



# COPYRIGHT CLAIMS BOARD

Docket number: 24-CCB-0001  
January 24, 2024

Harriet A. Frost

CLAIMANT

v.

Crunchbase.com, Jeff Li, Owner

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 **February 23, 2024**. 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.

### Infringing Activity

Your claim does not present enough facts to clearly state how the named respondents used any exclusive rights you have in the allegedly infringed work without permission.

Copyright law grants exclusive rights to copyright owners. These include the right to reproduce, distribute, and publicly display the work, and to make a “derivative work,” which is a work based on the original work. Someone who does one of those activities without the copyright owner’s permission may be infringing the copyright, unless they have a legitimate defense. More information about exclusive rights is available on page 3 of the [Starting an Infringement Claim](#) chapter of the CCB Handbook.

In the “Works infringed” section of your claim, you allege infringement of a literary work titled “The Rosewood Settlement: A Story about the Idella Carrier’s Families of Rosewood.” You allege that the work has been displayed and offered for sale on several websites without authorization. Your entry in the “Respondent” section, “Crunchbase.com, Jeff Li, Owner,” appears to list two distinct respondents, Crunchbase.com (Crunchbase) and Jeff Li (Li). However, you have not provided allegations that indicate that either of them committed an infringing act. A proper respondent for an infringement claim must be an alleged infringer. For each respondent named, you must

state allegations regarding that respondent's allegedly infringing acts. Moreover, you may not combine multiple respondents in a single entry. When filing a claim against more than one respondent, you must add each respondent separately in the online claim form.

You do not include any allegation of infringing activity by Crunchbase. The claim mentions Crunchbase only once, to state that Li is "[l]isted as the owner of shoplazza.ru through crunchbase.com." If Crunchbase identified Li "as the owner of shoplazza.ru," that alone could not make Crunchbase liable for any infringement that occurred on shoplazza.ru. You name four website URLs where alleged infringing acts occurred, including on shoplazza.ru, but not on crunchbase.com. It is not apparent that Crunchbase is a proper respondent.

It also is not apparent that Li is a proper respondent. In the "Respondent" section, you list Crunchbase and "Jeff Li, Owner" in a single entry, but you allege that Li owns shoplazza.ru, not crunchbase.com, and you do not state facts that indicate that Li committed or participated in any infringing acts. It also does not appear that any contact information you provided in the "Respondent" section pertains to Li. A [supplemental document](#) filed with the claim indicates that the San Francisco address you provided is for Crunchbase, and that the phone number you provided is for an entity called The San Francisco Public Press (apparently, as listed on Crunchbase's website), while the email address you provided seems to be for Crunchbase rather than Li.

It also does not appear that Shoplazza or shoplazza.ru would be a proper respondent, because the Board cannot hear a claim asserted against a person or entity residing outside the United States. 17 U.S.C. § 1504(d)(4). Another [supplemental document](#) filed with the claim describes Shoplazza as "a cloud-based and multi-channel commerce platform design for online brands to go borderless," and indicates that it is located in Shenzhen, Guangdong, China. *See also Kelly Toys Holdings, LLC v. Pearlbuy Ltd.*, No. 21-cv-3084 (MKV), 2021 U.S. Dist. LEXIS 126419, \*2-3 (S.D.N.Y. July 7, 2021) (describing allegations that "the Chinese companies doing business as 'Shoplazza' and 'Algobuy' . . . were facilitating the allegedly infringing transactions"). In addition, the website's ".ru" domain name suffix indicates that the site is hosted in Russia. It does not appear to reside within the United States.

If you file an amended claim, you must list each respondent in its own entry in the "Respondent" section and include each respondent's address, if known. 37 C.F.R. § 222.2(c)(6). Each respondent must reside within the United States. 17 U.S.C. § 1504(d)(4). You must state allegations that more fully explain how each respondent participated in infringing activity. 37 C.F.R. § 222.2(c)(7)(iii)(C). You should be as detailed as possible, setting forth what the respondent did in relation to the work you allege was infringed.

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 supplemental 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](mailto: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