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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

05-CV-02113-CMP

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CV5 2113

Civil Action No.

ROBERT CRUMB,

Plaintiff,

v.

AMAZON.COM, INC.,

Defendant.

**COMPLAINT FOR
COPYRIGHT
INFRINGEMENT**

Plaintiff, by his attorneys Jules D. Zalon and Richard L. Goff, as and for his complaint against the defendant herein, hereby respectfully alleges the following upon knowledge as to plaintiff's own acts and upon information and belief as to all other matters

1. Plaintiff Robert Crumb is a United States citizen who presently resides in Saucy, France.

2. Defendant Amazon.com, Inc. is a Delaware corporation whose principal place of business is at 1516 2nd Avenue, Seattle, Washington 98101.

Complaint Case # _____

Richard L. Goff, 1000 Second Avenue, #3310
Seattle, WA 98104 - Tel: 206-838-1973

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JURISDICTION AND VENUE

3. The cause set forth hereinbelow arises under the Copyright Act, Title 17 U.S.C. 101, et seq. and jurisdiction and venue are founded upon Title 17 U.S.C. 101, Title 28 U.S.C. 1331, 1338, 1391(b), 2201 and 2202. A substantial portion of the events giving rise to the claims have occurred in the State of Washington.

AS AND FOR A FIRST COUNT FOR
COPYRIGHT INFRINGEMENT

4. In or prior to February, 1968, plaintiff Robert Crumb created an original series of comic drawings entitled "Keep On Truckin' . . .," a copy of which is annexed as Exhibit A, which work contains material wholly original with the said artist, and is copyrightable subject matter under the laws of the United States.

5. The said work was first published in or about February, 1968 by or under the authority of plaintiff, in Zap Comix #1.

6. On March 20, 1972, plaintiff filed an application to register the said work for copyright in the United States Copyright Office, and after compliance with the Copyright Act and all other laws governing copyrights, the Register of Copyrights issued a certification of registration dated and identified as follows: March 20, 1972, Registration Number A-322571. A copy of said registration is annexed hereto as Exhibit B.

7. Defendant has infringed the said copyright by copying the dominant character drawing therein and publishing it on their website as a tool for selling merchandise on its Internet web site.

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8. The defendant has performed the said acts referred to the preceding paragraph without the permission, consent or authority of the plaintiff and has therefore violated the copyright of the plaintiff in the said work.

9. The said defendant has at all times relevant to the acts set forth hereinabove had, actual and constructive knowledge of the rights of plaintiff, but has proceeded in complete disregard thereof.

10. Pursuant to 17 U.S.C. 505, the plaintiff is entitled to recover attorneys' fees and costs incurred in bringing this action.

PRAAYER FOR RELIEF

11. WHEREFORE, plaintiff requests judgment as follows:

A. That defendant, its agents, servants, employees, officers, successors and assigns and all persons acting under the defendant or on its behalf, be permanently enjoined from directly or indirectly infringing the plaintiff's copyrighted work;

B. That the defendant be required to account and pay over to the plaintiff all gains, profits and advantages derived by them from their infringement of plaintiff's copyright, in addition the damages which the plaintiff has sustained by reason of the defendant's said acts;

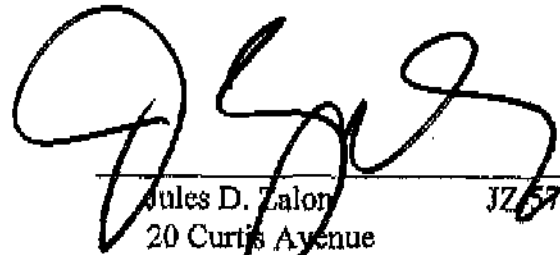
C. That the defendants be required to pay to the plaintiff the costs of this action, and reasonable attorneys' fees to be allowed by the Court; and

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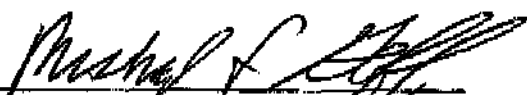
G. That plaintiff have such other and further relief as the Court deems just and proper.

Dated: West Orange, New Jersey
December 16, 2005



Jules D. Zalon JZ/5751
20 Curtis Avenue
West Orange, New Jersey 07052
Tel: 973-324-2444
Fax: 973-324-2810
email: jzalon@comcast.net

Local Counsel:

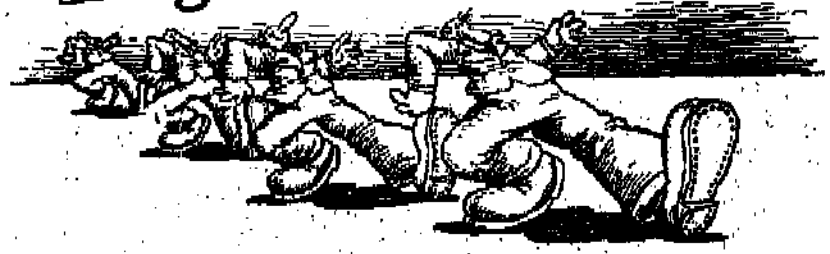


Richard L. Goff (WSBA #23158)
1000 Second Avenue, Suite 3310
Seattle, Washington 98104-1019
Tel: 206-838-1973
Fax: 206-621-6443
email: rgoff@rgofflaw.com

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Keep on Truckin'...



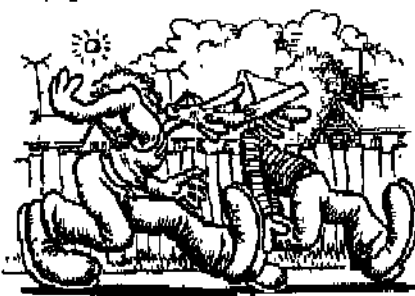
TRUCKIN' ON DOWN
THE LINE...



HEY HEY HEY...



I SAID KEEP ON TRUCKIN'...



TRUCKIN' MY BLUES AWAY!



Exhibit A

Complaint Case # _____

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FIGURE 1

Section for Registration of a Claim for Copyright
 Section 107, Title 17, United States Code
 Copyright Office, Library of Congress
 101 Independence Avenue, S.E.
 Washington, D.C. 20540-4071
 Telephone: (202) 707-7000
 Fax: (202) 707-2958
 E-mail: copyright@loc.gov

1. Title of the Work: _____

2. Author(s) or Creator(s): _____

3. Title of the Underlying Work: _____

4. Date of First Publication of Underlying Work: _____

5. Date of First Publication of This Work: _____

6. Date of Deposit: _____

7. Date of Registration: _____

8. Date of Renewal: _____

9. Date of Expiration: _____

10. Date of Transfer: _____

11. Date of Assignment: _____

12. Date of Reversion: _____

13. Date of Inheritance: _____

14. Date of Devolution: _____

15. Date of Escheat: _____

16. Date of Abandonment: _____

17. Date of Surrender: _____

18. Date of Forfeiture: _____

19. Date of Rescission: _____

20. Date of Annulment: _____

21. Date of Voidance: _____

22. Date of Invalidity: _____

23. Date of Nullity: _____

24. Date of Ineffectiveness: _____

25. Date of Inoperability: _____

26. Date of Inapplicability: _____

27. Date of Inapplicability: _____

28. Date of Inapplicability: _____

2. Description of the Work: _____

3. Classification: _____

4. Author(s) or Creator(s): _____

5. Title of the Underlying Work: _____

6. Date of First Publication of Underlying Work: _____

7. Date of First Publication of This Work: _____

8. Date of Deposit: _____

9. Date of Registration: _____

10. Date of Renewal: _____

11. Date of Expiration: _____

12. Date of Transfer: _____

13. Date of Assignment: _____

14. Date of Reversion: _____

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26. Date of Ineffectiveness: _____

27. Date of Inoperability: _____

28. Date of Inapplicability: _____

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47. Date of Inapplicability: _____

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49. Date of Inapplicability: _____

50. Date of Inapplicability: _____

Exhibit B

Complaint Case # _____