



COPYRIGHT CLAIMS BOARD

Docket number: 23-CCB-0087

March 24, 2023

Akiya Finley

CLAIMANT

v.

Raamla Mohamed and Pilar Savone

RESPONDENTS

ORDER TO AMEND NONCOMPLIANT CLAIM

The Copyright Claims Board finds that your claim does not comply with the requirements of the CASE Act and related regulations. The claim cannot move forward unless it is amended.

If you wish to proceed with this claim, you must file an amended claim by **April 24, 2023**. If you do not, the Board must dismiss your claim without prejudice, although you may file again in the future before the Board or in federal court. If you file an amended claim and it is found compliant, you will be notified and directed to proceed with service. There is no additional filing fee for an amended claim. 17 U.S.C. § 1506(f)(1)(B).

To make your amended claim compliant, you must resolve the issues identified below. [37 C.F.R. § 224.1\(c\)\(2\)](#). You may also choose to correct or edit any errors or other information in your claim before you file it again. You do not need to provide a legal argument in your claim – just a statement of facts and circumstances. Being specific in your description gives the other party and the Board more information about your claim. There is no character limit, so please be as detailed as possible.

Copyright Infringement – Elements

You have brought a copyright infringement claim before the Board. Your claim must make enough factual allegations to support each “element” of the claim. Information about the elements required to assert a claim of copyright infringement is available in the [Starting an Infringement Claim](#) chapter of the CCB Handbook. The elements of a copyright infringement claim are:

1. You own a valid copyright in the allegedly infringed work, or have been given an exclusive license to the copyright rights at issue in the work,
2. The respondent used one of your exclusive rights in the work without permission,
3. The respondent had access to your work, meaning a reasonable opportunity to view or hear your work, and
4. The respondent’s work is substantially similar to the original elements of expression in your work.

Your claim does not present clear facts to support the elements of a copyright infringement claim related to infringing activity by one of the respondents, and substantial similarity, as discussed below.

Infringing Activity

You have not stated facts that support a copyright infringement claim against one respondent, Pilar Savone. Your claim describes allegedly infringing acts by the other respondent, Raamla Mohamed, but your allegations do not mention Ms. Savone and do not make clear how she engaged in any allegedly infringing activity. To address this issue, if you file an amended claim against Ms. Savone, it must include specific facts that provide a basis for raising the claim against her personally. In the alternative, you may file an amended claim that does not include Ms. Savone as a respondent.

Substantial Similarity

Your claim also does not include facts that clearly identify or explain the similarities between your work and the allegedly infringing work. If it is not readily apparent from supplemental materials that are submitted with the claim, you must provide specific allegations about how your work and the allegedly infringing work are similar. You do not provide any information clearly describing or showing your allegedly infringed work, or stating or showing how it is substantially similar to any work by the respondent.

You allege that you gave your work, a script, to Raamla Mohamed's boss Shonda Rhimes, who gave it to Ms. Mohamed, and you allege that the television program "Reasonable Doubt," available on Hulu, infringes your copyright in the script. You provide a brief overview of a few characters and elements of the plot in your script: "The lawyer twin sister has a baby by a inmate and she is a police officer. According to my script the lawyer is stalked by Carlos the drug cartel king. The lawyer is being intimidated to lose certain cases by other learners." However, you do not identify any specific elements of your script that appear in "Reasonable Doubt." Instead, you broadly assert that "[s]cenes and logline from script are the same," and that "so many characteristics and similarities are in [R]easonable [D]oubt."

Your claim does not include enough information to describe or show how "Reasonable Doubt" is substantially similar to your work. Your claim does not clearly state how much of your work, or describe which elements of your work, is used in the allegedly infringing work. In addition, you have not provided copies of your work or the allegedly infringing work as supplemental documents. As a result, the claim does not provide enough information to enable the respondent to understand the claim and respond to it.

If you submit an amended claim, it must include more factual allegations that support the element of substantial similarity. Please provide more details and background regarding this element, including a clear, detailed statement regarding which portions of your work were taken by the respondents in the allegedly infringing work, or documents that are sufficient to show the similarities. If you include copies of the works at issue as supplemental documents, they must be clearly labeled and identified so they can be properly compared to each other.

Infringed Work – Clarity

A copyright infringement claim must include the title and author of each allegedly infringed work and, if a copyright registration has issued for the work, the registration number. [37 C.F.R. § 222.2\(c\)\(7\)\(ii\)\(A\)-\(C\)](#). In the

claim, you list the allegedly infringed work's title as "The Lawyer Hitwoman" and its author as Keke Kellum, and you provide TXu002106093 as its registration number. However, Copyright Office records for that registration number show that the title of the registered work is actually "The Lawyer Assassin," and that its author is you, Akiya Finley, not Keke Kellum. If you file an amended claim, make sure that it states the correct author and title of the allegedly infringed work. If you are not the work's author, then your amended claim must also include allegations that explain or show that you are the legal or beneficial owner of the copyright in that work.

To submit an amended claim, log into your eCCB account and take the following steps:

1. From your dashboard, click the **"Amend claim"** button and select your docket number from the dropdown list.
2. Your claim will unlock for editing. The information you originally entered will appear in the same order as in your original claim.
3. Make the necessary edits. If you have filed supplementary documents, you must re-upload any documents you wish to include in the amended claim on the **"Documentation"** page. Please include only documents directly related to your claim, and label them clearly.
4. Once you have completed your edits, continue to click through the fillable claim form until you reach the **"Review"** page. The Review page includes all the information that you have provided in the claim up to this point. Carefully double-check the information on this page. If you have any corrections, you can select **"Edit"** to revise any entries necessary. Each section of information has an **"Edit"** button, which will take you back to that section so you can make changes. After you make changes, you can click **"Save & review"** to return to the Review page. Please review your claim carefully. Once you submit your amended claim, you will be unable to edit the claim while it is in compliance review.
5. Once you have completed your review and any revisions, you must confirm that the information in your claim is accurate and truthful to the best of your knowledge. To complete the declaration, type your full name into the **"Digital signature"** box near the bottom of the **"Review filing"** page and click **"Agree & submit."**

If you have questions, please contact asktheboard@ccb.gov. Include your docket number in the subject line. The Board is unable to provide legal advice. We can only provide legal information and assistance concerning Board procedures and requirements. If you would like to seek further guidance from a lawyer or a law student at reduced or no cost, please visit the [Pro Bono Assistance](#) page on ccb.gov. You may also refer to the [Compliance Review](#) chapter of the CCB Handbook for more assistance.

Copyright Claims Attorney