



COPYRIGHT CLAIMS BOARD

Docket number: 25-CCB-0080
April 9, 2025

Michael A Angus

CLAIMANT

v.

The Sumner M. Redstone National
Amusements Part B General Trust

RESPONDENT

ORDER DISMISSING CLAIM WITHOUT PREJUDICE

The Copyright Claims Board (Board) issued orders that notified the claimant on March 11, 2025, and April 4, 2025, that the claim and amended claim, respectively, did not comply with the applicable statutory and regulatory requirements for filings before the Board. On April 5, 2025, the claimant filed a second amended claim, which was the final opportunity to file a compliant claim. 17 U.S.C. § 1506(f)(1)(B); 37 C.F.R. § 224.1(d).

A Copyright Claims Attorney reviewed the second amended claim and the attachment and determined that the infringement claim is still noncompliant because it fails to link the respondent to the infringing activities, detail how the respondent had access to the work, and identify similarities in the protectable expression between the claimant's work and the respondent's allegedly infringing work. As noted in the Board's April 4th Order to Amend Noncompliant Claim, none of the documents included with your claim show substantial similarities between the copyrightable material in your work (and subsequent social media posts) and the material in the movie. Copyright only extends to copyrightable subject matter, and copyright law only protects the components of a work that are original elements of expression by the author, not ideas or concepts that are common or necessary to a particular subject matter, and not standard expressions that naturally follow from the idea for a work of authorship.

The Copyright Claims Attorney referred the claim to a Copyright Claims Officer to confirm that it does not comply with the applicable requirements and that this proceeding should, therefore, be dismissed without prejudice. 17 U.S.C. § 1506(f)(1)(B). The Copyright Claims Officer reviewed the second amended claim and concurs with the finding of noncompliance. For the reasons set forth, the second amended claim does not present facts sufficient to show a plausible claim of copyright infringement and does not link any of the described activities to the named respondent. Accordingly, the Board dismisses the claim without prejudice and closes this case. Dismissal without prejudice means that the allegations may be raised again by filing a new claim if there is no agreement with the respondents to the contrary.

Copyright Claims Board