

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

COMPLAINT FORM

PETER CURRIN

David Currin

Full name(s) of Plaintiff(s)
(Do not use *et al.*)

307CV01069 RNC

3:06cv1069(RNC)

Case No.

~~307CV933~~
307CV01069
(To be supplied by the court)

v.

Pharrell Williams, The Neptunes,

STAR TRAK ENTERTAINMENT,

ARISTA RECORDS INC,

Sony Music Entertainment,

The RCA records Label, A unit

OF BMG MUSIC D/B/A BMG ENTERTAINMENT

AND BAD BOY ENTERTAINMENT

Full names of Defendant(s)
(Do not use *et al.*)

A. PARTIES

1. Peter & David Currin is a citizen of Connecticut who
(Plaintiff) (State)

presently resides at 16 Arthur drive, Blmpd Ct 06002
(mailing address or place of confinement)

If plaintiff is incarcerated, provide inmate number: N/A

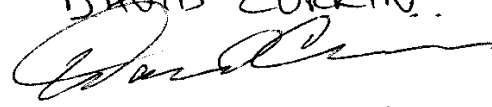
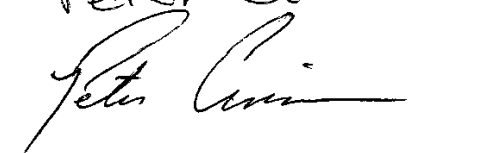
2. Defendant Pharrell Williams is a citizen of Virginia
(name of first defendant) (State)

whose address is 1232 Candlewood drive, Virginia Beach
Virginia 23464

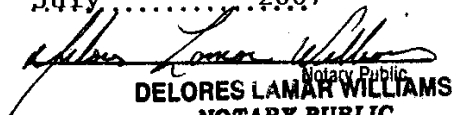
Plaintiffs respectfully ASK the Court for these Federal & Local Rules to be Applied to case Docket Number ~~306-1-983~~ DUE to the Abuses THAT TAKES PLACE IN Litigation process.

- PRE-TRIAL Procedures 26 F Report
- Rule 16 Conference
- Rule 26 A-D - mandatory disclosure
- Rule 53
- Rule 11
- Rule 5
- Rule 64
- Rule 33
- Rule 34
- Also in regards to 26 F Report * Foot note for possible Settlement negotiations.
- we ALSO would like to petition the district Judge TO HAVE A magistrate Judge OVER-SEE OUR CASE.
- Rule 56 if necessary

thank you

DAVID CURRIN.

 Peter Currin


Subscribed and sworn to before me, a Notary Public, in and for County of ... Hartford .. and State of Connecticut, this 13th day of July, 2007


 DELORES LAMAR WILLIAMS
 NOTARY PUBLIC
 MY COMMISSION EXPIRES SEP. 30, 2011

3. Defendant _____ is a citizen of _____
(name of second defendant) (State)

whose address is _____

(If more space is needed to furnish the above information for additional defendants, continue on a blank sheet which you should label "A. PARTIES." Be sure to include each defendant's identity and complete address.)

B. JURISDICTION

4. The jurisdiction of this court is invoked pursuant to: (list statute(s))

Jurisdiction is founded on 28 U.S.C. § 1338
Venue in this court is proper under 28 U.S.C. § 1391(b)

This Action seeks damages, declaratory relief, and permanent injunctive relief in accordance with 17 U.S.C. § 101 et seq and pursuant to 28 U.S.C. §§ 2201 and 2202.

C. NATURE OF THE CASE

BRIEFLY state the background of your case.

1. Plaintiffs are the owners of all rights, title, and interest to the musical composition "I'm Frontin'", including the copyright therein together with the right to register the statutory copyright therein.
2. Plaintiffs originally authored the composition "I'm Frontin'" some time in 1993 at Trod Nossell Studio.
3. The composition "I'm Frontin'" was thereafter recorded by ~~plaintiffs~~ plaintiffs some time in 1994 at Trod Nossell recording studio in Wallingford Ct. (see Exhibit A)
4. On or about August 7, 1995, a copy cassette tape comprising the recording of plaintiff composition "I'm Frontin'" was forwarded to Defendant Bad Boy Entertainment Inc.
5. Plaintiffs composition "I'm Frontin'" was thereafter recorded and pressed by plaintiffs onto a vinyl record by a company known as Disc Makers, now located in Philadelphia. (see Exhibit A for color picture copy of one of the record album produced).

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- 6. Plaintiffs are informed and believe and on that basis allege that in or around August of 2003, Defendants released a musical compilation in compact disc format entitled The Neptunes Presents Clones (also known as STAR TRAK Presents Clones.
- 7. Defendants musical compilation identified in above Paragraph 6 features a single recorded by Pharrell Williams entitled "Frontin"
- 8. Defendants have continued to distribute and offer for sale Defendants musical compilation identified in section 6
- 9. The single identified in 8 section 7 recorded by Pharrell Williams entitled "Frontin" achieved Top Ten status by going #1 on the Billboard chart.
- 10. Plaintiffs are informed and believe and on that basis allege that Sean Puffy Combs, a principal of Defendant Bad Boy Entertainment, and Defendant Pharrell Williams are long-time friends who have done business together.
- 11. Plaintiffs allege that Defendant Bad Boy Entertainment provided Defendant Pharrell Williams with access to Plaintiffs copyrighted musical composition "I'm Frontin"
- 12. The plaintiffs are claiming or alleging Probative similarity in regards to the composition Frontin Lyrics, music, ~~rhythm~~ Rhythm, and Arrangement of song
- 13. Plaintiffs allege and believe that Defendant has willfully infringed due to Boastful statement, "Ice Rockin, Brick choppin and Gun stopping I did it all beat cases without Cochran"

D. CAUSE OF ACTION

I allege that the following of my constitutional rights, privileges, or immunities or my rights under a federal statute have been violated and that the following facts form the basis of my allegations: (If more space is needed to explain any allegation or to list additional supporting facts, continue on a blank sheet which you should label "D. CAUSE OF ACTION.")

Claim I: 1. Plaintiffs allege that their six Exclusive Rights
Under the 1976 Copyright Act has been violated.
according to ~~17~~ (17 U.S.C. § 106)

Supporting Facts: (Include all facts you consider important, including names of persons involved, places, and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

Claim II: Plaintiff allege that Defendants made
A cover song off of their original song

Supporting Facts:

D. Cause of Action

Proof of Access

1. Plaintiffs allege Sean Combs A.K.A. (Puff Daddy) & who was an A&R Executive at Uptown Records who was released in 1992
2. Plaintiffs allege In 1993 he set up Bad Boy Entertainment as his own venture, Combs formed his own label called Bad Boy, and earned enough hit records to cement an alliance with Arista Records who at that time was headed by CEO Clive Davis, ARISTA was handling distribution for Bad Boy Records.
3. IN 1995 DAVID & Peter Cozzani mailed via U.S. Post office a demo tape with the proper affixation of notice to Bad Boy Entertainment.
4. IN 1996, Bad Boy Entertainment signed an artist then known as Mase to a recording deal
5. IN 1997 Mase released his own album named Harlem World
6. The Neptunes Production team which consists of Pharrell Williams and Chad Hugo got their big break in 1997 when they produced a track on Mase's highly successful 1997 album Harlem World
7. Williams and Hugo started their label STAR TRAK Entertainment after establishing a relationship with Arista Records.
8. IN January of 2002, the Neptunes signed an agreement to bring their label star TRAK Entertainment to Arista Records.

9. IN 2002, Puff Daddy and Pharell Williams did A Collaboration: with Busta Rhymes on A Song Called "PASS the COURVOISIER, PART II"
10. IN the Summer of 2003, Pharell Williams of the Neptunes released an Album called "The Neptunes presents clones" which featured Pharell William top 10 single "Frontin"

* These facts show that the defendant had Contact and has done Business, Also has had reasonable Time to view the unpublished material that was introduced to the third party BAD Boy Entertainment.

E. REQUEST FOR RELIEF

5. WHEREFORE, plaintiff demands: (state the relief you seek)

wherefore, the plaintiffs pray for the following relief:

1. A judgment declaring that Plaintiffs own (Prima Facie) the Copyright in Plaintiffs Composition 'I'm Frontin'
2. A judgment declaring that Defendants' Composition 'Frontin' is Probative similarity to Plaintiffs Composition 'I'm Frontin'
3. A judgment that Defendant Pharell Williams are liable for direct, contributory and vicarious Copyright infringement
4. A judgment that Defendants Pharell Williams are liable for ~~direct~~ willful Copyright infringement. ~~A judgment~~
5. A judgment that Defendants be ordered to submit to an Accounting (~~Federal~~ **AUDIT**) so that all sales, profits and other compensation, ~~Income~~ Tangible or intangible derived by Defendants from their acts may be determined.

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6. A judgment that Defendants be ordered to pay plaintiffs i All sales, ~~Actual~~ profits, and other compensation, Tangible or intangible, derived by Defendants from their acts of infringement of plaintiffs, Copyright; or alternatively
7. Entry of a permanent injunction pursuant to 17 U.S.C § 502 enjoining Defendants and Defendant's Agents, Servants, Employees, Officers, Attorneys, Successors, Licensee, Partners, and assigns, and all person's Acting in Concert or Participation with each or any of them, From (A) directly or indirectly infringing in any manner plaintiffs Copyright; And (b) causing Contributing to, Enabling, facilitating, or Participating in the infringement of plaintiffs Copyright.
8. Entry of a Court Order pursuant to 17 U.S.C § 503 for the impounding of all Copies Defendants infringing Compact discs and other forms of recordings made in violation of plaintiffs Copyright.
9. A judgment that Defendants be ordered to pay plaintiffs the Costs of this lawsuit, Prejudgment interest, and Reasonable attorneys fees pursuant to 17 U.S.C § 505.
10. A judgment declaring that plaintiffs own the Copyright Defendants' composition "Frontin"
11. A judgment declaring that plaintiffs are entitled to Full back Royalties and Future Royalties based on plaintiffs' ownership of the Copyright in Defendants' composition Frontin; OR in the Alternative, a judgment declaring plaintiffs' ownership interest in Defendants' composition

F. JURY DEMAND

6. Do you wish to have a jury trial? Yes No

Original signature of attorney (if any)

David Currin & Peter Currin
Plaintiff's Original Signature

Printed Name

DAVID CURRIN & Peter Currin
Printed Name

16 Arthur Drive
Bloomfield CT 06002

()
Attorney's full address and telephone

860 727-0780 & (860) 992-7775
Plaintiff's full address and telephone

Email address if available

Email address if available

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained in the complaint is true and correct. 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Executed at _____ on _____
(location) (date)

Plaintiff's Original Signature

General Information

Court	United States District Court for the District of Connecticut; United States District Court for the District of Connecticut
Federal Nature of Suit	Property Rights - Copyrights[820]
Docket Number	3:07-cv-01069
Status	Closed