

1
2
3
4
5
6
7 **UNITED STATES DISTRICT COURT**
8 **IN AND FOR THE WESTERN DISTRICT OF WASHINGTON**
9 **AT TACOMA**

10 AYLO PREMIUM LTD, a limited liability
11 company organized under the laws of the
12 Republic of Cyprus,

13
14 Plaintiff,

15 v.

16 JOHN DOES 1 - 20 d/b/a, PORNXP.COM,
17 PORNXP.NET, PORNXP.CC,
18 PORNXP.ORG, PORNXP.CLOUD,
19 PORNXP.EU, PORNXP.CLICK,
20 PORNXP.PICS, PORNXP.QUEST,
21 PORNXP.BUZZ, PORNXP.CFD,
22 PORNXP.NETWORK, PORNXP.PRO,
23 PORNXP.LIFE, PORNXP.SBS,
24 PORNXP.STREAM, PORNXP.ME,
25 PORNXP.CLUB, PORNXP.ONE,
26 PORNXP.SPACE, PORNXP.TV,
PORNXP.CAM, PORNXP.LIVE,
PORNXP.TUBE, PORNXP.TOP,
PORNXP.WATCH, PORNXP.DOWNLOAD,
PORNXP.LOL, PORNXP.LAT,
PORNXP.WEBSITE, PORNXP.SITE,
PORNXP.ONLINE, PORNXP.VIDEO,
PORNXP.XYZ, AND PORNXP.INFO.

Defendants.

Case No.

**COMPLAINT FOR DAMAGES AND
INJUNCTIVE RELIEF**

DEMAND FOR JURY TRIAL

1 Plaintiff Aylo Premium Ltd (“Plaintiff” or “Aylo”), by and through its counsel of record, files
 2 this Complaint against Defendants John Does 1-20, d/b/a pornxp.com, pornxp.net, pornxp.cc,
 3 pornxp.org, pornxp.cloud, pornxp.eu, pornxp.click, pornxp.pics, pornxp.quest, pornxp.buzz,
 4 pornxp.cfd, pornxp.network, pornxp.pro, pornxp.life, pornxp.sbs, pornxp.stream, pornxp.me,
 5 pornxp.club, pornxp.one, pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube,
 6 pornxp.top, pornxp.watch, pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site,
 7 pornxp.online, pornxp.video, pornxp.xyz, and pornxp.info (together, “Defendants”).

8 9 **PRELIMINARY STATEMENT**

10 1. Plaintiff is among the world’s leading premium adult entertainment content providers.
 11 Plaintiff owns one of the largest extant libraries of original adult-themed video material. A majority
 12 of Plaintiff’s content is and was produced in the United States.

13 2. Plaintiff methodically registers its video content with the U.S. Copyright Office,
 14 resulting in over 42,000 valid registrations (the “Works”).

15 3. By this lawsuit, Plaintiff seeks to protect thousands of its registered, copyrighted
 16 audiovisual Works from blatant infringement by Defendants.

17 4. In August 2023, Plaintiff’s predecessor, MG Premium Ltd, rebranded and changed its
 18 name to Aylo Premium Ltd. The name change from MG Premium Ltd to Aylo Premium Ltd did not
 19 disrupt any rights or ownership of the Works.

20 5. Plaintiff monetizes its Works through exclusive licenses to websites that sell monthly
 21 subscription packages to users to access and view the audiovisual Works.

22 6. The conduct that gives rise to this lawsuit is egregious and willful. Defendants own
 23 and operate the websites at the domains pornxp.com, pornxp.net, pornxp.cc, pornxp.org,
 24 pornxp.cloud, pornxp.eu, pornxp.click, pornxp.pics, pornxp.quest, pornxp.buzz, pornxp.cfd,
 25 pornxp.network, pornxp.pro, pornxp.life, pornxp.sbs, pornxp.stream, pornxp.me, pornxp.club,
 26 pornxp.one, pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube, pornxp.top,

1 pornxp.watch, pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site, pornxp.online,
2 pornxp.video, pornxp.xyz, and pornxp.info (together, “PornXP”). Collectively, Defendants use these
3 domain names to distribute infringing copies of audiovisual and image works, including Plaintiff’s
4 Works.

5 7. Defendants operate a coordinated network of infringing websites unified under the
6 “PornXP” brand, each hosted at a different top-level domain (*e.g.*, .com, .cloud, .tv, .click). These
7 mirrored sites share identical or near-identical layouts, backend infrastructure, libraries of
8 copyrighted content, and monetization tools. The use of a common brand identifier, cross-linked
9 logos, identical advertising scripts, and synchronized domain behavior reflects centralized control and
10 unified intent.

11 8. Defendants are directly and knowingly involved in the trafficking of tens of thousands
12 of pirated works—including 2,040 registered works owned by Plaintiff—on 71,400 individual web
13 pages. None of the infringing works posted on the sites are “user-generated content” or “third-party”
14 uploads. That is, the PornXP websites are not user-generated content (“UGC”) websites. There is no
15 user upload capability. Although the websites may visually present the appearance of allowing user
16 uploads, there is no functional upload capability; upon testing, the feature was found to be inoperative
17 and illusory—further confirming that Defendants themselves control the selection and posting of
18 infringing content on PornXP.

19 9. Defendants are not “service providers,” are not engaged in the storage of content at
20 the direction of users, and thus are not entitled to any of the safe harbors afforded under Section 512
21 of the Digital Millennium Copyright Act (“DMCA”) (17 U.S.C. § 512). Defendants do not even
22 attempt to comply with the takedown obligations under the DMCA that would afford them safe
23 harbor. Instead, they systematically refuse to comply with proper and compliant DMCA takedown
24 notices.

10. Defendants' actions are causing serious harm to Plaintiff and its business and must be stopped immediately. Because Defendants will not desist voluntarily, Plaintiff now comes before this Court to seek injunctive relief and damages.

JURISDICTION AND VENUE

11. This is a civil action seeking damages and injunctive relief for copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*

12. This Court has subject matter jurisdiction over Plaintiff's claims for copyright infringement under 28 U.S.C. §§ 1331 and 1338.

13. Defendants Does 1-20 (the "Defendants") are unknown individuals or entities that own and operate websites located at the uniform resource locators ("URLs") pornxp.com, pornxp.net, pornxp.cc, pornxp.org, pornxp.cloud, pornxp.eu, pornxp.click, pornxp.pics, pornxp.quest, pornxp.buzz, pornxp.cfd, pornxp.network, pornxp.pro, pornxp.life, pornxp.sbs, pornxp.stream, pornxp.me, pornxp.club, pornxp.one, pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube, pornxp.top, pornxp.watch, pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site, pornxp.online, pornxp.video, pornxp.xyz, and pornxp.info.

14. Defendants act in concert with each other in the operation of PornXP.¹

15. Defendants operate PornXP for purposes of the copyright infringement allegations alleged here.

16. Defendants knowingly and purposefully market to and target the entire United States, including residents of this District, through PornXP.

¹ As it relates to the PornXP network of domains, PornXP.cc functions both as a content delivery domain, serving infringing image and video content to users of the PornXP websites, and as a standalone website accessible to users. The infringing material delivered through PornXP.cc includes screenshots and video clips taken directly from Plaintiff's registered, copyright-protected works.

1 17. Specifically, the PornXP websites display geo-targeted advertisements to U.S. users,
2 confirming that the operators have the technical capability to identify the general location of each
3 visitor and serve ads accordingly. These advertisements are tailored to U.S. markets and include
4 promotions specific to this judicial district, further evidencing Defendants' intentional targeting of
5 U.S.-based and district-specific traffic.²

6 18. On information and belief, Defendants maintain contractual relationships with U.S.-
7 based companies to promote their services through advertisements displayed on the PornXP websites.
8 For example, PornXP displays advertisements for Chaturbate.com, an adult entertainment platform
9 owned and operated by Multi Media LLC, a company headquartered in California. Similarly, PornXP
10 displayed advertisements, on an affiliate basis, for McAfee software, a cybersecurity product
11 developed by McAfee LLC, a U.S. company headquartered in San Jose, California.

12 19. Defendants entered into agreements with U.S.-based domain name registrars to
13 register and maintain the domains comprising the PornXP network. These registrars include, but are
14 not limited to, Oregon-based Porkbun LLC, Arizona-based NameSilo LLC, Spaceship LLC, and
15 GoDaddy Operating Company, LLC.

16 20. Defendants have taken deliberate steps to conceal their identities as the registrants of
17 the PornXP domains by using domain privacy services to obscure ownership information from public
18 records. These services include Massachusetts-based Privacy Protect LLC (used for pornxp.cloud),
19 Arizona-based PrivacyGuardian.org LLC (used for pornxp.net and pornxp.cc), and North Carolina-
20 based Private by Design LLC (used for pornxp.club), among others.

21 21. Defendants have utilized an X.com (formerly Twitter) account to promote their
22 infringing websites to users in the United States. X is a U.S.-based company governed by its Terms
23 of Service, which require users to agree to certain U.S. legal standards and submit to U.S. jurisdiction
24
25

26 ² Attached as **Exhibit A** are redacted examples showing geo-targeted advertising, including in this district.

for disputes involving X. Defendants' use of X.com to promote their websites demonstrates their intentional engagement with U.S.-based platforms and audiences.

22. Each PornXP website includes a dedicated "2257 compliance page" that references 18 U.S.C. § 2257, a U.S. federal statute governing recordkeeping for sexually explicit content. By invoking this statute and inviting users to report unlawful material, Defendants intend for U.S. viewers to use the PornXP websites.³

23. The PornXP websites include DMCA Notice pages containing industry-standard language and instructions for submitting notifications of alleged copyright infringement pursuant to the Digital Millennium Copyright Act, specifically Title 17, Section 512(c)(2) of the United States Code.⁴ However, in practice, following these instructions does not result in the removal of infringing content, nor does it lead to the termination of repeat infringers, as required under the DMCA.

24. Website analysis overview reports prepared by Similarweb.com, an industry-trusted website analytics company show large numbers of visitors to PornXP sites for the two months ending March 2025 with a large percentage of visitors coming from the U.S.:

<u>Website</u>	<u>Average Monthly Visitors</u>	<u>United States source (percent)</u>
PornXP.com	7.26 million	United States (18.44%)
PornXP.cc	6.435 million	United States (10.66%)
PornXP.net	1.288 million	United States (12.64%)
PornXP.eu	2.06 million	United States (10.10%)

See attached **Exhibit C**, **Exhibit D**, **Exhibit E**, and **Exhibit F**.

25. Defendants' use of United States vendors, United States-based advertisers, geo-targeted ads, and other key services illustrates that Defendants are expressly aiming their website and business at the United States market.

³ Attached as **Exhibit B** are examples of PornXP 2257 compliance pages.

⁴ Attached as **Exhibit G** are examples of DMCA Pages from PornXP Websites.

26. On information and belief, Defendants all transact business in this judicial district through their interactive websites and through their interaction with the United States and Washington residents who have been offered the infringing content on PornXP and who have, themselves, engaged in acts of infringement in this District and State. The Court has personal jurisdiction over Defendants, who have engaged in business activities in and directed to this District and have committed tortious acts within this District or directed at this District. Defendants are subject to service of process under the state Long-Arm Statute and Fed. R. Civ. P. 4(e).

27. Any alien defendant is also subject to jurisdiction in any district. *See* 28 U.S.C. 1391 (“An alien may be sued in any district.”) *See also* Fed. R. Civ. P. 4(k)(2).

28. Venue is appropriate in this district pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events giving rise to the claim occurred in this judicial district and/or because Defendants are subject to the court’s personal jurisdiction with respect to this action.

PARTIES

29. Aylo Premium Ltd has at all relevant times been a private limited liability company organized under the laws of the Republic of Cyprus with its head office at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540. Aylo is the owner of the copyrights associated with many well-known trademark-protected brands of adult content, including “Reality Kings,” “Brazzers,” “MOFOS,” “Babes.com,” and “Twistys,” among others.

30. Plaintiff owns one of the largest portfolios of premium adult-oriented audiovisual content in the world. Plaintiff routinely registers copyrights in its content with the U.S. Copyright Office.

31. Plaintiff owns over 42,000 registered copyrights to legal adult videos.⁵

⁵ To comprehend the size of Plaintiff’s registered library of over 42,000 films, “[o]ver its 50-year history, the MPAA has rated a total of 29,791 films.” Source: <https://www.motionpictures.org/press/mpaa-celebrates-50-years-of-film-ratings> (2018).

1 32. Schedule A is a schedule of the copyright registrations for Plaintiff's works at issue,
2 attached here as **Exhibit I** (the "Subject Works").⁶

3 33. Plaintiff licenses its videos for valuable consideration, including for display on adult
4 entertainment subscription-based websites. Plaintiff has never authorized or given consent to
5 Defendants to use its copyrighted works on Defendants' websites.

6 34. Defendants own and operate the URLs located at pornxp.com, pornxp.net, pornxp.cc,
7 pornxp.org, pornxp.cloud, pornxp.eu, pornxp.click, pornxp.pics, pornxp.quest, pornxp.buzz,
8 pornxp.cfd, pornxp.network, pornxp.pro, pornxp.life, pornxp.sbs, pornxp.stream, pornxp.me,
9 pornxp.club, pornxp.one, pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube,
10 pornxp.top, pornxp.watch, pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site,
11 pornxp.online, pornxp.video, pornxp.xyz, and pornxp.info.

12 35. The following domains in the PornXP network—pornxp.com, pornxp.click,
13 pornxp.pics, pornxp.quest, pornxp.buzz, pornxp.cfd, pornxp.network, pornxp.net, pornxp.pro,
14 pornxp.life, pornxp.sbs, pornxp.stream, pornxp.cc, pornxp.org, pornxp.club, pornxp.one,
15 pornxp.space, pornxp.tv, pornxp.cam, pornxp.live, pornxp.tube, pornxp.top, pornxp.watch,
16 pornxp.download, pornxp.lol, pornxp.lat, pornxp.website, pornxp.site, pornxp.video, and
17 pornxp.xyz—are registered through U.S.-based registry operators or governed by registry agreements
18 enforceable under U.S. law. As such, these domains fall within the scope of U.S. legal jurisdiction
19 and are subject to enforcement through United States-based registry infrastructure.

20 36. The PornXP websites are available in the United States.

21 37. Defendants operate PornXP with the intention of broadcasting, distributing, or making
22 available content in the United States and earning money from the United States market.

23 38. Defendants are the owners, operators, shareholders, executives, and/or affiliates of
24 PornXP. Plaintiff is unaware of the true names or capacities of the Defendants. Plaintiff is informed
25 _____

26 ⁶ Also attached as **Exhibit H** are twenty-five examples of the 2,040 copyright registrations for the Subject Works pertinent to this case, as reflected in screenshots from the U.S. Copyright Office's Public Records Portal.

1 and believes, and on that basis alleges, that the Defendants either (a) directly performed the acts
 2 alleged here, (b) were acting as the agents, principals, alter egos, employees, or representatives of
 3 the owners and operators of PornXP, and/or (c) otherwise participated in the acts alleged here with
 4 the owners and operators of PornXP. Accordingly, the Defendants each are liable for all the acts
 5 alleged here because they were the cause in fact and proximate cause of all injuries suffered by
 6 Plaintiff as alleged here. Plaintiff will amend the complaint to state the true names of the Defendants
 7 when their identities are discovered.

8 9 **STATEMENT OF FACTS**

10 39. PornXP is a network of websites that displays pirated copyrighted adult entertainment
 11 content without authorization or license. PornXP.cc is used to deliver the image and video content
 12 displayed on PornXP. *See* footnote 1 above.

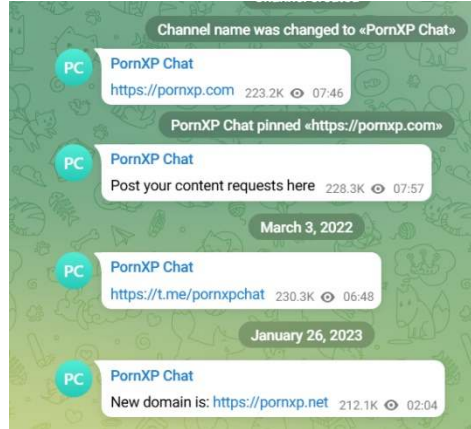
13 40. On information and belief, all of the video and image content on PornXP is placed
 14 onto PornXP by the owners and/or operators of the domains. That is, the website's visitors cannot
 15 upload any content to PornXP.

16 41. Defendants monetize their copyright infringement on PornXP through the advertising
 17 banners visible on the site. On information and belief, advertising is the only way PornXP makes
 18 money.

19 42. Besides displaying static banner advertisements, the PornXP websites show visitors
 20 pop-up advertisements when they view videos on the site. Those pop-up ads attempt to load software
 21 onto the user's device which commercially available antivirus software recognizes as malware.⁷

22
 23 ⁷ Defendants' malware has prompted publication of videos and articles warning about PornXP. *See, e.g.*, "Why The
 24 Pornxp.com Adult Website May Be a Security & Privacy Risk," available at
 25 https://www.youtube.com/watch?v=CBWbY_lm750. *See also* "Pornxp.com Redirects [Virus Removal Guide],"
 26 available at <https://sensorstechforum.com/pornxp-com-redirects/> (last visited May 15, 2025) ("Pornxp.com is a suspicious
 adult website that poses significant security and privacy risks. The website creates dangerous redirects to malicious or
 fraudulent third-party sites. These redirects can lead to phishing pages designed to steal personal information, fake
 download prompts containing malware, or deceptive offers aimed at exploiting users financially.").

43. Defendants facilitate additional infringement of Plaintiff's content through the use of Telegram, a cloud-based messaging platform accessible via mobile and desktop. Digital pirates use Telegram to disseminate and coordinate unlawful content distribution.⁸ The PornXP Telegram



channel has over 10,000 subscribers. Within the channel, Defendants actively solicit infringement by encouraging users to “Post your content requests here.”⁹

44. On PornXP, Plaintiff's Subject Works are easily searchable by brand name. Entering a brand name sends visitors to comprehensive pages that display the Subject Works, optimized for search engines with relevant keywords such as brand names, actors' names, and other descriptive details. Additionally, the PornXP homepage prominently features Subject Works, with daily updates adding new Works there.

45. PornXP allows users to share videos from the site on any other website or social media site, including YouTube, Telegram, Facebook, and X (formerly Twitter), and allows users to send the videos via email to anyone. This functionality makes it impossible to know where and how many

⁸ Sources: <https://torrentfreak.com/piracy-bots-and-channels-are-rampant-of-telegram-but-for-how-long-230519/>; <https://www.digitalmusicnews.com/2019/10/03/riaa-telegram-u-s-government-copyright-infringement/>; <https://www.redpoints.com/blog/telegram-book-piracy/>; <https://www.firstpost.com/opinion-news-expert-views-news-analysis-firstpost-viewpoint/pirated-content-on-whatsapp-and-telegram-how-is-it-regulated-in-india-11694881.html> (last visited May 15, 2025).

⁹ Source: <https://t.me/s/pornxpcom> (last visited: May 15, 2025).

1 times the copyrighted videos have been posted and displayed illegally as a direct result of Defendants'
2 unlawful display.

3 46. PornXP does not meet the requirements for the safe harbor provisions of the DMCA.
4 Specifically, Defendants do not honor take-down notices.¹⁰

5 47. On information and belief, Defendants load infringing materials onto PornXP and are
6 the sole infringers of content on those websites.

7 48. Plaintiff's agents routinely police websites to identify infringement of Plaintiff's
8 Works. Those investigations revealed that tens of thousands of Plaintiff's Works are available on
9 PornXP. PornXP has no license or authorization from Plaintiff to copy or display Plaintiff's Works.

10 49. As of May 20, 2025, Plaintiff has identified that the PornXP websites displayed 2,040
11 of Plaintiff's Works at 71,400 URLs. Schedule A, Exhibit I to this complaint, identifies the copyright
12 registrations and the URLs where Defendants displayed them. Defendants have no authority or license
13 to display or distribute any portion of Plaintiff's Works on PornXP.

14 50. Each of these 71,400 URLs on Defendants' websites display one or more of Plaintiff's
15 Works.

16 51. Plaintiff has demanded that PornXP remove Plaintiff's Works from PornXP by
17 sending a series of takedown notices in accordance with the takedown provisions of the Digital
18 Millennium Copyright Act, 17 U.S.C. § 512(c). Plaintiff (as Aylo Premium Ltd or MG Premium Ltd)
19 submitted over 680,000 DMCA-compliant takedown notices seeking to remove its Works from
20 PornXP. As of the filing of this complaint, Plaintiff or its agents sent DMCA-compliant takedown
21 notices identifying every URL listed in Schedule A to the email address Defendants provided by
22 PornXP for takedown communications, yet as of the date of this filing, 100% of the reported URLs
23 remained active.

24
25
26 ¹⁰ Since May 2020, Plaintiff has sent over 680,000 DMCA-compliant takedown notices to Defendants using the contact
email provided by Defendants' DMCA Page. 100% of the notices have been ignored.

52. Further, between September 2018, and April 2025, Plaintiff (as Aylo Premium Ltd or as MG Premium Ltd) sent over 2.1 million DMCA-compliant Takedown Notices under 17 U.S.C. § 512(c) to Google, LLC in an attempt to have links to its Works being infringed on PornXP removed from Google.com search results. Plaintiff frequently sends requests to Google, LLC to remove indexed links to infringing uses of its Works on Google.com.¹¹

53. None of the DMCA takedown notices Plaintiffs sent to the Defendants were returned as undeliverable.

54. Defendants did not remove any content identified in the takedown notices or respond to any of Plaintiff's DMCA takedown notices. On information and belief, Defendants have actual knowledge and notice of their infringement of Plaintiff's Works. Defendants' infringement is unmistakable even to a casual observer. Defendants' use of Plaintiff's brand names to index infringing material to facilitate searching underscores that Defendants know they are using Plaintiff's Works.

55. Through the conduct alleged here, Defendants knowingly promote, participate in, facilitate, assist, enable, materially contribute to, encourage, and induce copyright infringement, and thereby have infringed, secondarily infringed, and induced infringement by others, the copyrights in Plaintiff's Works.

56. Defendants, either jointly, severally, actually, constructively, and with or without direct concert with one another, deprived Plaintiff of the lawful monetary rewards that accompany its rights in the Works. Defendants' disregard for copyright laws threatens Plaintiff's business.

57. Defendants intentionally, knowingly, negligently, or through willful blindness avoided reasonable precautions to deter rampant copyright infringement on PornXP.

¹¹ Aylo Premium Ltd, formerly MG Premium Ltd, has filed 984,475,377 requests to remove links to infringing uses of its content from Google.com, making it the world's top copyright owner to request removal. Penguin Random House LLC follows in second with 888,110,933 requests, and BPI Ltd. (British Recorded Music Industry) follows in third with 632,987,320 requests. Source: https://transparencyreport.google.com/copyright/overview?browse_copyright=ce:owner;size:6&lu=browse_copyright (last visited on May 15, 2025).

1 58. Defendants' acts and omissions allow them to profit from their infringement while
2 imposing the burden of monitoring Defendants' website onto copyright holders, without sufficient
3 means to prevent continued and unabated infringement.

4
5 **FIRST CAUSE OF ACTION**

6 **Copyright Infringement – 17 U.S.C. §§ 101 *et seq.***

7 **Against All Defendants**

8 59. Plaintiff re-alleges the allegations set forth in the preceding paragraphs.

9 60. Plaintiff owns the copyright in each of the Subject Works.

10 61. Plaintiff has valid registrations with the United States Copyright Office for each of the
11 Subject Works.

12 62. Defendants have infringed, and are continuing to infringe Plaintiff's copyrights by
13 uploading, reproducing, adapting, distributing, publicly performing, and/or publicly displaying and
14 authorizing others to reproduce, adapt, distribute, publicly perform, and/or publicly display
15 copyrighted portions and elements of the Subject Works, and/or the Subject Works in their entirety,
16 without authorization, in violation of the Copyright Act, 17 U.S.C. § 101 *et seq.*

17 63. Defendants did not have authority or license to copy or display any of the Subject
18 Works.

19 64. Plaintiff has never authorized or given consent to Defendants to use any of the Subject
20 Works in the manner displayed and exploited by Defendants.

21 65. Defendants knew or should have known they did not have permission to exploit the
22 Subject Works on PornXP and further knew or should have known their acts constituted copyright
23 infringement.

24 66. The quantity and quality of videos available to users on PornXP increased the
25 attractiveness of PornXP to its customers, increased its user base, and increased its advertising sales
26 revenue.

1 67. On information and belief, Defendants actively uploaded pirated copyrighted files,
2 enabling users of PornXP to view copyrighted videos and images for free.

3 68. Defendants controlled pirated files of Subject Works and decided which files to
4 display on PornXP.

5 69. On information and belief, Defendants were aware of or were willfully blind to the
6 fact that pirated copyrighted materials comprised the most popular videos on PornXP.

7 70. Defendants, through PornXP, affirmatively and willfully accommodated Internet
8 traffic generated by the illegal acts.

9 71. As a direct and proximate result of Defendants' infringement, Plaintiff is entitled
10 to its actual damages along with Defendants' profits that are attributable to their infringement;
11 alternatively, it is entitled to statutory damages for infringement in the maximum statutory
12 amount allowed.

13 72. Because of Defendants' acts and conduct, Plaintiff has sustained and will continue
14 to sustain substantial, immediate, and irreparable injury for which there is no adequate remedy at
15 law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Plaintiff's
16 rights in the Subject Works. Plaintiff is entitled to temporary, preliminary, and permanent
17 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

18
19 **SECOND CAUSE OF ACTION**

20 **Contributory Copyright Infringement**

21 **Against All Defendants**

22 73. Plaintiff re-alleges the allegations in the preceding paragraphs.

23 74. Unknown individuals, without authorization, reproduced and distributed Plaintiff's
24 works through Defendants' websites, directly infringing Plaintiff's Subject Works.

25 75. Defendants contributed to the infringing acts of those individuals.

1 76. Defendants were aware, should have been aware, or were willfully blind to the
2 infringing activity.

3 77. Defendants aided, abetted, allowed, and encouraged those individuals to reproduce
4 and distribute Plaintiff's copyrighted works through PornXP without regard to copyright ownership.

5 78. Defendants had the ability and obligation to control and stop the infringements and
6 failed to do so.

7 79. On information and belief, Defendants materially contributed to or induced the
8 infringement.

9 80. Defendants have knowingly induced, caused, and/or materially contributed to the
10 unauthorized reproduction, adaptation, public display, and/or distribution of copies of Plaintiff's
11 copyrighted works, and thus to the direct infringement of Plaintiff's copyrighted works.

12 81. On information and belief, Defendants, as the owners and/or operators of PornXP,
13 received direct financial benefits from the infringements of the Subject Works on PornXP.

14 82. Defendants' actions constitute contributory infringement of Plaintiff's copyrights and
15 exclusive rights under copyright in Plaintiff's Subject Works in violation of the Copyright Act.

16 83. Defendants' acts of infringement by were willful, intentional, and purposeful and in
17 reckless disregard of and with indifference to Plaintiff's rights.

18 84. As a direct and proximate result of Defendants' infringement, Plaintiff is entitled
19 to its actual damages along with Defendants' profits that are attributable to their infringement;
20 alternatively, it is entitled to statutory damages for infringement in the maximum statutory
21 amount allowed.

22 85. Because of Defendants' acts and conduct, Plaintiff has sustained and will continue
23 to sustain substantial, immediate, and irreparable injury for which there is no adequate remedy at
24 law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Plaintiff's
25 rights in the Subject Works. Plaintiff is entitled to temporary, preliminary, and permanent
26 injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

THIRD CAUSE OF ACTION

Vicarious Copyright Infringement

Against All Defendants

86. Plaintiff re-alleges the allegations in the preceding paragraphs.

87. Unknown individuals, without authorization, reproduced and distributed Plaintiff's works through Defendants' websites, directly infringing Plaintiff's Subject Works.

88. Defendants had a right and ability to supervise or control that infringing conduct and failed to do so.

89. Defendants directly benefitted financially from the infringing activity.

90. The acts, omissions, and conduct of all Defendants constitute vicarious copyright infringement.

91. The acts of infringement by Defendants have been willful, intentional, and purposeful and in reckless disregard of and with indifference to Plaintiff's rights.

92. As a direct and proximate result of Defendants' infringement, Plaintiff is entitled to its actual damages along with Defendants' profits that are attributable to their infringement; alternatively, it is entitled to statutory damages for infringement in the maximum statutory amount allowed.

93. Because of Defendants' acts and conduct, Plaintiff has sustained and will continue to sustain substantial, immediate, and irreparable injury for which there is no adequate remedy at law. Unless enjoined and restrained by the Court, Defendants will continue to infringe Plaintiff's rights in the Subject Works. Plaintiff is entitled to temporary, preliminary, and permanent injunctive relief to restrain and enjoin Defendants' continuing infringing conduct.

\\

\\

\

FOURTH CAUSE OF ACTION

Inducement of Copyright Infringement

Against All Defendants

94. Plaintiff re-alleges the allegations in the preceding paragraphs.

95. Defendants have induced copyright infringement. Defendants designed and/or distributed technology, devices, or products used in infringement at PornXP.

96. Defendants intentionally designed, deployed, and maintain the PornXP websites and related infrastructure for the purpose of encouraging and facilitating widespread copyright infringement of Plaintiffs' Works. This includes the use of search indexing, advertising systems, and embedded content features specifically aimed at promoting access to pirated material.

97. On information and belief, Defendants directly induced individuals to access, download, and redistribute infringing copies of Plaintiff's copyrighted Works. Defendants accomplished this by promoting, recommending, and making available infringing content on the PornXP Websites.

98. As a direct and proximate result of Defendants' actions, individuals reproduced, distributed, and publicly displayed Plaintiff's copyrighted Works without authorization. These acts of infringement occurred through and because of Defendants' inducement.

99. Defendants' conduct constitutes inducement of copyright infringement under established law. Defendants knowingly took affirmative steps to foster infringement, and their actions were undertaken with the object of promoting infringement for commercial gain.

100. Defendants' actions constitute inducing copyright infringement of Plaintiff's copyrights and exclusive rights under copyright in Plaintiff's copyrighted works in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

101. The infringement of Plaintiff's rights in and to each of Plaintiff's copyrighted works constituted a separate and distinct infringement.

1 (2) Enabling, facilitating, permitting, assisting, soliciting, encouraging or
2 inducing, whether directly or indirectly, any user or other third party (i) to host, link
3 to, distribute, reproduce, copy, download, upload, make available for download, index,
4 display, exhibit, publicly perform, communicate to the public, stream, transmit, or
5 otherwise exploit or make any use of Plaintiff's copyrighted works, including the
6 Subject Works, or portions thereof; or (ii) to make available any of Plaintiff's
7 copyrighted works, including the Subject Works, for hosting, linking to, distributing,
8 reproducing, copying, downloading, uploading, making available for download,
9 indexing, displaying, exhibiting, publicly performing, communicating to the public,
10 streaming, transmitting, or other exploitation or use;

11 (3) Using, operating, maintaining, distributing, or supporting any computer server,
12 website, software, domain name, email address, social media account, bank account,
13 or payment processing system in connection with the hosting, linking to, distributing,
14 reproducing, copying, downloading, uploading, making available for download,
15 indexing, displaying, exhibiting, publicly performing, communicating to the public,
16 streaming, transmitting, or other exploitation or use of any of Plaintiff's copyrighted
17 works, including the Subject Works;

18 (4) Enabling, facilitating, permitting, assisting, soliciting, encouraging or
19 inducing, whether directly or indirectly, any user or other third party to visit any
20 website, including but not limited to any website operated by Defendants, that hosts,
21 links to, distributes, reproduces, copies, downloads, uploads, makes available for
22 download, indexes, displays, exhibits, publicly performs, communicates to the public,
23 streams, transmits, or otherwise exploits or makes any use of Plaintiff's copyrighted
24 works, including the Subject Works, or portions thereof;

25 (5) Transferring or performing any function that results in the transfer of the
26 registration of any PornXP domain names to any other registrant or registrar; and

1 (6) Assisting, aiding, or abetting any other person or business entity in engaging
2 in or performing any of the activities referred to in this Paragraph.

3 B. Requiring Defendants and their officers, servants, employees, agents, and any persons
4 who are, or on notice and upon continued provision of services would be, in active concert or
5 participation with them, including but not limited to the domain name registrars and registries
6 (including, but not limited to, Verisign, Inc., Porkbun LLC, NameSilo LLC, Public Interest Registry,
7 Spaceship LLC, and GoDaddy Operating Company, LLC) administering, holding, listing, or
8 otherwise having control over the PornXP domain names, or any other domain name used in
9 conjunction with Defendants' infringing activities, to transfer such domain name to Plaintiff's
10 ownership and control, including, *inter alia*, by changing the registrar of record to the registrar of
11 Plaintiff's choosing, unless Plaintiff requests that such domain name be held and/or released rather
12 than transferred.

13 C. Requiring Defendants, their agents, servants, officers, directors, employees, attorneys,
14 privies, representatives, successors, assigns, and parent and subsidiary corporations or other related
15 entities, and any or all persons or entity or entities acting in concert or participation with any of them,
16 or under their direction or control, including any internet search engines, web hosting and Internet
17 service providers, domain name registrars, domain name registries and other service or software
18 providers, within five (5) business days from the issuance of this Order:

19 (1) To block or attempt to block access by United States users of PornXP websites
20 by blocking or attempting to block access to all domains, subdomains, URLs, and/or
21 IP Addresses that has as its sole or predominant purpose to enable to facilitate access
22 to PornXP domains; and

23 (2) To re-route all domains, subdomains, URLs, and/or IP addresses that provide
24 access to each and every URL available from PornXP, their domains and subdomains.
25
26

1 D. That Defendants be ordered to file with the Court and serve upon Plaintiff, within
2 thirty (30) after the entry of an injunction, a report in writing and under oath, setting forth in detail
3 the manner and form in which Defendants have complied with any ordered injunction;

4 E. That Plaintiff be awarded statutory damages in an amount to be determined at trial for
5 all infringing activities, or actual damages including Plaintiff's damages and lost profits and
6 Defendants' profit, at Plaintiff's election;

7 F. That Defendants be ordered to account to Plaintiff for all profits, gains, and advantages
8 that they have realized through their unauthorized use of Plaintiff's copyrighted works;

9 G. That Plaintiff be awarded enhanced damages and attorney's fees;

10 H. That Plaintiff be awarded pre-judgment and post-judgment interest;

11 I. That Plaintiff be awarded costs and expenses incurred in prosecuting this action,
12 including expert witness fees; and

13 J. That such other and further preliminary and permanent relief be awarded to Plaintiff
14 as the Court deems appropriate.

15
16 **DEMAND FOR JURY TRIAL**

17 Plaintiff hereby respectfully demands a jury trial as provided by Rule 38(a) of the Federal
18 Rules of Civil Procedure.

19
20 \\\

21
22 \\\

23
24 \\\

25
26 \

1
2 DATED: May 29, 2025.

3 **FREEMAN LAW FIRM, INC.**

4 By /s/ Spencer D. Freeman

5 Spencer D. Freeman, WSBA No. 25069
6 1107 ½ Tacoma Avenue South
7 Tacoma, Washington 98042
8 253-383-4500
9 253-383-45101 (fax)
10 sfreeman@freemanlawfirm.org

11 **ETHAN JACOBS LAW CORPORATION**

12 By /s/ Ethan Jacobs

13 Ethan Jacobs (*pro hac vice forthcoming*)
14 100 Pine Street, Suite 1250
15 San Francisco, California 94111
16 415-275-0845
17 ethan@ejacobsllaw.com

18 *Counsel for Plaintiff Aylo Premium Ltd*