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7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 THE GRC TRUST, appearing through
11 Jimmy Ginn;

12 Plaintiff,

13 v.
14

15 MELISSA JEFFERSON p/k/a LIZZO, an
16 individual; ATLANTIC RECORDING
17 CORPORATION, a Delaware corporation;
and DOES 1-10,

18 Defendants.
19

Case No.

COMPLAINT FOR COPYRIGHT
INFRINGEMENT

JURY TRIAL DEMANDED

20
21 Plaintiff the GRC Trust, appearing through Jimmy Ginn (“Plaintiff” or
22 “GRC”), hereby prays to this Court for relief based on the following:

23 **Jurisdiction & Venue**

24 1. This action arises under the Copyright Act of 1976, 17 U.S.C. §§ 101, *et*
25 *seq.*

26 2. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,
27 1338(a)-(b).
28

Defendants' Unauthorized Exploitation of Plaintiff's Composition

9. GRC owns the composition of the original song *Win or Lose (We Tried)* registered with the Copyright Office (the "Composition"). Said work is registered with the U.S. Copyright Office.

10. In or around 2025, Defendants created the song entitled *I'm Goin' In Till October* or alternatively entitled *Good Jeans* (the "Infringing Work") and released it on social media platforms such as TikTok and Instagram.

11. The Infringing Work incorporates, interpolates, and samples instrumental and vocal elements of the Composition. Representatives for Lizzo acknowledge the same.

12. Defendants did not obtain authorization from GRC to use the Composition in the Infringing Work.

13. Upon information and belief, Defendants continue to exploit the Infringing Work for commercial gain, violating GRC's rights in the Composition.

14. The parties attempted informal resolution of the dispute but reached an impasse, necessitating the filing of this case.

First Claim for Relief

(For Copyright Infringement—Against all Defendants, and Each)

15. GRC incorporates by reference the allegations in the preceding paragraphs of this Complaint.

16. GRC owns the original Composition registered with the Copyright Office.

17. Defendants' sampling of the sound recording embodying the Composition establishes access by way of striking similarity.

18. Defendants, and each of them, copied, reproduced, distributed, made a derivative work of, publicly performed, and/or otherwise exploited the Composition in the Infringing Work without obtaining GRC's authorization.

1 19. Due to Defendants' acts of infringement, GRC has suffered damages in
2 an amount to be established at trial, including but not limited a reasonable license fee
3 for Defendants' use of the Composition.

4 20. Due to Defendants' acts of infringement, Defendants have obtained
5 profits they would not have realized but for their infringement of GRC's rights in the
6 Composition. As such, GRC is entitled to disgorgement of Defendants' profits
7 attributable to Defendants' infringement in an amount to be established at trial.

8 21. Upon information and belief, Defendants copied and exploited the
9 Composition with actual or constructive knowledge, and/or with reckless disregard or
10 willful blindness for, GRC's rights in the Composition, rendering their infringement
11 willful.

12 **Prayer for Relief**

13 *(Against All Defendants)*

14 WHEREFORE, GRC demands judgment against Defendants as follows:

- 15 a. An Order declaring that Defendants willfully infringed GRC's copyrights in
16 the Composition;
- 17 b. That Defendants, their agents and employees, and anyone working in
18 concert with the foregoing, be enjoined from further exploiting the
19 Composition;
- 20 c. That GRC be awarded all Defendants' profits, plus all GRC's losses,
21 attributable to Defendants' infringement, the exact sum to be proven at the
22 time of trial; or alternatively, if elected, statutory damages as available
23 under 17 U.S.C. § 504;
- 24 d. That GRC be awarded its reasonable attorneys' fees under 17 U.S.C. § 505;
- 25 e. That GRC be awarded pre-judgment interest as allowed by law;
- 26 f. That GRC be awarded the costs of this action; and
- 27
- 28

1 g. That GRC be awarded such further legal and equitable relief as the Court
2 deems proper.

3 GRC demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P. 38
4 and the 7th Amendment to the United States Constitution.

5
6 Respectfully submitted,

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8 Dated: October 21, 2025

By: /s/ Scott Alan Burroughs
Scott Alan Burroughs, Esq.
Nelson Campbell, Esq.
DONIGER / BURROUGHS
Attorneys for Plaintiff