



# COPYRIGHT CLAIMS BOARD

Docket number: 25-CCB-0098  
April 2, 2025

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Qwik Law LLC - DBA Qwik Code,  
LawTech Publishing Company, Ltd.,  
Glenn Hollister, Brian Sims  
CLAIMANTS

v.

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Heidi Hollister, Quick Codes Inc.  
RESPONDENTS

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## ORDER TO AMEND NONCOMPLIANT CLAIM

The Copyright Claims Board (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 **May 2, 2025**. 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 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 provide enough facts about the ownership of each work or how your works are substantially similar to the respondents’ allegedly infringing works. Please provide more details and background regarding these elements in your amended claim.

## Legal or Beneficial Ownership

Your claim provides unclear information about each claimant's status as a legal or beneficial owner of the allegedly infringed works. To bring a copyright infringement claim before the Board, the claimant must be “the legal or beneficial owner of the exclusive right [in a copyrighted work] at the time of the infringement.” 17 U.S.C. § 1504(c)(1). A legal owner is an author of the work who owns the exclusive rights at issue or a person or entity that has received a transfer of those rights, for example, by an assignment or an exclusive license. A beneficial owner is a legal owner who has transferred the rights at issue but retains some of the advantages of ownership, such as the right to receive royalties from the use of the work. A claimant who is not an author or named copyright owner of the allegedly infringed work must provide some specific details or supplemental documents explaining how the claimant owns, or has an exclusive license to use, the exclusive rights at issue.

The claim does not present facts that indicate that all the named claimants are proper claimants. As noted above, a claimant who is not an author or named copyright owner of the allegedly infringed work must provide some specific details or supplemental documents explaining how the claimant owns, or has an exclusive license to use, the exclusive rights at issue.

- **Glenn Hollister (“Hollister”)**: The registration information for “Qwik-Code ... California vehicle code reference manual” (CSN0042051) lists Hollister as the author and copyright claimant (owner) of the work. However, a Board review of the recent correspondence with the Copyright Office indicates that ownership of the work may have transferred during the 2019 sale of Qwik Code. If Hollister transferred ownership of the work in the 2019 sale of the business, he may not be a proper claimant and should be removed from the claim. To correct this issue, you can either (1) amend the claim to remove Hollister as a claimant or (2) provide additional information about how the legal or beneficial ownership in the work was retained by Hollister after the sale.
- **Brian Sims (“Sims”)**: Brian Sims is not listed as a copyright claimant of any of the works. Further, correspondence with the Copyright Office indicates that Brian Sims is an employee/owner of Qwik Code. Even though he may be the owner of Qwik Code, the law considers LLCs to be separate legal entities from the individuals who own them. Sims is not listed as a copyright claimant on any of the registrations listed in the claim and you have not included any additional information that would show that Sims has ownership of the copyright rights. To correct this issue, you can either (1) amend the claim to remove Sims as a claimant or (2) provide additional information about how the copyright in one or more of the works was transferred to, or exclusively licensed by, Sims.
- **LawTech Publishing Company, Ltd. (“LawTech”)**: It appears from the information included in your claim that LawTech owns or owned the older versions of the work (TX0004215598 and TX0004501566). It is unclear from the information included in your claim if these works were transferred to Qwik Code. In your amended claim, you must provide additional information about the relationship between LawTech and Qwik Code. If ownership in the works was transferred to Qwik

Code, Law/Tech may not be a proper claimant and should be removed from the claim. On the other hand, if the works were licensed to Qwik Code by LawTech, please include that information in the “Describe the infringement” section of the claim.

If the information in the claim identifying the claimants is inaccurate, you may correct that information in an amended claim. More information about legal and beneficial ownership is available at page 4 of the [Starting an Infringement Claim](#) chapter of the CCB Handbook.

### **Substantial Similarity**

Your claim also does not include enough facts that explain the similarities between your works and the respondents’ allegedly infringing works. If it is not readily apparent from supplemental documents that are submitted with the claim, you must provide some specific allegations about how your work—specifically the creative expression in your work—and the allegedly infringing works are similar.

Your claim states that your works are various editions of “Law summaries of California vehicle codes” and you have uploaded the 2025 edition of the “2025 California Peace Officers' Vehicle Code Law Summaries” as a supplemental document. The description of the work indicates that there is a combination of unprotected material and protected material. Copyright protection does not extend to facts and it does not extend to government edicts that have been issued by any federal, state, local, or territorial government, including legislative enactments, judicial decisions, administrative rulings, public ordinances, or similar types of official legal materials. Your registration extends only to the original creative expression (potentially, the summaries) included in the works. For an infringement claim, the respondent must have used your creative expression, not the unprotected material. Furthermore, in this case, the infringing and infringed work must be substantially similar in the creative expression that was new to the particular edition covered by the registration. Because of this, it is unclear how the respondents’ “2024 counterfeit books” infringed the 2025 California Peace Officers' Vehicle Code Law Summaries. It is unclear if creative expression in the 2025 edition of the work was included in the respondent’s “2024 books.”

No allegations in the “Describe the infringement” field of the claim describe or show how the respondents’ works are identical or substantially similar to the various versions of your works. If you amend your claim, you will need to provide concrete allegations explaining how the works are substantially similar in the copyrightable summary portions of your works. Additionally, because hyperlinks can lead to material that is no longer available online, the Board will not take into account material that is solely referred to in a hyperlink and not uploaded as supplemental documentation. Attach any supplemental materials that you want the Board to consider by uploading them as part of the claim rather than referring to them only with hyperlinks.

When 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 in your amended claim, including a clear, detailed statement regarding which portions of your work were taken by the respondent 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. More 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.

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 Board