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FILED
 LOS ANGELES SUPERIOR COURT

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5 Attorneys for Plaintiffs
 6 MICHELLE PFEIFFER, DIANE KEATON,
 MANDY MOORE and SANDRA BULLOCK

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 FOR THE COUNTY OF LOS ANGELES - WEST DISTRICT

10

11 MICHELLE PFEIFFER, an individual;
 12 DIANE KEATON, an individual;
 13 MANDY MOORE, an individual; and
 SANDRA BULLOCK, an individual;

Case No. **SC101403**

**COMPLAINT FOR DAMAGES AND
 INJUNCTIVE RELIEF FOR:**

14 Plaintiffs,
 15 v.

1. VIOLATION OF CALIFORNIA CIVIL CODE § 3344;
2. VIOLATION OF COMMON LAW RIGHT OF PUBLICITY; and
3. UNJUST ENRICHMENT

16 COMPUSA.COM, INC., a corporation;
 17 COMPUSA, INC., a corporation;
 18 TIGERDIRECT, INC., a corporation;
 SYSTEMAX, INC., a corporation;
 19 GLOBAL COMPUTER SUPPLIES, INC.,
 a corporation; GLOBAL GOV/ED, an entity
 of unknown form; INFOTEL
 20 DISTRIBUTORS USA, an entity of
 unknown form; and DOES 1-20, inclusive,

DEMAND FOR JURY TRIAL

INITIAL CASE MANAGEMENT REVIEW
 AND CONFERENCE **John H. Reid**
 MAY 0 6 2009

21 Defendants.

22 *[Handwritten signatures]*

[Handwritten signature] 8:30 AM

23 Plaintiffs Michelle Pfeiffer, Diane Keaton, Mandy Moore and Sandra Bullock (sometimes
 24 collectively, "Plaintiffs") allege as follows:

SUMMARY OF THE ACTION

26 1. Michelle Pfeiffer, Diane Keaton, Mandy Moore and Sandra Bullock are
 27 internationally recognized motion picture stars and celebrities, and their images, identities and
 28 personas have tremendous commercial value. Defendants CompUSA, TigerDirect, Systemax,

1 Inc., *et al.* are electronics retailers who used Plaintiffs' images repeatedly and continuously in
 2 online advertisements to sell brand-name electronics products including, among others, plasma
 3 and LCD high definition television sets, laptop computers, home theater sound systems, DVD
 4 players, universal remote controls, television wall mounts, and other products. (Copies of a
 5 small sampling of such advertisements are attached hereto as Exhibits "A" through "D.")
 6 Defendants used Plaintiffs' images for such commercial purposes without seeking or obtaining
 7 Plaintiffs' approval, and without paying them any compensation for the use, let alone
 8 compensation commensurate with the substantial commercial value of their publicity rights.

9 **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

10 **THE PARTIES**

11 2. Plaintiff MICHELLE PFEIFFER is, and at all times relevant hereto was, a
 12 resident of the State of California.

13 3. Plaintiff DIANE KEATON is, and at all times relevant hereto was, a resident of
 14 the State of California, County of Los Angeles.

15 4. Plaintiff MANDY MOORE, a.k.a., Amanda Leigh Moore, is and at all times
 16 relevant hereto was, a resident of the State of California, County of Los Angeles.

17 5. Plaintiff SANDRA BULLOCK is, and at all times relevant hereto was, a resident
 18 of the State of Texas.

19 6. Plaintiffs are informed and believe and based thereon allege that Defendant
 20 COMPUSA.COM, INC. ("CompUSA.com") is, and at all times relevant hereto was, a
 21 corporation organized and existing under the laws of the State of Florida, with its principle place
 22 of business located in the state of New York, and doing business in the State of California,
 23 County of Los Angeles.

24 7. Plaintiffs are informed and believe and based thereon allege that Defendant
 25 COMPUSA, INC. ("CompUSA, Inc.") is, and at all times relevant hereto was, a corporation with
 26 its principle place of business located in the State of Texas, at 14951 North Dallas Parkway,
 27 Dallas, Texas 75254.

28 ///

1 8. Plaintiffs are informed and believe and based thereon allege that Defendant
2 TIGERDIRECT, INC. ("TigerDirect") is, and at all times relevant hereto was, a corporation
3 organized and existing under the laws of the State of Florida, and doing business in the State of
4 California, County of Los Angeles.

5 9. Plaintiffs are informed and believe and based thereon allege that Defendant
6 SYSTEMAX, INC. ("Systemax") is, and at all times relevant hereto was, a corporation organized
7 and existing under the laws of the State of Delaware, with its principle place of business located
8 in the State of New York, and doing business in the State of California, County of Los Angeles.

9 10. Plaintiffs are informed and believe and based thereon allege that Defendant
10 GLOBAL COMPUTER SUPPLIES, INC. ("Global Computer") is, and at all times relevant
11 hereto was, a corporation organized and existing under the laws of the State of New York, and
12 doing business in the State of California, County of Los Angeles.

13 11. Plaintiffs are informed and believe and based thereon allege that Defendant
14 GLOBAL GOV/ED ("Global Gov/Ed") is, and at all times relevant hereto was, a business entity
15 of unknown form and origin, with its principle place of business in the State of Ohio, located at
16 6910 State Route 36, Fletcher, Ohio 45326, and doing business in the State of California, County
17 of Los Angeles.

18 12. Plaintiffs are informed and believe and based thereon allege that Defendant
19 INFOTEL DISTRIBUTORS USA ("Infotel") is, and at all times relevant hereto was, a business
20 entity of unknown form and origin, with its principle place of business in the State of Ohio,
21 located at 6910 State Route 36, Fletcher, Ohio 45326, and doing business in the State of
22 California, County of Los Angeles.

23 13. Plaintiffs are informed and believe and based thereon allege that the fictitiously-
24 named Defendants sued herein as Does 1 through 20, and each of them, are in some manner
25 responsible or legally liable for the actions, events, transactions and circumstances alleged
26 herein. The true names and capacities of such fictitiously-named Defendants, whether
27 individual, corporate, associate or otherwise, are presently unknown to Plaintiffs, and Plaintiffs
28 will seek leave of Court to amend this Complaint to assert the true names and capacities of such

1 fictitiously-named Defendants when the same have been ascertained. For convenience, each
 2 reference to a named Defendant herein shall also refer to Does 1 through 20, except that the First
 3 Cause of Action for Violation of California Civil Code section 3344 expressly excludes Does 1
 4 through 5. All defendants, including both the named defendants and those referred to herein as
 5 Does 1 through 20, are sometimes collectively referred to herein as "Defendants," except that
 6 Does 1 through 5 are expressly excluded from the First Cause of Action.

7 14. Plaintiffs are informed and believe and based thereon allege that Defendants, and
 8 each of them, were and are the agents, employees, partners, joint-venturers, co-conspirators,
 9 owners, principals, and employers of the remaining Defendants, and each of them are, and at all
 10 times herein mentioned were, acting within the course and scope of that agency, partnership,
 11 employment, conspiracy, ownership or joint venture. Plaintiffs are further informed and believe
 12 and based thereon allege that the acts and conduct herein alleged of each such Defendant were
 13 known to, authorized by and/or ratified by the other Defendants, and each of them.

14 15. Plaintiffs are universally known motion picture stars and celebrities who have
 15 starred in and received critical acclaim for their performances in motion pictures that have been
 16 viewed by millions of people throughout the United States and the world.

17 a. Michelle Pfeiffer has starred in more than 30 motion pictures including,
 18 among others: Grease 2 (1982), Scarface (1983), Into the Night (1985), Ladyhawke (1985),
 19 Sweet Liberty (1986), The Witches of Eastwick (1987), Amazon Women on the Moon (1987),
 20 Married to the Mob (1988), Tequila Sunrise (1988), Dangerous Liaisons (1988), The Fabulous
 21 Baker Boys (1989), The Russia House (1990), Frankie and Johnny (1991), Batman Returns
 22 (1992), Love Field (1992), The Age of Innocence (1993), Wolf (1994), Dangerous Minds (1995),
 23 Up Close & Personal (1996), To Gillian on Her 37th Birthday (1996), One Fine Day (1996), A
 24 Thousand Acres (1997), The Deep End of the Ocean (1999), A Midsummer Night's Dream
 25 (1999), The Story of Us (1999), What Lies Beneath (2000), I Am Sam (2001), White Oleander
 26 (2002), I Could Never Be Your Woman (2007), Hairspray (2007), Stardust (2007) and Cheri
 27 (2009, currently in post-production). Ms. Pfeiffer also has made numerous appearances on
 28 nationally televised programs including The Tonight Show with Jay Leno and Late Show with

1 David Letterman, among many others. A copy of excerpts from Ms. Pfeiffer's profile at The
2 Internet Movie Database (www.IMDB.com) is attached hereto as **Exhibit "E."**

3 b. Diane Keaton has starred in more than 35 motion pictures including,
4 among others: The Godfather (1972), Play It Again, Sam (1972), Sleeper (1973), The Godfather:
5 Part II (1974), Love and Death (1975), In Will, I Will ... for Now (1976), Harry and Walter Go to
6 New York (1976), Annic Hall (1977, won Best Actress Oscar award; film won Best Picture
7 Oscar), Looking for Mr. Goodbar (1977), Interiors (1978), Manhattan (1979, nominated for Best
8 Actress Oscar), Reds (1981, nominated for Best Actress Oscar), Shoot the Moon (1982), The
9 Little Drummer Girl (1984), Mrs. Soffel (1984), Crimes of the Heart (1986), Baby Boom (1987),
10 The Good Mother (1988), The Lemon Sisters (1990), The Godfather: Part III (1990), Father of
11 the Bride (1991), Manhattan Murder Mystery (1993), Father of the Bride, Part II (1995), The
12 First Wives Club (1995), Marvin's Room (1996, nominated for Best Actress Oscar), The Only
13 Thrill (1997), The Other Sister (1999), Town & Country (2001), Flan B (2001), Something's
14 Gotta Give (2003, nominated for Best Actress Oscar; won Golden Globe award), The Family
15 Stone (2005), Because I Said So (2007), Mama's Boy (2007), Smother (2008), and Mad Money
16 (2008). Ms. Keaton also has starred in numerous television movies, including: Running Mates
17 (1992), Amelia Erhart: The Final Flight (1994, portraying Amelia Erhart, nominated for Emmy
18 award for Outstanding Lead Actress), Northern Lights (1997), Sister Mary Explains It All (2001),
19 Crossed Over (2002), On Thin Ice (2003) and Surrender Dorothy (2006). Ms. Keaton also has
20 made numerous appearances on nationally televised programs including The Tonight Show with
21 Jay Leno and Late Show with David Letterman, among many others. A copy of excerpts from
22 Ms. Keaton's profile at The Internet Movie Database (www.IMDB.com) is attached hereto as
23 **Exhibit "F."**

24 c. Mandy Moore has starred in more than 10 motion pictures including,
25 among others: The Princess Diaries (2001), A Walk to Remember (2002), Try Seventeen (2002),
26 How to Deal (2003), Chasing Liberty (2004), Saved! (2004), Romance & Cigarettes (2005),
27 American Dreamz (2006), Southland Tales (2006), Dedication (2007), Because I Said So (2007),
28 and License to Wed (2007). Ms. Moore also is a popular singer, songwriter and recording artist,

1 having released several successful studio albums, compilation albums and music DVDs. Ms.
2 Moore also has made numerous television acting appearances including the series: Touched by
3 an Angel (1997), Roswell (1999), Scrubs (2006) and How I Met Your Mother (2007), and the
4 television movie: 2gether (2000). Ms. Moore also has made more than 70 appearances on
5 nationally televised programs including The Tonight Show with Jay Leno, Late Show with David
6 Letterman, and Jimmy Kimmel Live!, among many others. A copy of excerpts from Ms.
7 Moore's profile at The Internet Movie Database (www.IMDB.com) and discography at
8 RollingStone.com are attached hereto as Exhibit "G."

9 d. Sandra Bullock has starred in more than 25 motion pictures including,
10 among others: Speed (1994), Who Do I Gotta Kill? (1994), While You Were Sleeping (1995),
11 The Net (1995), Two If By Sea (1996), A Time to Kill (1996), In Love and War (1996), Speed 2
12 (1997), Hope Floats (1998), Practical Magic (1998), Forces of Nature (1999), Gun Shy (2000),
13 28 Days (2000), Miss Congeniality (2000), Murder by Numbers (2002), Divine Secrets of the
14 Ya-Ya Sisterhood (2002), Two Weeks Notice (2002), Crash (2004), Loverboy (2005), Miss
15 Congeniality 2: Armed & Fabulous (2005), The Lake House (2005), Infamous (2006),
16 Premonition (2007), All About Steve (scheduled release: March 2009) and The Proposal
17 (scheduled release: June 2009). Prior to her motion picture career, Ms. Bullock also starred in
18 the television series: Working Girl (1990), among other television acting roles. Ms. Bullock also
19 has made numerous appearances on nationally televised programs including The Tonight Show
20 with Jay Leno and Late Show with David Letterman, among many others. A copy of excerpts
21 from Ms. Bullock's profile at The Internet Movie Database (www.IMDB.com) is attached hereto
22 as Exhibit "H."

23 16. Plaintiffs' respective images, identities and personas are recognized instantly by
24 the public and have substantial commercial value. Plaintiffs exercise careful consideration prior
25 to permitting the commercial use of their publicity rights, such as their images, personas or
26 identities, to ensure that they are associated with products, entertainment, services and/or
27 companies in which they believe and to ensure that the value of their personas is not diminished,
28 either by association with products, entertainment, services and/or companies which they do not

1 personally desire to support and/or by over-saturation of their images. Plaintiffs will not
 2 voluntarily appear in print or other media unless they carefully select and believe in the product,
 3 and unless the compensation they receive is both commensurate with the value of the
 4 exploitation of their images and personas, and sufficient to compensate them for any potential
 5 diminution in value resulting from the commercial use of their publicity rights.

6 17. Plaintiffs are informed and believe and on that basis allege that Defendants are
 7 primarily engaged in the business of marketing and selling consumer electronics products
 8 through retail outlets located in multiple states throughout the United States, as well online,
 9 through the following Internet websites, among others:

- 10 www.CompUSA.com
- 11 www.TigerDirect.com
- 12 www.TigerDirect.ca [Canada]
- 13 www.GlobalComputers.com
- 14 www.GlobalGovEd.com
- 15 www.InfoTelDistributors.com

16 (collectively, the "Websites").

17 18. Defendants advertise their products in the State of California, throughout the
 18 United States and Canada, and around the world, through the Websites, in print advertisements,
 19 sales catalogs, email advertisements, and other forms of advertisements.

20 **DEFENDANTS' WRONGFUL CONDUCT**

21 19. Defendants intentionally and prominently used the photographs, images, identities
 22 and personas of each of the Plaintiffs in advertisements (collectively, "Advertisements") for
 23 brand-name commercial electronics products sold by Defendants at the Websites. The
 24 Advertisements consistently and repeatedly utilized the photographs, images, identities and
 25 personas of each of the Plaintiffs to attract attention to Defendants, their companies in general,
 26 their Websites, all of their products and services, and particular brand-name products advertised
 27 with Plaintiffs' photographs, including without limitation, plasma and LCD high definition
 28 televisions, laptop computers, DVD players, home theater sound systems, universal remote

1 controls, television wall mounts, and other such products (collectively, the "Advertised
2 Products"). True copies of some of the Advertisements, Websites and Advertised Products, by
3 way of example and for illustration purposes, are attached hereto as Exhibit "A" through "D."
4 Exhibit "A" hereto includes, among other Advertisements, a proximate use of Ms. Pfeiffer's
5 photograph at the *homepage* of TigerDirect.com, which had the effect of using Ms. Pfeiffer's
6 valuable publicity rights to advertise TigerDirect's company as a whole, and all of the many
7 products sold at its Website.

8 20. At no time did any Plaintiff ever give her permission to Defendants to use her
9 photograph, image, identity, persona or any other publicity right in the Advertisements, the
10 Websites, the Advertised Products, or in any other manner, nor has any Plaintiff been
11 compensated for such unauthorized commercial use of her publicity rights.

12 21. Plaintiffs are informed and believe and based thereon allege that Defendants
13 intentionally, negligently and/or knowingly caused Plaintiffs' photographs, images, identities and
14 personas to appear in the Advertisements for the purpose of advertising and promoting
15 Defendants, their businesses in general, their Websites, all of their products and services, and the
16 Advertised Products.

17 22. Plaintiffs have developed and cultivated their images and personas to create
18 celebrity and universal recognition, and Defendants have without any right, title or authorization,
19 misappropriated Plaintiffs' valuable publicity rights and the resulting success and popularity of
20 Plaintiffs by unlawfully using their photographs, images, identities and personas for the aforesaid
21 commercial purposes.

22 FIRST CAUSE OF ACTION

23 (For Violation of California Civil Code § 3344 against All Defendants *except*
24 Systemax, CompUSA, Inc., InfoTel and Does 1 through 5)

25 23. Plaintiffs repeat, re-allege, adopt and incorporate each and every allegation
26 contained in Paragraphs 1 through 22, inclusive, as though fully set forth herein.

27 24. The conduct of Defendants, as alleged hereinabove, constitutes a violation of
28 Section 3344 of the California Civil Code due to the knowing and unauthorized use of Plaintiffs'

1 photographs, images, identities and personas for commercial purposes. Plaintiffs' respective
2 photographs, images, identities and personas have substantial commercial value.

3 25. As a direct and proximate result of the aforesaid wrongful acts of Defendants,
4 each of the Plaintiffs has been damaged in an amount that is not yet fully ascertainable, but which
5 exceeds the jurisdictional minimum of this Court. When Plaintiffs have ascertained the full
6 amount of their damages, they will seek leave of Court to amend this Complaint accordingly.

7 26. As a direct and proximate result of the aforesaid wrongful acts of Defendants,
8 each Plaintiff has incurred, and will continue to incur, substantial attorneys' fees and costs.
9 Plaintiffs are entitled to an award of their attorneys' fees and costs incurred in connection with
10 this action pursuant to Section 3344(a) of the California Civil Code.

11 27. By reason of the aforesaid wrongful acts of Defendants, in addition to the relief
12 sought hereinabove, Plaintiffs are entitled to an accounting of all of Defendants' revenues and
13 profits associated with the unauthorized use of Plaintiffs' photographs, images, identities and
14 personas, and to an award of all such sums. By reason of Defendants' wrongful acts as alleged
15 hereinabove, Defendants are involuntary trustees holding all such sums in their possession under
16 a constructive trust for the benefit of Plaintiffs with a duty to transfer the same to Plaintiffs
17 forthwith.

18 28. Plaintiffs are informed and believe, and based thereon alleges, that Defendants, in
19 doing the things herein alleged, acted willfully, maliciously, oppressively and despicably, and
20 with full knowledge of the adverse effect of their actions on Plaintiffs and with willful and
21 deliberate disregard for the consequences to Plaintiffs. By reason thereof, Plaintiffs are entitled
22 to recover punitive and exemplary damages from Defendants in an amount to be determined at
23 the time of trial.

24 **SECOND CAUSE OF ACTION!**

25 (For Violation of Common Law Right of Publicity

26 Against All Defendants, including Does 1 through 20)

27 29. Plaintiffs repeat, re-allege, adopt and incorporate each and every allegation
28 contained in Paragraphs 1 through 22, inclusive, as though fully set forth herein.

1 30. Based on their hard work and use of their talents in the entertainment field,
 2 Plaintiffs' respective photographs, images, identities and personas have become, and are, very
 3 valuable worldwide and are invested with substantial goodwill in the eyes of the public.
 4 Accordingly, each Plaintiff has a valuable right of publicity, a property right with substantial
 5 commercial value, which she has not agreed to license or transfer, in whole or in part, to
 6 Defendants, or any of them, for any purpose whatsoever.

7 31. The wrongful acts of Defendants, and each of them, as alleged hereinabove,
 8 constitute a violation and misappropriation of Plaintiffs' respective rights of publicity because
 9 Defendants have misappropriated Plaintiffs' respective photographs, images, identities and
 10 personas, and used them, without permission, for commercial purposes to advertise and promote
 11 Defendants, their businesses in general, their Websites, their products and services generally, and
 12 the Advertised Products.

13 32. As a direct and proximate result of the aforesaid wrongful acts of Defendants, and
 14 each of them, Plaintiffs have been damaged in an amount that is not yet fully ascertainable, but
 15 which exceeds the jurisdictional minimum of this Court. When Plaintiffs have ascertained the
 16 full amount of their damages, they will seek leave of Court to amend this Complaint accordingly.

17 33. By reason of the aforesaid wrongful acts of Defendants, in addition to the relief
 18 sought hereinabove, Plaintiffs are entitled to an accounting of all of Defendants' revenues and
 19 profits associated with the unauthorized use of Plaintiffs' photographs, images, identities and
 20 personas, and to an award of all such sums. By reason of Defendants' wrongful acts as alleged
 21 hereinabove, Defendants are involuntary trustees holding all such sums in their possession under
 22 a constructive trust for the benefit of Plaintiffs with a duty to transfer the same to Plaintiffs
 23 forthwith.

24 34. Plaintiffs are informed and believe, and based thereon alleges, that Defendants, in
 25 doing the things herein alleged, acted willfully, maliciously, oppressively and despicably, and
 26 with full knowledge of the adverse effect of their actions on Plaintiffs and with willful and
 27 deliberate disregard for the consequences to Plaintiffs. By reason thereof, Plaintiffs are entitled

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1 to recover punitive and exemplary damages from Defendants in an amount to be determined at
2 the time of trial.

3 **THIRD CAUSE OF ACTION**

4 (For Unjust Enrichment Against All Defendants, including Does 1 through 20)

5 35. Plaintiffs repeat, re-allege, adopt and incorporate each and every allegation
6 contained in Paragraphs 1 through 22, inclusive, as though fully set forth herein.

7 36. As a result of the wrongful acts of Defendants, and each of them, as hereinabove
8 alleged, Defendants, and each of them, have been unjustly enriched and benefitted. Such unjust
9 enrichment and benefits include, but are not limited to: (1) the value of the use of Plaintiffs'
10 photographs, images, identities and personas for the commercial purposes made thereof by
11 Defendants; and (2) the amount of Defendants' revenues and profits attributable to the use of
12 Plaintiffs' photographs, images, identities and personas as alleged herein.

13 37. Defendants, and each of them, are under an obligation to pay Plaintiffs, forthwith,
14 the entire amount by which they have been unjustly enriched, and Plaintiffs are entitled to the
15 imposition of a constructive trust, such that Defendants, and each of them, are involuntary
16 trustees holding all such sums in their possession for the benefit of Plaintiffs with a duty to
17 transfer the same to Plaintiffs forthwith.

18
19 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

20
21 **AS TO THE FIRST CAUSE OF ACTION:**

- 22 1. General and special damages in accordance with proof at trial, together with
23 interest thereon at the legal rate;
- 24 2. An award of the revenues and profits received by Defendants as a result of the
25 unauthorized use of Plaintiffs' photographs, images, identities, personas and/or other publicity
26 rights;
- 27 3. Exemplary and punitive damages in an amount according to proof at the time of
28 trial;

1 4. An award of Plaintiffs' attorneys' fees;

2 5. Preliminary and permanent injunction prohibiting Defendants and their affiliated
3 companies from any further use of Plaintiffs' publicity rights (including without limitation name,
4 image, identity, persona, voice, or signature) without Plaintiffs' express written permission in
5 advance.

6 **AS TO THE SECOND CAUSE OF ACTION:**

7 6. General and special damages in accordance with proof at trial, together with
8 interest thereon at the legal rate;

9 7. An award of the revenues and profits received by Defendants as a result of the
10 unauthorized use of Plaintiffs' photographs, images, identities, personas and/or other publicity
11 rights;

12 8. Exemplary and punitive damages in an amount according to proof at the time of
13 trial;

14 9. Preliminary and permanent injunction prohibiting Defendants and their affiliated
15 companies from any further use of Plaintiffs' publicity rights (including without limitation name,
16 image, identity, persona, voice, or signature) without Plaintiffs' express written permission in
17 advance.

18 **AS TO THE THIRD CAUSE OF ACTION:**

19 10. General and special damages in an amount according to proof at trial, together
20 with interest thereon at the legal rate;

21 11. Imposition of a constructive trust on all monies and sums received by Defendants
22 as a result of their misappropriation of Plaintiffs' photographs, images, identities, personas,
23 and/or other publicity rights, with interest thereon at the legal rate;

24 12. Preliminary and permanent injunction prohibiting Defendants and their affiliated
25 companies from any further use of Plaintiffs' publicity rights (including without limitation name,
26 image, identity, persona, voice, or signature) without Plaintiffs' express written permission in
27 advance.

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1 **AS TO ALL CAUSES OF ACTION:**

2 13. For all costs of suit incurred herein; and

3 14. For such other and further relief as the Court may deem to be just and proper.

4
5 Dated: January 20, 2009

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP

6
7 By: 
8 CHARLES J. HARDER

9 Attorneys for Plaintiffs
MICHELLE PFEIFFER, DIANE KEATON,
MANDY MOORE and SANDRA BULLOCK

10
11
12 **DEMAND FOR JURY TRIAL**

13 Plaintiffs hereby demand a trial by jury.

14
15 Dated: January 20, 2009

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP

16
17 By: 
18 CHARLES J. HARDER

19 Attorneys for Plaintiffs
MICHELLE PFEIFFER, DIANE KEATON,
MANDY MOORE and SANDRA BULLOCK