictures at issue here, had been uploaded to and made available for public performance on Rutube, a Russian online video streaming service located at *rutube.ru* and available to users worldwide.
- 17. Watch Tower submitted to Rutube notices of claimed infringement, objecting to the unauthorized posting of its copyrighted works on the Rutube site and demanding their removal. In response, Rutube removed the Watch Tower videos from its site.
- 18. Shortly thereafter, Defendants posted the Watch Tower videos that had been "taken down" from Rutube to Defendants' *faithleaks.org* site.

- 19. In a May 2019 article titled "2019 Jehovah's Witness Convention Videos Published Again After Successful Takedown Request," published on Defendants' *truthandtransparency.org* website, Defendants boasted not only about their past infringements and refusals to comply with Watch Tower's efforts to enforce its copyrights, but also about these new infringements, leaving no doubt as to Defendants' willfulness.
- 20. The Watch Tower videos remain available on the *faithleaks* site to the present day.

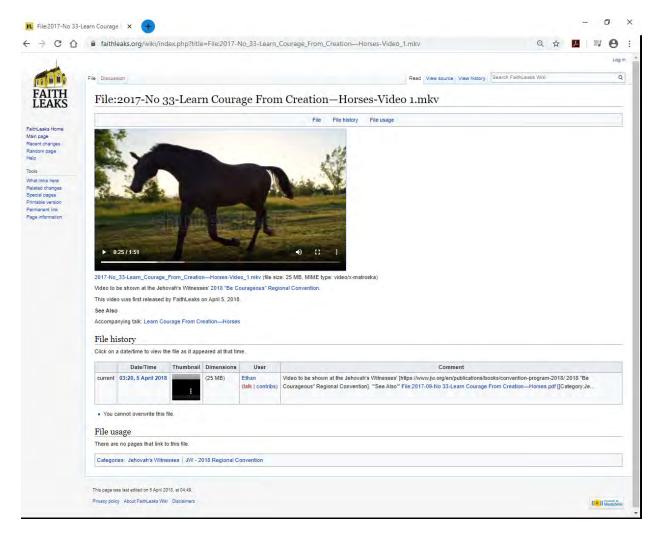
WATCH TOWER'S COPYRIGHTED MOTION PICTURES AND DEFENDANTS' INFRINGEMENTS

- 21. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Be a Courageous ... Pioneer." Watch Tower's copyright in the "Be a Courageous ... Pioneer" video has been duly registered with the United States Copyright Office under Registration No. PA0002121393, with an effective date of May 18, 2018.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Be a Courageous ... Pioneer" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_23-Be_a_Courageous%E2%80%94Pioneer-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



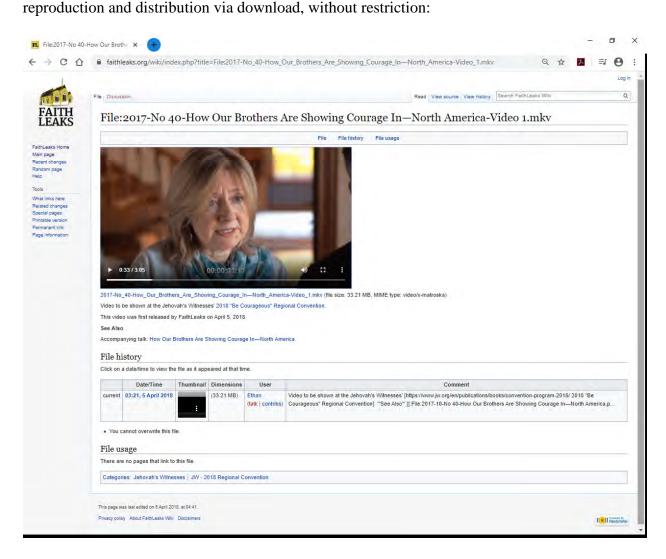
- 22. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 33 Video 1 Learn Courage From Creation (Symposium) Horses." Watch Tower's copyright in the "Talk 33 Video 1 Learn Courage From Creation (Symposium) Horses" video has been duly registered with the United States Copyright Office under Registration No. PA0002121074, with an effective date of May 18, 2018.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 33 Video 1 Learn Courage From Creation (Symposium) Horses" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_33-

Learn_Courage_From_Creation%E2%80%94Horses-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



23. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 40 - Video 1 - How Our Brothers Are Showing Courage In ... (Symposium) - North America." Watch Tower's copyright in the "Talk 40 - Video 1 - How Our Brothers Are Showing Courage In ... (Symposium) - North America" video has been duly registered with the United States Copyright Office under Registration No. PA0002121104, with an effective date of May 18, 2018.

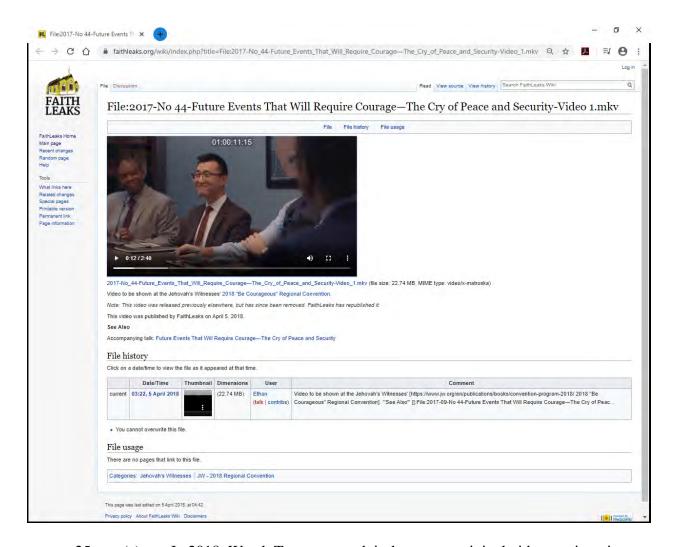
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 40 - Video 1 - How Our Brothers Are Showing Courage In ... (Symposium) - North America" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_40-How_Our_Brothers_Are_Showing_Courage_In%E2%80%94North_America-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further



24. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 44 - Video 1 - Future Events That Will Require Courage (Symposium) - The Cry of

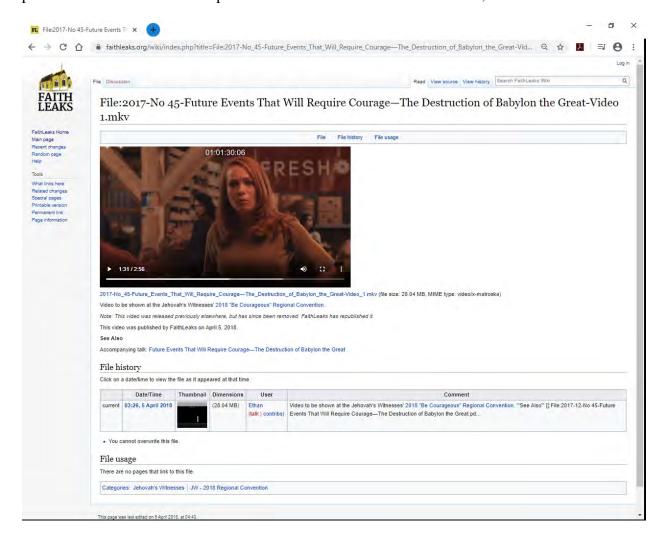
'Peace and Security!'" Watch Tower's copyright in the "Talk 44 - Video 1 - Future Events That Will Require Courage (Symposium) - The Cry of 'Peace and Security!'" video has been duly registered with the United States Copyright Office under Registration No. PA0002121120, with an effective date of May 18, 2018.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 44 - Video 1 - Future Events That Will Require Courage (Symposium) - The Cry of 'Peace and Security!'" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_44-Future_Events_That_Will_Require_Courage%E2%80%94The_Cry_of_Peace_and_Security-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 25. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 45 Video 1 Future Events That Will Require Courage (Symposium) The Destruction of Babylon the Great." Watch Tower's copyright in the "Talk 45 Video 1 Future Events That Will Require Courage (Symposium) The Destruction of Babylon the Great" video has been duly registered with the United States Copyright Office under Registration No. PA0002121121, with an effective date of May 18, 2018.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 45 Video 1 Future Events That Will Require Courage (Symposium) The Destruction of Babylon the Great" video on Defendants' "Faith

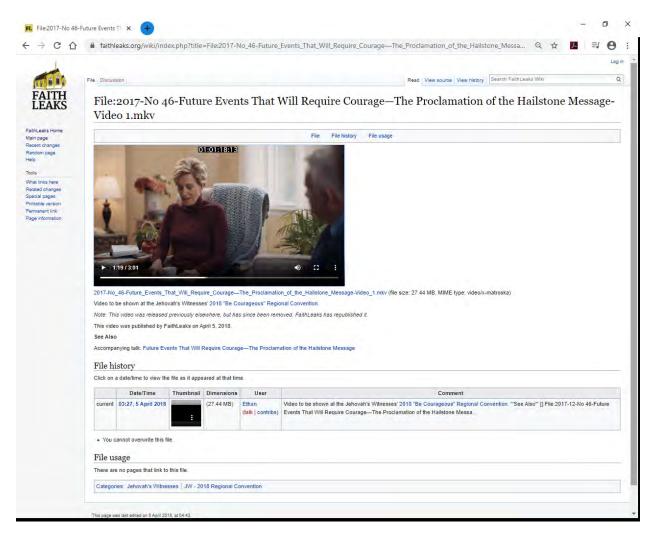
Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_45-Future_Events_That_Will_Require_Courage%E2%80%94The_Destruction_of_Babylon_the_Gr eat-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



26. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 46-Video 1 - Future Events That Will Require Courage (Symposium) - The Proclamation of the Hailstone Message." Watch Tower's copyright in the "Talk 46-Video 1 - Future Events That Will Require Courage (Symposium) - The Proclamation of the Hailstone Message" video has been duly registered with the United States Copyright Office under

Registration No. PA0002121124, with an effective date of May 18, 2018.

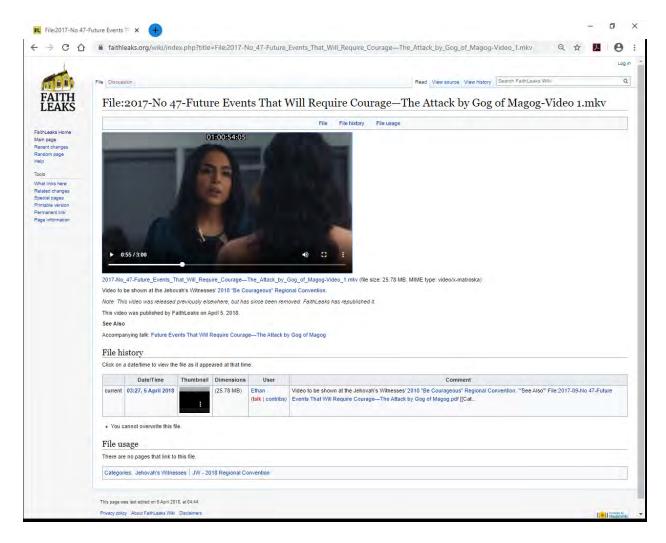
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 46-Video 1 - Future Events That Will Require Courage (Symposium) - The Proclamation of the Hailstone Message" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_46-Future_Events_That_Will_Require_Courage%E2%80%94The_Proclamation_of_the_Hailstone_Message-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



27. (a) In 2018, Watch Tower created, in-house, an original video motion picture

titled "Talk 47 - Video 1 - Future Events That Will Require Courage (Symposium) - The Attack by Gog of Magog." Watch Tower's copyright in the "Talk 47 - Video 1 - Future Events That Will Require Courage (Symposium) - The Attack by Gog of Magog" video has been duly registered with the United States Copyright Office under Registration No. PA0002121125, with an effective date of May 18, 2018.

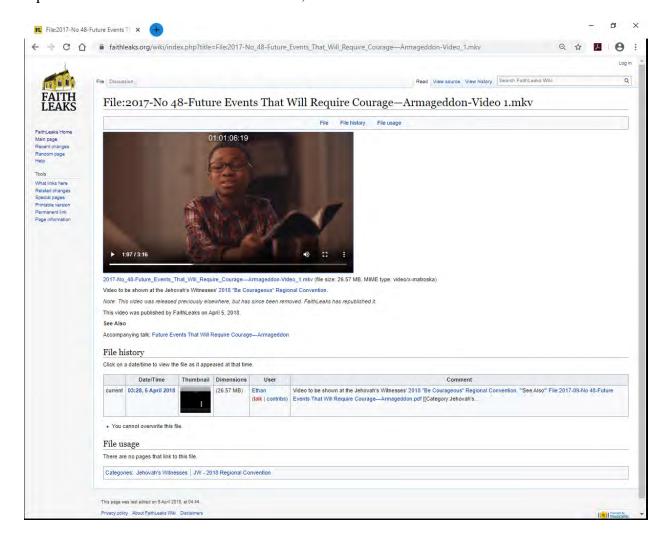
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 47 - Video 1 - Future Events That Will Require Courage (Symposium) - The Attack by Gog of Magog" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_47-Future_Events_That_Will_Require_Courage%E2%80%94The_Attack_by_Gog_of_Magog-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 28. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 48 Video 1 Future Events That Will Require Courage (Symposium) Armageddon." Watch Tower's copyright in the "Talk 48-Video 1 Future Events That Will Require Courage (Symposium) Armageddon" video has been duly registered with the United States Copyright Office under Registration No. PA0002121607, with an effective date of May 18, 2018.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 48-Video 1 Future Events That Will Require Courage (Symposium) Armageddon" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:2017-No_48-

Future_Events_That_Will_Require_Courage%E2%80%94Armageddon-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

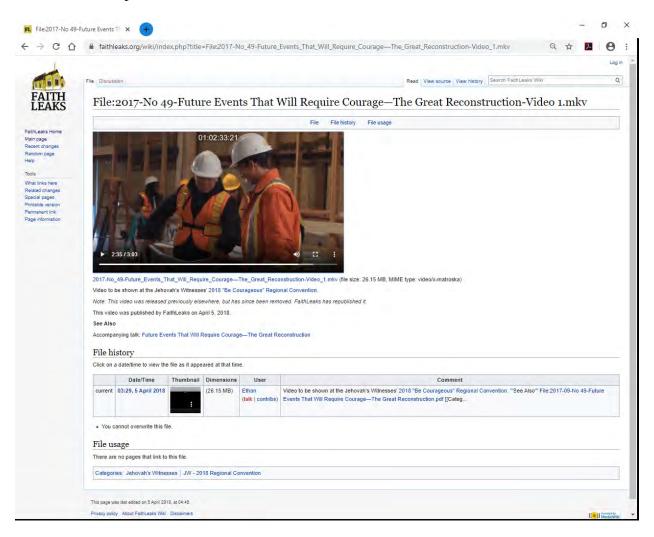


29. (a) In 2018, Watch Tower created, in-house, an original video motion picture titled "Talk 49 - Video 1 - Future Events That Will Require Courage (Symposium) - The Great Reconstruction." Watch Tower's copyright in the "Talk 49 - Video 1 - Future Events That Will Require Courage (Symposium) - The Great Reconstruction" video has been duly registered with the United States Copyright Office under Registration No. PA0002121129, with an effective date

of May 18, 2018.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 49 - Video 1 - Future Events That Will Require Courage (Symposium) - The Great Reconstruction" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_49-Future_Events_That_Will_Require_Courage%E2%80%94The_Great_Reconstruction-

Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

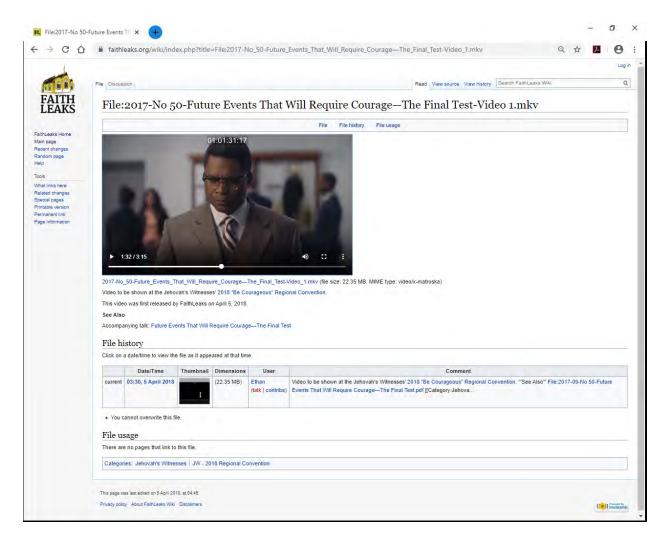


30. (a) In 2018, Watch Tower created, in-house, an original video motion picture

titled "Talk 50 - Video 1 - Future Events That Will Require Courage (Symposium) - The Final Test." Watch Tower's copyright in the "Talk 50 - Video 1 - Future Events That Will Require Courage (Symposium) - The Final Test" video has been duly registered with the United States Copyright Office under Registration No. PA0002121132, with an effective date of May 18, 2018.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 50 - Video 1 - Future Events That Will Require Courage (Symposium) - The Final Test" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:2017-No_50-

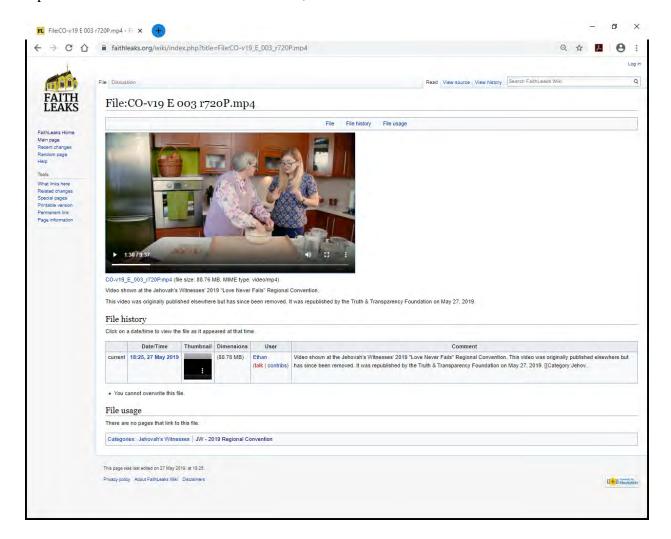
Future_Events_That_Will_Require_Courage%E2%80%94The_Final_Test-Video_1.mkv, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 31. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "2019 'Love Never Fails'! Convention Music-Video Presentation 1." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention Music-Video Presentation 1" video has been duly registered with the United States Copyright Office under Registration No. PA0002191509, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention Music-Video Presentation 1" video on Defendants' "Faith Leaks" website, at the URL

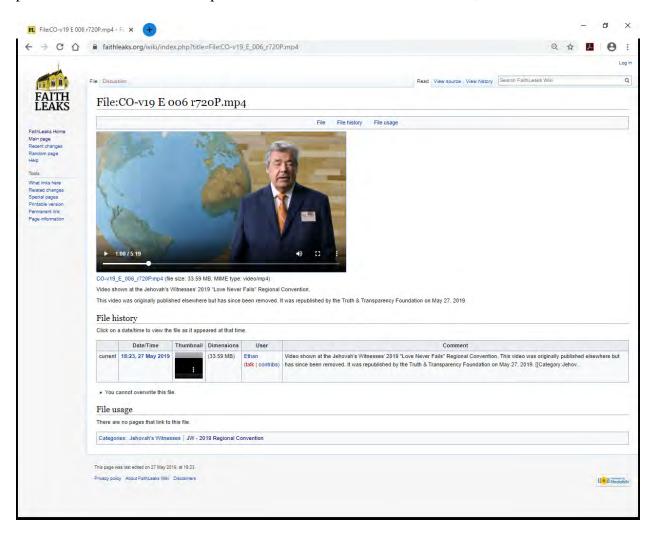
 https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_003_r720P.mp4, where it is

available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 32. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 01 Video 1 Chairman's Address: 'Love Never Fails Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)." Watch Tower's copyright in the "Talk 01 Video 1 Chairman's Address: 'Love Never Fails Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191514, with an effective date of May 17, 2019.
 - (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly

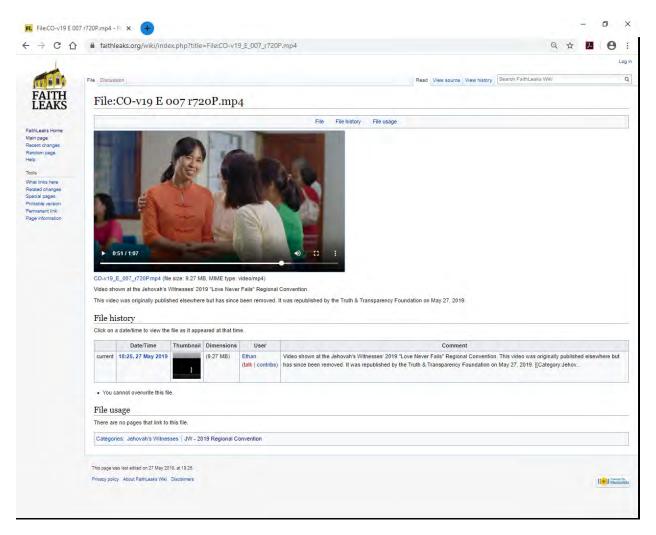
performed and distributed Watch Tower's "Talk 01 Video 1 - Chairman's Address: 'Love Never Fails - Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_006_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



33. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 01 Video 2 - Chairman's Address: 'Love Never Fails' - Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)." Watch Tower's copyright in the "Talk 01 Video 2 - Chairman's Address: 'Love Never Fails' - Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)" video has

been duly registered with the United States Copyright Office under Registration No. PA0002191517, with an effective date of May 17, 2019.

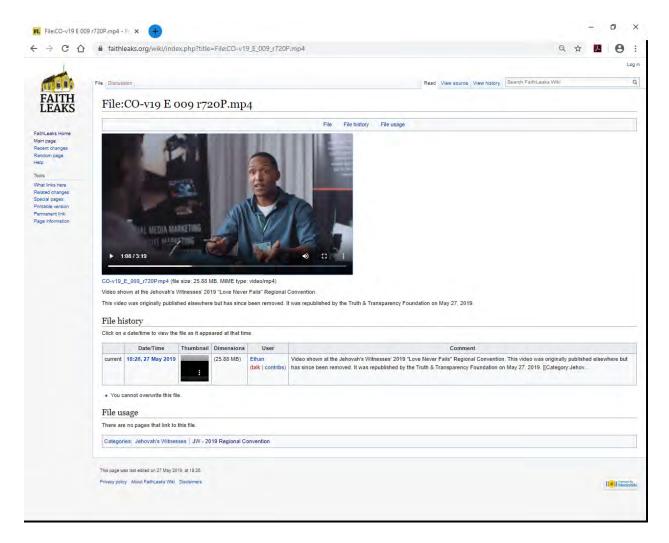
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 01 Video 2 - Chairman's Address: 'Love Never Fails' - Why?' (Romans 8:38, 39; 1 Corinthians 13:1-3, 8, 13)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_007_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



34. (a) In 2019, Watch Tower created, in-house, an original video motion picture

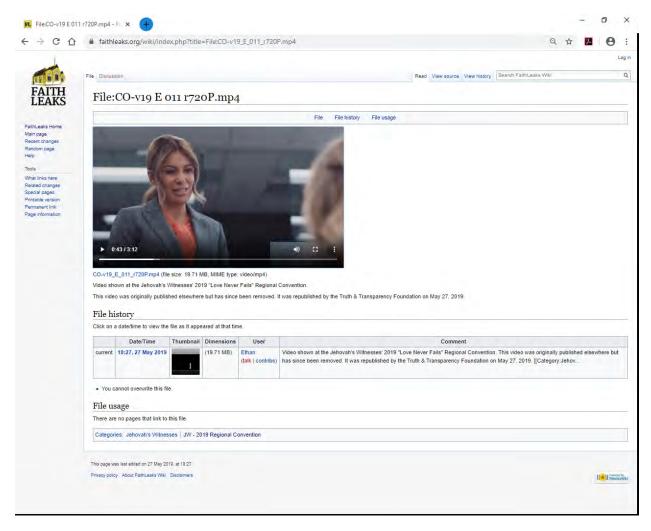
titled "Talk 02 Video 1 - Symposium: Beware of Trusting in What Fails! - Wealth (Matthew 6:24)." Watch Tower's copyright in the "Talk 02 Video 1 - Symposium: Beware of Trusting in What Fails! - Wealth (Matthew 6:24)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191478, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 02 Video 1 - Symposium: Beware of Trusting in What Fails! - Wealth (Matthew 6:24)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_009_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



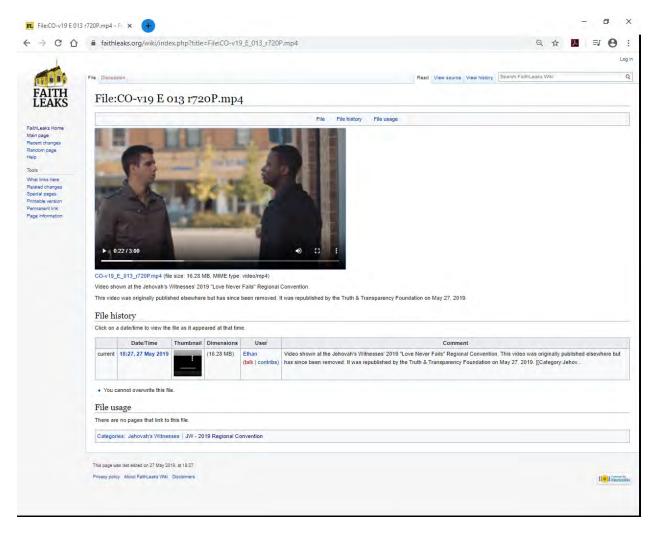
- 35. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 03 Video 1 Symposium: Beware of Trusting in What Fails! Status and Fame (Ecclesiastes 2:16; Romans 12:16)." Watch Tower's copyright in the "Talk 03 Video 1 Symposium: Beware of Trusting in What Fails! Status and Fame (Ecclesiastes 2:16; Romans 12:16)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191475, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 03 Video 1 Symposium: Beware of Trusting in What Fails! Status and Fame (Ecclesiastes 2:16; Romans 12:16)" video on Defendants' "Faith

Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_011_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



36. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 04 Video 1 - Symposium: Beware of Trusting in What Fails! - Human Wisdom (Romans 12:1, 2)." Watch Tower's copyright in the "Talk 04 Video 1 - Symposium: Beware of Trusting in What Fails! - Human Wisdom (Romans 12:1, 2)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191487, with an effective date of May 17, 2019.

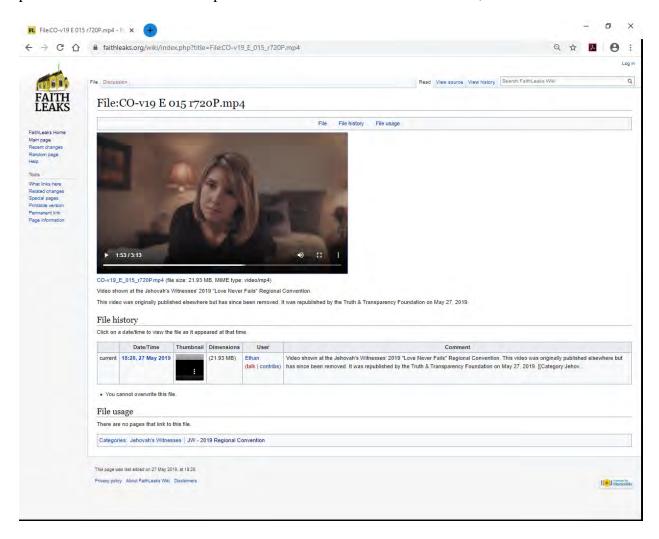
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 04 Video 1 - Symposium: Beware of Trusting in What Fails! - Human Wisdom (Romans 12:1, 2)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_013_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



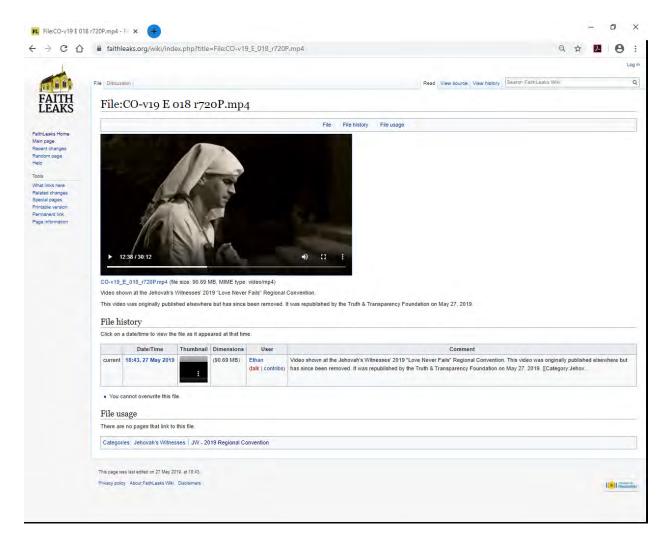
37. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 05 Video 1 - Symposium: Beware of Trusting in What Fails! - Strength and Beauty (Proverbs 31:30; 1 Peter 3:3, 4)." Watch Tower's copyright in the "Talk 05 Video 1 -

Symposium: Beware of Trusting in What Fails! - Strength and Beauty (Proverbs 31:30; 1 Peter 3:3, 4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191489, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 05 Video 1 - Symposium: Beware of Trusting in What Fails! - Strength and Beauty (Proverbs 31:30; 1 Peter 3:3, 4)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_015_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

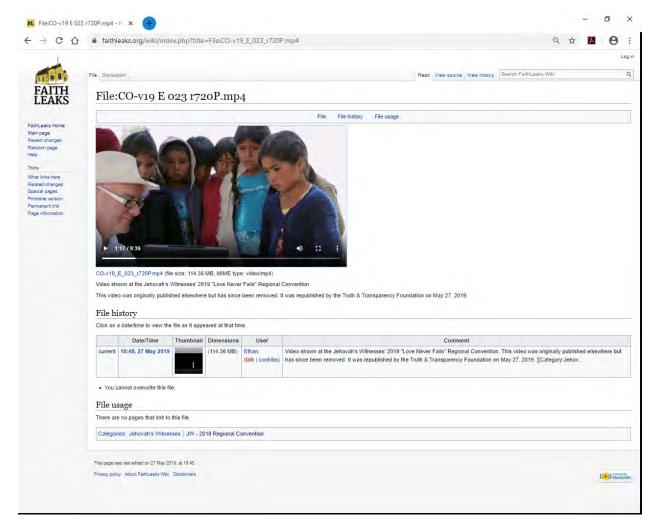


- 38. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 06 Video 1 DRAMATIC BIBLE READING: Jehovah Kept Showing Loyal Love (Genesis 37:1-36; 39:1; 47:12)." Watch Tower's copyright in the "Talk 06 Video 1 DRAMATIC BIBLE READING: Jehovah Kept Showing Loyal Love (Genesis 37:1-36; 39:1; 47:12)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191501, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 06 Video 1 DRAMATIC BIBLE READING: Jehovah Kept Showing Loyal Love (Genesis 37:1-36; 39:1; 47:12)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_018_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



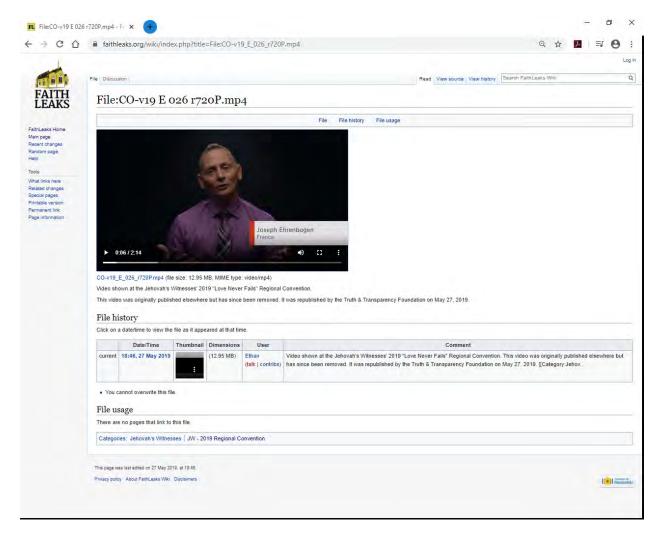
- 39. 40. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "2019 'Love Never Fails'! Convention—Music-Video Presentation 2Talk 23 Video 1 Symposium: Display Unfailing Love in the Congregation To the Elderly (Leviticus 19:32)." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention—Music-Video Presentation 2" video has been duly registered with the United States Copyright Office under Registration No. PA0002191510, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention—Music-Video Presentation 2" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_023_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



40. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 08 Video 1 - Symposium: Love Never Fails Despite ... A Loveless Upbringing (Psalm 27:10)." Watch Tower's copyright in the "Talk 08 Video 1 - Symposium: Love Never Fails Despite ... A Loveless Upbringing (Psalm 27:10)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191450, with an effective date of May 17, 2019.

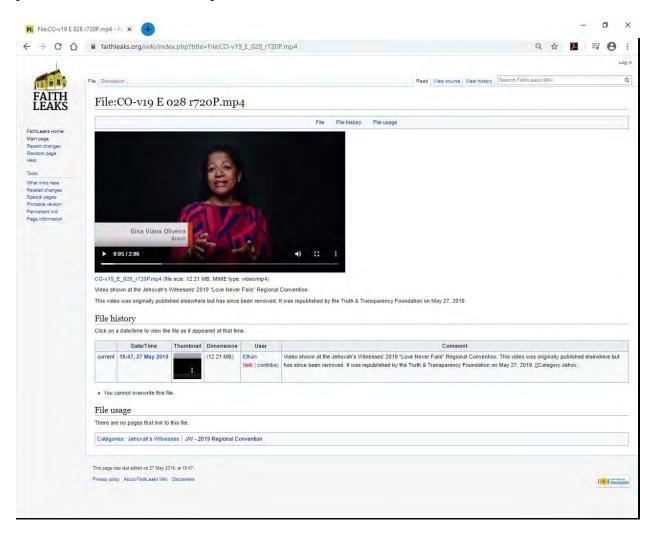
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 08 Video 1 - Symposium: Love Never Fails Despite ... A Loveless Upbringing (Psalm 27:10)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_026_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



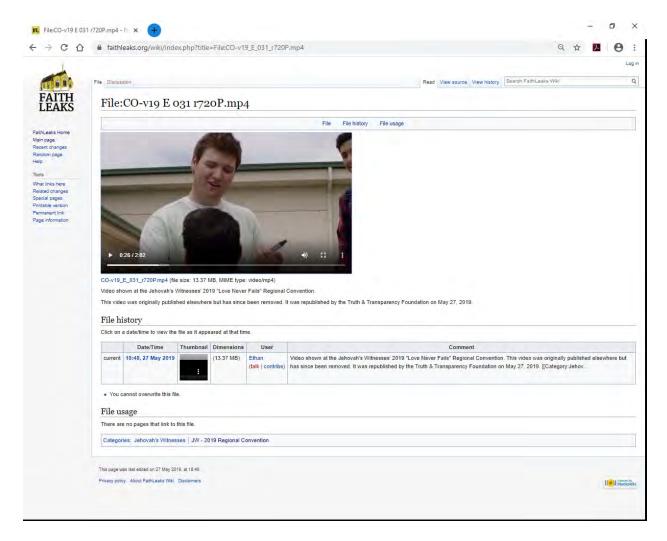
41. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 09 Video 1 - Symposium: Love Never Fails Despite ... A Difficult Work Environment (1 Peter 2:18-20)." Watch Tower's copyright in the "Talk 09 Video 1 -

Symposium: Love Never Fails Despite ... A Difficult Work Environment (1 Peter 2:18-20)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191453, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 09 Video 1 - Symposium: Love Never Fails Despite ... A Difficult Work Environment (1 Peter 2:18-20)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_028_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

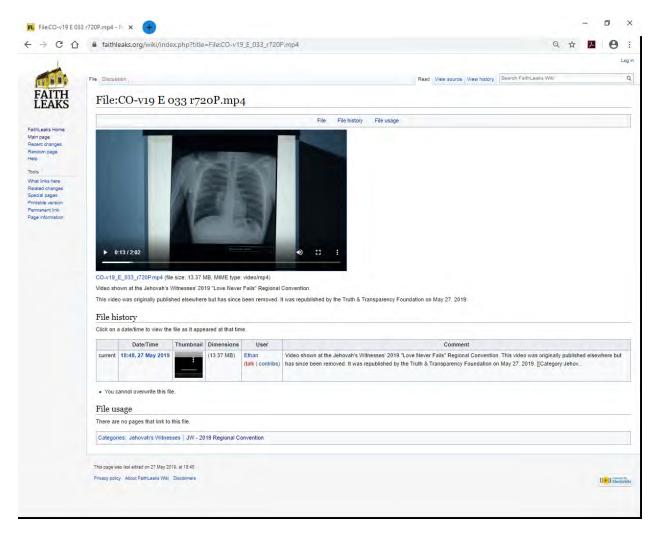


- 42. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 10 Video 2 Symposium: Love Never Fails Despite ... An Ungodly School Environment (1 Timothy 4:12)." Watch Tower's copyright in the "Talk 10 Video 2 Symposium: Love Never Fails Despite ... An Ungodly School Environment (1 Timothy 4:12)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191458, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 10 Video 2 Symposium: Love Never Fails Despite ... An Ungodly School Environment (1 Timothy 4:12)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_031_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



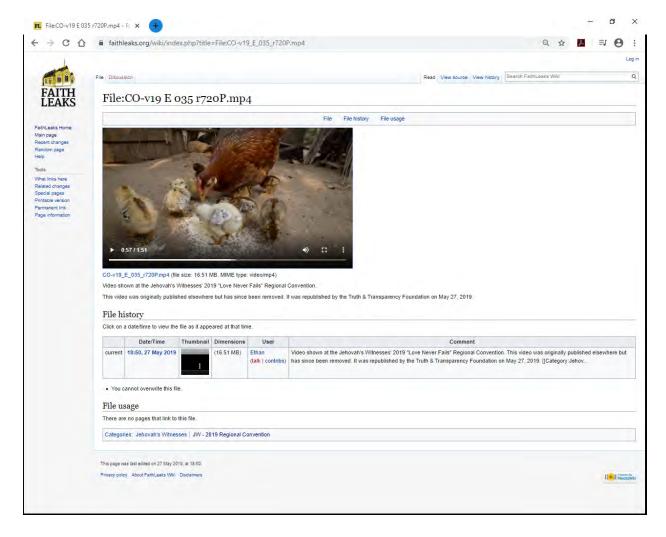
- 43. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 11 Video 1 Symposium: Love Never Fails Despite ... Chronic Health Problems (2 Corinthians 12:9, 10)." Watch Tower's copyright in the "Talk 11 Video 1 Symposium: Love Never Fails Despite ... Chronic Health Problems (2 Corinthians 12:9, 10)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191459, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 11 Video 1 Symposium: Love Never Fails Despite ... Chronic Health Problems (2 Corinthians 12:9, 10)" video on Defendants' "Faith

Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_033_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



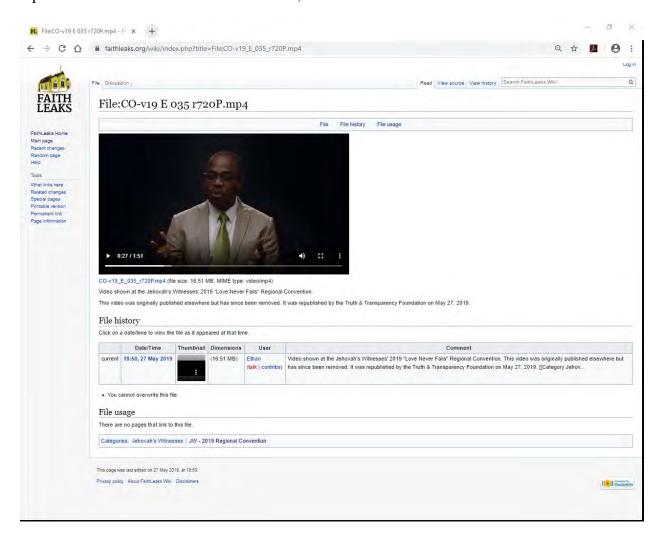
44. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 12 Video 1 - Symposium: Love Never Fails Despite ... Poverty (Philippians 4:12, 13)." Watch Tower's copyright in the "Talk 12 Video 1 - Symposium: Love Never Fails Despite ... Poverty (Philippians 4:12, 13)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191460, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 12 Video 1 - Symposium: Love Never Fails Despite ... Poverty (Philippians 4:12, 13)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_035_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

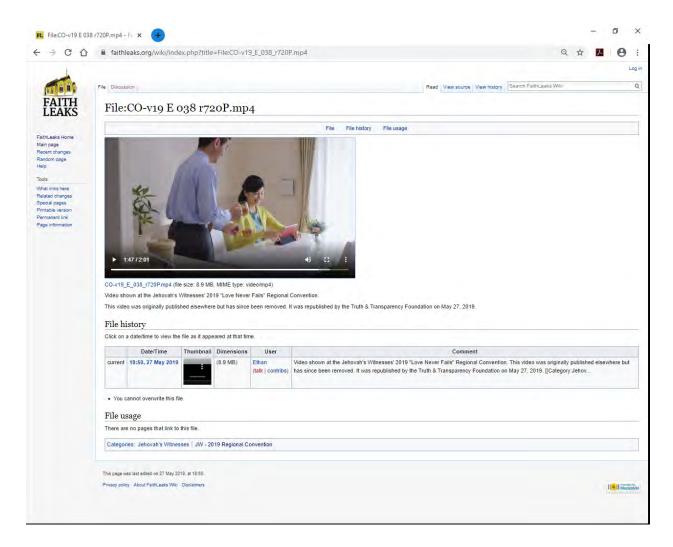


45. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 12 Video 2 - Symposium: Love Never Fails Despite ... Poverty (Philippians 4:12, 13)." Watch Tower's copyright in the "Talk 12 Video 2 - Symposium: Love Never Fails Despite

- ... Poverty (Philippians 4:12, 13)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191461, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 12 Video 2 Symposium: Love Never Fails Despite ... Poverty (Philippians 4:12, 13)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_036_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

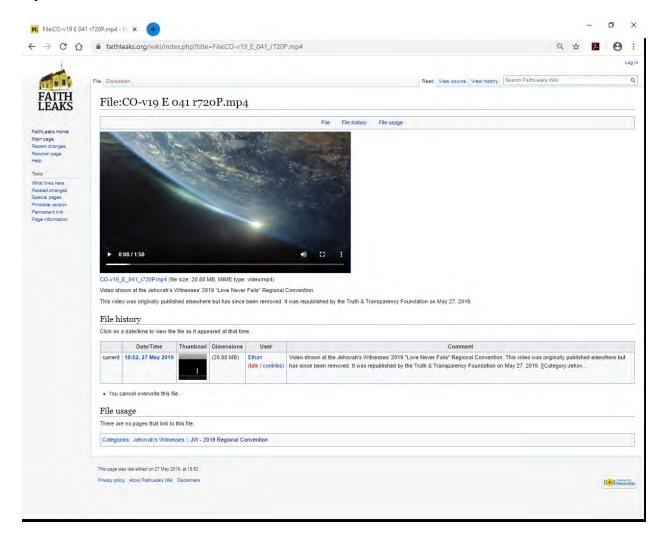


- 46. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 13 Video 1 Symposium: Love Never Fails Despite ... Family Opposition (Matthew 5:44)." Watch Tower's copyright in the "Talk 13 Video 1 Symposium: Love Never Fails Despite ... Family Opposition (Matthew 5:44)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191455, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 13 Video 1 Symposium: Love Never Fails Despite ... Family Opposition (Matthew 5:44)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_038_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



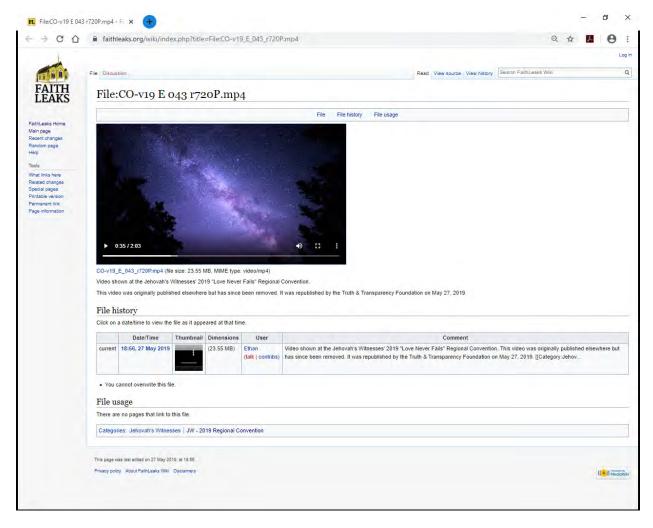
- 47. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 14 Video 1 Symposium: Creation Reveals Jehovah's Love The Heavens (Psalm 8:3, 4; 33:6)." Watch Tower's copyright in the "Talk 14 Video 1 Symposium: Creation Reveals Jehovah's Love The Heavens (Psalm 8:3, 4; 33:6)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191432, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 14 Video 1 Symposium: Creation Reveals Jehovah's Love The Heavens (Psalm 8:3, 4; 33:6)" video on Defendants' "Faith Leaks"

website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_041_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



48. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 15 Video 1 - Symposium: Creation Reveals Jehovah's Love - The Earth (Psalm 37:29; 115:16)." Watch Tower's copyright in the "Talk 15 Video 1 - Symposium: Creation Reveals Jehovah's Love - The Earth (Psalm 37:29; 115:16)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191434, with an effective date of May 17, 2019.

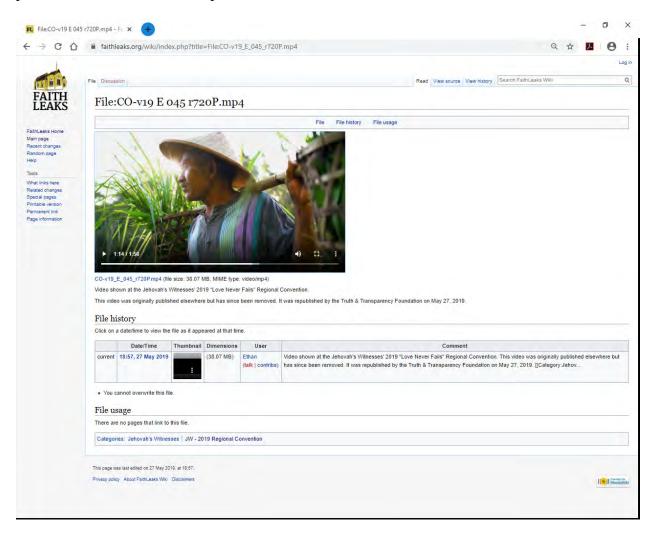
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 15 Video 1 - Symposium: Creation Reveals Jehovah's Love - The Earth (Psalm 37:29; 115:16)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_043_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



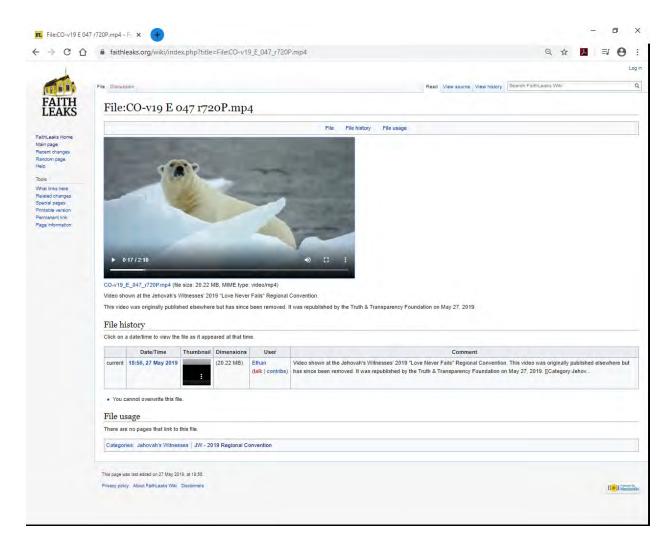
49. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 16 Video 1 - Symposium: Creation Reveals Jehovah's Love - Plants (Genesis 1:11, 29; 2:9, 15; Acts 14:16, 17)." Watch Tower's copyright in the "Talk 16 Video 1 - Symposium:

Creation Reveals Jehovah's Love - Plants (Genesis 1:11, 29; 2:9, 15; Acts 14:16, 17)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191437, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 16 Video 1 - Symposium: Creation Reveals Jehovah's Love - Plants (Genesis 1:11, 29; 2:9, 15; Acts 14:16, 17)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_045_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

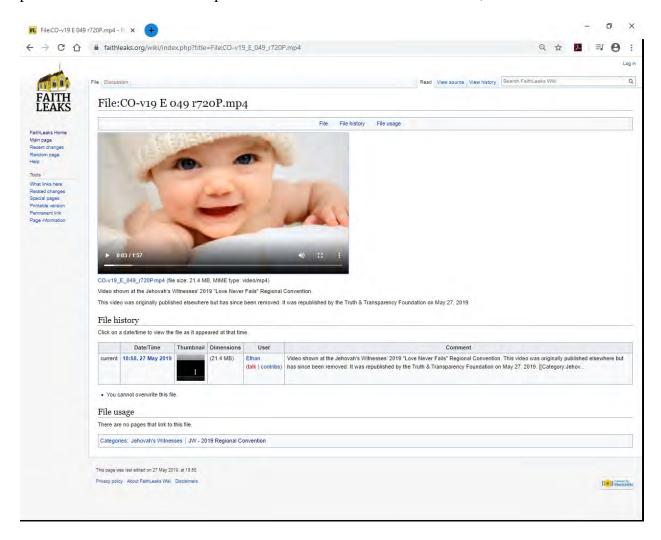


- 50. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 17 Video 1 Symposium: Creation Reveals Jehovah's Love Animals (Genesis 1:27; Matthew 6:26)." Watch Tower's copyright in the "Talk 17 Video 1 Symposium: Creation Reveals Jehovah's Love Animals (Genesis 1:27; Matthew 6:26)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191444, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 17 Video 1 Symposium: Creation Reveals Jehovah's Love Animals (Genesis 1:27; Matthew 6:26)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_047_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



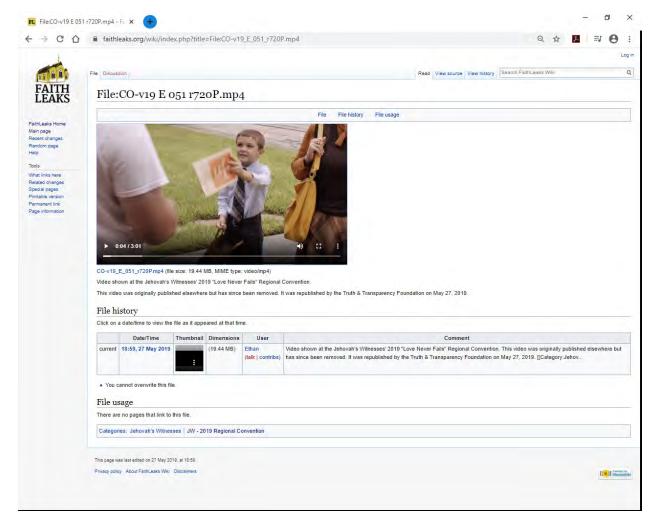
- 51. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 18 Video 1 Symposium: Creation Reveals Jehovah's Love The Human Body (Psalm 139:14; Ecclesiastes 3:11)." Watch Tower's copyright in the "Talk 18 Video 1 Symposium: Creation Reveals Jehovah's Love The Human Body (Psalm 139:14; Ecclesiastes 3:11)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191446, with an effective date of May 17, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 18 Video 1 Symposium: Creation Reveals Jehovah's Love The Human Body (Psalm 139:14; Ecclesiastes 3:11)" video on Defendants'

"Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_049_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



52. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 19 Video 1 - 'Those Whom Jehovah Loves He Disciplines' (Hebrews 12:5-11; Psalm 19:7, 8, 11)." Watch Tower's copyright in the "Talk 19 Video 1 - 'Those Whom Jehovah Loves He Disciplines' (Hebrews 12:5-11; Psalm 19:7, 8, 11)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191504, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 19 Video 1 - 'Those Whom Jehovah Loves He Disciplines' (Hebrews 12:5-11; Psalm 19:7, 8, 11)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_051_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

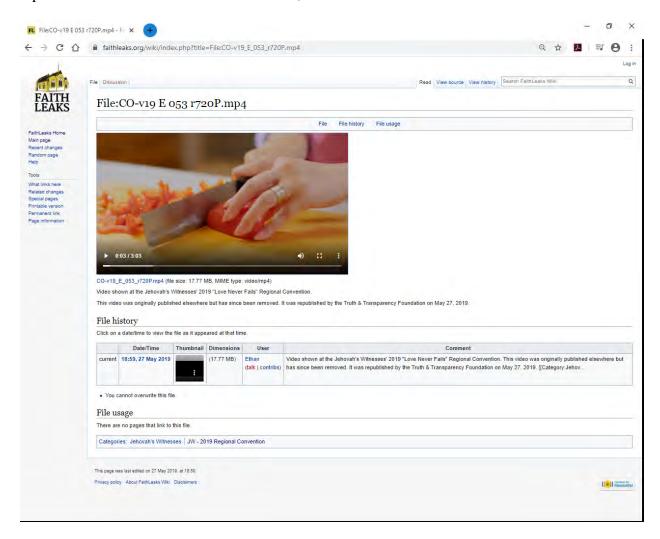


53. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 20 Video 1 - 'Clothe Yourselves With Love' (Colossians 3:12-14)." Watch Tower's copyright in the "Talk 20 Video 1 - 'Clothe Yourselves With Love' (Colossians 3:12-14)" video

has been duly registered with the United States Copyright Office under Registration No. PA0002191471, with an effective date of May 17, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 20 Video 1 - 'Clothe Yourselves With Love' (Colossians 3:12-14)" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_053_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



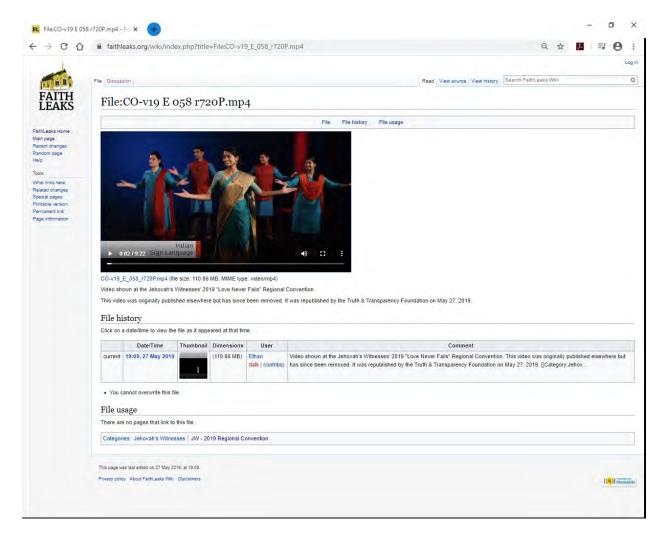
54. (a) In 2019, Watch Tower created, in-house, an original video motion picture

titled "2019 'Love Never Fails'! Convention - Music-Video Presentation 3." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention - Music-Video Presentation 3" video has been duly registered with the United States Copyright Office under Registration No.

PA0002191139, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention - Music-Video Presentation 3" video on Defendants' "Faith Leaks" website, at the URL

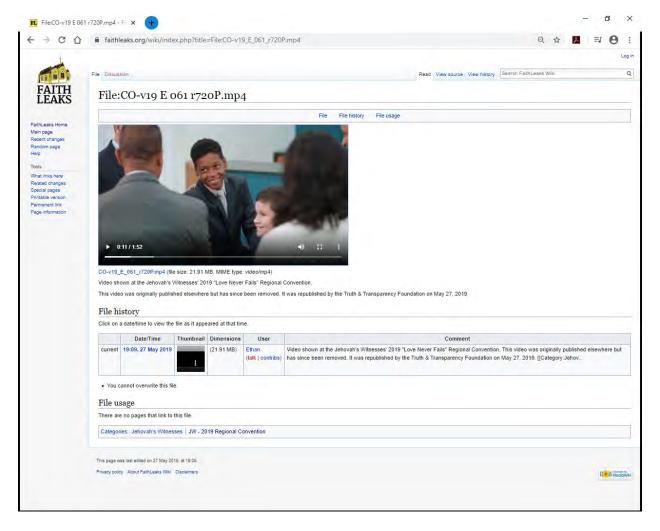
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_058_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 55. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 21 Video 1 Symposium: Display Unfailing Love in the Congregation To Those Taking the Lead (1 Thessalonians 5:12, 13)." Watch Tower's copyright in the "Talk 21 Video 1 Symposium: Display Unfailing Love in the Congregation To Those Taking the Lead (1 Thessalonians 5:12, 13)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191157, with an effective date of May 22, 2019, and Supplementary Registration No. PA0002214841, dated August 19, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 21 Video 1 Symposium: Display Unfailing

Love in the Congregation - To Those Taking the Lead (1 Thessalonians 5:12, 13)" video on Defendants' "Faith Leaks" website, at the URL

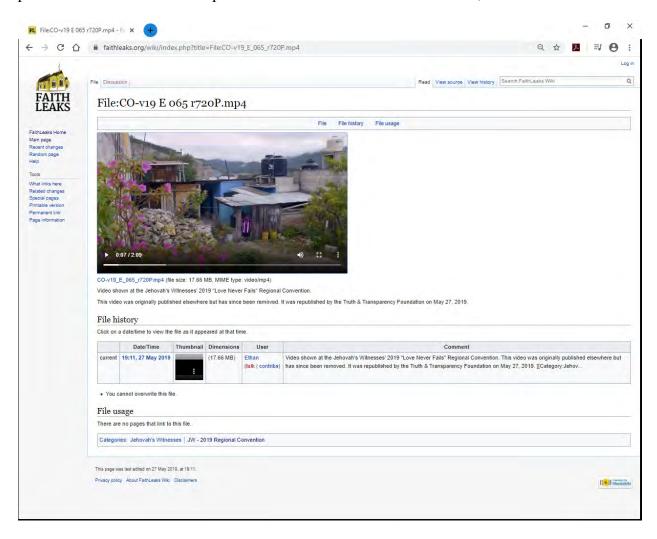
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_061_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



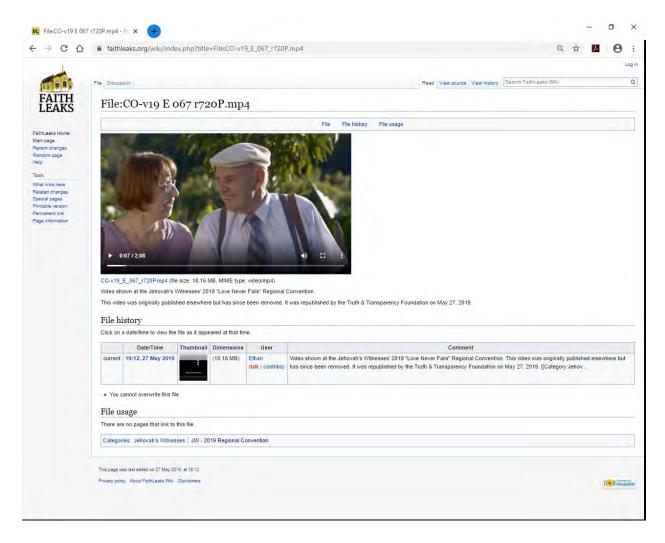
56. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 23 Video 1 - Symposium: Display Unfailing Love in the Congregation - To the Elderly (Leviticus 19:32)." Watch Tower's copyright in the "Talk 23 Video 1 - Symposium: Display Unfailing Love in the Congregation - To the Elderly (Leviticus 19:32)" video has been

duly registered with the United States Copyright Office under Registration No. PA0002191160, with an effective date of May 22, 2019, and Supplementary Registration No. PA0002216893, dated September 4, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 23 Video 1 - Symposium: Display Unfailing Love in the Congregation - To the Elderly (Leviticus 19:32)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_065_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



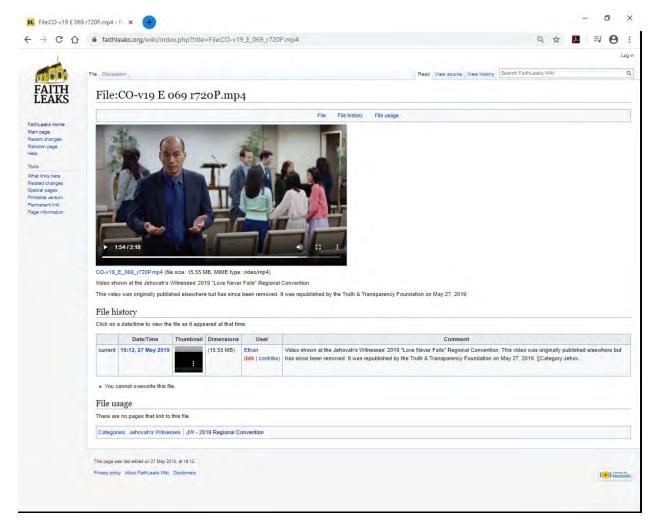
- 57. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 24 Video 1 Symposium: Display Unfailing Love in the Congregation To Full-Time Ministers (1 Thessalonians 1:3)." Watch Tower's copyright in the "Talk 24 Video 1 Symposium: Display Unfailing Love in the Congregation To Full-Time Ministers (1 Thessalonians 1:3)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191146, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 24 Video 1 Symposium: Display Unfailing Love in the Congregation To Full-Time Ministers (1 Thessalonians 1:3)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_067_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 58. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 25 Video 1 Symposium: Display Unfailing Love in the Congregation To Foreign Residents (Leviticus 19:34; Romans 15:7)." Watch Tower's copyright in the "Talk 25 Video 1 Symposium: Display Unfailing Love in the Congregation To Foreign Residents (Leviticus 19:34; Romans 15:7)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191155, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 25 Video 1 Symposium: Display Unfailing Love in the Congregation To Foreign Residents (Leviticus 19:34; Romans 15:7)" video on

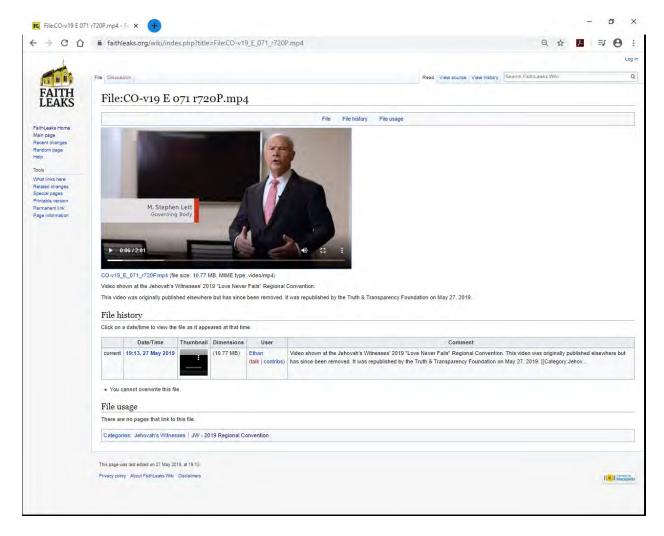
Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_069_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



59. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "ANNOUNCEMENT: Invitation to School for Kingdom Evangelizers Meeting." Watch Tower's copyright in the "ANNOUNCEMENT: Invitation to School for Kingdom Evangelizers Meeting" video has been duly registered with the United States Copyright Office under Registration No. PA0002191149, with an effective date of May 22, 2019.

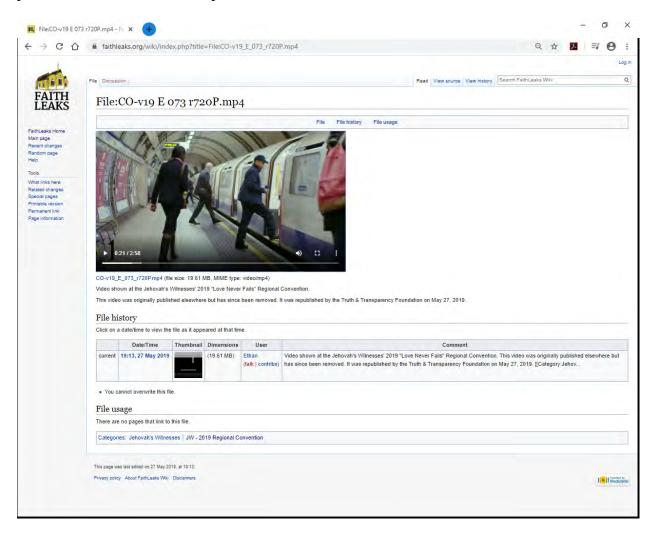
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "ANNOUNCEMENT: Invitation to School for Kingdom Evangelizers Meeting" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_071_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



60. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 26 Video 1 - Symposium: Display Unfailing Love in the Ministry - Show Your Love for God (1 John 5:3)." Watch Tower's copyright in the "Talk 26 Video 1 - Symposium: Display

Unfailing Love in the Ministry - Show Your Love for God (1 John 5:3)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191683, with an effective date of May 22, 2019.

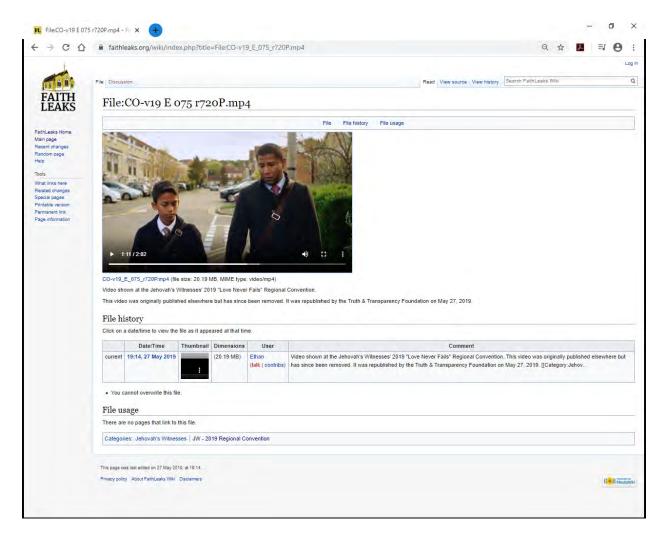
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 26 Video 1 - Symposium: Display Unfailing Love in the Ministry - Show Your Love for God (1 John 5:3)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_073_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 61. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 27 Video 1 Symposium: Display Unfailing Love in the Ministry 'Love Your Neighbor as Yourself' (Matthew 22:39)." Watch Tower's copyright in the "Talk 27 Video 1 Symposium: Display Unfailing Love in the Ministry 'Love Your Neighbor as Yourself' (Matthew 22:39)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191148, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 27 Video 1 Symposium: Display Unfailing Love in the Ministry 'Love Your Neighbor as Yourself' (Matthew 22:39)" video on Defendants' "Faith Leaks" website, at the URL

 https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_075_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further

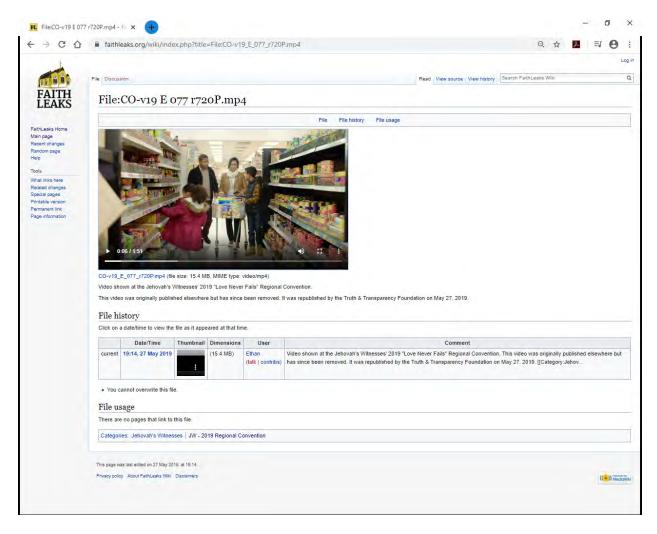
reproduction and distribution via download, without restriction:



- 62. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 28 Video 1 Symposium: Display Unfailing Love in the Ministry Love Jehovah's Word (Psalm 119:97; Matthew 13:52)." Watch Tower's copyright in the "Talk 28 Video 1 Symposium: Display Unfailing Love in the Ministry Love Jehovah's Word (Psalm 119:97; Matthew 13:52)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191684, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 28 Video 1 Symposium: Display Unfailing Love in the Ministry Love Jehovah's Word (Psalm 119:97; Matthew 13:52)" video on

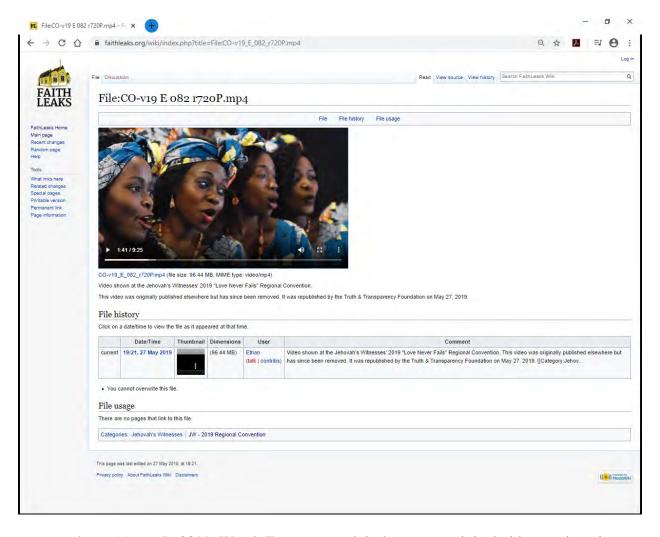
Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_077_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



63. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "2019 'Love Never Fails'! Convention - Music-Video Presentation 4 (v2)." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention - Music-Video Presentation 4 (v2)" video has been duly registered with the United States Copyright Office under Registration No. PA0002193286, with an effective date of June 5, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention - Music-Video Presentation 4 (v2)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_082_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

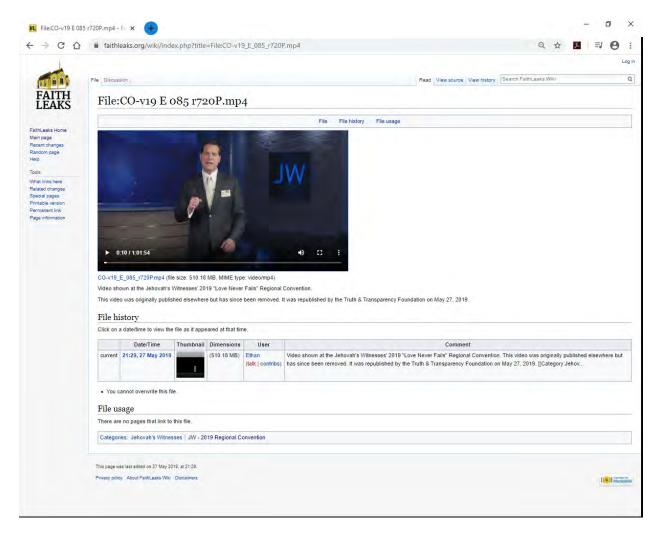


64. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 30 Video 1 - Symposium: How Our Brothers Are Showing Unfailing Love In ...

Africa (Genesis 16:13), Asia (Acts 2:44), Europe (John 4:35), North America (1 Corinthians

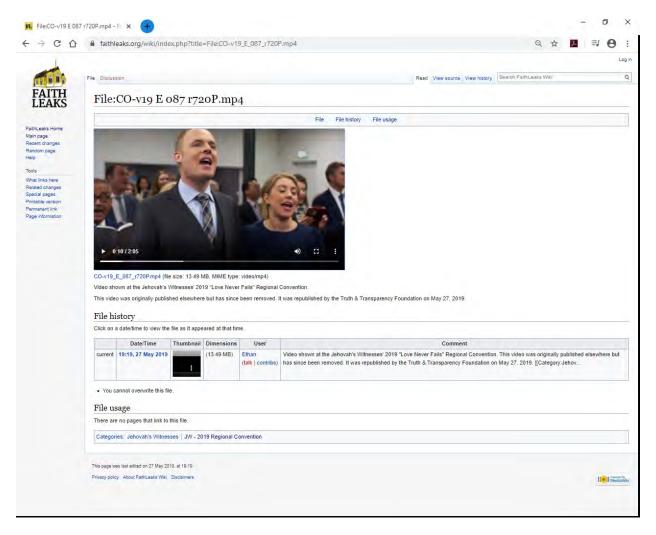
- 9:22), Oceania (Psalm 35:18), South America (Acts 1:8)." Watch Tower's copyright in the "Talk 30 Video 1 Symposium: How Our Brothers Are Showing Unfailing Love In ... Africa (Genesis 16:13), Asia (Acts 2:44), Europe (John 4:35), North America (1 Corinthians 9:22), Oceania (Psalm 35:18), South America (Acts 1:8)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191713, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 30 Video 1 Symposium: How Our Brothers Are Showing Unfailing Love In ... Africa (Genesis 16:13), Asia (Acts 2:44), Europe (John 4:35), North America (1 Corinthians 9:22), Oceania (Psalm 35:18), South America (Acts 1:8)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_085_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further

reproduction and distribution via download, without restriction:



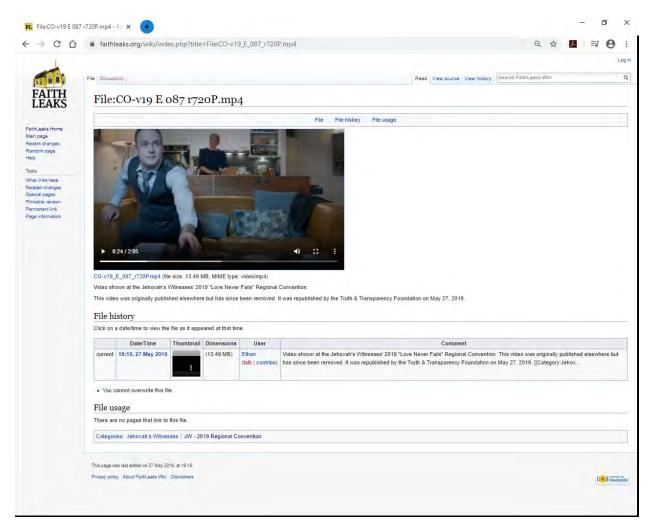
- 65. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 31 Video 1 Display Unfailing Love in Your Family Love Your Wife (Ephesians 5:28, 29)." Watch Tower's copyright in the "Talk 31 Video 1 Display Unfailing Love in Your Family Love Your Wife (Ephesians 5:28, 29)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191714, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 31 Video 1 Display Unfailing Love in Your Family Love Your Wife (Ephesians 5:28, 29)" video on Defendants' "Faith Leaks" website, at

the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_087_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



66. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 32 Video 1 - Display Unfailing Love in Your Family - Love Your Husband (Ephesians 5:33; 1 Peter 3:1-6)." Watch Tower's copyright in the "Talk 32 Video 1 - Display Unfailing Love in Your Family - Love Your Husband (Ephesians 5:33; 1 Peter 3:1-6)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191715, with an effective date of May 22, 2019.

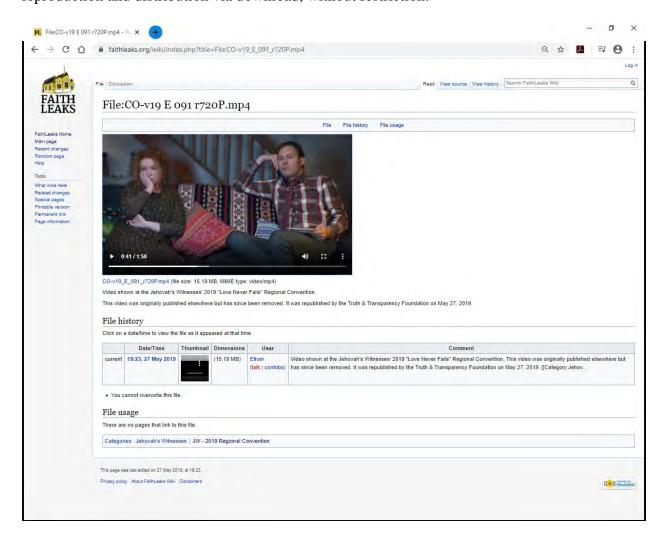
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 32 Video 1 - Display Unfailing Love in Your Family - Love Your Husband (Ephesians 5:33; 1 Peter 3:1-6)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_089_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



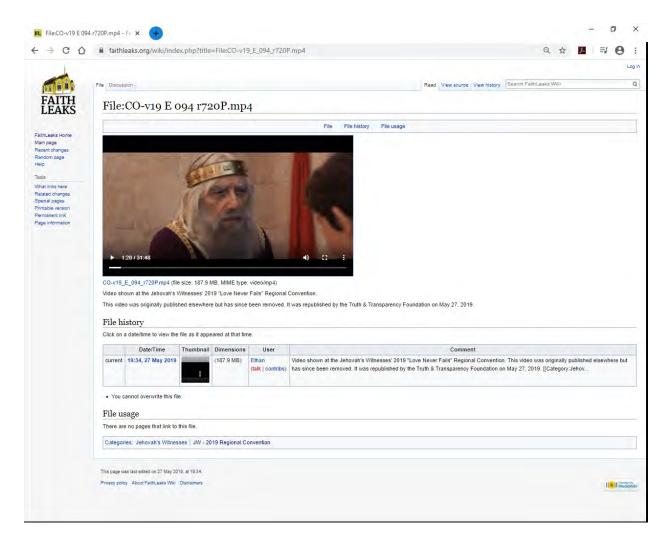
67. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 33 Video 1 - Display Unfailing Love in Your Family - Love Your Children (Titus 2:4)." Watch Tower's copyright in the "Talk 33 Video 1 - Display Unfailing Love in Your

Family - Love Your Children (Titus 2:4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191717, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 33 Video 1 - Display Unfailing Love in Your Family - Love Your Children (Titus 2:4)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_091_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

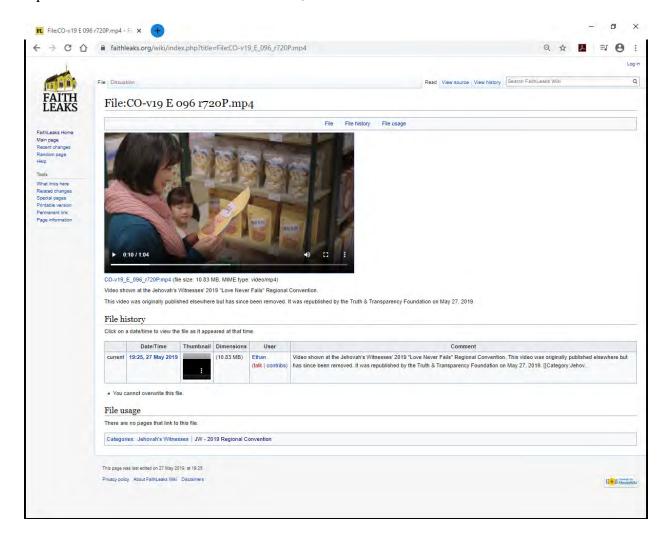


- 68. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "The Story of Josiah: Love Jehovah; Hate What Is Bad Part I (2 Chronicles 33:10-24; 34:1, 2)." Watch Tower's copyright in the "The Story of Josiah: Love Jehovah; Hate What Is Bad Part I (2 Chronicles 33:10-24; 34:1, 2)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191144, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "The Story of Josiah: Love Jehovah; Hate What Is Bad Part I (2 Chronicles 33:10-24; 34:1, 2)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_094_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



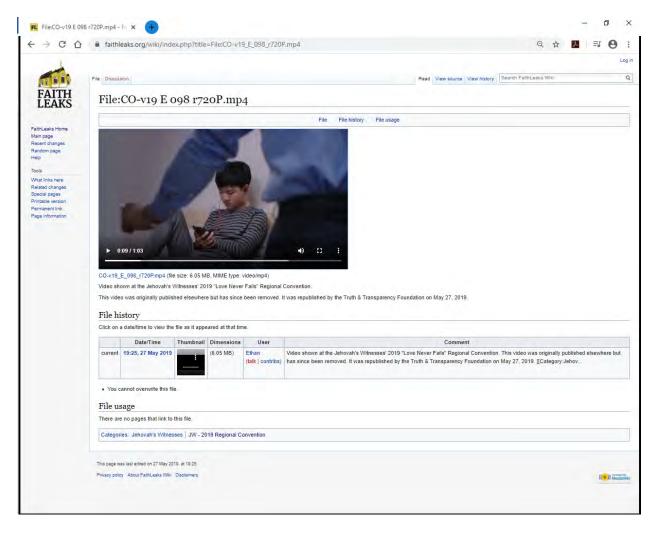
- 69. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 35 Video 1 Teach Your Children How to Show Love (2 Timothy 3:14, 15)." Watch Tower's copyright in the "Talk 35 Video 1 Teach Your Children How to Show Love (2 Timothy 3:14, 15)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191678, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 35 Video 1 Teach Your Children How to Show Love (2 Timothy 3:14, 15)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_096_r720P.mp4, where it is

available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



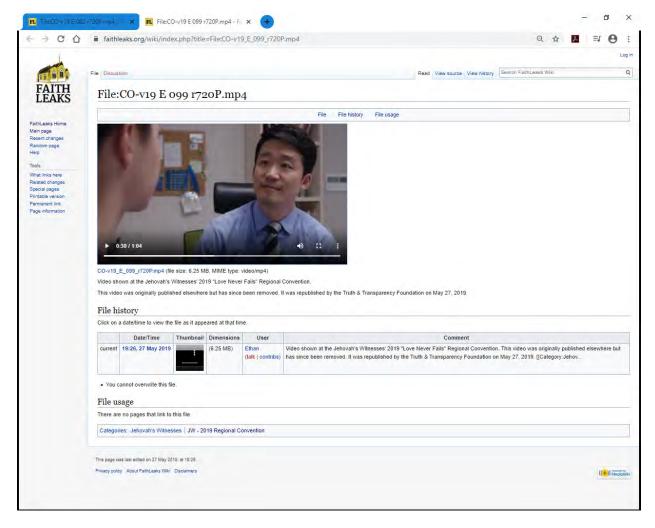
- 70. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 35 Video 3 Teach Your Children How to Show Love (2 Timothy 3:14, 15)." Watch Tower's copyright in the "Talk 35 Video 3 Teach Your Children How to Show Love (2 Timothy 3:14, 15)" video has been duly registered with the United States Copyright Office under Registration No. PA0002192006, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 35 Video 3 Teach Your Children How to

Show Love (2 Timothy 3:14, 15)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_098_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



71. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 35 Video 4 - Teach Your Children How to Show Love (2 Timothy 3:14, 15)." Watch Tower's copyright in the "Talk 35 Video 4 - Teach Your Children How to Show Love (2 Timothy 3:14, 15)" video has been duly registered with the United States Copyright Office under Registration No. PA0002192007, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 35 Video 4 - Teach Your Children How to Show Love (2 Timothy 3:14, 15)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_099_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

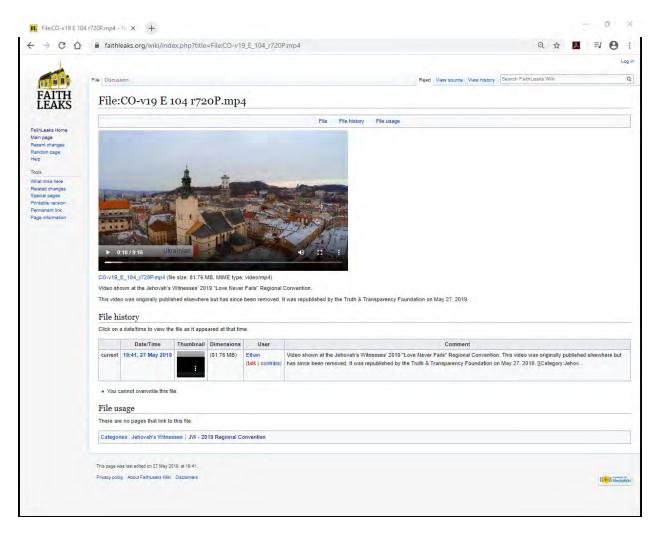


72. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "2019 'Love Never Fails'! Convention - Music-Video Presentation 5." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention - Music-Video Presentation 5" video has

been duly registered with the United States Copyright Office under Registration No. PA0002191679, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention - Music-Video Presentation 5" video on Defendants' "Faith Leaks" website, at the URL

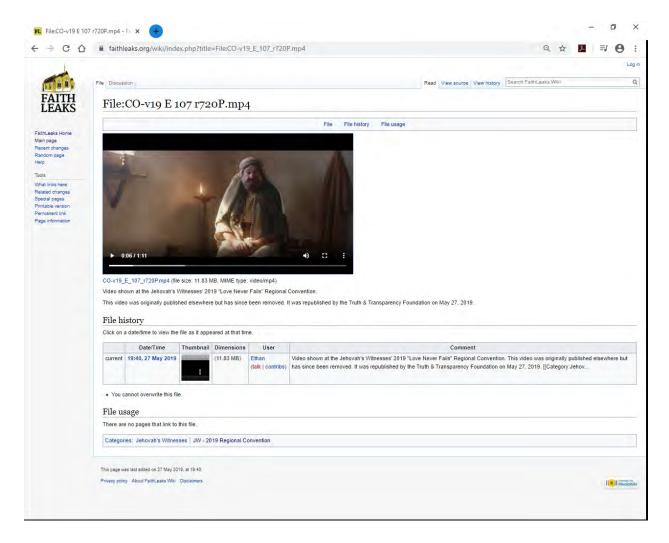
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_104_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



73. (a) In 2019, Watch Tower created, in-house, an original video motion picture

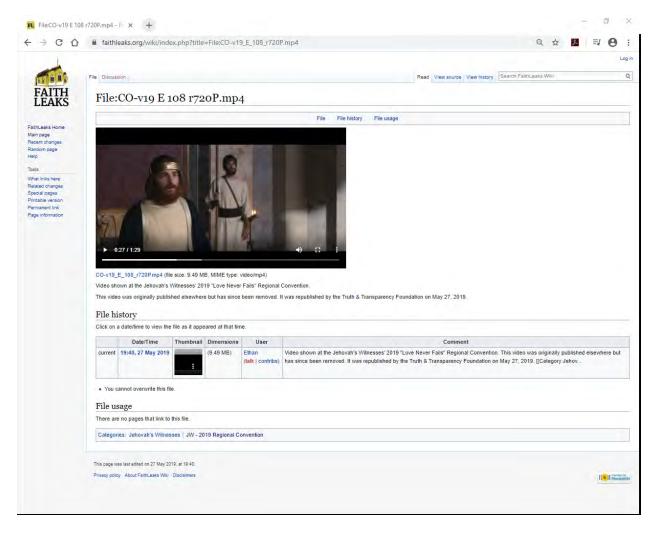
titled "Talk 36 Video 1 - Symposium: Remember How Love Behaves - Is Patient and Kind (1 Corinthians 13:4)." Watch Tower's copyright in the "Talk 36 Video 1 - Symposium: Remember How Love Behaves - Is Patient and Kind (1 Corinthians 13:4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002192010, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 36 Video 1 - Symposium: Remember How Love Behaves - Is Patient and Kind (1 Corinthians 13:4)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_107_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



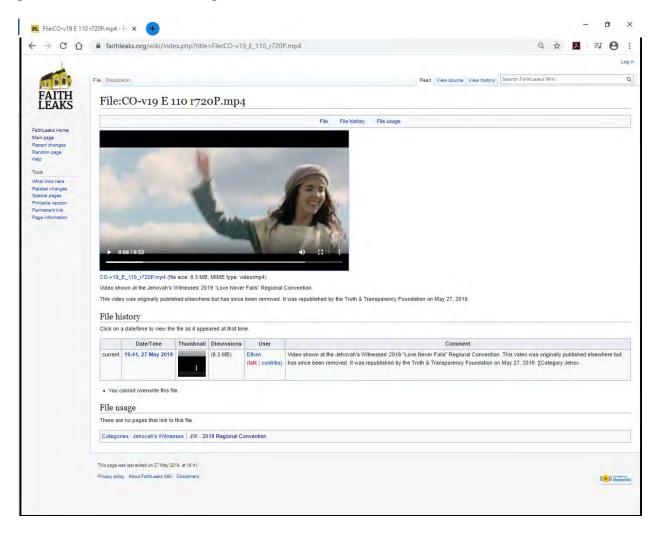
- 74. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 36 Video 2 Symposium: Remember How Love Behaves Is Patient and Kind (1 Corinthians 13:4)." Watch Tower's copyright in the "Talk 36 Video 2 Symposium: Remember How Love Behaves Is Patient and Kind (1 Corinthians 13:4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002192009, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 36 Video 2 Symposium: Remember How Love Behaves Is Patient and Kind (1 Corinthians 13:4)" video on Defendants' "Faith Leaks"

website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_108_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



75. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 37 Video 1 - Symposium: Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)." Watch Tower's copyright in the "Talk 37 Video 1 - Symposium: Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191147, with an effective date of May 22, 2019.

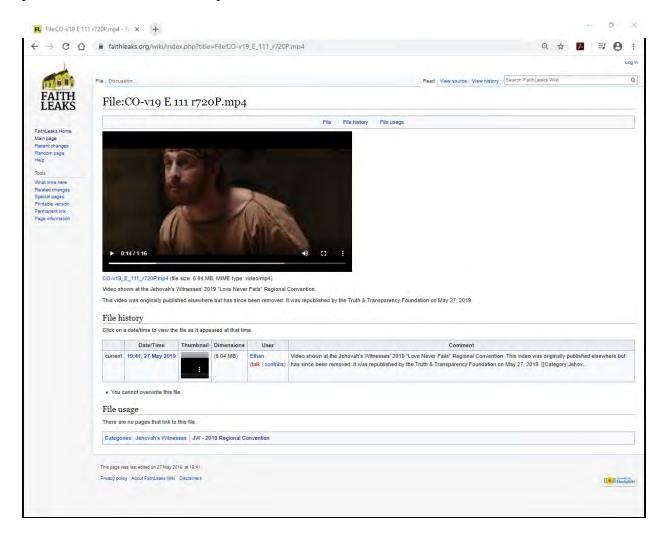
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 37 Video 1 - Symposium: Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_110_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



76. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 37 Video 2 - Symposium: Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)." Watch Tower's copyright in the "Talk 37 Video 2 - Symposium:

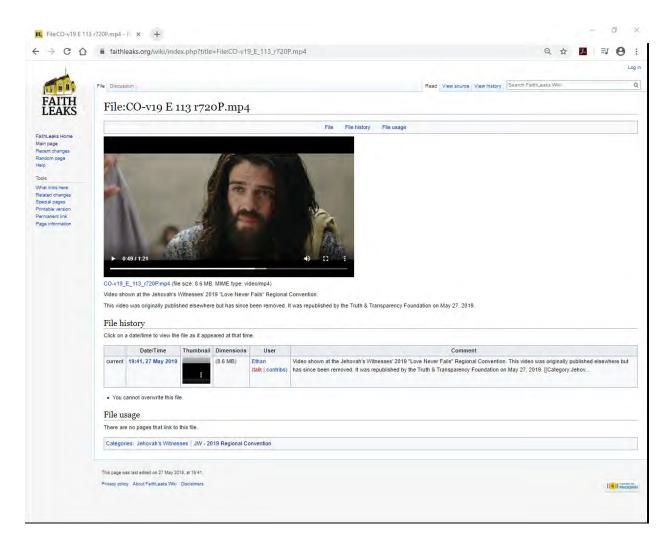
Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191150, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 37 Video 2 - Symposium: Remember How Love Behaves - Is Not Jealous; Does Not Brag (1 Corinthians 13:4)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_111_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 77. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 38 Video 1 Symposium: Remember How Love Behaves Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)." Watch Tower's copyright in the "Talk 38 Video 1 Symposium: Remember How Love Behaves Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191151, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 38 Video 1 Symposium: Remember How Love Behaves Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)" video on Defendants' "Faith Leaks" website, at the URL

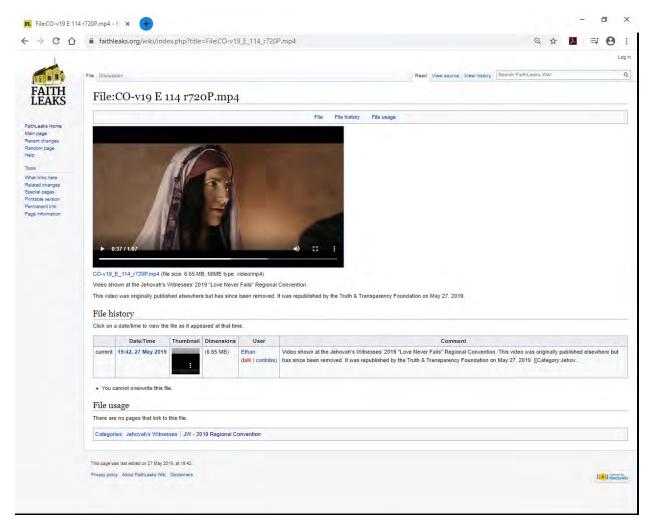
 https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_113_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 78. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 38 Video 2 Symposium: Remember How Love Behaves Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)." Watch Tower's copyright in the "Talk 38 Video 2 Symposium: Remember How Love Behaves Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191152, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 38 Video 2 Symposium: Remember How

Love Behaves - Does Not Get Puffed Up; Does Not Behave Indecently (1 Corinthians 13:4, 5)" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_114_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

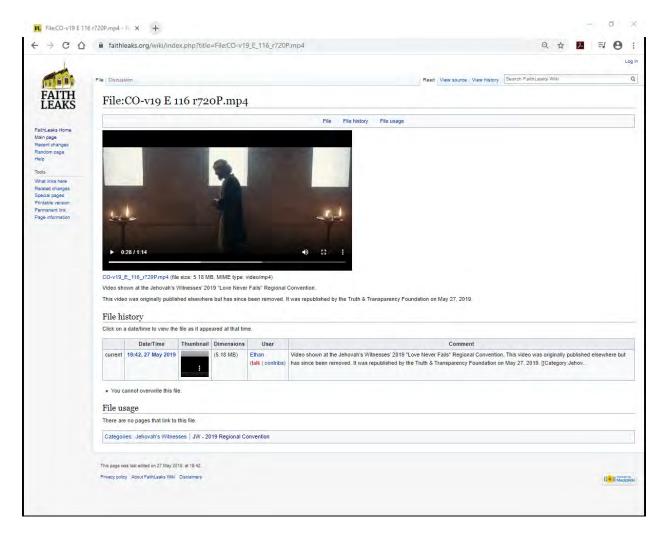


79. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 39 Video 1 - Symposium: Remember How Love Behaves - Does Not Look for Its Own Interests; Does Not Become Provoked (1 Corinthians 13:5)." Watch Tower's copyright in the "Talk 39 Video 1 - Symposium: Remember How Love Behaves - Does Not Look for Its Own

Interests; Does Not Become Provoked (1 Corinthians 13:5)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191156, with an effective date of May 22, 2019.

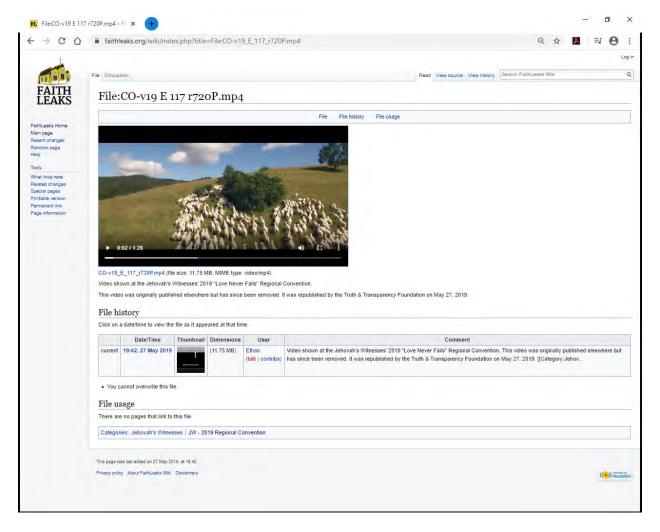
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 39 Video 1 - Symposium: Remember How Love Behaves - Does Not Look for Its Own Interests; Does Not Become Provoked (1 Corinthians 13:5)" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_116_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 80. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 39 Video 2 Symposium: Remember How Love Behaves Does Not Look for Its Own Interests; Does Not Become Provoked (1 Corinthians 13:5)." Watch Tower's copyright in the "Talk 39 Video 2 Symposium: Remember How Love Behaves Does Not Look for Its Own Interests; Does Not Become Provoked (1 Corinthians 13:5)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191153, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 39 Video 2 Symposium: Remember How

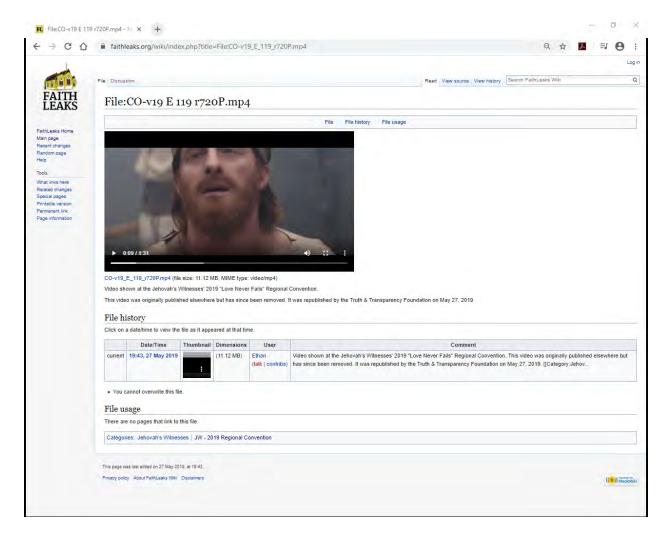
Love Behaves - Does Not Look for Its Own Interests; Does Not Become Provoked (1 Corinthians 13:5)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_117_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



81. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 40 Video 1 - Symposium: Remember How Love Behaves - Does Not Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)." Watch Tower's copyright in the "Talk 40 Video 1 - Symposium: Remember How Love Behaves - Does Not

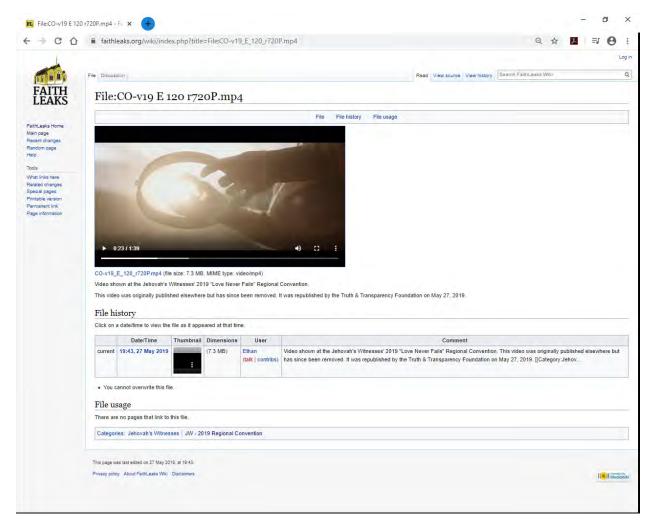
Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191154, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 40 Video 1 - Symposium: Remember How Love Behaves - Does Not Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_119_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 82. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 40 Video 2 Symposium: Remember How Love Behaves Does Not Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)." Watch Tower's copyright in the "Talk 40 Video 2 Symposium: Remember How Love Behaves Does Not Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191719, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 40 Video 2 Symposium: Remember How

Love Behaves - Does Not Keep Account of the Injury; Does Not Rejoice Over Unrighteousness (1 Corinthians 13:5, 6)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_120_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

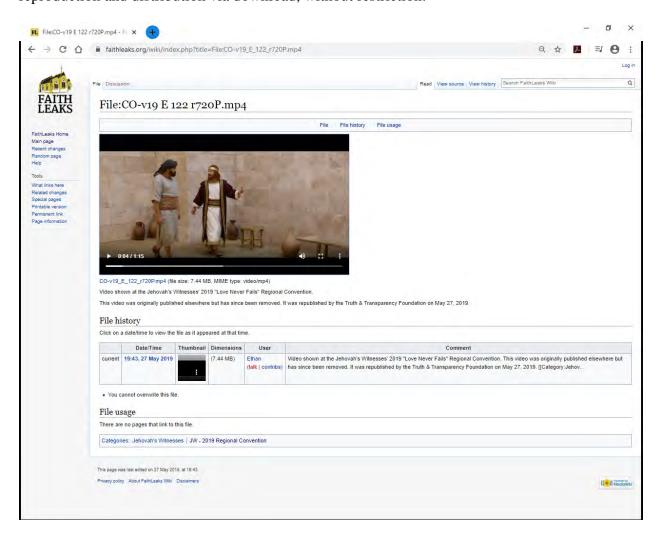


83. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 41 Video 1 - Symposium: Remember How Love Behaves - Rejoices With the Truth; Bears All Things (1 Corinthians 13:6, 7)." Watch Tower's copyright in the "Talk 41 Video 1 - Symposium: Remember How Love Behaves - Rejoices With the Truth; Bears All Things (1

Corinthians 13:6, 7)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191722, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 41 Video 1 - Symposium: Remember How Love Behaves - Rejoices With the Truth; Bears All Things (1 Corinthians 13:6, 7)" video on Defendants' "Faith Leaks" website, at the URL

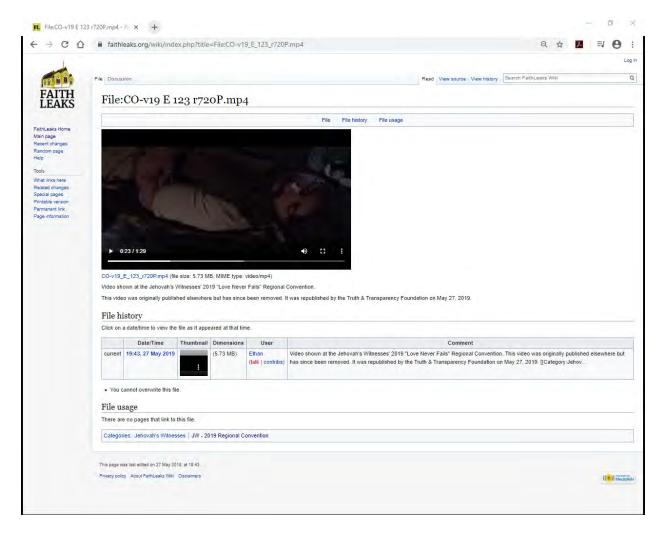
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_122_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 84. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 41 Video 2 Symposium: Remember How Love Behaves Rejoices With the Truth; Bears All Things (1 Corinthians 13:6, 7)." Watch Tower's copyright in the "Talk 41 Video 2 Symposium: Remember How Love Behaves Rejoices With the Truth; Bears All Things (1 Corinthians 13:6, 7)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191723, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 41 Video 2 Symposium: Remember How Love Behaves Rejoices With the Truth; Bears All Things (1 Corinthians 13:6, 7)" video on Defendants' "Faith Leaks" website, at the URL

 https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_123_r720P.mp4, where it is

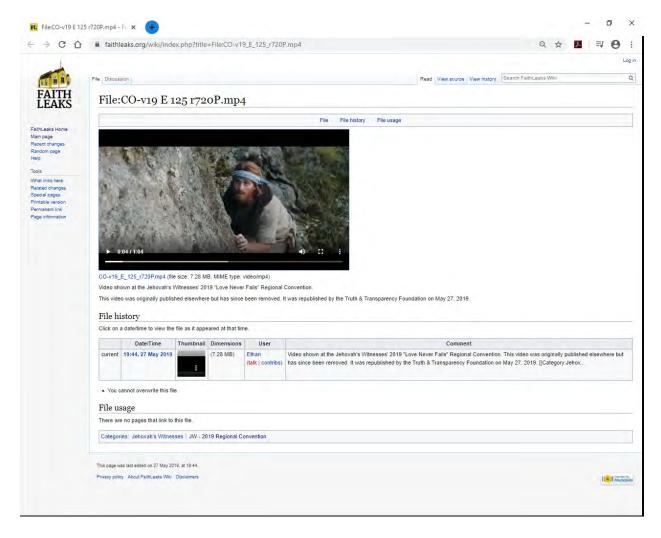
available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 85. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 42 Video 1 Symposium: Remember How Love Behaves Believes All Things; Hopes All Things 1 Corinthians 13:7)." Watch Tower's copyright in the "Talk 42 Video 1 Symposium: Remember How Love Behaves Believes All Things; Hopes All Things 1 Corinthians 13:7)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191724, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 42 Video 1 Symposium: Remember How Love Behaves Believes All Things; Hopes All Things 1 Corinthians 13:7)" video on

Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_125_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

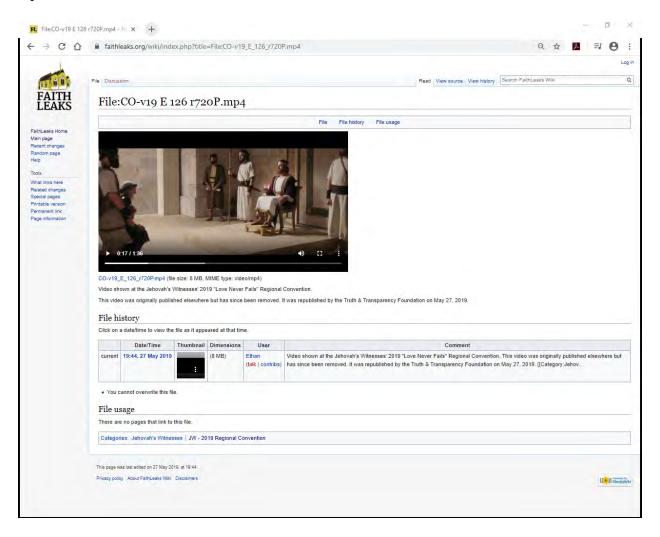


86. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 42 Video 2 - Symposium: Remember How Love Behaves - Believes All Things; Hopes All Things 1 Corinthians 13:7)." Watch Tower's copyright in the "Talk 42 Video 2 - Symposium: Remember How Love Behaves - Believes All Things; Hopes All Things 1 Corinthians 13:7)" video has been duly registered with the United States Copyright Office under

Registration No. PA0002191727, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 42 Video 2 - Symposium: Remember How Love Behaves - Believes All Things; Hopes All Things 1 Corinthians 13:7)" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_126_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

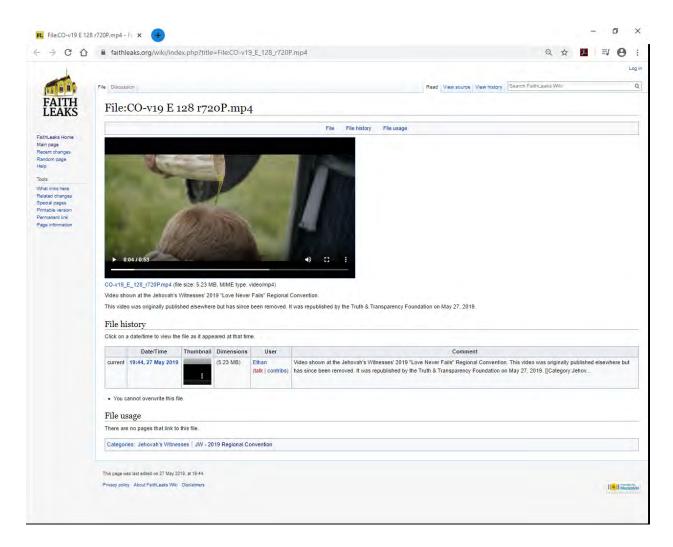


87. (a) In 2019, Watch Tower created, in-house, an original video motion picture

titled "Talk 43 Video 1 - Symposium: Remember How Love Behaves - Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)." Watch Tower's copyright in the "Talk 43 Video 1 - Symposium: Remember How Love Behaves - Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191729, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 43 Video 1 - Symposium: Remember How Love Behaves - Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)" video on Defendants' "Faith Leaks" website, at the URL

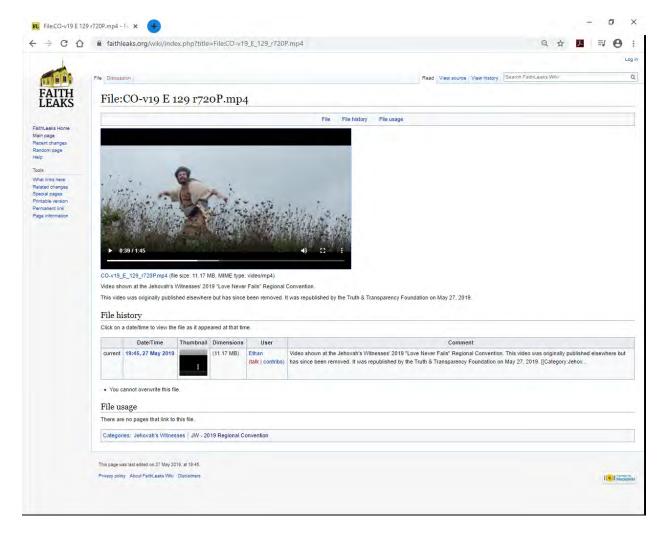
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_128_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 88. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 43 Video 2 Symposium: Remember How Love Behaves Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)." Watch Tower's copyright in the "Talk 43 Video 2 Symposium: Remember How Love Behaves Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191159, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 43 Video 2 Symposium: Remember How Love Behaves Endures All Things; Love Never Fails (1 Corinthians 13:7, 8)" video on

Defendants' "Faith Leaks" website, at the URL

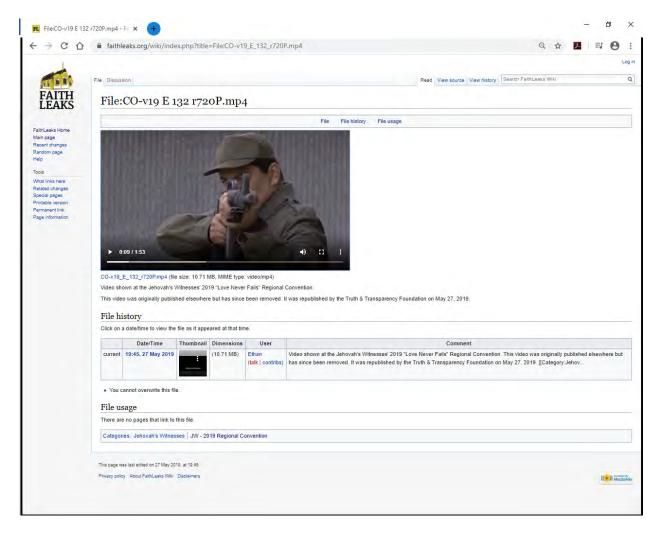
https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_129_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



89. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 44 Video 1 - Public Bible Discourse: True Love in a Hate-Filled World - Where? (John 13:34, 35)." Watch Tower's copyright in the "Talk 44 Video 1 - Public Bible Discourse: True Love in a Hate-Filled World - Where? (John 13:34, 35)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191418, with an

effective date of May 22, 2019.

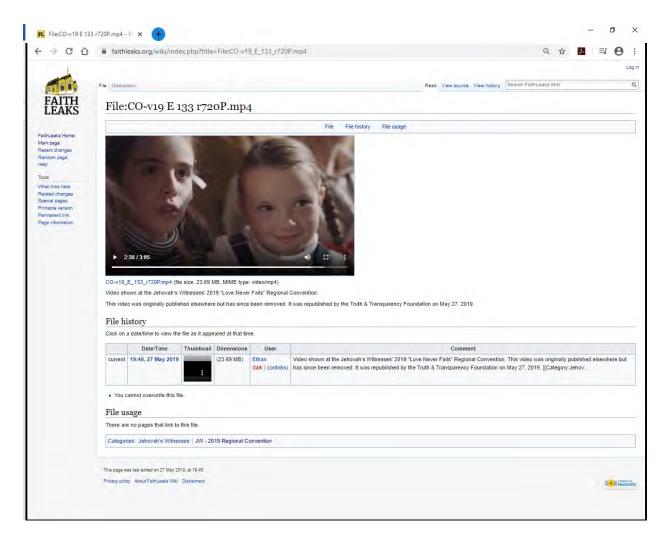
(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 44 Video 1 - Public Bible Discourse: True Love in a Hate-Filled World - Where? (John 13:34, 35)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_132_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



90. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 44 Video 2 - Public Bible Discourse: True Love in a Hate-Filled World - Where?

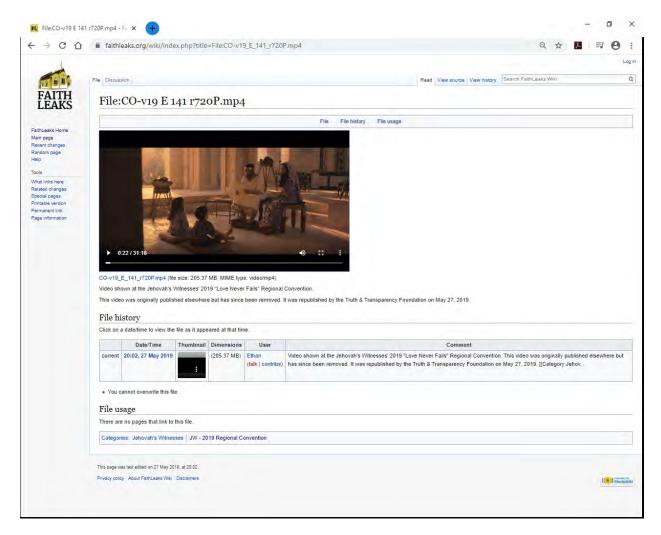
(John 13:34, 35)." Watch Tower's copyright in the "Talk 44 Video 2 - Public Bible Discourse: True Love in a Hate-Filled World - Where? (John 13:34, 35)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191141, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 44 Video 2 - Public Bible Discourse: True Love in a Hate-Filled World - Where? (John 13:34, 35)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_133_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



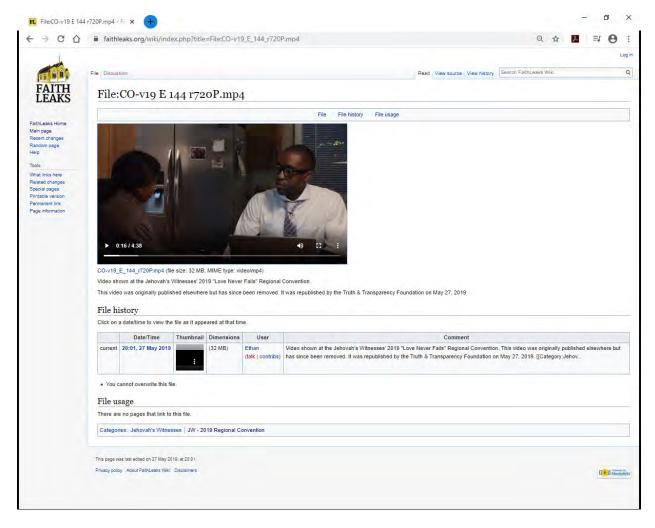
- 91. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "The Story of Josiah: Love Jehovah; Hate What Is Bad Part II (2 Kings 22:3-20; 23:1-25; 2 Chronicles 34:3-33; 35:1-19)." Watch Tower's copyright in the "The Story of Josiah: Love Jehovah; Hate What Is Bad Part II (2 Kings 22:3-20; 23:1-25; 2 Chronicles 34:3-33; 35:1-19)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191682, with an effective date of May 22, 2019.
- (b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "The Story of Josiah: Love Jehovah; Hate What Is Bad Part II (2 Kings 22:3-20; 23:1-25; 2 Chronicles 34:3-33; 35:1-19)" video on Defendants'

"Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_141_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



92. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 47 Video 1 - 'Carefully Consider Jehovah's Acts of Loyal Love' (Psalm 107:43; Ephesians 5:1, 2)." Watch Tower's copyright in the "Talk 47 Video 1 - 'Carefully Consider Jehovah's Acts of Loyal Love' (Psalm 107:43; Ephesians 5:1, 2)" video has been duly registered with the United States Copyright Office under Registration No. PA0002191138, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 47 Video 1 - 'Carefully Consider Jehovah's Acts of Loyal Love' (Psalm 107:43; Ephesians 5:1, 2)" video on Defendants' "Faith Leaks" website, at the URL https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_144_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:

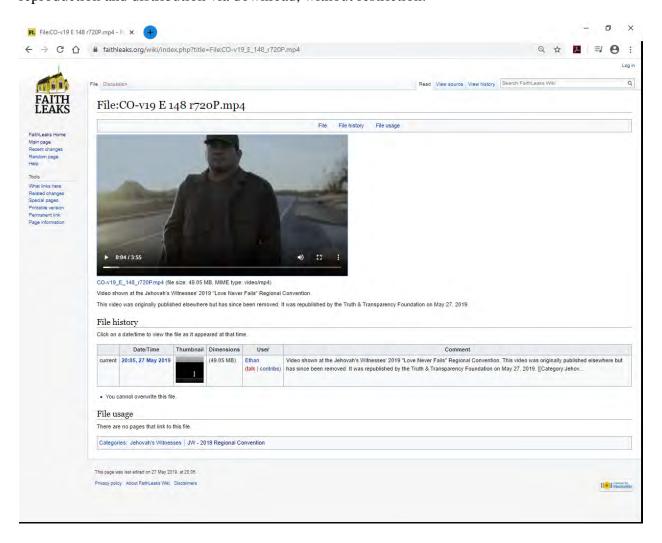


93. (a) In 2019, Watch Tower created, in-house, an original video motion picture titled "Talk 47 Video 5 - Unfailing Love (1 Corinthians 13:8))." Watch Tower's copyright in the "Talk 47 Video 5 - Unfailing Love (1 Corinthians 13:8))" video has been duly registered with the

United States Copyright Office under Registration No. PA0002191706, with an effective date of May 24, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "Talk 47 Video 5 - Unfailing Love (1 Corinthians 13:8))" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_148_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



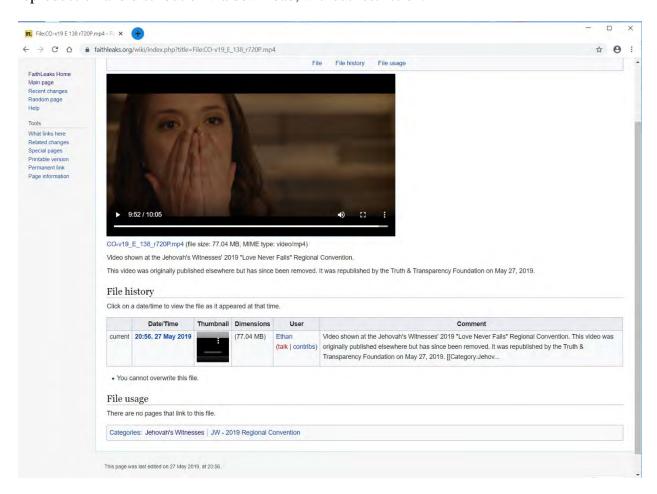
94. (a) In 2019, Watch Tower created, in-house, an original video motion picture

titled "2019 'Love Never Fails'! Convention - Music-Video Presentation 6." Watch Tower's copyright in the "2019 'Love Never Fails'! Convention - Music-Video Presentation 6" video has been duly registered with the United States Copyright Office under Registration No.

PA0002191143, with an effective date of May 22, 2019.

(b) Defendants have unlawfully copied, reproduced, publicly displayed, publicly performed and distributed Watch Tower's "2019 'Love Never Fails'! Convention - Music-Video Presentation 6" video on Defendants' "Faith Leaks" website, at the URL

https://faithleaks.org/wiki/index.php?title=File:CO-v19_E_083_r720P.mp4, where it is available, in its entirety and without alteration, for public performance and for further reproduction and distribution via download, without restriction:



- 95. Defendants McKnight and Dodge personally participated in, and supervised and directed, the infringing acts described above. Indeed, they personally conceived of, and directed and approved all key aspects of, TTF's infringing activities. They were the moving force behind those infringing acts.
- 96. The acts of Defendants described above were committed without the permission, license or consent of Watch Tower.
- 97. Upon information and belief, the acts of Defendants described above were committed with knowledge or in reckless disregard of Watch Tower's exclusive rights in the Watch Tower videos.

CLAIM FOR RELIEF (Copyright Infringement)

- 98. Watch Tower repeats and realleges the assertions contained in paragraphs 1 through 97 above.
- 99. Watch Tower is the author of, and sole proprietor of all right, title and interest in and to the copyrights in, each of the Watch Tower videos described above. Under 17 U.S.C. § 106, Watch Tower has the exclusive right to reproduce, distribute, publicly display, publicly perform, and prepare derivative works based on the Watch Tower videos.
- 100. As alleged above, Defendants have infringed the copyrights in each of the above-described Watch Tower videos by unlawfully reproducing, distributing, publicly displaying, publicly performing and/or distributing the Watch Tower videos.
- 101. As alleged above, Defendants' infringements are willful in that they are committed with knowledge or in reckless disregard of Watch Tower's exclusive rights in its copyrighted videos.

- 102. Watch Tower is entitled to recover from Defendants its actual damages as well as the profits of Defendants attributable to each of the infringements and not taken into account in computing actual damages, pursuant to 17 U.S.C. § 504(b); or, at Watch Tower's election, an award of statutory damages pursuant to 17 U.S.C. § 504(c) with respect to each of the Watch Tower videos infringed by Defendants that meets the requirements of 17 U.S.C. § 412.
- 103. Pursuant to 17 U.S.C. § 505, Watch Tower is also entitled to recover its costs and attorneys' fees from Defendants with respect to each of the Watch Tower videos infringed by Defendants that meets the requirements of 17 U.S.C. § 412.
- 104. As a result of Defendants' copyright infringements, Watch Tower has suffered, and will continue to suffer, irreparable injury not fully compensable in monetary damages, and is therefore entitled to an injunction enjoining Defendants from engaging in their infringing activities.

WHEREFORE, Watch Tower prays that the Court:

- 1. Find that Defendants have willfully infringed Watch Tower's registered copyrights in the Watch Tower videos;
- 2. Preliminarily and permanently enjoin Defendants, their officers, agents, employees, and related companies, and all persons acting for, with, by, through, or under them, from copying, reproducing, publicly displaying, publicly performing, distributing, advertising, promoting, offering for sale or selling the Watch Tower videos;
- 3. (a) Award to Watch Tower, pursuant to 17 U.S.C. § 504(c), its actual damages incurred as a result of Defendants' acts of copyright infringement, and all profits Defendants realized as a result of such unlawful acts, in amounts to be determined at trial; or

- (b) In the alternative, with respect to each of the Watch Tower Videos infringed by Defendants that meets the requirements of 17 U.S.C. § 412, award to Watch Tower, at its election, statutory damages pursuant to 17 U.S.C. § 504(c);
- 4. Award to Watch Tower, pursuant to 17 U.S.C. § 505, its costs and attorneys' fees incurred as a result of Defendants' unlawful acts; and
- 5. Grant such other and further relief as the Court deems necessary and proper under the circumstances.

Dated: New York, New York April 30, 2020

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.

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Thomas Kjellberg (txk@cll.com)

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Attorneys for Plaintiff