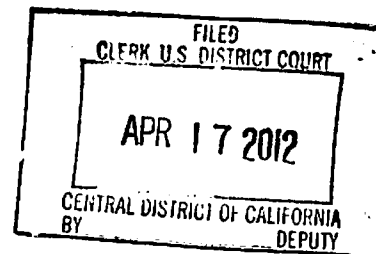


COPY¹

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Attorneys for Plaintiff EPROPERTYSITES, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA -

SECTION

EPROPERTYSITES, LLC, a Limited Liability Company,

Plaintiff,

v.

LISTINGS-TO-LEADS, LLC, a Limited Liability Company, SCOTT PIERCE, an individual, and YE GONG, an individual, and DOES 1 THROUGH 10, INCLUSIVE,

Defendants.

SACV12 CASE NO.

578 CJ (JPRx)

COMPLAINT FOR COPYRIGHT INFRINGEMENT, CONTRIBUTORY COPYRIGHT INFRINGEMENT, TRADE DRESS INFRINGEMENT AND UNJUST ENRICHMENT

DEMAND FOR JURY TRIAL

INTRODUCTION

1. This is an action by Plaintiff, ePropertySites, LLC (hereinafter "ePropertySites") against Defendants, Listings-to-Leads, LLC (hereinafter "L2L"), Scott Pierce, Ye Gong, and Does 1 through 20.

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PARTIES

2. ePropertySites is a California limited liability company with its principal place of business at 31 Journey, Suite 200, Aliso Viejo, CA 92656. ePropertySites is in the business of designing, coding, producing, and maintaining websites that allow consumers to market real property over the Internet.

3. On information and belief, L2L is a Nevada limited liability company with its principal place of business at 2566 Deer Season Street Henderson, NV 89052. On information and belief, L2L is in the business of producing and maintaining websites that enable consumers to market real property over the Internet. Plaintiff may not have the correct name and contact information of L2L and will seek leave of this Court to amend this Complaint to include L2L's proper name and contact information once that information becomes available.

4. On information and belief, Scott Pierce is an individual who resides at 2566 Deer Season Street Henderson, NV 89052. On information and belief, Pierce is the Chief Executive Officer, and owner of L2L.

5. On information and belief, Ye Gong is an individual who resides at 2566 Deer Season Street Henderson, NV 89052. On information and belief, Gong is the Director of Finance, and owner of L2L.

6. On information and belief, Pierce and L2L are alter egos of one another with respect to the acts complained of herein. On information and belief, Pierce, through his company L2L, regularly conducts business in this judicial district, including offering its services in this judicial district.

7. On information and belief, Pierce, through his company L2L, derives substantial revenue from the sales of its services in this judicial district. On information and belief, Pierce has purposefully directed contacts to the State of California.

8. On information and belief, Gong and L2L are alter egos of one another with respect to the acts complained of herein. On information and belief,

1 Gong, through her company L2L, regularly conducts business in this judicial
2 district, including offering its services in this judicial district.

3 9. On information and belief, Gong, through her company L2L, derives
4 substantial revenue from the sales of its services in this judicial district. On
5 information and belief, Gong has purposefully directed contacts to the State of
6 California.

7 10. The true names and capacities, whether individual, corporate,
8 associate or otherwise, of Defendants Does 1 through 20, inclusive, are unknown
9 to Plaintiff, which therefore sues said Defendants by such fictitious names.
10 Plaintiff will seek leave of this Court to amend this Complaint to include their
11 proper names and capacities when they have been ascertained. Plaintiff is
12 informed and believes, and based thereon alleges, that each of the fictitiously
13 named Defendants participated in and are in some manner responsible for the acts
14 described in this Complaint and the damage resulting therefrom.

15 11. Plaintiff alleges on information and belief that each of the Defendants
16 named herein as Does 1 through 20, inclusive, performed, participated in, or
17 abetted in some manner, the acts alleged herein, proximately caused the damages
18 alleged herein below, and are liable to Plaintiff for the damages and relief sought
19 herein.

20 12. Plaintiff alleges on information and belief that, in performing the acts
21 and omissions alleged herein, and at all times relevant hereto, each of the
22 Defendants was the agent and employee of each of the other Defendants and was at
23 all times acting within the course and scope of such agency and employment with
24 the knowledge and approval of each of the other Defendants.

25 **JURISDICTION AND VENUE**

26 13. This action arises under the Copyright and Trademark Laws of the
27 United States, as hereinafter more fully appears. This Court has jurisdiction over
28 the subject matter of this action pursuant to 28 U.S.C. §1338 (a) (action arising

1 under an Act of Congress relating to copyright and trademark) and 28 U.S.C. §
2 1331 (federal question).

3 14. This Court also has subject matter jurisdiction under 28 U.S.C. § 1332
4 because there is complete diversity of citizenship between the parties and the
5 matter in controversy exceeds the sum or value of \$75,000, exclusive of interest
6 and costs.

7 15. On information and belief, this Court has general and specific
8 personal jurisdiction over L2L in that L2L does business in this judicial district,
9 derives substantial revenue from this judicial district by engaging in an extensive,
10 systematic and continuous course of conduct within this judicial district, and
11 because the subject claims arise from acts within this judicial district resulting in
12 injury and damages to Plaintiff within this judicial district.

13 16. On information and belief, this Court has general and specific
14 personal jurisdiction over Scott Pierce in that Scott Pierce is an alter ego of L2L
15 and directs L2L to do business in this judicial district, derives substantial revenue
16 from this judicial district by engaging in an extensive, systematic and continuous
17 course of conduct within this judicial district, and because the subject claims arise
18 from acts within this judicial district resulting in injury and damages to Plaintiff
19 within this judicial district.

20 17. On information and belief, this Court has general and specific
21 personal jurisdiction over Ye Gong in that Ye Gong is an alter ego of L2L and
22 directs L2L to do business in this judicial district, derives substantial revenue from
23 this judicial district by engaging in an extensive, systematic and continuous course
24 of conduct within this judicial district, and because the subject claims arise from
25 acts within this judicial district resulting in injury and damages to Plaintiff within
26 this judicial district.

27 18. Venue is proper in this District pursuant to 28 U.S.C. §§1391(b), and
28 1400(a) in that the subject infringement involves the infringement of copyrights

1 and trade dress owned by Plaintiff, which is located in Aliso Viejo, CA, and lies
2 within the Central District of California.

3 **GENERAL ALLEGATIONS**

4 19. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through
5 18 as if fully set forth herein.

6 20. Plaintiff is in the business of designing, coding, producing, and
7 maintaining websites that allow consumers to market real property over the
8 Internet, which include the website www.epropertiesites.com (hereinafter "the
9 Protected Website"), the webpages registered at the United States Copyright Office
10 with Registration Numbers PA 1-679-898 (hereinafter "898 Registration"), PA 1-
11 681-153 (hereinafter "'153 Registration"), and PA 1-681-155 (hereinafter "'155
12 Registration"), and the source code for the website registered at the United States
13 Copyright Office with Registration Number TX 7-496-803 (hereinafter "803"
14 Registration").

15 21. On or about June 30 2007, Plaintiff launched the Protected Website
16 with the Internet domain name www.epropertiesites.com to enable consumers to
17 market real property over the Internet. At least as early as this time, the public had
18 access to the Protected Website, the webpages and the source code.

19 22. Since June 30, 2007, Gregory J. Mazurek, an employee of
20 ePropertySites, has programmed, designed, and developed the webpages published
21 on the Protected Website, and assigned all his present and future copyright rights
22 in those webpages to ePropertySites. A true and correct copy of the assignment
23 document entitled "Transfer of Copyright Rights" is attached hereto and
24 incorporated herein as Exhibit A.

25 23. Effective June 9, 2010, Plaintiff obtained the '898 Registration from
26 the United States Copyright Office. The '898 Registration grants Plaintiff the
27 exclusive right, title, and interest in webpages published on July 11, 2007 for the

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1 Protected Website. A true and correct copy of the '898 Registration is attached
2 hereto and incorporated herein as Exhibit B.

3 24. Effective June 11, 2010, Plaintiff obtained the '153 Registration from
4 the United States Copyright Office. The '153 Registration grants Plaintiff the
5 exclusive right, title, and interest in webpages published on July 24, 2009 for the
6 Protected Website. A true and correct copy of the '153 Registration is attached
7 hereto and incorporated herein as Exhibit C.

8 25. Effective June 11, 2010, Plaintiff obtained the '155 Registration from
9 the United States Copyright Office. The '155 Registration grants Plaintiff the
10 exclusive right, title, and interest in webpages published on April 28, 2010 for the
11 Protected Website. A true and correct copy of the '155 Registration is attached
12 hereto and incorporated herein as Exhibit D.

13 26. Effective March 19, 2012, Plaintiff obtained the '803 Registration
14 from the United States Copyright Office. The '803 Registration grants Plaintiff the
15 exclusive right, title, and interest in the source code published on December 31,
16 2005 on Plaintiff's website www.NowOffered.com. All rights and ownership in the
17 source code was transferred to ePropertySites in 2007. A true and correct copy of
18 the '803 Registration is attached hereto and incorporated herein as Exhibit E.

19 27. Plaintiff also owns protectable trade dress comprising the distinctive
20 "look and feel" of the Protected Website. Plaintiff's trade dress serves to identify
21 Plaintiff as the source of its services. Plaintiff has invested substantial time, effort
22 and financial resources in creating and promoting its trade dress in connection with
23 the sale of its services in interstate commerce. The trade dress is widely recognized
24 and has become an asset of substantial value as a symbol of Plaintiff, its quality
25 service and its good will.

26 28. Plaintiff's trade dress is inherently distinctive as applied to its services
27 and/or has acquired secondary meaning through Plaintiff's long-term, widespread
28 and continuous use of the trade dress in commerce.

1 29. Plaintiff's trade dress comprising the Protected Website is unique,
2 recognizable and not merely functional.

3 30. The distinct and non-functional features of Plaintiff's trade dress
4 include, but are not limited to, the following:

- 5 A. 4 layout options, listed on the top of the webpage;
- 6 B. The first layout having the following features:
 - 7 i) Address bar listed at the top of the webpage under the
 - 8 layout options in a gray box with white lettering;
 - 9 ii) A picture of the property being listed below the address
 - 10 bar;
 - 11 iii) Pricing listed below the picture;
 - 12 iv) A "property information" bar below the pricing in a gray
 - 13 box with white lettering;
 - 14 v) Bedroom, square footage, bathroom and year built
 - 15 information below the property information;
 - 16 vi) A code for scanning under the property information bar
 - 17 on the right side of the webpage; and
 - 18 vii) "Property Description" in bold with a description of the
 - 19 property below.
- 20 C. The second layout having the following features:
 - 21 i) A gray bar on the top of the webpage listing the address
 - 22 and price in white lettering;
 - 23 ii) A gray bar on the left side of the page acting as a border;
 - 24 iii) A large picture of the property below the top bar, which
 - 25 has a right side end that aligns with the right side end of
 - 26 the top bar;
 - 27 iv) Two smaller pictures of the property below the large
 - 28 picture and side by side of each other; and

v) A code for scanning under the large picture and on the right of the two smaller pictures.

D. The third layout having the following features:

- i) A gray rectangular block on the left side of the webpage;
- ii) The address listed in gray lettering above the block and italicized;
- iii) The price listed on the right side of the page that aligns with the second line of the address;
- iv) A large picture of the property that starts within the box and extends to the right, outside of the box;
- v) Two smaller pictures below the large picture that each fit within the box; and
- vi) Information regarding the property listed in black lettering to the right of the two smaller pictures and below the large picture.

E. The fourth layout having the following features:

- i) A thin gray lined box at the top of the page where the address is written in gray and centered;
- ii) A large picture of the property on the left side of the page below the address box;
- iii) A gray box to the right of the large picture that says "The Details" in white and italicized;
- iv) Smaller pictures below the details box that are placed vertically; and
- v) Information regarding the property listed in black lettering below the large picture.

31. On information and belief, L2L is in the business of producing and maintaining websites that enable consumers to market real property over the

1 Internet, including the website www.listingstoleads.com (hereinafter "the
2 Infringing Website"), which utilizes the webpages included in the '898
3 Registration, the '153 Registration and the '155 Registration, as well as the source
4 code included in the '803 Registration.

5 32. On information and belief, Defendants launched the Infringing
6 Website after the publications of the '153 '155 and the '803 Registrations. The
7 Infringing Website is virtually identical, and if not, at least substantially similar to
8 the Protected Website. This Infringing Website also offers services to enable
9 consumers to market real property over the Internet in a virtually identical, and if
10 not, at least substantially similar format to the format published on the Protected
11 Website. A true and correct copy of webpages published at the Infringing Website
12 is attached hereto and incorporated herein as Exhibit F.

13 33. On information and belief, since August 19, 2009, Defendants have
14 engaged multiple clients to use services provided on the Infringing Website, which
15 has components that were duplicated, reproduced, and/or derived from the subject
16 matter protected under the '898 Registration, the '153 Registration, the '155
17 Registration, and the '803 Registration.

18 34. On information and belief, Defendants knowingly induced,
19 participated in, aided in, and profited from the illegal reproduction of subject
20 matter published at the Protected Website, as alleged above.

21 35. On information and belief, Defendants have, without authorization,
22 duplicated the distinctive "look and feel" of the Protected Website that is described
23 hereinbefore, on the Infringing Website, in a way that is likely to cause confusion,
24 mistake and/or deception to consumers.

25 36. On information and belief, actual and potential consumers of Plaintiff
26 have relied upon this likely confusion, mistake and/or deception, and such reliance
27 has caused economic loss to Plaintiff's business.

28 ///

1 37. The similarities between the features on the Defendants' Infringing
2 Website and Plaintiff's Protected Website's trade dress, which is associated with its
3 quality, reliability, reputation and goodwill, is likely to cause consumer confusion
4 or to cause mistake or to deceive as to the Infringing Website's affiliation,
5 connection, or association with and/or endorsement or approval by the same source
6 as Plaintiff's Website.

7 38. On information and belief, Defendants exercised joint ownership or
8 control over the Infringing Website and/or intentionally induced or encouraged the
9 infringement of Plaintiff's rights under 15 U.S.C. §1125(a).

10 **FIRST CLAIM FOR RELIEF**
11 **COPYRIGHT INFRINGEMENT**

12 39. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through
13 38 as if fully set forth herein.

14 40. On information and belief, Defendants' acts described above and
15 specifically, without limitation, their launching a website that is virtually identical,
16 and if not, at least substantially similar to Plaintiff's Protected Website with
17 webpages that are virtually identical, and if not, at least substantially similar to the
18 '898, '153 and '155 Registrations, and source code that is virtually identical, and if
19 not, at least substantially similar to the '803 Registration, constitute copyright
20 infringement in violation of 17 U.S.C. §106.

21 41. All of the Defendants' infringing acts as set forth herein were and are
22 performed without any license, permission, or authorization of Plaintiff.

23 42. Defendants have infringed, have contributed to infringement, and/or
24 have induced infringement of the '898 Registration, the '153 Registration, the
25 '155 Registration and the '803 Registration by deriving, copying, using,
26 distributing, and publicly showing the infringing subject matter, and continue to do
27 so, in violation of 17 U.S.C. §106.

28 ///

1 43. Due to Defendants' acts of copyright infringement, Defendants have
2 obtained profits they would not otherwise have realized but for their infringement
3 of the '898 Registration, the '153 Registration, the '155 Registration, and the '803
4 Registration. Pursuant to 17 U.S.C. §504(b), Plaintiff is entitled to disgorgement
5 of Defendants' profits attributable to Defendants' infringement of the '898
6 Registration, the '153 Registration, the '155 Registration and the '803 Registration
7 in an amount subject to proof at trial.

8 44. The infringing activities of Defendants have been, and continue to be,
9 willful and deliberate, entitling Plaintiff to statutory damages under 17 U.S.C.
10 §504(c)(2) and making this case exceptional within the meaning of 17 U.S.C.
11 §505, subject to the limitations of § 412.

12 **SECOND CLAIM FOR RELIEF**
13 **CONTRIBUTORY INFRINGEMENT**

14 45. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through
15 44 as if fully set forth herein.

16 46. On information and belief, Defendants' acts described above and
17 specifically, without limitation, their knowing inducement, participation, aiding
18 and profiting from the illegal duplication, reproduction and/or derivation of the
19 subject matter published at Protected Website, constitute contributory copyright
20 infringement of the '898, '153, '155 and '803 Registrations in violation of 17 U.S.C.
21 §106.

22 47. Plaintiff alleges on information and belief that the Defendants' acts of
23 contributory infringement as alleged herein were willful and deliberate.

24 48. Due to Defendants' acts of contributory copyright infringement,
25 Defendants have obtained profits they would not otherwise have realized but for
26 their infringement of the '898 Registration, the '153 Registration, the '155
27 Registration and the '803 Registration. Pursuant to 17 U.S.C. §504(b), Plaintiff is
28 entitled to disgorgement of Defendants' profits attributable to Defendants'

1 infringement of the '898 Registration, the '153 Registration, the '155 Registration
2 and the '803 Registration in an amount subject to proof at trial.

3 49. The infringing activities of Defendants have been, and continue to be,
4 willful and deliberate, entitling Plaintiff to statutory damages under 17 U.S.C.
5 §504(c)(2) and making this case exceptional within the meaning of 17 U.S.C.
6 §505, subject to the limitations of § 412.

7 **THIRD CLAIM FOR RELIEF**

8 **TRADE DRESS INFRINGEMENT**

9 50. Plaintiff repeats and re-alleges the allegations of paragraphs 1 through
10 49 as if fully set forth herein.

11 51. The acts of Defendants described herein and specifically, without
12 limitation, Defendants' duplicating the distinctive "look and feel" of Protected
13 Website on the Infringing Website in a way that is likely to cause confusion,
14 mistake and/or deception to consumers, constitute infringement of Plaintiff's rights
15 under 15 U.S.C. § 1125(a) and/or vicarious or contributory infringement of
16 Plaintiff's rights under 15 U.S.C. § 1125(a).

17 52. The acts of Defendants as described herein have been, and continue to
18 be, willful and deliberate and in conscious disregard of Plaintiff's rights, making
19 this an exceptional case within the meaning of 15 U.S.C. § 1117.

20 53. Due to the acts of Defendants as described herein, Plaintiff has been
21 damaged and will continue to be damaged, and Defendants have been unjustly
22 enriched in an amount to be proven at trial.

23 **FOURTH CLAIM FOR RELIEF**

24 **UNJUST ENRICHMENT**

25 54. Plaintiff repeats and re-alleges the allegations of paragraphs 1
26 through 53 as if fully set forth herein.

27 55. Plaintiff alleges on information and belief that Defendants have
28 received multiple benefits they would not otherwise have received but for their

1 unjust taking of the subject matter published at Protected Website, without
2 compensation, and their passing off of derivative subject matter published at the
3 Infringing Website as their own.

4 56. Defendants have been unjustly enriched and continue to retain those
5 benefits belonging to Plaintiff by continuing to operate the Infringing Website at
6 the expense of Plaintiff. Plaintiff is entitled to disgorgement of Defendants' profits
7 attributable to Defendants' improper taking in an amount subject to proof at trial.

8 57. Wherefore, Plaintiff requests judgment against Defendants as set forth
9 in the prayer below.

10 **PRAYER FOR RELIEF**

11 58. WHEREFORE, Plaintiff prays that this Court:

- 12 A) Find that the '898 Registration has been infringed as alleged
13 herein;
- 14 B) Find that the '153 Registration has been infringed as alleged
15 herein;
- 16 C) Find that the '155 Registration has been infringed as alleged
17 herein;
- 18 D) Find that the '803 Registration has been infringed as alleged
19 herein;
- 20 E) Find that Plaintiff's distinctive and non-functional trade dress
21 has been infringed as alleged herein;
- 22 F) Award damages adequate to compensate Plaintiff for copyright
23 infringement, including not less than statutory damages under
24 17 U.S.C.A. §504(c)(1) for infringement;
- 25 G) Award damages adequate to compensate Plaintiff for trade
26 dress infringement;
- 27 H) Find that the infringements have been willful and deliberate;

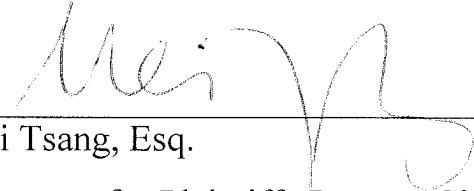
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- 1 I) Award Plaintiff increased damages, costs, expenses, and
2 attorneys' fees pursuant to 17 U.S.C. §§504(c)(2) and 505
3 because of the willful and deliberate nature of the
4 infringements;
5 J) Award Plaintiff treble damages, costs, and attorneys' fees
6 pursuant to 15 U.S.C. §1117.
7 K) Permanently enjoin Defendants and its officers, agents,
8 servants, employees and affiliates, as well as all others in active
9 concert or participation with it as to any of the foregoing, from
10 infringing, contributing to the infringement of, and inducing the
11 infringement of any of the '898 Registration, the '153
12 Registration, the '155 Registration, the '803 Registration and
13 Plaintiff's trade dress; and
14 L) Award Plaintiff such other and further relief as this Court may
15 deem just and proper.

16 Respectfully submitted,
17 FISH & ASSOCIATES, PC
18

19 Dated: April 16, 2012

20 By:

21 
Mei Tsang, Esq.

22 Attorneys for Plaintiff ePropertySites, LLC
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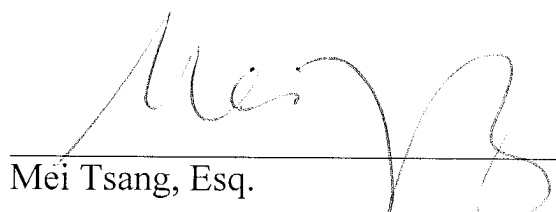
1 **DEMAND FOR JURY TRIAL**

2 Pursuant to Local Rule 38-1 of the Local Rules of the United States District
3 Court for the Central District of California, Plaintiff hereby demands a jury trial in
4 this action.

5 Respectfully submitted,
6 FISH & ASSOCIATES, PC
7

8 Dated: April 16, 2012

9 By:

10 
Mei Tsang, Esq.

11 Attorneys for Plaintiff ePropertySites, LLC
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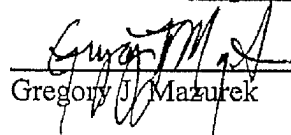
EXHIBIT A

TRANSFER OF COPYRIGHT RIGHTS

I, Gregory J. Mazurek, have created, and will continue to create, copyrightable subject matter published at the website domain address www.epropertiesites.com, some of which has been registered at the United States Copyright Office with Registration Numbers PA 1-679-898, PA 1-681-153, and PA 1-681-155. I reserve the right to show these works as samples of my work to future customers, and hereby transfer all remaining present and future copyright rights I own in the aforesaid subject matter to ePropertySites, LLC, a California Corporation with its principal place of business at 31 Journey, Suite 200, Aliso Viejo, CA 92656.

Date: 7-9-2010

Date of Birth: August 4, 1959



Gregory J. Mazurek

EXHIBIT B

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
PA 1-679-898

Effective date of
registration:
June 9, 2010

Title _____

Title of Work: eProperty Screenshots

Completion/Publication _____

Year of Completion: 2007

Date of 1st Publication: July 11, 2007

Author _____

■ Author: Gregory J. Mazurek

Author Created: text and artwork

Citizen of: United States

Year Born: 1959

Anonymous: Yes

Copyright claimant _____

Copyright Claimant: Gregory J. Mazurek

31 Journey, Suite 200, Aliso Viejo, CA, 92656, United States

Limitation of copyright claim _____

Material excluded from this claim: previous version of website

New material included in claim: added text and artwork to a preexisting website

Rights and Permissions _____

Name: Gregory J. Mazurek

Address: 31 Journey, Suite 200

Aliso Viejo, CA 92656 United States

Certification _____

Name: Gregory J. Mazurek

Date: May 3, 2010

Applicant's Tracking Number: 101931.0002

Correspondence: Yes

Copyright Office notes: Regarding limitation of claim: copy contains new material only.

Picture & Logo

[Information](#) [Picture & Logo](#) [Options](#) [My pURL](#) [Past Orders](#)

Personal Picture Guidelines & Rules

Your personal picture should be in jpg format (gif format okay). If your picture is in another format, [read this](#).

Personal Picture Online



click to delete

Upload your Personal picture

Upload your Personal Picture here. Just type in the file name (or click the Browse button to search for it) and then click "send".

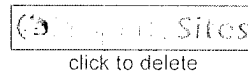
Upload your Personal picture

Your picture should be 150 pixels wide by 180 pixels tall. If it isn't, we will crop and resize it for you within 48 hours.

Company Logo Guidelines & Rules

Your company logo should be in gif format (jpg format okay). If your logo is in another format, [read this](#).

Company Logo Online



Upload your Companys Logo

Upload your Companys Logo here. Just type in the file name (or click the Browse button to search for it) and then click "send".

Upload your Companys Logo.

Your logo should be no wider then 140 pixels. If it is, we will crop and resize it for you within 24 hours.

OR Select one of these Logos

*** select one ***

[Home](#) [Agents](#) [Properties](#) [Leads](#) [Forums](#) [Reports](#) [Marketing](#) [Setup](#) [Logout](#)

Properties

[Properties](#) [CL Poster](#) [Broadcasts](#) [Options](#) [Widgets](#)
 Add New
Properties per page 5 [Go](#)

NOTICE: All "Active" listings are automatically fed to many classified and real estate websites such as Google Base, www.Oodle.com and www.Trulia.com, and are linked back to your property website.

Date ▼	Address	Go	status	edit	site	pics	docs	trax	hits	tools	delete
6-27 2009	napa napa		Back-up	,		 98	0 /	 0	 11		
5-27 2009	1 Main Street Beverly Hills		Back-up	,		 23	0 /	 0	 9		
1-15 2008	68 Sobrante Aliso Viejo		Active	,		 24	1 /	 2	 2906		

Design & Contents Copyright © 2007 - 1183230804A - Greg ("Dr. &") Mazurek

EXHIBIT C

Registration Number
PA 1-681-153

Effective date of
registration:
June 11, 2010

Title _____

Title of Work: eProperty Screenshots 2009

Completion/ Publication _____

Year of Completion: 2009

Date of 1st Publication: July 24, 2009

Nation of 1st Publication: United States

Author _____

■ **Author:** Gregory J. Mazurek

Author Created: text and compilation of photographs

Citizen of: United States

Year Born: 1959

Anonymous: Yes

Copyright claimant _____

Copyright Claimant: Gregory J. Mazurek

31 Journey, Suite 200, Aliso Viejo, CA, 92656, United States

Limitation of copyright claim _____

Material excluded from this claim: previous versions of website

New material included in claim: added text and compilation of photographs

Rights and Permissions _____

Name: Gregory J. Mazurek

Address: 31 Journey, Suite 200

Aliso Viejo, CA 92656 United States

Certification _____

Name: Gregory J. Mazurek

Date: June 8, 2010

Applicant's Tracking Number: 101931.0005

Copyright Office notes: Regarding limitation of claim: copy deposited contains new material only.

Registration #: PA0001681153

Service Request #: 1-424517346

Fish & Associates, PC
Andrew Mar
2603 Main Street, Suite 1000
Irvine, CA 92614

EXHIBIT D

Registration Number
PA 1-681-155

Effective date of
registration:

June 11, 2010

Title

Title of Work: eProperty Screenshots 2010

Completion/ Publication

Year of Completion: 2010

Date of 1st Publication: April 28, 2010

Nation of 1st Publication: United States

Author

■ Author: Gregory J. Mazurek

Author Created: text, computer program code, compilation of photographs and artwork

Citizen of: United States

Year Born: 1959

Anonymous: Yes

Copyright claimant

Copyright Claimant: Gregory J. Mazurek

31 Journey, Suite 200, Aliso Viejo, CA, 92656, United States

Limitation of copyright claim

Material excluded from this claim: artwork, photographs and some computer program code

New material included in claim: added text, computer program code, compilation of photographs and artwork

Rights and Permissions

Name: Gregory J. Mazurek

Address: 31 Journey, Suite 200

Aliso Viejo, CA 92656 United States

Certification

Name: Gregory J. Mazurek

Date: June 8, 2010

Applicant's Tracking Number: 101931.0005

Correspondence: Yes

Registration #: PA0001681155

Service Request #: 1-424491334

Fish & Associates, PC
Andrew Mar
2603 Main Street, Suite 1000
Irvine, CA 92614

EXHIBIT E

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Maria A. Pallante

Register of Copyrights, United States of America

Registration Number
TX 7-496-803

Effective date of
registration:
March 19, 2012

Title

Title of Work: ePropertySites.com Source Code
Previous or Alternative Title: www.NowOffered.com Source Code

Completion/Publication

Year of Completion: 2005
Date of 1st Publication: December 31, 2005 Nation of 1st Publication: United States

Author

■ Author: ePropertySites.com, LLC
Author Created: computer program
Work made for hire: Yes
Domiciled in: United States

Copyright claimant

Copyright Claimant: ePropertySites.com, LLC
15 Enterprise, Suite 500, Aliso Viejo, CA, 92656, United States

Rights and Permissions

Organization Name: ePropertySites.com, LLC
Telephone: 949-273-8206
Address: 15 Enterprise, Suite 500
Aliso Viejo, CA 92656 United States

Certification

Name: Mei Tsang, Attorney for Applicant, CA State Bar Member
Date: March 16, 2012
Applicant's Tracking Number: 101931.0002

Correspondence: Yes

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text-decoration:none;}
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<br>
<b style="font-size:14px;">See Website:
24741archway.ePropertySites.com<br>
</b>For more pictures instantly: Text
"911" To 79564<br>
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I n f o r m a t i o n</b></td>
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<td>2,800</td>
<td nowrap align=right><b>Lot Size:</b>&nbsp;&nbsp;&nbsp;</td>
<td>43,560 (1.00 acres)</td>
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<td>Orange</td>
<td nowrap align=right><b>Community:</b>&nbsp;&nbsp;&nbsp;</td>
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<td nowrap align=right><b>MLS Nbr:</b>&nbsp;&nbsp;&nbsp;</td>
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Gourmet granite slab kitchen and all stainless appliances are perfect for
anyone that loves to entertain. The cul-de-sac over sized almost a 1/4 acre
lot make this the perfect family home. The best schools in the area, this rare
Riparian Falls gem will not last. There are hardwood floors, ceramic tile, new
landscaping and sprinklers... too much to list here.... Better Hurry... </td>
</tr>
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<td><li>Stainless Appliances</td>
<td><li>1/4 acre lot</td>
<td><li>Galpão</td>
</tr>
<tr>
<td><li>Mansão</td>
<td><li>Chalé/Bangalô</td>
</tr>
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</td>
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<td>
<b>Greg &#40;&quot;&amp; the&quot;&#41; Mazurek</b><br>
<font style="font-size:10px;">
Co-Founder, CEO / CTO<br>
Office 949.555.1212<br>
Mobile 949.555.1931<br>
greg@epropertymail.com<br>
</font>
<br>
<b>ePropertySites, LLC</b><br>
<font style="font-size:10px;">
15 Enterprise - Suite 500<br>
Aliso Viejo, CA 92656<br>
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<font style="font-size:10px;">
brandon.castille@gmail.com<br>
</font>
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Information believed to be accurate but is not guaranteed.
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.PageTitle {color:#FFFFFF; font-size:13px;
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.city {font-family:verdana, Geneva, ms sans serif, arial; font-size:16px;
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text-decoration:underline;}
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.error {color:#990000; font-size:13px; font-weight:bold;
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24741 Archway Lane,
<b class=large style="color:#FFFFFF;">Laguna Niguel</b>
</td>
<td nowrap align=right><br><b class=large style="color:#FFFFFF;">Priced $1,750,000 to
$2,000,000</b>&nbsp;  </td>
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[illegible]

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<br>
<b style="font-size:14px;">Complete Details:
2474larchway.ePropertySites.com<br>
</b>For more pictures instantly: Text
"911" To 79564<br>
<br>
</div>
Gourmet granite slab kitchen and all stainless appliances are perfect for
anyone that loves to entertain. The cul-de-sac over sized almost a 1/4 acre
lot make this the perfect family home. The best schools in the area, this rare
Riparian Falls gem will not last. There are hardwood floors, ceramic tile, new
landscaping and sprinklers... too much to list here.... Better Hurry... </td>
</tr>
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<table width=100% cellpadding=0 cellspacing=2 border=0>
<tr>
<td nowrap align=left>Bedrooms: 4</td>
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<td nowrap align=left>Lot Size: 43,560 (1.00 acres)</td>
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<td nowrap align=right>Orange County</td>
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<tr>
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Information believed to be accurate but is not guaranteed.
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  .city { font-style:italic; font-family:times new roman,verdana,geneva,ms
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<br></td>
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to $2,000,000</b><br><img src=
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<b style="font-size:14px;">
http://2474larchway.ePropertySites.com<br>
</b>For more pictures instantly: Text
"911" To 79564<br>
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[illegible]

[illegible]

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Information believed to be accurate but is not guaranteed.
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4 bedrooms 3 bathrooms 2,800 approx sq.ft. - Granite Counters - Stainless Appliances 1/4 acre lot - Galpão - Mansão - Chalé/Bangalô	

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```

Agent Information	
Leander Information	
Greg & the Mazurek	
Co-Founder, CEO / CTO	
Office 949.555.1212	
Mobile 949.555.1931	
greg@epropertymail.com	
ePropertySites, LLC	
15 Enterprise - Suite 500	
Aliso Viejo, CA 92656	
Brandon	
brandon.castille@gmail.com	

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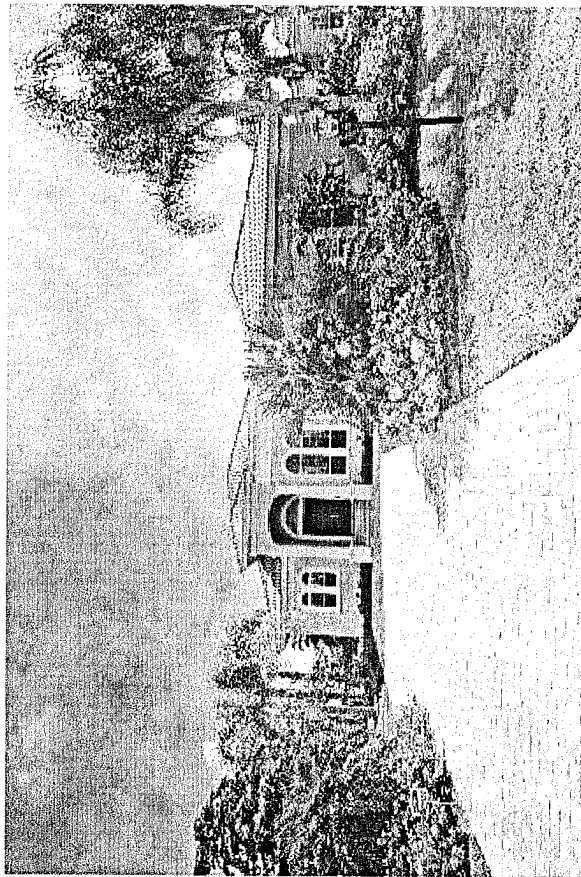
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EXHIBIT F

1627 Bahia Vista Drive Sarasota FL



\$Contact for Price

Property Information

Bedrooms: 3
Square Feet: 2,300

Bathrooms: 3 bath (2 full, 1 half)
Year built: 2000

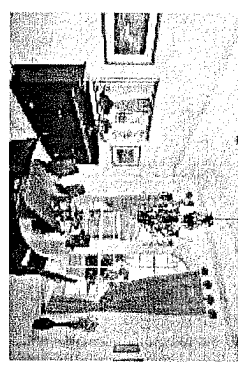
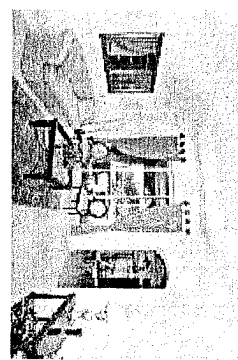
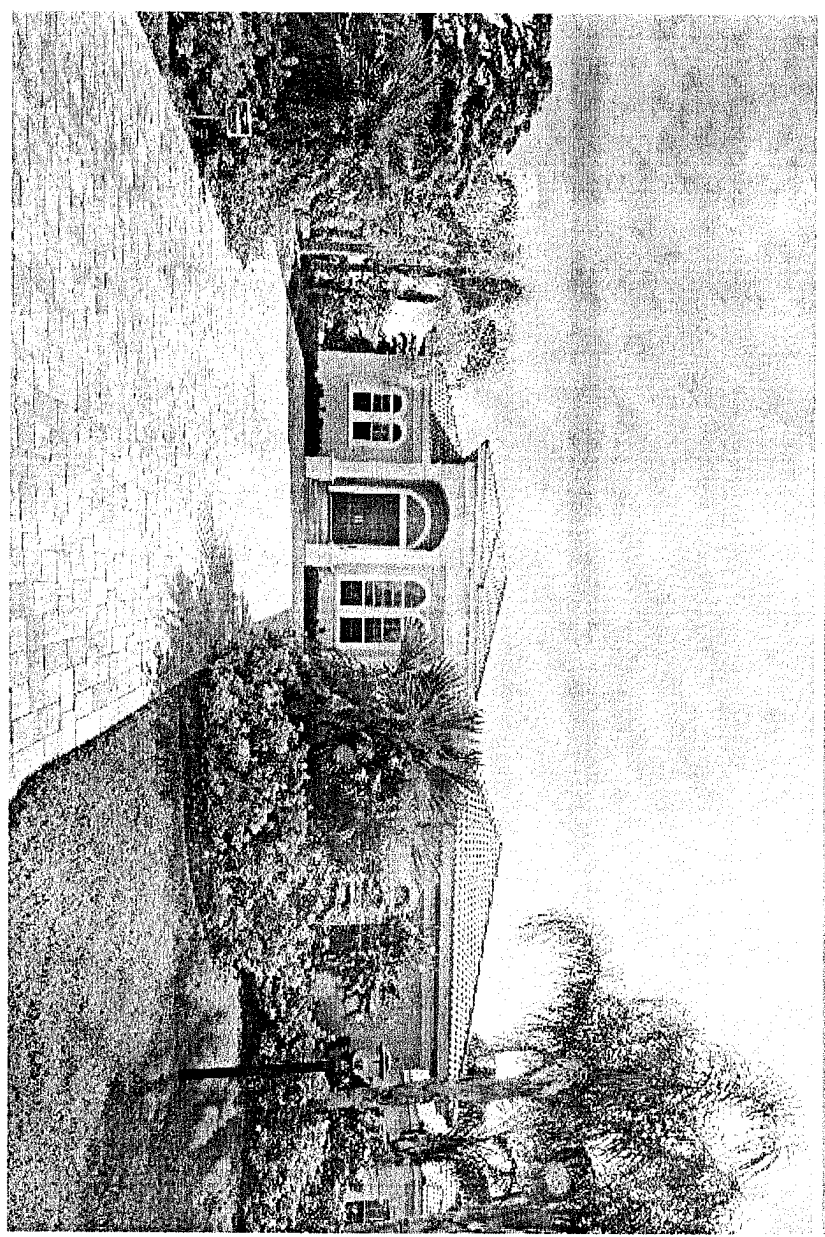


Scan for more information or
visit: <http://tiny.cc/Gv5t44>

Property Description

Please call 800-788-8508 ext 4568 for the most updated information.

Beautiful pool home with fabulous backyard for entertaining! Main home is 1092 sf with 3 bedrooms and one bath. Guest house has almost 800 sf with a complete kitchenette and a beautifully updated bathroom.



Scan for more information or visit:
<http://idf.me/G05v4>

Please call 800-788-8508 ext 4568 for the most updated information.

Beautiful pool home with fabulous backyard for entertaining! Main home is 1092 sf with 3 bedrooms and one bath. Guest house has almost 800 sf with a complete kitchenette and a beautiful updated bathroom.





<http://www.searchallproperties.com/listings.html/607082/1627-Bahia-Vista-Drive-Sarasota-FL/?print=1>

1627 Bahia Vista Dr...

1627 Bahia Vista Dr...

1627 Bahia Vista Dr...

[File](#) [Edit](#) [View](#) [Favorites](#) [Tools](#) [Help](#)

Go From

Search

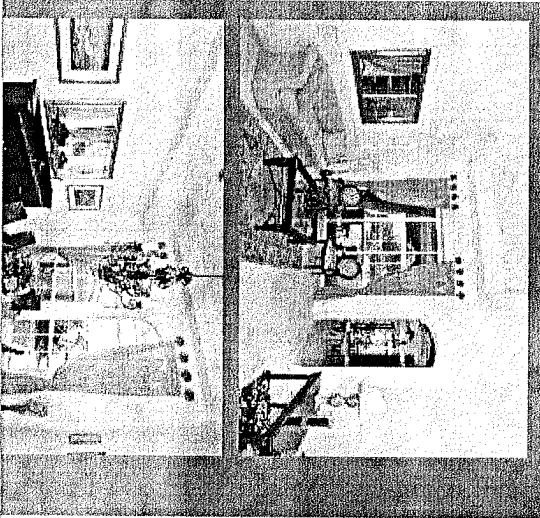
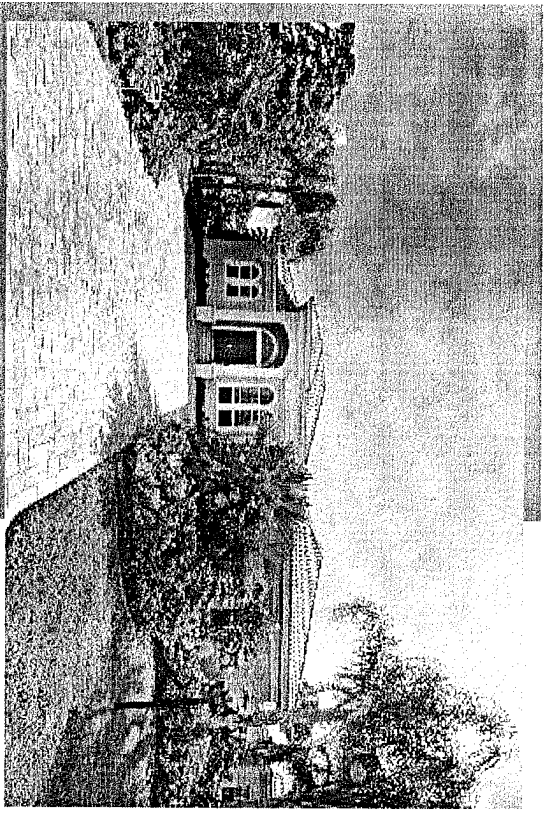
[LAYOUT 1](#) | [LAYOUT 2](#) | [LAYOUT 3](#) | [LAYOUT 4](#)

Search

Return

1627 Bahia Vista Drive Sarasota, FL

Contact for Price



Please call 800-788-8508 ext 4568 for the most updated information.

Beautiful pool home with fabulous backyard for entertaining! Main home is 1092 sf with 3 bedrooms and one bath. Guest house has almost 800 sf with a complete kitchenette and a beautifully updated bathroom.

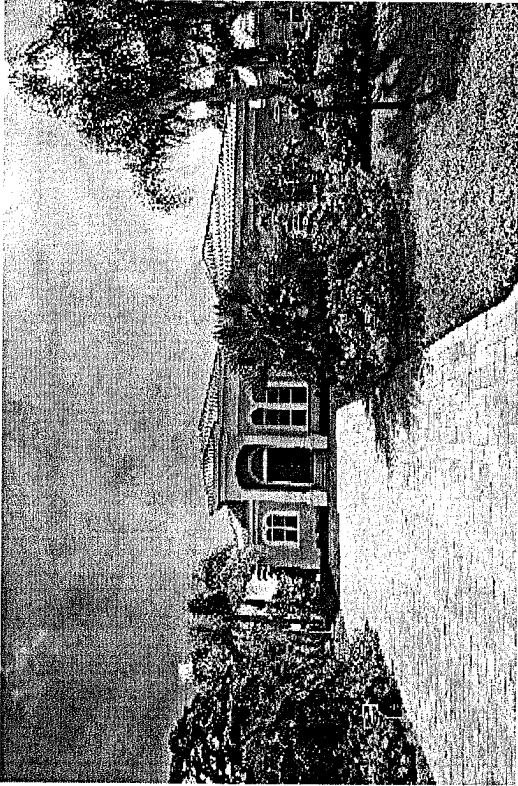
- 3 bedrooms
- 3 bath (2 full, 1 half)
- 2,300 approx sq.ft

Visit: <http://grl.me/Go5V4>

This is the legal description.

1627 Bahia Vista Drive

Sarasota, FL



Please call 800-788-8508 ext 4568 for the most updated information.

Beautiful pool home with fabulous backyard for entertaining! Main home is 1092 sf with 3 bedrooms and one bath. Guest house has almost 800 sf with a complete kitchenette and a beautifully updated bathroom.

3 bedrooms

3 bath (2 full, 1 half)

2,300 approx sq.ft

📄

Scan for more information or visit: <http://arfm.me/G0514>

The Details

