

# EXHIBIT X

(MDY's SDF)

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14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**  
16 **WESTERN DIVISION**

17 BRIAN M. KOPP,

18 Plaintiff,

19 v.

20 VIVENDI UNIVERSAL GAMES,  
21 INC., BLIZZARD  
22 ENTERTAINMENT, INC., and  
23 ENTERTAINMENT SOFTWARE  
ASSOCIATION

Case No.:

**COMPLAINT FOR  
MISREPRESENTATION UNDER  
THE DIGITAL MILLENNIUM  
COPYRIGHT ACT,  
INTERFERENCE WITH  
CONTRACT, INTERFERENCE  
WITH PROSPECTIVE ECONOMIC  
RELATIONS, UNFAIR,  
DECEPTIVE, AND FRAUDULENT  
BUSINESS PRACTICES, AND  
DECLARATORY AND  
INJUNCTIVE RELIEF.**

**DEMAND FOR JURY TRIAL**

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1 rights. Defendant's misrepresentations caused plaintiff to be unable to sell  
2 his guide on eBay and has thus resulted in lost profits. Plaintiff seeks  
3 damages and declaratory and injunctive relief to prevent defendant from  
4 engaging in further interference with his sale of the guide.  
5

### 6 PARTIES

7 3. Plaintiff is an individual domiciled in Bronson, Florida.  
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9 4. Vivendi is a developer and publisher of video game software.  
10 It is a corporation incorporated in Delaware with its principal place of  
11 business in Los Angeles, California.  
12

13 5. Blizzard is a developer and publisher of video game software.  
14 It is a corporation incorporated in Delaware with its principal place of  
15 business in Irvine, California, and is a wholly owned subsidiary of Vivendi.  
16

17 6. The ESA is a trade group representing video game publishers.  
18 It is a corporation incorporated in Delaware with its principal place of  
19 business in Washington, D.C.  
20

### 21 FACTS

#### 22 The World of Warcraft Game

23 7. Blizzard is the developer and publisher of a video game called  
24 "World of Warcraft." World of Warcraft is what is frequently referred to as  
25 a "massively multiplayer online role-playing game," in which players from  
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1 around the world play together in a huge virtual environment. World of  
2 Warcraft is currently the most popular online game in North America, with  
3 more than 1.5 million subscribers.  
4

5 8. Players in World of Warcraft create characters such as warriors,  
6 wizards, and rogues. The characters can be either human or members of  
7 various fantasy races such as dwarves, night elves, and gnomes. Players  
8 earn gold and “experience points” for their characters by killing monsters  
9 and completing “quests.”  
10

11 9. Experience points are the measure of a player’s success in  
12 World of Warcraft. After accumulating a certain amount of experience  
13 points, a character advances in level. All characters in the game are ranked  
14 at a level between one and sixty. As players earn higher levels, their  
15 characters are able to acquire new skills and magic powers. Achieving a  
16 high level is the ultimate goal of the game, and high-level characters are  
17 granted special status and privileges. Players usually must devote literally  
18 hundreds of hours to playing the game to achieve a character of level sixty.  
19 A secondary goal of the game is to accumulate gold, which players can use  
20 to purchase weapons, armor, and other useful items for their characters.  
21

22 10. To play World of Warcraft, a player must first purchase a copy  
23 of the software published by Blizzard. The player must then register with  
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1 the World of Warcraft online service and pay Blizzard a monthly  
2 subscription fee.

3  
4 11. Blizzard has a registered copyright, including Registration No.  
5 PA-1-247-131, in the World of Warcraft game and a registered trademark,  
6 including Registration Nos. 2,877,945 and 2,972,619, in the phrase "World  
7 of Warcraft."  
8

9 **The eBay Auction Site**

10 12. eBay is a virtual Internet marketplace on which members can  
11 sell goods and services in an auction-style or fixed-price format. It is by far  
12 the largest site of its kind on the Internet, with more than one hundred  
13 million registered users. Each product for sale on eBay has its own web  
14 page, called a "listing" or "auction," which describes the product and allows  
15 potential purchasers to bid on or purchase the product.  
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18 13. As an Internet Service Provider ("ISP"), eBay is protected from  
19 liability by the Digital Millennium Copyright Act ("DMCA") for listings  
20 that contain copyrighted text or pictures or that advertise unauthorized  
21 copies of copyrighted material. *Hendrickson v. eBay, Inc.*, 165 F. Supp. 2d  
22 1082, 1088 (C.D. Cal. 2001). The DMCA provides ISPs safe harbor from  
23 liability for "infringement of copyright by reason of the storage at the  
24 direction of a user of material that resides on a system or network controlled  
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1 or operated by [the ISP].” 17 U.S.C. § 512(c)(1). To qualify for protection  
2 from liability under this provision, an ISP must act expeditiously to remove  
3 material that is claimed to be infringing upon receiving a “notice of claimed  
4 infringement” from the copyright owner. *Id.* § 512(c)(1)(C). The  
5 requirements of a notice of claimed infringement are spelled out in 17  
6 U.S.C. § 512(c)(3).  
7

8  
9 14. The DMCA also provides a mechanism for a subscriber to an  
10 ISP who is targeted by a notice of claimed infringement to contest the notice  
11 with the ISP. Under 17 U.S.C. § 512(g), a subscriber to an ISP can submit a  
12 “counter notice” to the ISP stating “under penalty of perjury that the  
13 subscriber has a good faith belief that the material was removed . . . as a  
14 result of mistake or misidentification of the material.” *Id.* § 512(g)(3). An  
15 ISP continues to enjoy safe harbor from liability if, upon receiving a counter  
16 notice from a subscriber, it notifies the person who filed the notice of  
17 claimed infringement that it will reinstate the removed material in ten to  
18 fourteen business days unless it receives notice that there is a pending legal  
19 action to restrain the subscriber from continuing to post the allegedly  
20 infringing material. *Id.* § 512(g)(2).  
21

22 15. To meet the safe harbor requirements in the DMCA, eBay  
23 implemented a program called the “Verified Rights Owner”—or “VeRO”—  
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1 program. *See Hendrickson*, 165 F. Supp. 2d at 1085 (citing eBay statement  
2 that VeRO procedures “are intended to substantially comply with the  
3 requirements of the [DMCA]”). Owners of intellectual property who  
4 register for the VeRO program can submit a notice of claimed infringement  
5 to eBay stating that a particular auction violates their intellectual property  
6 rights. In filling out the notice of claimed infringement, the VeRO member  
7 must sign a statement, under penalty of perjury, that it has a good-faith belief  
8 that the identified auction violates its intellectual property rights or the  
9 intellectual property rights of someone it represents.  
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13       16. When a VeRO member submits a notice of claimed  
14 infringement regarding a particular auction listing, eBay automatically  
15 terminates that listing. eBay does not independently review the validity of  
16 the notice of claimed infringement and trusts the VeRO member’s honesty  
17 that a particular auction is infringing.  
18  
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20       17. When a certain number of an eBay seller’s auctions are  
21 terminated because of notices of claimed infringement from a VeRO  
22 member, eBay will suspend that seller’s account. The number of  
23 terminations required before the seller’s account is suspended varies from  
24 seller to seller.  
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1           18. If it is the first time a seller has been suspended, eBay will  
2           reinstate the seller's account if the seller submits a signed request for  
3           reinstatement swearing under penalty of perjury not to knowingly offer any  
4           items or post any listings on eBay that are illegal or that infringe the rights of  
5           any third parties. If a seller's account is suspended a second time because of  
6           notices of claimed infringement from VeRO members, eBay will not  
7           reinstate the account absent a request from the VeRO member that caused  
8           the suspension or a court order.  
9

10           19. Defendants are members of eBay's VeRO program. After  
11           joining the program, eBay informed them that if it received a notice of  
12           claimed infringement regarding a particular auction, it would automatically  
13           terminate the auction and would reinstate the auction at the VeRO member's  
14           request.  
15

16           20. Defendants submitted multiple notices of claimed infringement  
17           against various auction listings and, based on that experience, fully  
18           understood the procedures of eBay's VeRO program.  
19

20                           **Plaintiff's World of Warcraft Guide**  
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22           21. Plaintiff purchased a copy of World of Warcraft on November  
23           23, 2004, and immediately subscribed to Blizzard's online service. Plaintiff  
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1 played the game frequently and, over the next few months, reached level  
2 sixty with one of his characters (a night elf rogue).  
3

4 22. Based on his experience playing the game and information he  
5 obtained from other players over the Internet, plaintiff created an electronic  
6 guidebook titled "The Ultimate World of Warcraft Leveling & Gold Guide."  
7  
8 The book contained tips on how to play the game, how to accomplish quests,  
9 and how to acquire gold and experience points.

10 23. The book did not contain any of defendants' copyrighted text or  
11 storyline. It did contain a small number of "screen shots"—pictures of the  
12 screen captured while playing the game—that plaintiff downloaded from a  
13 web site unaffiliated with defendants. The book was the independent  
14 creation of plaintiff and was entitled to the protection of the First  
15 Amendment. It did not infringe any of defendants' copyrights, and the  
16 limited use of screen shots constituted fair use.  
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19 24. Plaintiff included a disclaimer on the first page of the book  
20 stating that "[t]his guide is not a copy of the official guide," and that the  
21 book is "an unauthorized source" of information about the game. Plaintiff  
22 also noted in the disclaimer that World of Warcraft is "owned and operated  
23 by Blizzard" and that he had "composed this guide independently and it is  
24 not endorsed or authorized by Blizzard." The disclaimer further stated that  
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1 “[t]his product was created solely to inform/educate players of the online  
2 game World Of Warcraft [about how] to become a better player.”  
3

4 25. There was never any likelihood of confusion about whether  
5 plaintiff’s book was sponsored by or affiliated with defendants. The book  
6 did not infringe, dilute, or tarnish defendants’ trademarks or any other rights.  
7

8 26. On August 18, 2005, plaintiff began offering his book for sale  
9 on eBay using the account name “wowseller88.” Plaintiff created a listing  
10 for the book that did not include any of defendants’ copyrighted text or  
11 graphics. The listing included a copy of the disclaimer from the book and  
12 clearly stated that plaintiff was not affiliated with Blizzard. Nothing in the  
13 eBay listing infringed any of defendants’ copyrights.  
14  
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16 27. Everything in plaintiff’s eBay listings was truthful. There was  
17 never any likelihood of confusion about whether the listing was sponsored  
18 by or affiliated with defendants. Plaintiff’s eBay listing did not infringe,  
19 dilute, or tarnish defendants’ trademarks or any other rights.  
20

21 28. Plaintiff used multiple copies of the same listing to sell his book  
22 on eBay. After selling a book, plaintiff created a new auction listing so that  
23 he always had several books available for purchase at any time. Plaintiff  
24 sold several hundred copies of his book on eBay over the next several  
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1 months, sometimes in the form of an auction and sometimes for a fixed  
2 price. Most copies of the book sold for about fifteen dollars.  
3

### 4 Conduct of the Defendants

5  
6 29. In September 2005, defendants filed several notices of claimed  
7 infringement with eBay, swearing under penalty of perjury that they had a  
8 good faith belief that plaintiff's auctions of his book violated defendants'  
9 intellectual property rights.  
10

11  
12 30. After receiving the notices of claimed infringement from  
13 defendants, eBay sent plaintiff several emails notifying him that his auctions  
14 had been terminated "because the intellectual property rights owner notified  
15 us, under penalty of perjury, that your listing or the item itself infringes their  
16 copyright, trademark, or other rights." eBay notified bidders on the auction  
17 that the auction had been terminated and that their bids were canceled.  
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19  
20 31. In its notification to plaintiff, eBay identified the intellectual  
21 property rights owner responsible for the termination of the auctions as the  
22 ESA and provided the email address "esa@theesa.com" (an email address  
23 belonging to the ESA) as contact information. However, the ESA was  
24 actually working in combination with and with the authorization of the other  
25 defendants, Blizzard and Vivendi.  
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1           32. Plaintiff sent numerous emails to the ESA at the specified email  
2 address, explaining that his book did not infringe anybody's intellectual  
3 property rights, asking why his auctions were terminated, and requesting that  
4 the ESA revoke its notice of claimed infringement. The ESA did not  
5 respond to plaintiff's emails.  
6

7  
8           33. In late September 2005, plaintiff filed five counter notices with  
9 eBay under the DMCA, contesting the removal of his auctions. Pursuant to  
10 the DMCA, 17 U.S.C. § 512(g), eBay then told defendants they had fourteen  
11 days to notify eBay that they had initiated a legal action against plaintiff or  
12 the auctions would be reinstated.  
13

14           34. When defendants did not respond within the required period,  
15 eBay reinstated the five auctions on October 6, 2005. Plaintiff continued  
16 selling his book on eBay.  
17

18           35. The next day, on October 7, defendants filed a new notice of  
19 claimed infringement against another of plaintiff's book auctions. eBay  
20 automatically terminates an auction when a VeRO member submits a notice  
21 of claimed infringement, even if the targeted listing is identical to another  
22 auction that has already been reinstated pursuant to a counter notice.  
23 Accordingly, eBay terminated the targeted auction.  
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1           36. On October 11, defendants submitted five more notices of  
2 claimed infringement against plaintiff, and eBay notified plaintiff that five  
3 more of his book auctions had been terminated as a result.  
4

5           37. In one of the October 11 notifications, eBay notified plaintiff  
6 that the VeRO member responsible for terminating his auction was the ESA,  
7 but provided a contact email address of "vuglegal@vugames.com" (an email  
8 address belonging to Vivendi's legal department).  
9

10           38. On October 13, defendants submitted six more notices of  
11 claimed infringement against plaintiff, causing eBay to terminate six more of  
12 plaintiff's book auctions.  
13

14           39. Plaintiff continued to attempt to contact the ESA at the supplied  
15 email address but received no response.  
16

17           40. On November 2, defendants submitted three more notices of  
18 claimed infringement to eBay and eBay notified plaintiff that three more of  
19 his book auctions were therefore terminated. In one of the notifications,  
20 eBay identified the VeRO member that had requested termination as the  
21 ESA, but again supplied as contact information the email address  
22 vulegal@vugames.com.  
23

24           41. On the same day, plaintiff emailed the Vivendi legal department  
25 at the vulegal@vugames.com address, writing:  
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1 i have filed a counter suite [counter notice] with ebay back in  
2 the end of september, as of october 5th ESA has agreed not to  
3 vero my listings as I have proved this is my product and not  
4 infringing rights. i never get a reply from the esa@theesa.com  
5 email you used to use, if this is a bot [automated web robot]  
6 that does this you have to make it stop removing my listings.  
7  
8 thank you[.]

10  
11 42. Plaintiff received an automated email reply from Rod Rigole.  
12 Rigole is Vice President of Legal Affairs at Vivendi and in that capacity also  
13 serves as legal counsel for Blizzard. The email stated that Rigole was out of  
14 the office until November 9, but gave an emergency cellular phone contact  
15 number. Plaintiff called Rigole's cell phone number and left a voice mail  
16 message explaining that he had filed a counter notice, that his book did not  
17 infringe defendants' intellectual property, and that he wanted defendants to  
18 stop terminating his auctions.  
19  
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21  
22 43. On November 3, Rigole responded to plaintiff's email, telling  
23 him he would be out of the office until November 9 and to contact him again  
24 at that time.  
25

26 44. Meanwhile, defendants continued to submit notices of claimed  
27 infringement against plaintiff. Between November 4th and 7th, defendants  
28

1 submitted ten more notices of claimed infringement and eBay terminated all  
2 ten of the targeted auctions. On November 6, because of Vivendi's repeated  
3 notices of claimed infringement, plaintiff's eBay account was suspended,  
4 and all his auctions were terminated. As a result, plaintiff was unable to sell  
5 any more products on eBay.  
6

7  
8 45. Defendants ordered each of these ten auctions removed while  
9 Rigole was still on vacation, even though defendants were on notice that the  
10 book did not infringe their intellectual property rights and had not yet  
11 requested to see a copy of plaintiff's book.  
12

13 46. Once again, in two of the notices from eBay informing plaintiff  
14 that his auctions had been terminated, the VeRO member reporting the  
15 allegedly infringing auction was identified as the ESA, but the contact  
16 information was listed as the email address vulegal@vugames.com.  
17

18 47. On November 6, Plaintiff again emailed the Vivendi legal  
19 department at the vulegal@vugames.com address, writing:  
20

21 what is this all about again first it was ESA then i got the last  
22 vero from ESA with this email. how is this infringing your  
23 rights when its a guide i've compiled? do people there blindly  
24 vero or do they use a bot of some kind. if this reaches the same  
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1 person who is out of office till nov 9th please tell me what the  
2 deal is[.]  
3

4 Plaintiff provided a link to a website where his book was accessible.

5 48. Also on November 6, plaintiff sent an email directly to Rigole's  
6 email address. Plaintiff repeated the statement he had made in his email to  
7 the legal department and again provided the link to read his book. Plaintiff  
8 stated that he had unsuccessfully tried to call Rigole's cell phone, and wrote  
9 "I am trying to show you so you can tell ebay this is not infringing because I  
10 have been suspended and this is my selling account on ebay and this costs  
11 me a great deal of money not being able to sell." He further wrote that "to  
12 reinstate these you simply have to send an email to vero@ebay.com . . . . I  
13 would greatly appreciate if you looked into this and could stop the removal  
14 of the listings by whoever is doing this. I do not sell any form of items from  
15 the game world of warcraft simply informational guides."  
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20 49. On November 8, Rigole replied to plaintiff via email, writing:  
21 "I would not consider this an emergency. I will be back in the office on  
22 Wednesday and would be more than happy to discuss after I review the  
23 materials you sent."  
24

25 50. On November 9, Rigole emailed plaintiff:  
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1 Please send me a copy of your "guide" so that I can better  
2 address your inquiry. Note, however, that you are not allowed  
3 to sell unauthorized [World of Warcraft] guides that attempt to  
4 trade off the substantial good will that Blizzard Entertainment  
5 has built up in World of Warcraft.  
6  
7

8 51. On November 9, 2005, plaintiff emailed Rigole, attaching for  
9 the second time a link to a web page where Rigole could view the book. In  
10 the email, plaintiff told Rigole that he had previously filed a counter notice  
11 against the ESA that went uncontested. He attached a copy of the previous  
12 counter notice and requested that Rigole contact eBay to have his account  
13 reinstated. Plaintiff also informed Rigole that eBay was his means of  
14 income and that without his account he was unable to sell other products on  
15 eBay.  
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19 52. On November 10, 2005, Rigole replied via email, telling  
20 plaintiff that he had reviewed the book, but had not been able to view any of  
21 its images. Rigole wrote that "the problem is that you are using Blizzard's  
22 intellectual property for commercial purposes in your sale of an  
23 unauthorized 'World of Warcraft leveling guide' and are attempting to trade  
24 off the substantial good will that Blizzard has built up in the World of  
25 Warcraft brand."  
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1       53. Plaintiff and Rigole exchanged a series of further emails.  
2 Plaintiff argued that his book did not infringe any of Blizzard's intellectual  
3 property rights. Rigole acknowledged that plaintiff's reinstatement on eBay  
4 "requires confirmation from the rights holder, which is Blizzard," but stated  
5 that "such confirmation will not be forthcoming." Rigole told plaintiff that  
6 "[i]f you continue selling this guide in the same manner, it will be removed  
7 and further action will be taken against you." Rigole advised plaintiff to  
8 consult an attorney and wrote: "Please note that you have been put on  
9 notice. Blizzard reserves its right to pursue legal remedies if you[r] conduct  
10 continues."  
11

12       54. Rigole refused to clarify how plaintiff's book infringed  
13 defendants' intellectual property, writing in an email only that "[i]t has to do  
14 with established legal principles involving intellectual property, including  
15 trademark and/or copyright." Rigole advised plaintiff to consult a reference  
16 book for more information or to "search[] the Internet for the following  
17 terms 'intellectual property', 'trademarks', and 'copyrights.'"  
18  
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20       55. On November 14, plaintiff again emailed Rigole requesting that  
21 Rigole consent to have eBay reinstate his account. Rigole responded the  
22 same day: "As I said, your 'guide' violates Blizzard Entertainment's  
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1 intellectual property. Therefore, I cannot provide the consent you have  
2 requested.”  
3

4 56. Plaintiff then submitted a request for reinstatement with eBay,  
5 declaring under penalty of perjury that he would not knowingly offer any  
6 items or post any listings on eBay that are illegal or that infringe the rights of  
7 any third parties. As a result, eBay reinstated plaintiff's account on  
8 November 15. To avoid having his account again wrongfully suspended by  
9 defendants, plaintiff stopped selling any more of his books using his  
10 wowseller88 account. Plaintiff instead created a separate eBay account  
11 called hotguides88 and resumed selling his books using that account.  
12  
13

14 57. On November 18, defendants submitted three more notices of  
15 claimed infringement with eBay and, as a result, eBay terminated three of  
16 plaintiff's auctions associated with the hotguides88 account.  
17

18 58. On that same day, plaintiff again contacted Rigole by email  
19 requesting that defendants allow him to re-list his auctions. Rigole  
20 responded via email that the auction had been terminated because it  
21 “involve[d] the infringement of Blizzard Entertainment's intellectual  
22 property, specifically the World of Warcraft / WoW trademarks and  
23 copyrights.” He further wrote: “Please consider this a warning. If you  
24 continue with the aforementioned activities, we will have no other  
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1 alternative but to review all legal remedies available to us including taking  
2 formal legal action to protect our rights.”

3  
4 59. On November 28, Vivendi filed another notice of claimed  
5 infringement against plaintiff's wowseller88 account on one of the auctions  
6 that plaintiff had already voluntarily removed. VeRO members on eBay  
7 have the ability to view and file notices of claimed infringement against  
8 auction listings even after they have been voluntarily removed by the seller.  
9 As a result, plaintiff's wowseller88 account was suspended for a second  
10 time.  
11

12  
13 60. On December 16, 2005, defendants submitted five more notices  
14 of claimed infringement with eBay for auctions connected with plaintiff's  
15 hotguides88 account. As a result, eBay indefinitely suspended plaintiff's  
16 hotguides88 account the same day. eBay notified plaintiff that the auctions  
17 were terminated “because Blizzard Entertainment reported it to us for  
18 violating their intellectual property rights.” The only contact information  
19 given was the email address nharms@blizzard.com, an email address  
20 belonging to Blizzard.  
21  
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23  
24 61. On December 29, plaintiff emailed the nharms@blizzard email  
25 address requesting to know why his auctions were terminated. On January  
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1 4, 2006, plaintiff received an emailed response from Rigole, who said the  
2 inquiry had been forwarded to his attention. Rigole wrote:

3  
4 You are not allowed to sell an unauthorized "guide" that  
5 attempts to trade off the substantial good will and recognition  
6 that Blizzard has built up in connection with its World of  
7 Warcraft product. In addition, the EULA prohibits using the  
8 World of Warcraft software for "commercial purposes".

9  
10 Your disclaimer that the guides are for "educational purposes  
11 only" is ineffective.

12  
13 Please consider this a warning. If you continue with the  
14 aforementioned activities, we will have not [sic] other  
15 alternative but to review all legal remedies available to us  
16 including taking formal legal action to protect our rights.  
17

18  
19 62. All of plaintiff's auctions terminated by eBay were the result of  
20 notices of claimed infringement filed against plaintiff by the ESA, Vivendi,  
21 and Blizzard, working separately or in cooperation.  
22

23 63. Vivendi and the ESA filed these notices of claimed  
24 infringement even though plaintiff had filed a counter notice under the  
25 DMCA and were on notice that the book did not infringe any of their  
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1 intellectual property rights. Defendants had not yet requested to see a copy  
2 of plaintiff's book at the time they ordered most of the auctions terminated.

3  
4 64. eBay has informed plaintiff that it will reinstate his account  
5 only when it receives consent from defendants.

6  
7 65. As a result of defendants' misrepresentations, Plaintiff has lost  
8 sales and is unable to continue to sell his book on eBay.

9 **FIRST CLAIM FOR RELIEF**  
10 **MISREPRESENTATION OF COPYRIGHT INFRINGEMENT**  
11 **UNDER THE DMCA, 17 U.S.C. § 512(f)**

12 66. By submitting notices of claimed infringement to eBay  
13 regarding plaintiff's book, defendants knowingly and materially  
14 misrepresented that plaintiff's sale of his book infringed defendants'  
15 copyright.  
16

17 67. Defendants' conduct resulted in lost profits for plaintiff.

18 **SECOND CLAIM FOR RELIEF**  
19 **TORTIOUS INTERFERENCE WITH CONTRACT**

20 68. Plaintiff had a valid contract with eBay to sell products on its  
21 auction site.  
22

23 69. Plaintiff also had valid contracts with eBay shoppers who had  
24 placed bids on or agreed to purchase his book.  
25

26 70. Defendants knew about plaintiff's contracts with eBay and  
27 eBay shoppers.  
28

1           71. Defendants intentionally filed false notices of claimed  
2 infringement to disrupt plaintiff's contracts. In the alternative, defendants  
3  
4 negligently filed the false notices of claimed infringement.

5           72. Defendants' conduct caused eBay and to terminate its contract  
6 with plaintiff by suspending his account.  
7

8           73. Defendants' conduct also caused eBay shoppers who had  
9 placed bids or agreed to buy his book to terminate their contracts with  
10 plaintiff.  
11

12           74. Defendants' conduct resulted in lost profits for plaintiff.

13                           **THIRD CLAIM FOR RELIEF**  
14                           **TORTIOUS INTERFERENCE WITH**  
15                           **PROSPECTIVE ECONOMIC ADVANTAGE**

16           75. Plaintiff had an economic relationship with eBay, with the  
17 probability of future economic benefit to plaintiff.  
18

19           76. Plaintiff also had economic relationships with potential  
20 purchasers who had bid on his book auctions or would bid on future book  
21 auctions.  
22

23           77. Defendants knew about plaintiff's economic relationship with  
24 eBay and potential purchasers of his book.

25           78. Defendants intentionally filed false notices of claimed  
26 infringement to disrupt plaintiff's future economic benefit by causing him  
27  
28



1 lost sales. In the alternative, defendants negligently filed the false notices of  
2 claimed infringement against plaintiff.

3  
4 79. Defendants' conduct was independently wrongful in that it  
5 constituted misrepresentation and improper business practices.

6  
7 80. Defendants' conduct caused plaintiff to lose future economic  
8 benefits by causing lost sales.

9 **FOURTH CLAIM FOR RELIEF**  
10 **UNFAIR, DECEPTIVE, AND FRAUDULENT**  
11 **BUSINESS PRACTICES**

12 81. Defendants' conduct constitutes unfair, deceptive, and  
13 fraudulent business practices under the California Unfair Competition Law,  
14 Cal. Bus. & Prof. Code § 17200, the Florida Deceptive and Unfair Trade  
15 Practices Act, Fla. Stat. §§ 501.201-.213, and the D.C. Consumer Protection  
16 Procedures Act, D.C. Stat. § 28-3904.

17  
18 82. Defendants' conduct resulted in lost profits for plaintiff.

19  
20 **FIFTH CLAIM FOR RELIEF**  
21 **DECLARATORY AND INJUNCTIVE RELIEF**

22 83. Defendants contend that plaintiff's book infringes their  
23 copyright, trademark, and other unidentified intellectual property rights.

24  
25 84. Plaintiff contends that his book does not infringe any of  
26 defendants' copyright, trademark, or other rights, constitutes fair use, and is  
27 protected by the First Amendment.  
28

1       85. Defendants have threatened to take legal action against plaintiff  
2 if he continues selling his book.

3  
4       86. Plaintiff continues to sell his book on his personal website at  
5 <http://www.ultimatewowguide.i8.com> under threat of legal action by  
6 defendants and plans to continue doing so for the indefinite future.

7  
8       87. Defendants have repeatedly terminated plaintiff's eBay auctions  
9 and have threatened to continue doing so.

10       88. As a result of defendants' termination of his auctions, eBay  
11 suspended Plaintiff's account and has informed plaintiff that it will not  
12 reinstate it until eBay receives authorization from defendants.

13  
14       89. Defendants have refused to authorize eBay to reinstate  
15 Plaintiff's account, and will not do so absent an order of this Court to the  
16 contrary.

17  
18       90. Plaintiff desires to sell his book on eBay but, as a result of  
19 defendants' actions, is unable to do so. As a result, plaintiff continues to  
20 lose profits.

21  
22       91. There is a real and actual controversy between Plaintiff and  
23 defendants regarding whether the continued sale of his book is lawful or  
24 whether it infringes defendants' rights.

25  
26 //  
27  
28

**DEMAND FOR RELIEF**

Plaintiff demands judgment as follows:

1. Actual damages, punitive damages, treble or statutory damages under D.C. Stat. § 28-3905(k), costs, and attorneys' fees.
2. A declaratory judgment that plaintiff's sale of the book, "The Ultimate World of Warcraft Leveling & Gold Guide," is lawful, protected by the First Amendment, and does not infringe defendants' copyright, trademark, or other rights.
3. An injunction:
  - a. prohibiting defendants from further interfering with the sale of plaintiff's book, and
  - b. requiring defendants to rescind their notices of claimed infringement with eBay and to authorize eBay to reinstate plaintiff's account.

//

//

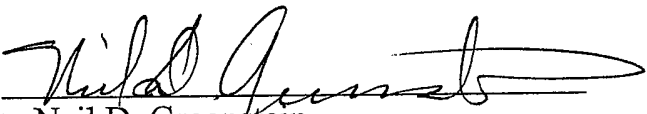
1           4.       Such other relief as the Court finds appropriate.

2           Dated: March 23, 2006

3                       Respectfully submitted,

4                               NEIL D. GREENSTEIN  
5                               TECHMARK

6                               GREGORY A. BECK  
7                               PAUL ALAN LEVY  
8                               PUBLIC CITIZEN LITIGATION GROUP

9  
10                               By:   
11                               Neil D. Greenstein  
12                               Attorneys for Plaintiff

13  
14                               **DEMAND FOR JURY TRIAL**


15                       Plaintiff, Brian M. Kopp, hereby requests a trial by jury on all issues  
16                       triable of right by a jury.

17  
18           Dated: March 23, 2006

19                       Respectfully submitted,

20                               NEIL D. GREENSTEIN  
21                               TECHMARK

22                               GREGORY A. BECK  
23                               PAUL ALAN LEVY  
24                               PUBLIC CITIZEN LITIGATION GROUP

25                               By:   
26                               Neil D. Greenstein  
27                               Attorneys for Plaintiff



**"Amazing Proven Method To Level You Faster Than Ever Before  
Read to the Bottom Now to See How You Can Level Faster Too"**



**Get Ready To See Proven Results Faster, Easier In Even LESS TIME Just By Using A Secret Path That **Blizzard** Doesn't Want YOU To Know About. Let Me Explain.**

Proof 1-70 Playing Time  
Pre Patch 2.3

**Martin of [www.wow-strategy.com](http://www.wow-strategy.com)**

**"I spent 38 hours and 11 minutes at level 60 before Burning Crusade was out (proof is on my blog from the site name below the picture). The only relevant things I did was teach my pet bite rank 7 and clear the bank. Let's very liberally say that'd take 3 hours... so to get my final /played time you'd have to subtract 35 hours and 11 minutes from the 10 day 7 hour and 49 minute total which gives 8 days, 20**

hours, 38 minutes to level 70." [Martin Malmberg](#)

[Check out my 1-60 time](#) on the 2.3 Public Test Realms of 5 days 5 hours and remember that I was not speed leveling during this process of revamping.

## Professional Gamer Shares Amazing Strategy!

**It's about time isn't it?** This guide was made because there were so many **World of Warcraft guides** out there today that it was hard to pick a good one, let alone **a good leveling guide that is legal**. Many of them are far from worth even considering. Any of these guides range from being found on ebay to personal websites, and from gold to leveling guides to pvp and more.

If you're like me then you're sick of seeing the same old thing that people post on the forums or try to sell on ebay for a quick dollar. **What they're actually doing is giving you an ineffective grinding guide.** It was *thought* that grinding was the fastest way to hit 70 in the past because that is what all the bots and leveling services do. Grinding has been since **proven** to be not only slow but bad overall. Not only do you get bored very fast from grinding, but it takes the fun out of the game. But wait, there's more.

---

### Just Ask Yourself This Simple Question:

- ☐ A. Would you rather kill things endlessly in the middle of nowhere for 15 days to hit 70?

**OR ...**

- ☐ B. Would you rather have to do less work and have more fun as you level by questing, gaining faction, and making friends along the way?

---

If you chose **B** then keep reading because **you're going to discover the best kept secrets.**

If you chose **A** then keep reading as well because you will be **shocked** when you **see the amazing difference.**

## 2.4

### Recent Comment:

*Just wanted to say thanks to you and your guide. I have all the "official" guides and books that the big stores sell, and your guide is seriously the best investment I've made since buying WOW.*

*It saves me so much time, especially since I work 50+ hours a week and I don't have a lot of time a week to dedicate trying to level up and keep up with my guild mates. Your guide has helped me keep up with them and their levels, while spending half the time or less than they do. The quest guide coupled with the map add-on and preset waypoints literally saved me hours and hours of having to search for items as well as choosing the right quests and staying away from the trash*

*Thanks Brian, you rock!  
-Chucky Walters*



## Level to 70 Faster or Easier

The truth about **World of Warcraft**, as well as every other MMO on the market, is that the process to hit the end game level isn't as easy as you might hope but it is a lot faster and easier in **WoW**. They all start out very promising, allowing you to gain levels very fast, and then it just tapers off and becomes a long process of steep leveling curves. WoW itself doesn't participate in the steep curves to level.

By the steep leveling curves I mean the amount of XP required to reach the next level and how it exponentially jumps up a lot to reach the next level. It generally starts off allowing you to level very fast and then at a certain level the XP jumps up at a faster and faster rate until you're grinding for a week or more just for one level.

This is where WoW takes the cake. **Not only is the leveling curve extremely minimal** by jumping up at nearly a small set amount of XP per level, but **there are nearly endless quests for you to do from when you first start a character to when you hit 70**. This in turn allows you to level faster than you could have in previous games and to have a lot more fun while you do it. That is something that no other MMO had to offer and it is what they're all trying to copy now, but with little success. **The large amount of quests in World of Warcraft are also what make it possible to have such a revealing leveling guide unlike any other**. Let me explain why questing is so important.

---

## Questing Is What Makes Such A Revealing Guide Possible

**If you chose Option B** above then you already know **WoW is a lot more fun and easier than other MMO's mainly due to questing**.

**If you chose Option A** above then you're just so used to grinding from other MMO's that had little or no quests for XP gain that you think it is how WoW should be played.

## Questing Not Grinding

The truth is that **World of Warcraft is meant to be played by having fun questing all over the world and not grinding in remote locations** everything you see for hours. Sure you could grind all day but you take all the fun, and the storyline, out of the game.

Before The Burning Crusade Expansion was released, **I have speed leveled many characters by questing. I also tested out how fast you could grind**. There was a **shocking difference** in the times, faction gain, friends made, and the overall boredom. There was nearly a 4 day difference of the actual time spent in game. If that doesn't already sound bad enough, since The Burning Crusade Expansion was released, Blizzard severely upped the XP rates for 2 reasons.

**The first reason was simply logical**, they wanted to make the content last a while since you had 10 more levels instead of 60.

**The second reason was to stop people from grinding and actually enjoy the games content.** The target ranged from the average MMO consumer who is used to grinding on a daily basis, as mentioned above, to the leveling services that are frowned upon and is a bannable offense.

This not only makes grinding extremely time consuming, but will never allow you to level in an efficient manner. The only possible thing you could gain from it is a lot of gold, but **it makes a lot more sense to hit 70 first before you farm gold.** Particularly for the fact **you get more gold from higher level monsters** and so that you can farm anything you want and at **a lot faster pace.**

## I'm NOW Revealing my Secret Step-by-Step Leveling Guide

**I have followed this path in my head since my first alliance character in WoW and I finally wrote it down** on paper in an **extremely easy to read, Step By Step guide** that **anyone can use.** You can now get the results that you want and have fun while you do it, **with less work** than ever before.

**You no longer need to deal with the frustration** of not knowing what to do next, where you should be questing, or doing things like far away quests to only find out 5 minutes later that you found another quest that you could have done at the same time. This outstanding guide will show you what should be done next, exactly where you should be for your level, and will keep you from doing quests that are too tough for your level.

**Every step is numbered** and sorted by each zone that you will quest in from level 1-70. Nearly every quest in the game is covered from the start to the end and is linked to the widely popular World of Warcraft database, Thottbot. You will be able to easily follow each step to achieve your maximum efficiency of the time spent playing and your level.

What I did with my years of speed leveling was chart down the **fastest way to complete multiple quests** in one running. In most cases you will be able to do big loops around a zone and knock quests off left and right so that by the time you got back to town to turn them in, you had a nice experience boost. This was especially great if you just leveled out in the field and had 5 or 6 quests to still turn in and are now 30% or more into the next level.

The **Best part** about this guide is that **you can solo all the way to 70.** You may need to group a few times throughout, but you'll **never be dependant on needing a group again.** Needing a group is also the most common mistake that people make and is the reason they resort to grinding. Most people try to complete every quest in a zone before they move on when what you should be doing is all the easier quests and come back later when you level up for the final quests.

### Pictures Are Included!

**I took pictures of nearly everything you have to interact with** in one way or another. Pictures of what you need to pick up, odd quest turn ins, special techniques, etc. **I have pictures under the step it corresponds to** so that you will fully understand what you're doing, and what to look for.

**Use Any Race Or Class, They're All Here:** [Draenei, Night Elf, Human, Dwarf, and Gnome](#), or [Shamans, Rogues, Druids, Hunters, Mages, Paladins, Priests, Warriors, and Warlocks](#)

I wrote down all the steps as well for the starting zones for **all 5 races: Draenei, Night Elf, Human, Dwarf, and Gnome.** These guides cover your starting race specific zones. After you do that every race has the same path to 70.

You can also pick any class and use the same guide without worries. **So whether you're a Shaman, Rogue, Druid, Hunter, Mage, Paladin, Priest, Warrior, or Warlock**, you can rest assured that **you will benefit from all of the features in this Alliance Leveling Guide** the same.

Now what I'm about to tell you will surprise you

---

## Blizzard Doesn't Want You To Know This...

... and they will never let you know this. Why you ask? Well it's all about the big money. The less you know about leveling, the more you play, and the more money Blizzard gets. Every month they're making roughly \$120 Million in monthly subscriber fees alone. If you've seen any of their official guide books then you know



that they don't reveal anything you couldn't find out in a week of playing around. They might list all the items in the game but it is obsolete in a month because they add patches with new content and items, as well as change stats and character builds. At this point if you bought the guide that was released with the game nothing would make sense. Almost every character has had a change or rename of something and it will not match up

Blizzard's official World of Warcraft Strategy Guide doesn't show you how to do anything really. **However our guide helps you achieve getting from 1-70 faster.** Stay with me now.

## THE ULTIMATE BONUS: Bring The Leveling Guide To Life

**This is an amazing mod that will uncover your entire map** so that you can see everything before it's uncovered. It also allows you to **import the special waypoint system that has every coordinate in from the guide** incorporated into it for even faster leveling so you don't have to search for coordinates with your mouse.

Since every coordinate is documented onto your in game map, you can easily set a waypoint and an arrow will show you the direction and how far it is to that destination. Then once you get there it automatically clears itself. **Best of all this mod itself is 100% legal, it is not a cheat or a hack.** I do not give you this installation file, you download it from a highly known WoW Gaming Mod site so you have zero risk of being hacked.

Click The Picture Below For More Information On This Amazing Mod



## No Cheats, No Hacks, 100% Legal

**There are absolutely no cheats and no hacks in this guide.** Everything you do is all you. I have the **fastest, most efficient path** charted out. **All you have to do is follow it, have fun, and level faster than ever before.** You'll be leveling so fast that **people will swear you are cheating.** That is where you can have even **more fun.** When someone asks how you are xx level so fast, just tell them you're hacking. They might report you but the GM will know you're not. =)

Now here comes the good part.

## Secure Your Copy And Discover The Best Alliance Guide

Now these secrets being revealed are so startling and shocking that it is in danger of being taken off the

internet as we speak. This guide is 100 times greater than that of the official strategy guide. Why? Well because it's an online only game so Blizzard will not make a guide anything like this and they will never officially support it. As I said they want you to pay more and play more to level.

### **Actual Testimonials**

**Brian,**

***I got your leveling guide more then a month ago (April). I truly feel that I'm getting more than I bargained for. You update your guide quite often and you always provide those updates to existing customers. It's emails like the one of your most recent update that show that you're dedicated to customer service and want every one of your previous members to enjoy the benefits of the latest information.***

***That, combined with just the amazing quality of the guide has made me a customer for life.***

***Thank you for all your hard work, it is truly appreciated.***

**Gary Weber**

***Icecrown: Deelmackey (70 hunter), Fubarian (61 Warlock), Opatamoot (40 Druid)***

---

**Hey Brian,**

***Thank you for an excellent guide! Getting what you pay for these days is more rare than an epic drop, but I can honestly say that your guide is worth every penny!***

***Thanks and keep up the great work!***

**Brad C.**

---

***Thanks Brian!!!! I use this guide like a Bible!! I have been playing mmo's for about 8 years, and usually when I level I hate it, but this guide has made the game more interesting now that I don't have to grind every level. This guide reduces SOO much downtime, you would have to be crazy NOT to grab This Guide!!!!***

**Jason Kujo**

---

**Dear Brian Kopp,**

***I'd just like to comment your excellent guide. Never have I seen a better use of a internet video game guide, mixed with the great instructions and tips you give. I must simply say I'm amazed that the entire world of world of warcraft doesn't have it yet.***

***I've taken the liberty of showing off a couple pages at school, as some of my friends thought it was a scam and that I was simply lying. When they saw the two pages, they were still a bit uncertain, but when I invited them home to see it in action, they too were amazed at the efficient leveling that could be achieved with your wonderful guide.***

***Cheers,***

***Joakim Tobiasson - A VERY satisfied costumer.***

---

*I wasn't quite sure where to put Feedback, so I decided to send it to you this way. My cousin bought your guide for me for my birthday. When i first got it I wasn't sure whether I should use it or not, or whether it was counted as cheating. But I had a go, and I just couldn't stop using it. It's brilliant! Since I've started using it, I've got 2 level 70's!*

*I told my friends I had it, and I showed them a preview. And they were dumbstruck at how fast I could level. Thank you very very much Brian. Really appreciate it!*

~ Aisha Luckie

---

Dear Brian,

*I purchased your guide and have been following it step by step since my purchase. I'm extremely pleased with it and I just had to tell you.*










*It's perfect for someone like me who used to run out of quests and not know what to do next. You hear the word "guide" used often, but it truly is a guide. You take us step by step how to utilize the most of our online time. And for a stay at home mom, it's great to finally catch up with my friends!*

*I can't wait to use it for the Draenei I plan to create and use your heavily anticipated upcoming guide for them!*

*Thank you so much for your great work. This was worth every penny!*  
*Mya - Priestess of Bloodscalp*  
*More feedbacks are available, I try to not spam you with them.*

## Here Is A Brief Recap

---

-  This is a digital leveling guide that you can view and download in the members area. The members area also helps with updates and new releases
-  120 pages from my 1-70 "Set In Stone" route with links to every quest and covering every class and race
-  Every step is written down from level 1-70 showing you when to accept/turn in quests, where to go, etc so you can easily follow with any Alliance race
-  I have a tip section for basic information such as which Mods I use and general leveling tips
-  Interactive Map Coordinates for 1-70. **This is an amazing mod** that you install that will uncover your entire map, like Diablo 2 maphack, so that you can see everything before it's uncovered. It also allows you to import the special waypoint system that shows every coordinate in the guide on your map for even faster leveling so you don't have to manually search for coordinates.
-  I Include class specific solo talent guides for Shamans, Rogues, Druids, Hunters, Mages, Paladins, Priests, Warriors, and Warlocks  
**Yep all 9 classes**
-  **This guide is 100% legitimate** and **WILL NOT get you banned**. No hacks, bots, or cheats are used
-  This is not a gold making guide, but my original guide is free on [margamer](http://margamer.com) but remember that solo you will find many blue items and have a lot of money naturally while using this guide
-  This is a digital guide so you can click each quest if you need additional help and information

From noobs to veterans, this guide will help you on all levels.



Whether you want to just know what quests to get or avoid or you want to follow this 100%, you will be amazed at every turn



Whether you are using this guide to level as fast as you can or just casually so you don't get stuck, this guide will help you level so much faster than if you didn't know it.



Guide and Interactive Map Mod are **compatible for Mac users.**

If there is anything else you want to know just e-mail me.



### TRY IT FREE!

Try the guide and get a sample of the entire 1-20 zones for all 5 races.

Yes you read that correctly. Not only will you get a huge sample of 1-20 but you will also get a sample of the Outlands guide starting at 60.

I'm letting you try all of this free just to prove to you how great this guide really is.

Name:

Email:

Sign Me Up

Secure your copy today and you'll get all updates **FREE!** So you get all the class guides, any updated tweaks to the guide, and any updates to the **1-70 Burning Crusade Guides FREE!**



## ☐ **YES BRIAN, LET ME IN RIGHT NOW!** **I Want To Secure My Lifetime Membership To** **"Brian Kopp's 1-70 Alliance Leveling Guide"** **Immediately!**

I Understand that I will have access to the members only website where I can download and print out the entire **1-70 Alliance Leveling Guide**. I also understand that the guide will help me level with **any Alliance race or class** faster than I had ever dreamed or even just help to keep me on the right path. I will also get complete access to every "Solo Talent Build" for all 9 classes in World of Warcraft; Shamans, Rogues, Druids, Hunters, Mages, Paladins, Priests, Warriors, and Warlocks

I also understand that this is a **lifetime membership** and a 60-day



guarantee. I also have no obligation to pay ANY monthly fees to gain access to new and updated content to the **1-70 Alliance Leveling Guide** or the 9 "Solo Talent Build" class guides

☒ **Yes, I Agree!** I want my lifetime membership for a one-time low investment of only...



The **Brian Kopp 1-70 Alliance Leveling Guide** is downloadable, you will be taken to an account creation page to create a login for future updates immediately after clicking the button below where you can download your guide. You **WILL NOT** receive anything in the mail regarding the creation of your account besides a receipt.



[Don't have a Credit Card, Paypal, or Echeck? Click Here](#)

You will be taken directly to the account creation page immediately after you click the create account button. Once you create your account you can then make your one-time investment and download the Brian Kopp 1-70 Alliance Leveling Guide. **DO NOT CLOSE YOUR BROWSER BEFORE CREATING AN ACCOUNT.**

What are you doing reading down here? Why didn't you order yet?...Oh, you must be one of those skeptics thinking my guide still sounds too good to be true. Probably because of the price or because you've seen other guides out there. I'll tell you what. I'll directly link you to some other guides and I guarantee that after you try them out that you will not like them and you will be back to try this guide out.

Check some of these guys out and see the quality difference in my guide compared to them:

[Ultimate WoW Guide](#): Good site but the leveling guide section is pretty bad. Very unorganized and hard to follow.

[WoWhints](#): This is by far the worse leveling guide I've ever seen. First he tried to steal my guide and now his guide has 10 steps per level. If you've played 10 minutes in outland then you will know why this is garbage.

Why would I tell you to just go buy another product? Well because I believe my guide is the best one available for leveling an alliance character 1-70 that I offer a [30 Day Money Back Guarantee](#) so if it's not for you then what do you have to lose?

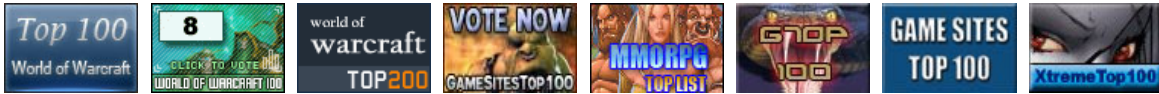
**Last Chance**



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