	Case 2:25-cv-10085 Docur	ment 1 Filed 10/21	L/25 Page 1 of 5 Page ID #:1		
1 2	Scott Alan Burroughs (SBN 235718) scott@donigerlawfirm.com Nelson Campbell (SBN 357579)				
3	ncampbell@donigerlawfirm.com				
4	DONIGER / BURROUGHS 603 Rose Avenue				
5	Venice, California 90291 Telephone: (310) 590-1820				
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7	Attorneys for Plaintiff				
8	UNITED STATES DISTRICT COURT				
9	CENTRAL DISTRICT OF CALIFORNIA				
10	THE GRC TRUST, appear	ring through	Case No.		
11	Jimmy Ginn;		COMPLAINT FOR COPYRIGHT		
12	Plaintiff,		INFRINGEMENT		
13	V.		JURY TRIAL DEMANDED		
14					
15	MELISSA JEFFERSON p/k/a LIZZO, an individual; ATLANTIC RECORDING				
16	CORPORATION, a Delaware corporation;				
17	and DOES 1-10,				
18	Defendants.				
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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	<u>Jurisdiction & Venue</u>				
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		1			
	COMPLAINT				

3. Venue in this judicial district is proper under 28 U.S.C. §§ 1391(c) and 1400(a).

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<u>Parties</u>

- 4. Plaintiff the GRC Trust, appearing through Jimmy Ginn in his representative capacity as duly-acting trustee of The GRC Trust, is a Revocable Trust existing under the laws of the State of Georgia.
- 5. Upon information and belief, Defendant Melissa Jefferson p/k/a "Lizzo" is a resident of this judicial district.
- 6. Upon information and belief, Defendant Atlantic Recording Corporation is a Delaware limited liability company with a principal place of business located at 1633 Broadway New York, NY 10019, and doing business in and with California and this judicial district.
- 7. Defendants Does 1-10 (collectively "DOE Defendants") (together with Lizzo and Atlantic, the "Defendants") are other parties not yet identified who have infringed GRC's copyrights, have contributed to the infringement of GRC's copyrights, or have engaged in one or more of the wrongful practices alleged herein. The true names, whether corporate, individual, or otherwise, of DOE Defendants are presently unknown to GRC, which therefore sue said DOE Defendants by such fictitious names, and will seek leave to amend this Complaint to show their true names and capacities when the same have been ascertained.
- 8. Upon information and belief, at all relevant times, each of the Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Defendants, and was at all times acting within the scope of such agency, affiliation, alter-ego relationship, and/or employment; and actively participated in, subsequently ratified, and/or adopted each and all of the acts or conduct alleged, with full knowledge of each and every violation of GRC's rights and the damages to GRC proximately caused thereby.

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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.

- 19. Due to Defendants' acts of infringement, GRC has suffered damages in an amount to be established at trial, including but not limited a reasonable license fee for Defendants' use of the Composition.
- 20. Due to Defendants' acts of infringement, Defendants have obtained profits they would not have realized but for their infringement of GRC's rights in the Composition. As such, GRC is entitled to disgorgement of Defendants' profits attributable to Defendants' infringement in an amount to be established at trial.
- 21. Upon information and belief, Defendants copied and exploited the Composition with actual or constructive knowledge, and/or with reckless disregard or willful blindness for, GRC's rights in the Composition, rendering their infringement willful.

Prayer for Relief

(Against All Defendants)

WHEREFORE, GRC demands judgment against Defendants as follows:

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

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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.		
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6	Respectfully submitted,		
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8	Dated: October 21, 2025 By: <u>/s/ Scott Alan Burroughs</u> Scott Alan Burroughs, Esq.		
9	Nelson Campbell, Esq.		
10	DONIGER / BURROUGHS Attorneys for Plaintiff		
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