



**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

Tara Mapes,

Plaintiff,

Case No.: 25-1574

v.

JOHN DOES 1-9, unknown individuals; ANGELIC
ICE PHOTOGRAPHY, a South African business
entity; TANISHA LLOYD, an individual; and META
PLATFORMS, INC., a Delaware Corporation,

Defendants.

John Di Giacomo (P73056)
Eric Misterovich (P73422)
Andrew Jurgensen (P81123)
REVISION LEGAL, PLLC
Attorneys for Plaintiff
8051 Moorsbridge Rd.
Portage, Michigan 49024
T: (269) 281-3908
F: (231) 714-0200
john@revisionlegal.com
eric@revisionlegal.com
drew@revisionlegal.com

COMPLAINT AND DEMAND FOR A JURY TRIAL

Plaintiff Tara Mapes, by and through her attorneys Revision Legal, PLLC, states the following for her Complaint.

INTRODUCTION

1. This is a relatively simple case about extensive and prolific online infringement. Plaintiff, a photographer and graphic designer, makes a living photographing families and designing beautiful images commonly used by other photographers and her own customers that

utilize and feature Plaintiff's photographs and artwork. Unfortunately, her designs are easy to pirate—individuals online screenshot/download her works, offer them up for sale and redistribute them in huge groups on the social media platform Facebook (the groups having collectively over half a million members), and even offering to curate the designs for other group members eager to pay substantially less than what Plaintiff charges to do the same work professionally. It is hard to imagine a more perfect, axiomatic case of the need for copyright law: creation takes effort; copying takes seconds.

What's worse: Facebook allows it to happen. Plaintiff has repeatedly provided notice of the subject infringement to Facebook in excruciating detail. She relied on the Digital Millennium Copyright Act's ("DMCA") takedown procedure to make those requests, and Facebook relies on same to shield it from secondary liability. But where Plaintiff followed the rules, Facebook ignored them. Instead of responding to Plaintiff's requests in good faith, it stalled, made inane follow up requests, and even threatened to terminate Plaintiff's ability to report infringement entirely. All to keep collecting free, valuable data from over half a million group members and selling valuable advertisement space to reach all those eyes.

So, this is a relatively simple case about extensive and prolific online infringement, but it is also a case about Facebook's ability to facilitate or, at least, allow that infringement to continue. The infringers benefit from their copying and monetization of same, Facebook benefits from the over half a million happy group members, uptick in user activity, and advertisements and free data collection. Only Plaintiff, the artist, loses out. She now brings this lawsuit invoking the United States copyright laws meant to protect her creative works against this very kind of blatant and repeated infringement.

PARTIES

2. Plaintiff Tara Mapes is an individual residing in Guilford, Indiana. She is a professional photographer, digital artist, and the registered owner of numerous original works protected under the United States Copyright Act.

3. Defendants John Does 1–9 are the unknown individuals who operate various Facebook groups (the “Facebook Groups”) that willfully copied, distributed, publicly displayed, and sold infringing copies and derivative works based on Plaintiff’s copyrighted photographs (“Doe Defendants”). Their identities will be added when discovered.

4. Defendant Angelic Ice Photography is a South African business entity with a listed business address of Kirschner Rd, Beyers Park, Boksburg, 1459, South Africa.

5. Defendant Tanisha Lloyd is, upon information and belief, a citizen of South Africa and is the sole member and operator of Defendant Angelic Ice Photography.

6. Defendant Meta Platforms, Inc. is a Delaware corporation with its principal place of business located at 1601 Willow Road, Menlo Park, California 94025 (“Meta”). Meta owns and operates Facebook, a social media platform.

JURISDICTION AND VENUE

7. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Copyright Act. 17 U.S.C. § 501.

8. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

9. Meta is subject to personal jurisdiction in this District because it aims and conducts substantial business here, including maintaining and operating the Facebook platform, which, upon information and belief, has tens of thousands of users located in in this judicial district.

Facebook also maintains and operates Facebook groups, including the Facebook Groups operated by the Doe Defendants in this case, which are accessible to users in this District, where the infringement occurred.

10. On information and belief, the Doe Defendants are individuals residing in the United States who created, operate, and maintain the Facebook Groups, which are accessible in this judicial district and through which the infringing conduct occurred.

11. On information and belief, the Doe Defendants purposefully directed their activities toward this judicial district by distributing and offering for sale infringing copies and derivative works of Plaintiff's copyrighted photographs to Facebook users located within this juridical district, including Plaintiff herself.

12. The Doe Defendants' infringing conduct was intentionally directed at the United States and at Indiana residents, and Plaintiff's injuries from that conduct occurred within this judicial district.

13. On information and belief, Defendants Angelic Ice Photography and Tanisha Lloyd are domiciled outside the United States, but they created, operate, and maintain Facebook groups, commercial business pages on Facebook, or Facebook accounts that are accessible in this judicial district and through which the infringing conduct occurred.

14. On information and belief, Defendants Angelic Ice Photography and Tanisha Lloyd purposefully directed their activities toward this judicial district, and the United States writ large, by distributing and offering for sale infringing copies and derivative works of Plaintiff's copyrighted photographs to Facebook users located within this District, including Plaintiff herself, and removed and replaced the copyright data of Plaintiff with her own logo in violation of 17 U.S.C. § 1202

15. Defendants Angelic Ice Photography and Tanisha Lloyd’s infringing conduct was intentionally directed at the United States and at Indiana residents, and Plaintiff’s injuries from that conduct occurred within this judicial district.

16. Venue is proper in this District under 28 U.S.C. § 1400(a) because Plaintiff resides in this District and a substantial part of the infringing conduct occurred here.

FACTUAL BACKGROUND

17. Plaintiff is the author and registered copyright owner of numerous works of the visual arts, including but not limited to the following federally registered copyrights: VA0002227723, VA0002224804, VA0002248504, VA0002151851, and VA0002284642 (collectively, Plaintiff’s “Copyright Registrations”).

18. Plaintiff is the sole owner of the Copyright Registrations.

19. Each above work was duly registered with the U.S. Copyright Office before being infringed by Defendants entitling Plaintiff to statutory damages and attorneys’ fees under 17 U.S.C. § 504 and § 505.

20. Over the last several years, the Doe Defendants, operating as the administrators and moderators of the Facebook Groups, have willfully infringed Plaintiff’s copyrighted works. These groups, some numbering in the hundreds of thousands of members, were created and maintained specifically to redistribute, publicly display, edit, and sell infringing copies of Plaintiff’s works without authorization.

21. The infringing Facebook Groups identified to date include but are not limited to:

- a. Edit My Photo Please (~241,100 members)
- b. PhotoSHOP Edits & Requests (~212,600 members)
- c. Photoshop Edits and Requests (~19,600 members)

- d. Edit My Picture and AI Video (~33,900 members)
- e. Edit Free Photo Uk (~2,700 members)
- f. Free Photo Editing for Everybody (~24,300 members)
- g. Tweakers Restoring Yesterday (~23,200 members)
- h. Please Edit My Photos for Free (~94,400 members)¹
- i. “Official” Edit my photo please? (~38,100 members)

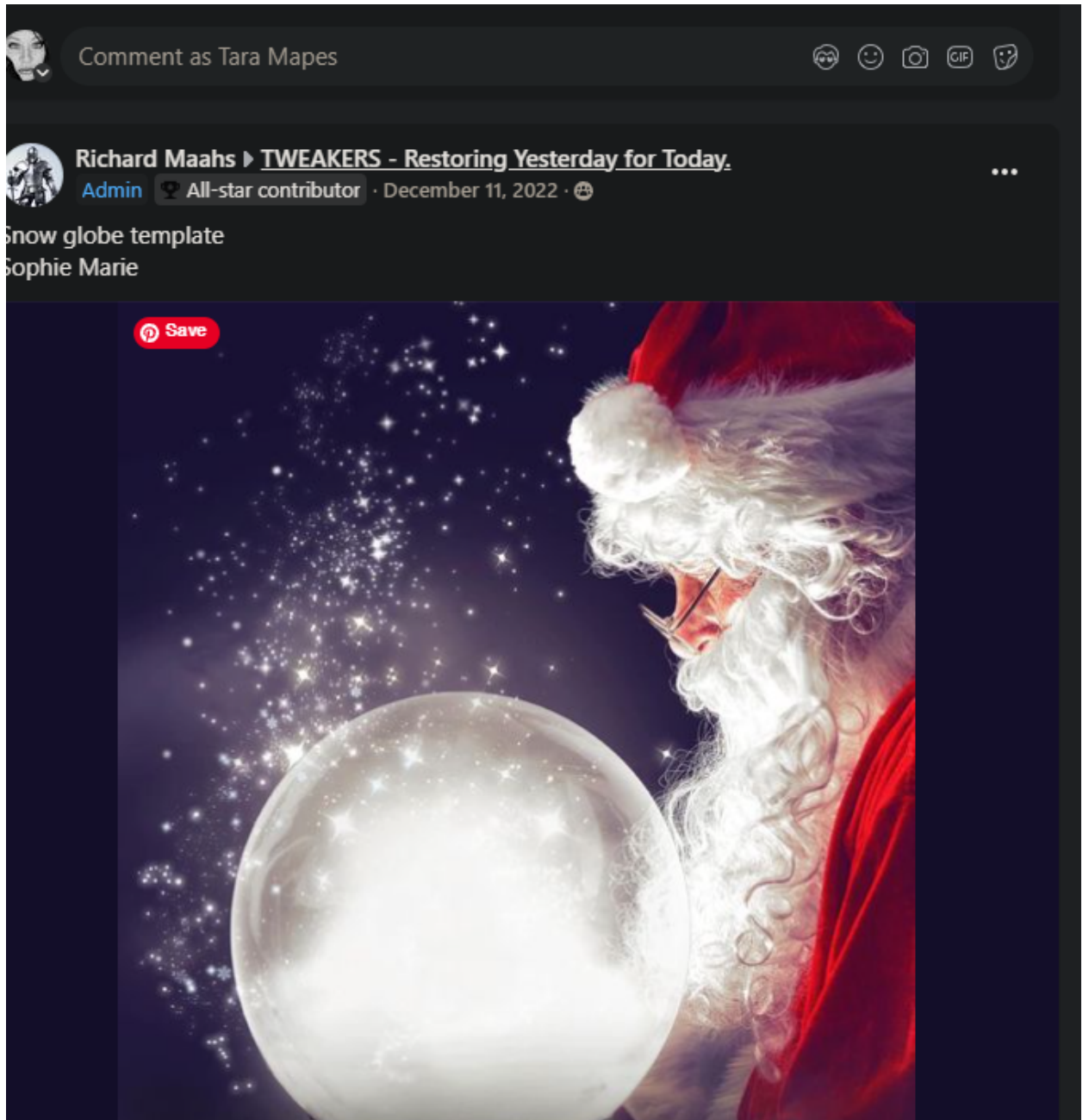
22. These Facebook Groups repeatedly and openly used Plaintiff’s works, including her “Santa Globe” and “Santa Couch” images, to generate unauthorized derivative works and sell and redistribute them to group members, in direct competition with Plaintiff’s business (see images below). Attached to this Complaint as **Exhibit 2** is a table detailing all the specific instances of infringement subject to this lawsuit.

23. These Facebook Groups often block Plaintiff’s access to the Facebook Groups upon notice of infringement to conceal their ongoing infringement.

¹ Plaintiff has attached as **Exhibit 1** a document with URL’s for the Facebook Groups identified in this allegation.

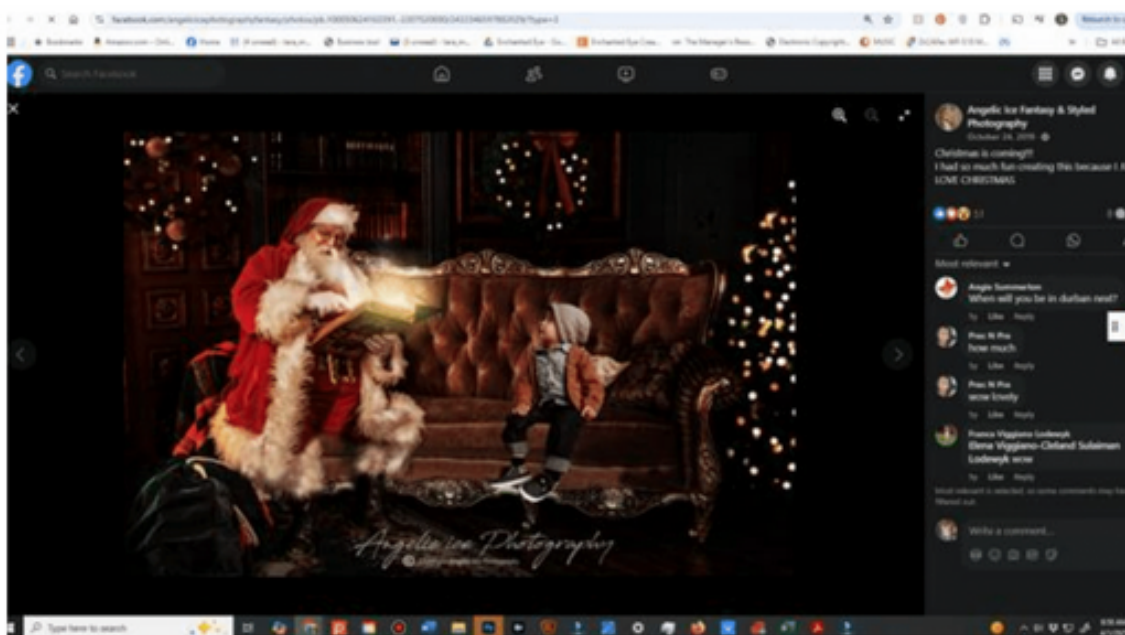


24. As one example of many, Defendant Tweakers Restore Yesterday Today downloaded/screenshotted Plaintiff's work, removed her watermark, and posted it in the editing group for services and redistribution to other editors who are members of the twenty-thousand-plus member group, as can be seen in the image below.



25. In another example, Angelic Ice downloaded and modified the lower of the below screenshots depicting Plaintiff's work of Santa Clause reading a book to a child. The first image is Plaintiff's creation, the second is Defendant Angelic Ice's reproduction and derivative version in which she removed Plaintiff's logo and child, inserted her own logo and photo of another child, and offered services using Plaintiff's image. Defendant then posted the infringing image on her

Facebook page of twenty thousand followers claiming authorship, offering sessions and edits into the image, and advertising and marketing her business.



26. Plaintiff's business involves creating original photographic templates and customizing them for her clients, offering remote editing to her customers worldwide, and offering them for sale to photographers for their in-person photography sessions. The Doe Defendants' unauthorized activities severely disrupt this business model.

27. Plaintiff has never given the Doe Defendants permission to reproduce, distribute, publicly display, or create derivative works of her copyrighted works or any of her original designs nor remove her copyright data.

28. The Doe Defendants do not possess a license, express or implied, to reproduce, distribute, publicly display, or create derivative works of Plaintiff's works or any of her original designs.

29. Plaintiff sent Meta an extensive series of DMCA takedown notices between 2021 and 2025, identifying dozens of infringing Facebook groups—including the subject Facebook Groups—and thousands of infringing URLs; she provided screenshots, ownership documentation, and explanations of the repeat infringement. Attached to this Complaint as **Exhibit 2** is a chart detailing Plaintiff's DMCA takedown efforts to Meta regarding the subject Facebook Groups and the Copyright Registrations underlying this lawsuit.

30. These notices included the following communications regarding Angelic Ice Photography alone:

- a. **March 23, 2025:** Plaintiff sent seventeen (17) individual DMCA reports to Meta in one day, comprising hundreds of infringing URLs.
- b. **March 24-25, 2025:** Plaintiff was unable to send the remaining reports of 182 additional infringement links and as a result sent multiple follow-up emails to Meta's copyright, legal, and abuse teams (to ip@fb.com,

copyright@fb.com, support@fb.com, legal@fb.com, and others), each providing screenshots of Meta's broken reporting form and reiterating the details of the infringement.

- c. **March 26-27, 2025:** Plaintiff sent certified letters to Meta's Delaware and California addresses with further documentation of the infringements and Meta's non-compliance with its DMCA obligations.
- d. **April 2025:** Meta issued a series of evasive responses (on April 10, 14, 15, 23, 28, and 29), raising baseless objections such as minor typographical discrepancies in the provided links and falsely claiming that no live infringing content could be located—even though the links worked and Plaintiff provided screenshots and videos as proof.

31. Plaintiff has submitted DMCA takedown notices to Facebook related to infringement of one or more of her Copyright Registrations by each of the Doe Defendant Facebook Groups, as can be seen in **Exhibit 2**.

32. Between 2021 and 2024, Plaintiff identified and reported approximately 3,372 infringing URLs to Facebook.

33. Despite acknowledging the complained-of infringement in several of its responses, Meta failed to remove all infringing content and refused to disable the Facebook Groups that were the source of repeated violations and still has not removed some today with notice of infringement confirmed received by Meta in 2024.

34. Meta further obstructed enforcement by disabling Plaintiff's ability to submit additional DMCA takedowns through its online form. After filing 17 reports on March 23, 2025, Meta's platform blocked Plaintiff from filing more reports and warned that her account could be

permanently disabled if she continued to use the reporting feature. To date, Meta has not confirmed it has removed that block. This forced Plaintiff to shift to email and certified mail to avoid losing her business account.

35. Meta repeatedly replied to Plaintiff's emails with auto responses directing her to use its broken IP reporting form, despite clear evidence that it was not functioning and despite receiving full notice of the infringement by alternative means. Meta refused to take action even after Plaintiff provided detailed error screenshots, timelines of her reporting attempts, and clear evidence that the Facebook Groups continued to host infringing material months after the first notices were sent.

36. Meta's responses were inconsistent and contradictory. While acknowledging the receipt of reports and sometimes responding claiming to remove certain content, Meta left vast quantities of infringing material online, including infringing posts Plaintiff originally reported in November 2024 even after Plaintiff notified Meta multiple times following up on the very emails Meta sent her to confirm Meta received the notice of infringement.

37. Meta maintains a policy to suspend or terminate the accounts of repeat infringers pursuant to the requirements of the DMCA.

38. Meta failed to terminate the accounts of users it knew were engaged in mass infringement, including the operator of Angelic Ice Photography who has a documented 344 reports of infringement on Plaintiff's work alone and the Doe Defendants' accounts, despite specific notice and demand to do so, and in violation of its own intellectual property policies published online.

39. Meta has the technological capability to track infringing URLs, fingerprint images, and restrict flagged groups or accounts. Despite repeated notice, Meta failed to implement such preventative tools in connection with Plaintiff's reports.

40. As of this writing, Angelic Ice Photography still maintains a commercial business page through Facebook, but it has been locked to South African followers only, preventing anyone outside of that location to view that page.

41. Numerous infringements Plaintiff reported to Meta are still published on Facebook within the Facebook Groups even though Plaintiff continued to notify Facebook multiple times months after filing the original DMCA reports of infringement.

42. All the infringement Plaintiff reported to Meta, which forms the basis of Plaintiff's claims in this lawsuit, is specifically identified in the attached **Exhibit 2** (featuring Plaintiff's "Infringed Works").

43. Meta's failure to take meaningful action—despite repeated, verified notice over many months and years—demonstrates its knowing and willful participation in and facilitation of the infringing activity.

COUNT I – COPYRIGHT INFRINGEMENT (17 U.S.C. § 501(a))
Against John Does 1-9, Angelic Ice Photography, and Tanisha Lloyd

44. Plaintiff incorporates the above paragraphs as if fully restated herein.

45. Plaintiff owns copyright registrations for the Infringed Works identified in **Exhibit 2**.

46. The Infringed Works are all creative works, which are original to Plaintiff, fixed in a tangible medium of expression, and works of authorship, specifically, of visual art.

47. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd had access to Plaintiff's works.

48. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd have all redistributed and created derivatives of Plaintiff's Infringed Works.

49. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd have reproduced, prepared derivative works of, distributed copies of, and displayed publicly works that are actual copies of, or substantially similarly to, Plaintiff's Infringed Works.

50. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd have reproduced, prepared derivative works of, distributed copies of, and displayed publicly works that use substantial portions of protected expression found in Plaintiff's Infringed Works.

51. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd acted with volition when they reproduced, prepared derivative works of, distributed copies of, and displayed publicly works that use substantial portions of protected expression found in Plaintiff's Infringed Works.

52. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's unauthorized copying of substantial portions of Plaintiff's Infringed Works violates Plaintiff's exclusive right of reproduction granted in 17 U.S.C. § 106(1).

53. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's unauthorized distribution of the Infringing Works violates Plaintiff's exclusive right of distribution granted in 17 U.S.C. § 106(3).

54. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's public display of Infringing Works violates Plaintiff's exclusive right of public display granted in 17 U.S.C. § 106(4).

55. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's unauthorized copying of substantial portions of Plaintiff's protected work and creation of new works

substantially similar to Plaintiff's Infringed Works violates Plaintiff's exclusive right to create derivative works granted in 17 U.S.C. § 106(2).

56. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's infringement of the Infringed Works was deliberate and willful.

57. As a result of the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's infringement, Plaintiff has suffered monetary damages.

58. As the sole author of works that infringe Plaintiff's Infringed Works, and as the President of Angelic Ice Photography, Tanisha Lloyd directs, controls, ratifies, participates in, or is the moving force behind the infringement committed by Angelic Ice Photography and is thus personally liable for such infringement.

59. As the sole author of works that infringe Plaintiff's Infringed Works, and as the President of Angelic Ice Photography, Tanisha Lloyd supervises Angelic Ice Photography's infringing activity and has a financial interest in that activity and is thus personally liable for such infringement.

60. Plaintiff is entitled to the recovery of, at her election, statutory damages, actual damages, Defendants' profits, and the costs of this action.

61. Plaintiff is also entitled to preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502 and 17 U.S.C § 106.

62. Plaintiff is entitled to her attorneys' fees pursuant to 17 U.S.C. § 505 and 17 U.S.C § 106.

COUNT II – VIOLATION OF 17 U.S.C. § 1202
Against John Does 1-9, Angelic Ice Photography, and Tanisha Lloyd

63. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's removed Plaintiff's logo, appearing as a watermark of Plaintiff's name, from her published copyrighted

works and reproduced, publicly displayed, distributed, and made derivative works of those works without Plaintiff's logo.

64. Plaintiff did not give the Doe Defendants, Angelic Ice Photography, or Tanisha Lloyd permission or authorization to remove her logo from her works.

65. Plaintiff's logo constitutes copyright management information under 17 U.S.C. 1202(c).

66. The Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd's unauthorized removal and modification of Plaintiff's copyright management information on the Infringed Works violates 17 U.S. Code § 1202 (a),(b).

67. Plaintiff is entitled to statutory damages and attorneys' fees pursuant to 17 U.S. Code § 1202.

COUNT III – SECONDARY COPYRIGHT INFRINGEMENT
(CONTRIBUTORY INFRINGEMENT)
Against Meta Platforms, Inc.

68. Plaintiff incorporates the above paragraphs as if fully restated herein.

69. Defendant Meta had actual and repeated notice of the direct copyright infringement committed by the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd. Plaintiff provided Defendant Meta with numerous detailed DMCA takedown notices over a period of several years, identifying specific Facebook Groups, infringing URLs, infringing images, and the identity of the infringing users and administrators, including Angelic Ice Photography and Tanisha Lloyd.

70. These takedown notices included screenshots, ownership documentation, and video proof demonstrating that Plaintiff's copyrighted works had been used without authorization and continued to be publicly displayed, copied, and distributed through Facebook Groups. Meta

acknowledged receiving these reports but failed to act meaningfully or expeditiously to remove the infringing content or disable the accounts or groups responsible.

71. In addition to actual notice, Meta had constructive knowledge of the infringing activity. The volume and nature of Plaintiff's complaints, the widespread distribution of infringing material across the multiple, large Facebook Groups, the removal of copyright management information, and the blatant reuse of Plaintiff's distinctive images without attribution constituted obvious and recurring infringement that would have been apparent to a reasonable service provider. This "red flag" knowledge, coupled with Meta's access to content moderation tools and control over its platform, imposed a duty to act that Meta failed to discharge.

72. Despite this actual and constructive notice, Meta materially contributed to the infringement of Plaintiff's Infringed Works by continuing to operate and maintain its Facebook platform, which provided the means and instrumentalities by which the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd copied, distributed, publicly displayed, and created derivative works of Plaintiff's copyrighted photographs.

73. Meta knowingly facilitated the infringing conduct by:

- a. allowing the infringing Facebook Groups to continue operating,
- b. allowing the same infringing material to remain published on its platform long after notice,
- c. failing to disable the accounts of known repeat infringers,
- d. blocking Plaintiff's access to DMCA reporting features, and
- e. refusing to act on verified infringement notices sent by certified mail and email even when technical issues with its platform were documented in detail.

74. Meta's conduct substantially assisted and encouraged the underlying infringement, including by structuring and maintaining Facebook Groups in a way that promoted the sharing and redistribution of infringing content. Meta's platform tools—such as photo-sharing features, group messaging, tagging, commenting, blocking and public display functions—played an integral role in the facilitation and perpetuation of the infringement.

75. By knowingly contributing to the infringement of Plaintiff's Infringed Works, Meta is liable for contributory copyright infringement.

76. Meta forfeited any safe harbor protection from claims of contributory infringement related to the infringement complained of herein given its failure to follow the DMCA takedown procedures and knowingly and willfully refusing to take action after repeated notices.

77. Meta failed to reasonably implement its repeat infringer policy as required by the DMCA. Despite receiving detailed notice that users like Angelic Ice Photography, the Facebook Groups, and the Doe Defendants were the subject of hundreds of infringement reports, Meta did not terminate their accounts or disable access to infringing material.

78. Meta was willfully blind to the infringement of Plaintiff's copyrighted works. Meta's refusal to review alternative notices, its automated rejection of direct emails, and its ongoing failure to act even after certified letters were received, reflect deliberate avoidance of actual knowledge of infringement.

79. Meta has the technological capability to track infringing URLs, fingerprint images, and restrict flagged groups or accounts. Despite repeated notice, Meta failed to implement such preventative tools in connection with Plaintiff's reports.

80. Meta profited directly from increased user engagement in infringing groups, which yielded more ad impressions and enriched its proprietary data collection. Plaintiff was also able

to sell advertisement space within the feeds and on the webpages of the Facebook Groups themselves. This monetization of infringing content creates a motive for inaction. As a result of Defendant Meta's contributory infringement, Plaintiff has suffered monetary damages.

81. Plaintiff is entitled to the recovery of, at her election, statutory damages, actual damages, Defendant Meta's profits, and the costs of this action.

82. Plaintiff is also entitled to preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502 and 17 U.S.C § 106.

83. Plaintiff is entitled to her attorneys' fees pursuant to 17 U.S.C. § 505 and 17 U.S.C § 106.

COUNT IV – SECONDARY COPYRIGHT INFRINGEMENT
(VICARIOUS LIABILITY)
Against Meta Platforms, Inc.

84. Plaintiff incorporates the above paragraphs as if fully restated herein.

85. The direct copyright infringement committed by the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd identified above was all facilitated by Defendant Meta's Facebook platform.

86. Defendant Meta's Facebook platform allowed the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd to create user profiles and the Facebook Groups, which allowed them to publicly display and distribute unlawful copies and derivative works of Plaintiff's Infringed Works.

87. Meta derived a financial benefit from this infringing activity, including by increased user engagement leading to more valuable data sets for targeted advertising.

88. Meta also benefits directly from the Facebook Groups where it can sell advertisements and sponsored content to place on the Facebook Group's pages, which will be seen by the tens or hundreds of thousands of members of those groups.

89. Meta also gains a direct financial benefit from each Facebook Group and user that remains active on the Facebook Platform where Meta collects personal data from same and uses that data to increase the effectiveness, and thus value, of targeted advertising.

90. Meta has the legal right and practical ability to stop the infringement of Plaintiff's Infringed Works by the Doe Defendants, Angelic Ice Photography, and Tanisha Lloyd, but failed to do so.

91. Despite its ability to control—or at least stop—the Doe Defendant's, Angelic Ice Photography's, and Tanisha Lloyd's infringement of Plaintiff's Infringed Works, and despite receiving express notice from Plaintiff regarding said infringement, Defendant Meta has not stopped or limited the Doe Defendants, Angelic Ice Photography, or Tanisha Lloyd from continuing to infringe, and Meta continues to directly benefit from profits earned by said infringement.

92. Meta forfeited any safe harbor protection from claims of vicarious liability related to the infringement complained of herein given its failure to follow the DMCA takedown procedures.

93. As a result of Defendant Meta's vicarious infringement, Plaintiff has suffered monetary damages.

94. Plaintiff is entitled to the recovery of, at its election, statutory damages, actual damages, Defendant Meta's profits, and the costs of this action.

95. Plaintiff is also entitled to preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502 and 17 U.S.C § 106.

96. Plaintiff is entitled to her attorneys' fees pursuant to 17 U.S.C. § 505 and 17 U.S.C § 106.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests this Honorable Court grant the following relief:

- A. Enjoin Defendants from continuing to infringe Plaintiff's works in any way;
- B. Award Plaintiff all damages to which she is entitled, including, but not limited to, actual and statutory damages, Defendants' profits, all costs and expenses, including attorneys' fees; and
- C. Award Plaintiff any other relief to which she is entitled.

Respectfully submitted,

REVISION LEGAL, PLLC



Dated: August 7, 2025

John Di Giacomo (P73056)
Eric Misterovich (P73422)
Andrew Jurgensen (P81123)
REVISION LEGAL, PLLC
Attorneys for Plaintiff
8051 Moorsbridge Rd.
Portage, Michigan 49024
T: (269) 281-3908
F: (231) 714-0200
john@revisionlegal.com
eric@revisionlegal.com
drew@revisionlegal.com