

FILED

2009 OCT 16 PM 12:25
CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

1 Arnold P. Lutzker, DC Bar No. 101816 (Pro Hac Vice Application Filed)
2 Allison L. Rapp, MD Bar No. 28930 (Pro Hac Vice Application Filed)
3 Jeannette M. Carmadella , DC Bar No. 500586 (Pro Hac Vice Appl. Filed)
4 Lutzker & Lutzker LLP
5 1233 20th Street, NW, Suite 703
6 Washington, DC 20036
7 Telephone No. 202-408-7600 Ext. 1
8 Fax 202-408-7677
9 Email: arnie@lutzker.com

10 Katherine Butts Warwick (California Bar No. 118977)
11 1890 Brigden Road
12 Pasadena, California 91104
13 Telephone No. 213-346-9067
14 Fax 213-346-9069
15 Email: kbwesq@pacbell.net

16 ATTORNEYS FOR PLAINTIFF

17 IN THE UNITED STATES DISTRICT COURT
18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 Yolanda Buggs, an individual,)
20)
21 Plaintiff.)
22)
23 vs.)
24)
25 Dreamworks, Inc., A Delaware)
26 corporation; Dreamworks Animation)
27 SKG, Inc., a Delaware Corporation;)
28 Dreamworks Animation LLC, a)
Delaware limited liability company;)
and Paramount Pictures Corporation,)
a Delaware Corporation)
Defendants.)

CASE NO. CV09-7070 SJO (AGRx)
FIRST AMENDED COMPLAINT FOR
COPYRIGHT INFRINGEMENT

JURY TRIAL DEMANDED

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

FIRST AMENDED COMPLAINT

Plaintiff, Yolanda Buggs, alleges as follows:

NATURE OF THE ACTION

1. In October 2006, Defendants Dreamworks Animation LLC, Dreamworks Animation, SKG, Inc. and Dreamworks, Inc. (collectively “Dreamworks”) and Paramount Pictures Corporation (“PPC”) released a motion picture, *Flushed Away* (“*Flushed Away*” or “Defendants’ Film”). *Flushed Away*, which grossed over \$160 million at the box office, is the story of a rodent, living in a plush London apartment, who gets flushed down the toilet into the sewers of London and has to find his way home. The Defendants’ Film credits Chris Kuser (“Mr. Kuser”) as “Creative Executive,” which means that the idea for the movie originated with him, and that he worked on the film’s production. Although many other people contributed to the film, the inspiration, initial story and characters of Defendants’ Film originated with Mr. Kuser. In fact, Mr. Kuser told Plaintiff he “created the original concept for the film *Flushed Away*.” The only problem is that Mr. Kuser stole that “original concept” for the project from the Plaintiff, Yolanda Buggs.

2. While Ms. Buggs and Mr. Kuser were both students at American Film Institute (“AFI”) Conservatory’s Graduate Program in filmmaking, Ms. Buggs developed an idea and wrote an original screenplay entitled *Critter Island* (“*Critter Island*” or “Plaintiff’s Work”). In the course of her studies at AFI, Ms. Buggs revised and

1 polished several versions of *Critter Island*, sharing copies of her copyrighted
2 screenplays with classmate, Mr. Kuser, who was then an intern with Defendant
3 Dreamworks. *Critter Island* is a story about a cockroach living in New York who
4 gets flushed down the drain into the sewers of New York and has to find his way
5 home. The similarities of plot, character and events are neither coincidental, nor
6 insignificant. The brazen theft, for which Mr. Kuser was unremorseful, shattered Ms.
7 Buggs, an aspiring filmmaker, and left her brilliant work unsellable. It is these
8 wrongs that this suit seeks to rectify.

11 THE PARTIES

12 3. Plaintiff is a citizen and resident of Los Angeles, California.

13 4. On information and belief, Dreamworks Animation LLC, Dreamworks
14 Animation SKG, Inc. and Dreamworks, Inc. are all formed under the corporate law of
15 the State of Delaware. The principal place of business of each of the Dreamworks
16 companies in Glendale, California. The primary business of the companies is the
17 production of motion pictures which are distributed to theaters, video stores, broadcast
18 stations and cable systems throughout the United States, including California and the
19 world.
20
21
22

23 5. On information and belief, PPC is a Delaware corporation. PPC is a diverse
24 entertainment company, whose principal business activities, directly or through
25 subsidiaries, include the distribution of motion pictures and television programs for
26 itself and others and the operation of broadcasting stations and cable television
27
28

1 networks. PPC has numerous business offices throughout the United States, including
2 in Los Angeles, California. In addition, PPC distributes motion pictures (including
3 Defendant's Film) and licenses the public performance of motion pictures, television
4 programs and cable television network programs for itself and others, including
5 Defendants' Film, to entities throughout the United States, including California, and
6 the world.
7

8
9 JURISDICTION AND VENUE

10 6. This is a civil action seeking monetary, declaratory and injunctive relief for
11 copyright infringement under the Copyright Act of 1976, as amended, 17 U.S.C.
12 §101, *et. seq.*
13

14 7. This court has personal jurisdiction over Defendant Dreamworks because it
15 resides in the state due to its principal place of business being located in Glendale,
16 California. The Plaintiff's claims also arose directly from Defendant Dreamworks'
17 actions within the forum state.
18

19 8. This court has personal jurisdiction over Defendant PPC because it resides in
20 the state due to its principal place of business being located in Los Angeles,
21 California. The Plaintiff's claims also arose directly from Defendant PPC's actions
22 within the forum state.
23

24 9. This court has subject matter jurisdiction to hear Plaintiff's copyright claims
25 under 17 U.S.C. § 101 *et seq.*; 28 U.S.C. §§ 1331 and 1338.
26

27 10. Venue of this action is proper pursuant to 28 U.S.C. §§ 1400(a) and 1391(b).
28

FACTS

1
2 A. *At the AFI Graduate Program, Plaintiff Shared Her Ideas and Copyrighted*
3 *Screenplays with Mr. Kuser, an Intern at Defendant Dreamworks*

4 11. In September 1999, Ms. Buggs, an aspiring screenwriter, enrolled in a two
5 year Screenwriting Program at the American Film Institute (AFI) Conservatory
6 Graduate School in Los Angeles. At AFI, Ms. Buggs met Mr. Kuser, who was
7 enrolled in AFI Conservatory's Producing Program. While at AFI, Mr. Kuser told
8 Ms. Buggs that he was interning at Defendant Dreamworks, and she shared with him
9 her interest and passion for writing for animation.
10

11
12 12. Over the next two years, Ms. Buggs developed an idea for an animated film.
13 She wrote a screenplay based on her idea, which she entitled *Critter Island*. Ms.
14 Buggs wrote two revisions of Plaintiff's Work. She registered the initial two versions
15 of her screenplay for *Critter Island* (the "Screenplay") with the U.S. Copyright Office,
16 Reg. Nos. PAu 2-582-976 and PAu 2-528-871. See Exhibit 1.
17

18
19 13. For her screenwriting class, Ms. Buggs described *Critter Island* as follows:

20 A story about a hydrophobic water bug (Mario) and a rival roach (Vicki) who
21 learn that their family faces fumigation in 3 days, but before they can deliver
22 the news, they get washed down a sink drain and flushed out into the mean
23 sewers of New York City, where they both have to cope with each other while
24 they fight their way home to warn their loved ones before the bug man arrives.
25 Along the way, they meet friends who give them advice and lessons on life and
26 survival.

27 14. Aware of Mr. Kuser's employment at Defendant Dreamworks and in light of
28 his encouraging support for her idea, Ms. Buggs gave Mr. Kuser a copy of each

1 version of *Critter Island* to read and comment on. She submitted a final version of the
2 Screenplay as her graduation work for AFI.

3 15. After graduation from AFI, in July 2001, Ms. Buggs contacted Mr. Kuser to
4 set up a meeting for him to help her navigate a presentation of *Critter Island* at
5 Defendant Dreamworks. Instead of reflecting his past enthusiasm for Plaintiff's
6 Work, Mr. Kuser discouraged her, insisting that she would need to hire a private
7 lawyer to introduce *Critter Island* to Defendant Dreamworks. That turned out to be an
8 impossible task for Ms. Buggs, who could not afford to retain an attorney to represent
9 her.
10
11

12 16. In 2003, Ms. Buggs gave it one more try. She sent Mr. Kuser a DVD
13 containing a three minute, animated short film that she scripted and had a friend
14 animate. This short was based on the first act break scene of *Critter Island* where the
15 main character is washed down the drain. She sent Mr. Kuser the DVD with a
16 handwritten note urging Defendant Dreamworks to consider the project, but nothing
17 happened and the material was not returned.
18
19

20
21 *B. In October 2006 Plaintiff Confronts Mr. Kuser Who Claims Credit for the*
22 *Story*

23 17. For Ms. Buggs, that's where the matter ended, until the fall of 2006, when she
24 saw a trailer for *Flushed Away*, a film produced by Defendant Dreamworks and
25 distributed by Defendant PPC. The Defendants described the movie as follows:
26

27 A story of an uptown rat who meets up with a lower class rat who flushes him
28 down the toilet from his penthouse apartment ending in the sewers of London,

1 where he has to learn a whole new and different way of life while finding his
2 way home.

3 18. Prior to *Flushed Away*'s release in October 2006, Ms. Buggs decided to meet
4 Mr. Kuser, whom she knew was employed full-time at Defendant Dreamworks. At
5 that meeting, Mr. Kuser told Ms. Buggs that he brought the original concept for
6 *Flushed Away* to Defendant Dreamworks. When she asked him if he recalled her
7 *Critter Island*, her screenplay of an insect that gets flushed down the drain, he said
8 only "vaguely." He boasted about his accomplishment and then cautioned her sternly
9 that after *Flushed Away* was released, the concept of going down a drain would no
10 longer be an original idea, and she could not market it. He further discouraged Ms.
11 Buggs from pursuing her project, indicating that Hollywood animation studios had
12 little interest in other "bug movies." This meeting left Ms. Buggs devastated,
13 depressed, and without any sense of direction.

14
15
16
17 *C. Mr. Kuser was Credited As "Creative Executive" of Flushed Away, Which*
18 *Grossed Millions and Spawned Derivative Works*

19 19. The Defendants released *Flushed Away* on October 22, 2006. On information
20 and belief, it has grossed in excess of \$160 million in theatrical and video distribution
21 worldwide. In addition, Defendant Dreamworks developed video games, spin off
22 DVDs and other works based on *Flushed Away*.

23
24
25 20. On information and belief, Defendant Dreamworks credited its employee, Mr.
26 Kuser, as "Creative Executive" of *Flushed Away*. In Hollywood parlance, the
27 "Creative Executive" is the person who originates the film project for the producing
28

1 company and who has a material role in managing the evolution of the story to the
2 screen.

3 *D. Flushed Away Bears Substantial Similarity to Critter Island*

4
5 21. *Flushed Away* bears substantial similarity to *Critter Island*. The most essential
6 element of the *Flushed Away* storyline and the heart of the Plaintiff's Work – the lead
7 character getting flushed down a bathroom drain into the sewers of the city and
8 forming an unlikely partnership in order to return home – is directly copied from
9
10 *Critter Island*.

11 22. "Flushed down the drain" is a recurring plot device employed in *Flushed*
12 *Away*. For example, in one scene, *Flushed Away*'s "singing slugs" warble "poor, poor
13 Roddy, flushed down his own potty," reiterating the key element of the storyline.
14

15 23. There are other significant similarities between Plaintiff's Work and *Flushed*
16 *Away*. For example, both storylines rely on anthropomorphic pests (a roach in *Critter*
17 *Island*, a rat in *Flushed Away*), living in human residences in big cities (New York for
18 Plaintiff, London for Defendants), who dress like humans and whose stories are ones
19 of struggle to survive in the sewers of the big city while trying to find their way back
20
21 home.
22

23 24. Many other elements of the plot, characterization, theme, mood, sequence of
24 events, and setting are substantially similar in both works. For example:
25

26 a) *Lead Characters*. The personalities of the lead characters Mario and Vicki
27 (*Critter Island*) and Roddy and Rita (*Flushed Away*), as developed in the
28

1 plot, are strikingly similar. Both Rita and Vicki are portrayed as tough, tom-
2 boy type characters with glimpses of vulnerability. Both Roddy and Mario
3 are portrayed as showy, quick-thinking characters who initially start with a
4 sense of entitlement and a tendency to lie about what they are most sensitive
5 about, but end up saving the day. In addition, while Roddy and Rita are both
6 rodents, Roddy is a mouse and Rita is a rat. Similarly, while Mario and
7 Vicki are both cockroaches, Mario is a Water Bug and Vicki is a Brown
8 Bandit Cockroach.
9
10

11 b) *Sequence of Lead Character Relationship.* The sequence of the developing
12 relationship between the male and female protagonists is similar in both works.
13 Both pairs start with a hate relationship in which the two characters are
14 combative and argumentative. The hate relationship escalates to where one
15 character actively “harms” the other. Eventually the hate relationship turns into
16 friendship and both share a romantic moment. Finally, some kind of insult or
17 misunderstanding leads to a temporary separation between these two characters,
18 but they are later reunited and trust is established after they realize they need to
19 cooperate and work together to defeat their opponent and return home.
20
21

22 c) *Sequence of Storyline.* Both works begin in an above ground setting of a
23 human residence in a large city, where the main characters eat the humans’ food
24 and use the humans’ things when they are not there. The setting of both works
25 then transfers to an underground sewer or subway, an unconventional choice of
26
27
28

1 setting, after the two protagonists are flushed down a bathroom drain, which is
2 visualized as a theme park water ride and a pretzel-like structure in both works.
3 While underground, the protagonists must work together to defeat the enemy
4 and return home. In the end, they both manage to safely return to their “homes”
5 in human residences. However, upon return they decide to leave their human
6 “homes” and move to where their kind belongs (back to the sewer in *Flushed*
7 *Away*, and to a landfill in *Critter Island*).
8
9

10 d) *Use of G.I. Joe Character in both.* Mario interacts with a G.I. Joe character
11 early in the story, as does Roddy;
12

13 e) *Both lead characters can't swim.* As he is flushed down the drain, Mario
14 declares he can't swim; Roddy does the same. Eventually both Mario and
15 Roddy have to overcome their fear of water in order to save the day.
16

17 f) *Both lead characters are flushed down the drain as a result of a lie they tell.*
18 Mario ends up falling down the drain while trying to prove he can swim, when
19 he really cannot; Roddy falls down the drain while trying to trick another mouse
20 into doing the same.
21

22 g) *Both lead characters meet antagonists with whom there is mutual fear but*
23 *ultimately proves to be harmless.* While underground, Mario meets a mouse
24 that he is afraid of and who is afraid of him; Roddy meets a slug that he is
25 afraid of and who is afraid of him.
26
27
28

1 h) *Gymnastic escape moves are employed in both.* Mario and Rita both execute
2 a gymnastic move off an object to a perfect dismount;

3 i) *Both stories have a scene with an evil opponent freezing rodents/roaches.* In
4 *Flushed Away* the “evil” Toad uses liquid nitrogen to literally freeze his
5 enemies. In *Critter Island*, the “evil” exterminator’s sprayer “freezes” the bugs
6 in mid-stride.
7

8 j) *Both stories involve an evil enemy set to destroy the main characters’ species.*
9 In *Flushed Away* the villainous Toad plans to annihilate the rodent population
10 but his plan is foiled at the last minute by Roddy and Rita; in *Critter Island* the
11 evil exterminator’s attempt to kill the cockroach population is thwarted at the
12 last minute by Mario and Vicki.
13

14 k) *In both stories, there are cute, singing creatures.* Soon after Roddy first
15 enters the sewer he meets singing slugs. Soon after Mario first enters the sewer,
16 he meets singing roaches.
17

18 l) *In both stories, a parachute device is used as an escape device.* In pivotal
19 scenes in both works, characters employ a parachute and float down high above
20 the city skyline. Rita and Roddy use a plastic bag as a parachute, tugging on
21 the bag handles to navigate to Roddy’s home. Mario uses a toy’s parachute to
22 propel him and his friends in the air, tugging on the parachute strings to guide
23 them to the dump truck.
24
25
26
27
28

1 m) *Both stories involve gangs or mob characters.* Plaintiff's Work involves
2 two rival cockroach gangs. Defendants' Work involves a mob boss Toad and
3 henchmen Rats.

4 n) *Both works contain evil giant long legged spider characters.* Mario and
5 Vicki are chased by a giant long legged spider. Roddy and Rita must fight a
6 giant daddy long legged spider in the Flushed Away Video Game.
7

8 o) *Both works have the same target audience.* Both works have similar light-
9 hearted and fun moods and are geared toward the same target audience. They
10 each highlight the themes for family, freedom, and understanding between
11 different species.
12

13 p) *Both works have a similar mood and pace.* Both works are fast-paced action
14 adventure comedies filled with exciting and suspenseful escapades intertwined
15 with slap stick comedy and quick-witted dialogue.
16
17

18 25. The substantial similarity between *Flushed Away* and *Critter Island* is not
19 coincidental; it evidences Defendants' copying from the materials to which
20 Mr. Kuser had access. The substantial similarity between *Flushed Away* and
21 *Critter Island* extends to protectable elements of Plaintiff's original
22 authorship.
23
24
25
26
27
28

COPYRIGHT INFRINGEMENT
Against All Defendants

1
2
3 26. Plaintiff realleges and incorporates herein the allegations in Paragraphs 1-25,
4 inclusive.

5
6 a) *Critter Island* is an original work of authorship and the subject of U.S.

7 Copyright Registration Nos. PAu 2-582-976 and PAu 2-528-871.

8
9 b) At all times relevant hereto, Plaintiff has been and is the owner of all
10 copyright rights in and to *Critter Island*, and she never assigned, licensed or otherwise
11 transferred her copyright rights to any of the Defendants or to any third party.

12
13 27. Through Mr. Kuser, Defendant Dreamworks had unrestricted access to *Critter*
14 *Island*. On information and belief, Mr. Kuser utilized his access to *Critter Island* in
15 order to copy from Plaintiff's Work.

16
17 28. In addition, the similarity between *Flushed Away* and *Critter Island* is so
18 substantial as to be independently probative of the fact that Defendant Dreamworks,
19 through Mr. Kuser, had access to and copied from Plaintiff's Work.

20
21 29. *Flushed Away* is substantially similar to *Critter Island*, and the substantial
22 similarity extends to Plaintiff's original, copyright-protected authorship. Thus,
23 Defendants' *Flushed Away* screenplay and *Flushed Away* film each represent an
24 unauthorized reproduction of, and an unauthorized derivative work based upon,
25 Plaintiff's Work.
26
27
28

1 30. On or about October 22, 2006, Defendants Dreamworks and PPC began
2 reproducing, distributing, and publicly performing *Flushed Away* in connection with
3 theatrical exhibition in the United States, including California. Thereafter, the
4 Defendants began adapting, reproducing, distributing, and publicly performing
5 *Flushed Away* in connection with exhibition and sale in other markets, including
6 international theatrical markets, home video, broadcast and cable. Each such
7 reproduction, distribution, public performance, and adaptation of *Flushed Away*
8 infringed Plaintiff's rights in *Critter Island*.

9
10
11 31. Upon information and belief, the Defendants have also exploited Defendants'
12 Film in other ways, including but not limited to creation of derivative motion pictures,
13 video games and merchandising. Each such exploitation constitutes an unauthorized
14 reproduction, adaptation, distribution, public performance, and/or public display of
15 Plaintiff's Work.

16
17
18 32. Defendants, in creating, writing, producing, marketing and distributing
19 *Flushed Away*, have infringed Plaintiff's copyrights in *Critter Island*, and such
20 infringement was intentional and willful.

21
22 33. By reason of Defendants' infringements, Plaintiff has sustained and will
23 continue to sustain substantial injury, loss, and damage to her ownership rights in
24 Plaintiff's Work.

25
26 34. Plaintiff is entitled to receive all appropriate injunctive relief, including but
27 not limited to the relief available under 17 U.S.C. §§502-503.
28

1 35. Plaintiff is further entitled to recover from the Defendants the damages,
2 including attorneys' fees, she has sustained and will sustain, and any gains, profits and
3 advantages obtained by Defendants as a result of Defendants' willful acts of
4 infringement alleged in this Complaint, including but not limited to such damages and
5 awards as are available under 17. U.S.C. §§504-505.
6

7 PRAYER FOR RELIEF
8

9 WHEREFORE, Plaintiff prays for judgment against each Defendant as follows:

10 A. Preliminarily and permanently enjoining and restraining Defendants,
11 their officers, directors, shareholders, agents, employees, and attorneys and all those
12 acting in concert with them from:
13

14 1. Infringing Plaintiff's copyrights in *Critter Island* in any manner,
15 including but not limited to reproducing Defendants' Film, publicly distributing
16 it, publicly displaying it, or preparing any derivative work based on it, in any
17 medium;
18

19 2. Failing to provide proper credit for the use of Plaintiff's Work within
20 Defendants' Film;
21

22 B. Ordering that Defendants file with this Court and serve upon Plaintiff
23 within 20 days after the service of such injunction, an affidavit, sworn to under
24 penalty of perjury, setting forth in detail the manner and form in which Defendants
25 have complied with such injunctions.
26
27
28

1 C. Ordering an accounting of all revenues received by each Defendant as a
2 result of its unlawful conduct.

3 E. Awarding Plaintiff: 1) Defendants' profits realized as a result of the
4 copyright infringement; 2) damages sustained by Plaintiff, including damages arising
5 from Defendants' intentional and willful conduct and their failure to provide proper
6 on-screen credit for Plaintiff's authorial contributions to Defendants' Film; and 3) the
7 costs of this action.
8

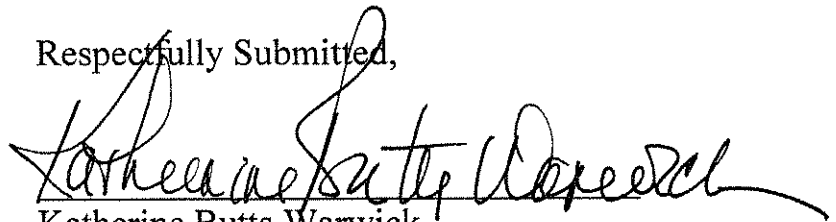
9
10 F. Awarding Plaintiff statutory damages and attorney's fees pursuant to 17
11 U.S.C. §§ 504-505.

12
13 G. Awarding Plaintiff prejudgment and post-judgment interest on any
14 monetary award in this action.

15 H. Granting such other and further relief as to this Court deems just and
16 proper.
17

18 DATED: October 16 2009

19
20
21 Respectfully Submitted,

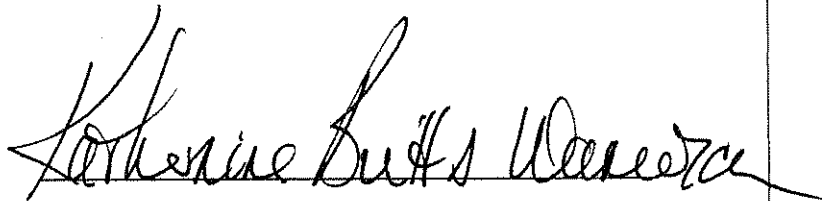
22 

23 Katherine Butts Warwick,
24 Counsel for Plaintiff Yolanda Buggs
25
26
27
28

DEMAND FOR JURY TRIAL

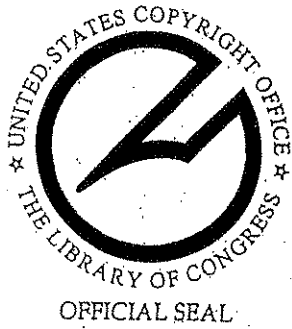
Plaintiff hereby demands a trial by jury on all issues triable to a jury.

DATED: October 16 2009



Katherine Butts Warwick
Counsel for Plaintiff, Yolanda Buggs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



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

PAU 2-528-871



EFFECTIVE DATE OF REGISTRATION

12 11 2000 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

Critter Island

PREVIOUS OR ALTERNATIVE TITLES

NATURE OF THIS WORK See instructions

Motion Picture Animated Screenplay

NAME OF AUTHOR

Yolanda E. Buggs

DATES OF BIRTH AND DEATH Year Born Year Died

08/14/1971

Was this contribution to the work a "work made for hire"?

No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous?

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed?

Screen play

NAME OF AUTHOR

DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?

No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous?

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed?

NAME OF AUTHOR

DATES OF BIRTH AND DEATH Year Born Year Died

Was this contribution to the work a "work made for hire"?

No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous?

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed?

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases.

2000

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Complete this information ONLY if this work has been published.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Yolanda E. Buggs 6615 Franklin Ave. #201 Hollywood, CA 90028

APPLICATION RECEIVED

DEC 11 2000

DO NOT WRITE HERE OFFICE USE ONLY

CONF. DEPOSIT RECEIVED

DEC 11 2000

TWO DEPOSITS RECEIVED

REGISTRATION NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

MORE ON BACK Complete all applicable spaces (numbers 5-9) on the reverse side of this page. See detailed instructions. Sign the form at line 8.

DO NOT WRITE HERE

EXAMINED BY *[Signature]*

FORM PA

CHECKED BY

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
 - a. This is the first published edition of a work previously registered in unpublished form.
 - b. This is the first application submitted by this author as copyright claimant.
 - c. This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

- a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼
- b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Be sure to give your attention to these instructions before completing this space

6

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼ Account Number ▼

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name Address Apt. City State Zip ▼

Area Code & Telephone Number ▼

Be sure to give your attention to these instructions before completing this space

CERTIFICATION I, the undersigned, hereby certify that I am the

- Check only one ▼
- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

8

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Yolanda E. Buggs

date ▶ 12-4-00

Handwritten signature (X) ▼

Yolanda E. Buggs

MAIL CERTIFICATE TO

Certificate will be mailed in window envelope

Name ▼	<i>Yolanda E. Buggs</i>
Number Street Apartment Number ▼	<i>6615 Franklin Ave, #201</i>
City State ZIP ▼	<i>Hollywood, CA 90028</i>

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE

1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:
Register of Copyrights
Library of Congress
Washington, D.C. 20559

9

* 17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 (e) or in any written statement filed in connection with the application shall be fined not more than \$2,500.

ORM PA
For a Work of the Performing Arts
UNITED STATES COPYRIGHT OFFICE



OFFICIAL SEAL

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

PAU 2-582-976
[Barcode]

APR 18 2001

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

Critter Island

PREVIOUS OR ALTERNATIVE TITLES ▼

NATURE OF THIS WORK ▼ See instructions

Motion Picture Animated Screenplay

2

NAME OF AUTHOR ▼

a *Yolanda E. Buggs*

DATES OF BIRTH AND DEATH

Year Born ▼ *08/04/11* Year Died ▼

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR { Citizen of ▶
Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Screenplay

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼

b

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR { Citizen of ▶
Domiciled in ▶

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

c

Was this contribution to the work a "work made for hire"?

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country
OR { Citizen of ▶
Domiciled in ▶

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2001

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month ▶ Day ▶ Year ▶

Nation ▶

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

*Yolanda E. Buggs
6615 Franklin Ave, #201
Hollywood, CA 90028*

APPLICATION RECEIVED

APR 18 2001

ONE DEPOSIT RECEIVED

APR 18 2001

TWO DEPOSITS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

REMITTANCE NUMBER AND DATE

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

*Character(s) not registrable.
Compendium II of Copyright Office
Practices.

EXAMINED BY _____
 CHECKED BY SPD
JM

CORRESPONDENCE
 Yes

FORM PA
 FOR
 COPYRIGHT
 OFFICE
 USE
 ONLY

5

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼
- a. This is the first published edition of a work previously registered in unpublished form.
 - b. This is the first application submitted by this author as copyright claimant.
 - c. This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give: Previous Registration Number ▼ PAU 2-528-871
 Year of Registration ▼ 12-11-2000

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼
 (also called *Cr.Mer.Draft*)
This newly submitted script is a 2nd draft of the first draft (which was registered under PAU-2-528-871)
This changed version is a "derivative work" of the previous version

6
See instructions before completing this space

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

The changed version differs from the first draft in that a couple of characters have been cut and some have been added. Characters roles & relationships have also changed. Also some story modifications have been made. However, the overall goal for my own character is the same.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account

Name ▼ _____ Account Number ▼ _____

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt./City/State/ZIP ▼

Area Code and Telephone Number ▶ _____

Be sure to give your daytime phone number

CERTIFICATION I, the undersigned, hereby certify that I am the

- Check only one ▼
- author
 - other copyright claimant
 - owner of exclusive right(s)
 - authorized agent of
- Name of author or other copyright claimant, or owner of exclusive right(s) ▲ _____

8

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Yolanda E. Buggs date 4/3/01

Handwritten signature (X) ▼ Yolanda E. Buggs

MAIL CERTIFICATE TO

Name ▼ Yolanda E. Buggs

Number Street Apartment Number ▼ 6615 Franklin Ave, #201

City State ZIP ▼ Hollywood, CA 90028

Certificate will be mailed in window envelope

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL ELEMENTS IN THE SAME PACKAGE:

1. Application form
2. Non-refundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:
 Register of Copyrights
 Library of Congress
 Washington, D.C. 20559

9
The Copyright Office has the authority to adjust fees at 5-year intervals, based on changes in the Consumer Price Index. The next adjustment is due in 1995. Please contact the Copyright Office after July 1995 to determine the actual fee schedule.