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Attorneys for Plaintiff Brittany Alexandria Sheets

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BRITTANY ALEXANDRIA SHEETS,
an individual, aka Mars Argo;

Plaintiff,

vs.

COREY MICHAEL MIXTER, an
individual, aka Titanic Sinclair;
TITANIC SINCLAIR
PRODUCTIONS, INC., a California
corporation; MORIAH ROSE
PEREIRA, an individual, aka Poppy,
aka ThatPoppy, aka I am Poppy; and I
AM POPPY, INC., a California
corporation

Defendants.

CASE NO. CV 18-3204

COMPLAINT FOR:

1. COPYRIGHT INFRINGEMENT
2. COMMON LAW RIGHT OF PUBLICITY
3. VIOLATION OF CALIFORNIA'S UNFAIR BUSINESS LAWS (Cal. Bus. & Prof. Code §§17200, *et seq.*)
4. DOMESTIC VIOLENCE DAMAGES (Cal. Code Proc. §340.15)

DEMAND FOR JURY TRIAL

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COMPLAINT

Plaintiff Brittany Alexandria Sheets alleges as follows:

I. INTRODUCTION

1. Plaintiff Brittany Alexandria Sheets is an actress and recording artist known by the alter ego and stage name “Mars Argo.”

2. Ms. Sheets is originally from Saginaw, Michigan, and, in 2008, met a local man named Corey Mixer. The two began a romantic relationship, and also began pursuing creative endeavors together. They subsequently moved together to Chicago and then to Los Angeles.

3. In addition to being the alter ego of Plaintiff Brittany Sheets, Mars Argo also is the name of a musical project between Ms. Sheets and Mr. Mixer, who is known by his alter ego of Titanic Sinclair (“Mr. Mixer” or “Titanic Sinclair”). In 2009, Ms. Sheets and Mr. Mixer began making music in their bedroom and releasing videos of their performances on their YouTube channel called Grocerybag.tv. All of the content on the channel was self-produced and consisted of short films, music videos, and a show called “Computer Show.” The channel was active from 2009 through 2015, and roughly 92 videos were released during that time.

4. In addition to producing and publishing content through their YouTube channel, in early 2012, Mars Argo began performing live stage shows and performing for audiences at venues across the country.

5. Although Mars Argo was growing in popularity during this time, Ms. Sheets was living a nightmare and, behind closed doors, she was enduring severe emotional and psychological abuse and manipulation from Mr. Mixer.

6. In January 2014, after confronting Mr. Mixer about his recurrent infidelity, Ms. Sheets ended her relationship with Mr. Mixer, and asked that their association become strictly professional. However, Mr. Mixer did not honor Ms. Sheets’ requests. Following the end of their romantic relationship,

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1 Mr. Mixer began to repeatedly harass, stalk, threaten, and abuse Ms. Sheets,
2 including – but not limited to – threatening to commit suicide, repeatedly
3 showing up unannounced at Ms. Sheets’ doorstep, breaking into her apartment,
4 stalking her every move on social media, disparaging her to mutual friends,
5 acquaintances, or others in the industry, and even physically assaulting her.

6 7. Despite Mr. Mixer’s abusive behavior, Ms. Sheets was hesitant to
7 end their professional association because she had worked so hard to build Mars
8 Argo, and the project was gaining notoriety.

9 8. In mid-2014, however, the abuse and manipulation from Mr. Mixer
10 became too much, and Ms. Sheets stopped making new content with him. Upon
11 losing Ms. Sheets, Mr. Mixer’s intimidation only intensified.

12 9. Finally, in late 2015, Ms. Sheets decided she had no option but to
13 leave Los Angeles, to try to protect herself from Mr. Mixer’s threats and
14 harassment.

15 10. Around the same time that Mr. Mixer had been actively harassing
16 Ms. Sheets, in November 2014, Mr. Mixer calculatedly transformed another
17 woman, Moriah Rose Pereira – known by the stage name “ThatPoppy” or
18 “Poppy” or “I’m Poppy” (collectively “Poppy”) – into a Mars Argo knockoff.

19 11. Although Poppy was a natural brunette, after meeting Mr. Mixer,
20 Ms. Pereira dyed her hair a specific platinum blonde and, in character as Poppy,
21 started to alter her voice to be a pitch higher to mimic Mars Argo’s distinctive
22 speaking voice.

23 12. Mr. Mixer and Ms. Pereira began to produce short segments on a
24 YouTube channel that were set against substantially similar backdrops and in a
25 deliberately similar format to the Mars Argo project.

26 13. From November 2014 to the present, through the Poppy project, Mr.
27 Mixer and Ms. Pereira as Poppy, deliberately copied Mars Argo’s identity,
28 likeness, expression of ideas, sound, style, and aesthetic in YouTube segments,

1 music videos, live performances, internet videos, and other performances or
2 shows. These actions constitute copyright infringement, a violation of Ms.
3 Sheets' right to publicity, and violation of the California Business and
4 Professions Code sections 17200 *et sequence*.

5 14. Moreover, by combining that infringement with a sinister campaign
6 of harassment, Mr. Mixer attempted to drive Ms. Sheets out of the
7 entertainment business – not only stealing her intellectual property but
8 appropriating her entire persona.

9 15. Like many women, Ms. Sheets has previously been afraid to come
10 forward with her story. She feared retribution and retaliation from Mr. Mixer,
11 including further public disparagement and renewed intimidation of professional
12 and personal acquaintances.

13 16. Ms. Sheets also continues to fear for her own personal safety, given
14 Mr. Mixer's violent, menacing, and unstable conduct following their break-up.

15 17. Ms. Sheets realizes, however, that the only way to gain freedom
16 from Mr. Mixer and to move forward both professionally and personally is to
17 hold him and his enablers accountable and seek protection from the Court.

18 18. This complaint seeks damages from Mr. Mixer both for his
19 personal abuse of Ms. Sheets, and from Mr. Mixer and from his company in
20 copying Mars Argo's identity, likeness, and expression of ideas as part of his
21 work with the artist Poppy, and for the blatant and willful infringement of Mars
22 Argo's copyright.

23 19. In addition, given Mr. Mixer's past history of abuse, Ms. Sheets is
24 simultaneously seeking a domestic violence restraining order against Mr. Mixer
25 in state court during the pendency of this litigation so Ms. Sheets is protected
26 from further retaliation and abuse as a result of this lawsuit.

27 20. Additionally, Ms. Sheets seeks damages from Ms. Pereira for being
28 a knowing accomplice to Mr. Mixer's unlawful actions in deliberately copying,

1 stealing, and appropriating Ms. Sheets' identity, style, aesthetic, likeness,
2 expression of ideas, content, and work as Mars Argo in her own work as Poppy.

3 **II. JURISDICTION AND VENUE**

4 21. This is an action for copyright infringement arising under the
5 Copyright Act of 1976, as amended, 17 U.S.C. § 101 *et seq.* The Court has
6 subject matter jurisdiction under 17 U.S.C. § 501 and 28 U.S.C. §§ 1331 and
7 1338(a). This Court also has supplemental jurisdiction over Plaintiff's claims
8 arising under state law under 28 U.S.C. § 1367, as those claims form part of the
9 same case or controversy.

10 22. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and
11 1400(a) because Defendants Mixter and Pereira reside in this District, may be
12 found in this District, and are subject to personal jurisdiction in this District.
13 Mr. Mixter and Ms. Pereira also have substantial and continuous ties to this
14 District.

15 23. This Court has personal jurisdiction over Defendant Mixter because,
16 among other things, (i) Corey Michael Mixter, aka Titanic Sinclair, transacts
17 business and works in this District, (ii) engaged in wrongdoing in this District;
18 and (iii) resides in this District.

19 24. This Court has personal jurisdiction over Defendant Pereira
20 because, among other things, (i) Moriah Rose Pereira, aka Poppy, transacts
21 business and works in this District, (ii) engaged in wrongdoing in this District;
22 and (iii) resides in this District.

23 **III. PARTIES**

24 25. The Plaintiff in this action is Brittany Alexandria Sheets an
25 individual, who is now and at various relevant times was a resident of Los
26 Angeles, California.

27 26. Plaintiff is informed and believes that Mr. Mixter is, and was at all
28 relevant times, an individual and resident of the County of Los Angeles, State of

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1 California. Defendant Corey Mixter goes by the professional name of Titanic
2 Sinclair, and describes himself on his website titanicsinclairbandcamp.com as “a
3 LA-based audio and visual artist” and on his website titanicsinclair.com as “a
4 director/writer living in LA.”

5 27. Defendant Titanic Sinclair Productions, Inc. is a California
6 corporation that filed articles of incorporation on or around April 10, 2017. A
7 December 5, 2017, State of California Statement of Information lists Defendant
8 Mixter as the Chief Executive Officer, Secretary, Chief Financial Officer, and
9 Director of the corporation. The corporation business type is “entertainment
10 services.”

11 28. Defendant Moriah Rose Pereira goes by the professional name
12 “Poppy” aka “ThatPoppy” aka “I’m Poppy.” Plaintiff is informed and believes
13 that Ms. Pereira is, and was at all relevant times, an individual and resident of
14 the County of Los Angeles, State of California.

15 29. Defendant I am Poppy, Inc. is a California corporation that filed
16 articles of incorporation on or around July 11, 2017. An August 21, 2017, State
17 of California Statement of Information lists Defendant Pereira as the Chief
18 Executive Officer, Secretary, Chief Financial Officer, and Director of the
19 corporation. The corporation business type is “entertainment services.”

20 **IV. BACKGROUND**

21 **A. Ms. Sheets and Mr. Mixter Began Mars Argo In 2009 And** 22 **Created Original Content for Mars Argo Until 2014**

23 30. Mars Argo is the alter ego of singer, actress, YouTube artist and
24 personality Brittany Sheets. It is also the name of the musical project between
25 Ms. Sheets and Corey Mixter, who is known by his alter ego, Titanic Sinclair
26 (“Titanic Sinclair” or “Mr. Mixter”). Ms. Sheets and Mr. Mixter began dating
27 in 2008. In 2009, Ms. Sheets and Mr. Mixter began making music in their
28 bedroom and released content on their YouTube channel called Grocerybag.tv.

1 All of the content on the channel was self-produced and consisted of short films,
2 music videos, and a show called “Computer Show.” The channel was active
3 from 2009 through 2015. Roughly 92 videos were released while still active.
4 The videos were an artistic social commentary on the internet, celebrity, and pop
5 culture, with a focus on the future and technology.

6 31. Throughout this time, Ms. Sheets created, developed, participated
7 in, and contributed to Mars Argo content, scripts, directing, lighting, framing,
8 filming, editing, motion graphics, color correction, hair/make-up, wardrobe,
9 styling, sound design, lyrical composition, and imaging and branding for Mars
10 Argo videos, songs, recordings and performances. Ms. Sheets’ photography
11 was largely responsible for the “look” of Mars Argo, and Mr. Mixter continues
12 to appropriate that work to this day.

13 32. In addition to her creative contributions, throughout their personal
14 and professional relationship, Mr. Mixter was essentially insolvent, relying on
15 constant financial support from Ms. Sheets and her family.

16 33. In late 2012/early 2013, Ms. Sheets and Mr. Mixter moved to Los
17 Angeles, and auditioned new members for their band to perform live shows in
18 addition to producing internet content. When they moved to Los Angeles,
19 Sheets and Mixter shared an apartment.

20 34. Around this time, in early 2013, Ms. Sheets and Mr. Mixter
21 received a loan from Ms. Sheets’ father, Don Sheets, to fund the Mars Argo
22 project. As part of the loan, Ms. Sheets, Don Sheets, and Mr. Mixter formed the
23 Mars Argo, LLC, a limited liability company in the state of Michigan, in which
24 Don Sheets became an 83.3% owner of Mars Argo, LLC, with Brittany Sheets
25 and Corey Mixter each respectively owning 8.3% of Mars Argo, LLC
26 (incorporated in April 2013). Mars Argo LLC also was incorporated in Los
27 Angeles in March 2013. The purpose of the Mars Argo, LLC was to develop
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1 the Mars Argo brand to generate revenue from a variety of sources, including
2 royalties, retail sales, licensing revenue and appearance fees.

3 35. Although the band Mars Argo grew in popularity during this time,
4 Ms. Sheets was enduring severe emotional and psychological abuse and
5 manipulation from Mr. Mixer. He constantly insulted her intellect and
6 denigrated and degraded her in public and in private.

7 36. He repeatedly told her that she was getting old and that she needed
8 him to be successful in her career. He created a sense that she was running out
9 of time and that her only solution was to finance the project and create content
10 for it. Unsurprisingly, a review of Mars Argo songs from the time shows that
11 many lyrics were related to the controlling nature of the relationship with Mr.
12 Mixer.

13 37. Ms. Sheets believes that Mr. Mixer deliberately sought to shatter
14 her self-confidence so that she would not pursue any individual creative
15 opportunities and would instead continue to support him both creatively and
16 financially.

17 38. If Ms. Sheets had an opportunity to collaborate on an outside
18 project, Mr. Mixer would belittle the opportunity and speak poorly of the
19 person or project, so that Ms. Sheets would, in turn, feel doubt or distrust. Mr.
20 Mixer would then advise her on how to respond to the opportunity or even take
21 it upon himself to draft a response for her to turn down the project.

22 39. Finally, in January 2014, after confronting Mr. Mixer about his
23 recurrent infidelity, Ms. Sheets ended the romantic relationship with Mr. Mixer,
24 and shortly thereafter asked him to move out of the apartment they shared.
25 However, they continued to work together professionally due to Mars Argo's
26 rising popularity and upcoming live shows the band had scheduled. They also
27 had recently shot the music video for the single "Using You" with a Grammy
28 Award nominee for producer of the year and were in the process of editing the

1 video.

2 40. Shortly thereafter, in February 2014, Mars Argo released “Delete
3 Your Facebook” on Grocerybag.tv.

4 41. During this time, the band Mars Argo continued to gain a cult
5 following, and in March 2014, Mars Argo performed three successful showcases
6 at the South by Southwest festival in Austin, Texas. Thereafter, Mars Argo
7 continued to perform shows, including at the Nerdmelt Theater in Los Angeles,
8 California.

9 42. Because of Mars Argo’s rising success, Ms. Sheets attempted to
10 maintain a working relationship with Mr. Mixer, but found it increasingly
11 difficult due to his emotionally-abusive, demeaning, and manipulative conduct.
12 This behavior by Mr. Mixer was witnessed by others including friends,
13 neighbors, and Mars Argo band members.

14 43. As a result, on May 31, 2014, Ms. Sheets and Mars Argo canceled
15 their first show at Belly of the Beast Blowout festival in Los Angeles,
16 California.

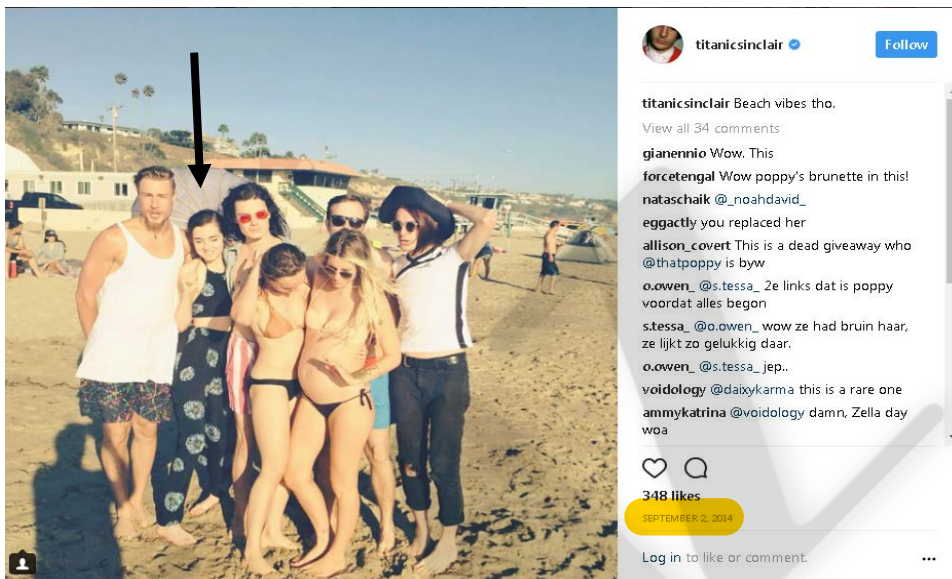
17 44. In June 2014, Ms. Sheets put the band on hiatus from rehearsals
18 and performances. Thereafter, Mr. Mixer’s abusive conduct only grew worse.

19 45. Around this time, Mr. Mixer began frequently breaking into Ms.
20 Sheets’ gated apartment building and would wait for her in the courtyard of the
21 building until she got home.

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1 46. Around the same time, in mid-2014, Mr. Mixer met Moriah Rose
2 Pereira, known by her stage name at the time "ThatPoppy" (now "Poppy"),
3 through a mutual friend. At the time, Poppy was a brunette with dark brown
4 hair.



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14 47. Ms. Sheets is informed and believes that Mr. Mixer and Ms.
15 Pereira began working together a few months after meeting, although Ms.
16 Sheets was unaware of it at the time.

17 48. Soon thereafter, Ms. Pereira began to sport a shorter blonde
18 hairstyle resembling that of Ms. Sheets at the time. Looking back on social
19 media comments, it appears Mars Argo fans immediately noticed:



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1 49. In August 2014, Ms. Sheets requested that Mr. Mixer not contact
2 her going forward. However, throughout August and September 2014, Mr.
3 Mixer continued to contact Ms. Sheets against her wishes, including sending a
4 text message threatening his own suicide. Mr. Mixer also continued to break
5 into Ms. Sheets' gated apartment complex to wait for her in the courtyard.

6 50. On one afternoon in September 2014, Ms. Sheets found Mr. Mixer
7 sitting in her courtyard and he seemed jittery. He demanded that she delete all
8 of the videos on their YouTube channel. His behavior and mannerisms
9 frightened Ms. Sheets, who immediately changed the passwords to the
10 Grocerybag.tv YouTube account to protect their work. Ms. Sheets had always
11 been the one responsible for monitoring and managing the account, so it was not
12 unusual for her to access the channel.

13 **B. Mr. Mixer Begins To Copy The Mars Argo Project With Poppy**
14 **And To Increasingly Threaten And Attack Ms. Sheets**

15 51. In November 2014, Mr. Mixer started releasing videos with
16 Poppy. The first video released was entitled "Poppy Eats Cotton Candy."
17 When Ms. Sheets originally met Poppy, she had short brown hair and looked
18 extremely different than how she appears today. Once Poppy began working
19 with Mr. Mixer, however, she started sporting a blonde bob and her natural
20 voice was altered in videos to be a pitch higher to sound like Mars Argo.

21 52. In addition to copying the look of Ms. Sheets, the aesthetic of the
22 Poppy videos also is similar to that of Mars Argo. Like Mars Argo, most Poppy
23 videos had a plain, white-hued backdrop, were framed like a portrait with the
24 main subject in the middle of the frame. Poppy would tilt her head to the
25 camera, and the videos had a colorful, childlike kawaii pop culture effect
26 (kawaii is the culture of cuteness in Japan). Both Mars Argo and Poppy are
27 often described as having a "doll-like" quality.
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1 53. Around the same time Mr. Mixter released his first work with
2 Poppy, on November 9, 2014, Mr. Mixter broke into Ms. Sheets apartment
3 through her bedroom window in the middle of the night. He was obviously
4 intoxicated or high on drugs. Ms. Sheets asked him to leave and go home. Ms.
5 Sheets photographed the broken window.



20 54. A few weeks later, Mr. Mixter broke into Ms. Sheets' apartment
21 when she was not home and went onto her computer to log into her Facebook
22 account and block new friends of hers. Ms. Sheets discovered this only later
23 when she tried to communicate with the blocked individuals.

24 55. Because Ms. Sheets had worked so hard to create the "Using You"
25 music video as Mars Argo, on January 13, 2015, she released the video. That
26 same day, Mr. Mixter also posted the video on his Instagram.
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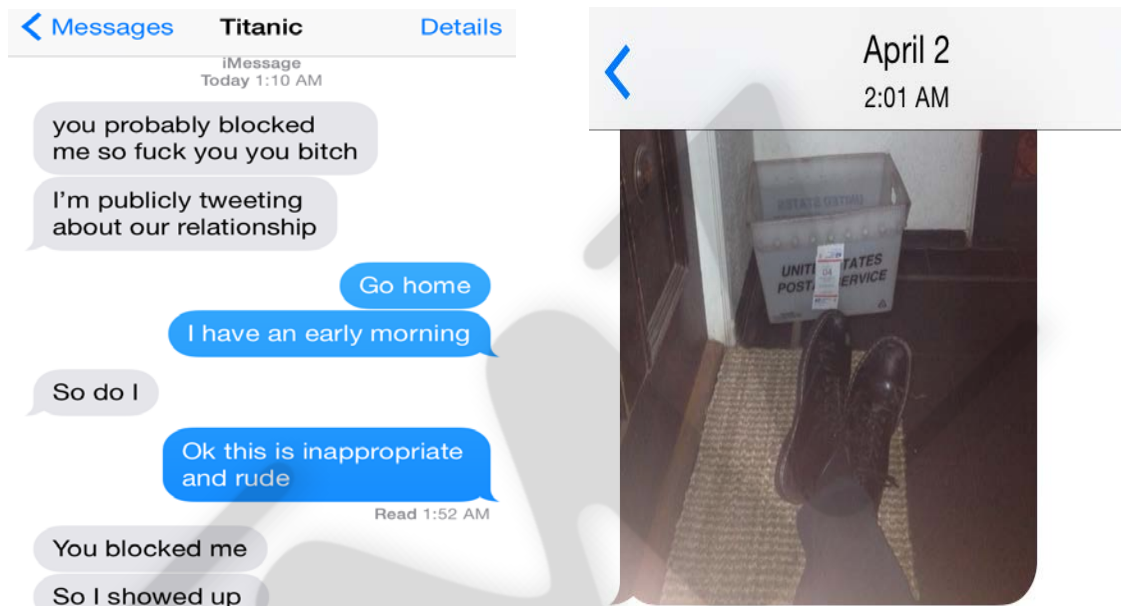
1 56. Shortly thereafter, Mr. Mixer once again broke into Ms. Sheets
2 apartment while seemingly intoxicated and began smashing her wine glasses
3 one by one. He said he was angry that Ms. Sheets had joined some Facebook
4 group and repeatedly asked her for the name of the group.



18 57. In addition to breaking into her home, Mr. Mixer continually
19 tracked Ms. Sheets social media postings, and would either contact her shortly
20 after she posted or thereafter post on his own social media and reference the
21 places or things she had discussed online. Ms. Sheets began to feel like Mr.
22 Mixer was monitoring her every move.

23 58. In March 2015, Mr. Mixer, aka Titanic Sinclair, began shooting
24 the music video for a song called “Trust Fund.” All of the lyrics of “Trust
25 Fund” are an obvious jab at Ms. Sheets and her family’s wealth. The song was
26 later released in May 2015. A copy of the lyrics to Trust Fund is attached hereto
27 as Exhibit A and incorporated by reference into the complaint.
28

59. On April 2, 2015, Mr. Mixer broke into Ms. Sheets' courtyard and texted her a picture of himself sitting outside her door on her door mat after midnight. The message was threatening and said "you probably blocked me so fuck you you bitch. I'm publicly tweeting about our relationship. . . . You blocked me. So I showed up."



60. During April 2015, Mr. Mixer sent another seemingly suicidal message to Ms. Sheets saying he wanted to see her one more time before "I go."

61. Thereafter, when Mr. Mixer learned of Ms. Sheets' plans to go into the studio to pursue a solo venture, he became violent. During the last week of April 2015, Mr. Mixer showed up unannounced and approached Ms. Sheets outside the gate to her home and viciously punched her in the face. He then followed her through the gate, through the courtyard, and to her apartment door. Ms. Sheets quickly ran inside her apartment, locked herself inside, and yelled for Mr. Mixer to leave. These actions terrified Ms. Sheets, but she was too afraid to report the incident to police, out of fear that Mr. Mixer would retaliate against her in even worse ways.

62. Shortly after the assault, in May 2015, Mr. Mixer took numerous actions aimed at isolating and intimidating Ms. Sheets, including but not limited

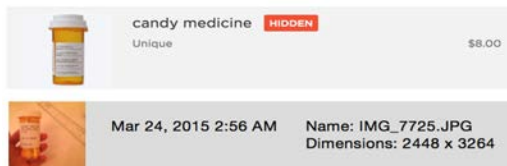
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1 to emailing and texting her disturbing messages, writing additional lyrics about
 2 her, copying her ideas and work as Mars Argo, and posting photos he knew she
 3 would recognize. If he could not work with her, he did not want anyone else to
 4 either.

5 63. Pursuant to his threat on April 2, 2015 to “tweet about [the]
 6 relationship” to their fans, on May 6, 2015, Mr. Mixer falsely publicly tweeted
 7 that he “wrote every word of every video” on Grocerybag.tv.

8 64. On May 7, 2015, Mr. Mixer posted a photo on Instagram about his
 9 “Trust Fund” single, which he released that day on his own website. The photo
 10 he posted on Instagram and the album cover for “Trust Fund” again blatantly
 11 copied a concept that Ms. Sheets had confidentially told Mr. Mixer while still
 12 working together. In March 2015, Ms. Sheets was working on merchandise for
 13 a solo music venture named “Guppy,” and one of the products that she created
 14 was heart shaped candy that comes in a prescription bottle. Mr. Mixer had seen
 15 Ms. Sheets’ photograph of the candy bottle and later copied it. In May 2015,
 16 Mr. Mixer specifically used a photograph of prescription bottles as his
 17 Instagram announcement of Trust Fund. In April 2015, another artist with
 18 whom Titanic Sinclair was working at the time, had a show and sold a
 19 prescription bottle candy. Later, Poppy too made videos and sold a prescription
 20 bottle of candy.



Mars Argo

Titanic Sinclair Copy

1 65. The same day he posted the Trust Fund Instagram photo, on May 7,
2 2015, Mr. Mixter, aka Titanic Sinclair, also released the song “Guppy” and
3 intentionally titled the track with the name of the new solo project that Ms.
4 Sheets had been working on before she had a chance to release her project.
5 Because of these actions, Ms. Sheets eventually decided to abandon her project.

6 66. The lyrics to the song “Guppy” by Mr. Mixter are another blatant
7 stab at Ms. Sheets and, among other things, reference her father’s money and
8 their relationship. A copy of the lyrics to the song “Guppy” are attached hereto
9 as Exhibit B to the complaint and incorporated by reference into the complaint.

10 67. On or around May 10, 2015, Poppy posted a photo taken by Mr.
11 Mixter, in which she is wearing Ms. Sheets’ jacket. Poppy now not only looked
12 and sounded like Mars Argo but was wearing her actual clothes.



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22 **Mars Argo**



23 **Poppy Copy**

24 68. Presumably seeking to manipulate Ms. Sheets into speaking with
25 him, on the following day, May 11, 2015, Mr. Mixter sent Ms. Sheets a text
26 about a potential drug overdose saying “Just took 11 oxy’s laterrrrr” followed by
27 gibberish. His text messages were erratic and frightening.

28 69. On May 14, 2015, Mr. Mixter then emailed a direct threat to Ms.
Sheets, saying: “You don’t even realize the hole you are digging yourself into.”

1 70. Throughout June 2015, Mr. Mixer continued to send threatening
2 emails to Ms. Sheets, along with demeaning and untrue messages about Ms.
3 Sheets to other people with whom she was in communication.

4 71. In September 2015, Mr. Mixer posted a creepy, distorted drawing
5 of Ms. Sheets' mother, Diane, to his Instagram, saying: "I drew my mom Diane
6 tonight. I miss my mom." Mr. Mixer's mother is not named Diane.



20 72. Finally, in December 2015, feeling not only harassed and in danger,
21 but that all of her creative output was being sourced for Mr. Mixer's projects
22 and the Poppy storyline, Ms. Sheets largely stopped posting online as Mars
23 Argo, including Instagram and Facebook, which had been her direct avenue to
24 communicate with her fans.

25 73. At this time, Ms. Sheets believed that the only way for her to avoid
26 Mr. Mixer was to hide her whereabouts from him, isolate herself from former
27 friends and acquaintances that Mr. Mixer kept in contact with, and essentially
28 "disappear" so that Mr. Mixer could no longer belittle, abuse, stalk, threaten,
harass, or find her.

1 74. Despite Ms. Sheets' absence, Mr. Mixer continued to demean Ms.
2 Sheets on social media throughout 2016 and 2017, including the following
3 untrue, false, and derogatory statements:

- 4 • calling Ms. Sheets a "complete nutcase"
- 5 • saying Ms. Sheets "gave up"
- 6 • claiming that "he designed everything and wrote/produced
7 songs" relating to Mars Argo
- 8 • calling Ms. Sheets "evil"
- 9 • stating "how does it feel knowing I wrote every word you've
10 ever heard her say"
- 11 • claiming "she [Ms. Sheets] wrote about ten percent of the
12 words, I wrote all the music"
- 13 • describing Ms. Sheets as "a spoiled rich kid who quit because
14 success was too much work"
- 15 • claiming he "invented" Mars Argo
- 16 • claiming "none of the songs were her original composition"
17 and
- 18 • calling Ms. Sheets "a compulsive liar."

19 75. As a result of Mr. Mixer's actions, Ms. Sheets has been diagnosed
20 with post-traumatic stress disorder, for which she has received regular treatment.

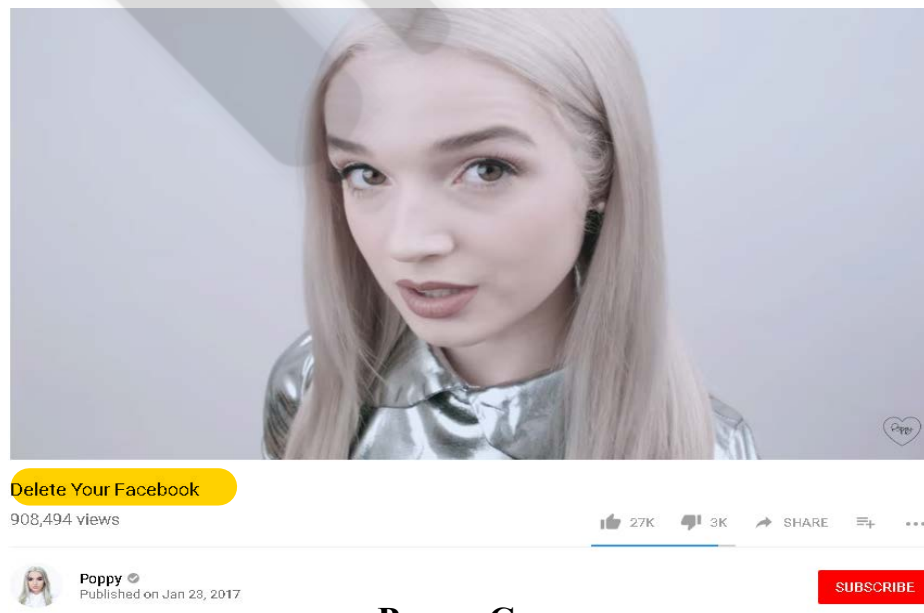
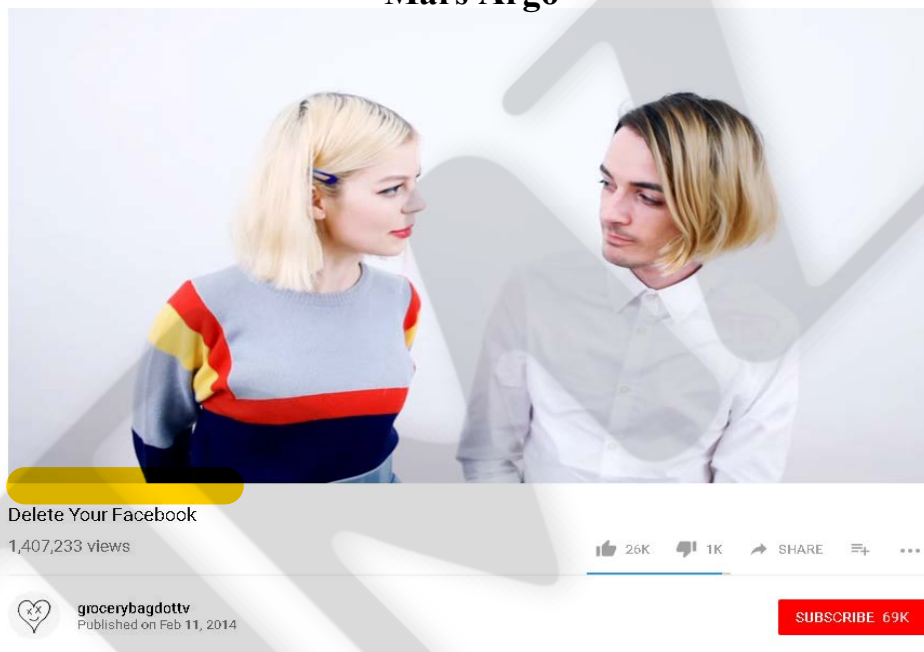
21 **C. As Poppy Grows In Popularity, Numerous Fans And**
22 **Commentators Note Substantial Similarities To Mars Argo**

23 76. When the Mars Argo project ended, Mr. Mixer transformed Poppy
24 into a new Mars Argo, and directly copied the content, style, aesthetic, sound,
25 and expression of ideas of Ms. Sheets. Ms. Sheets is informed and believes that
26 Mr. Mixer wanted to displace Mars Argo with Poppy. Just like Mars Argo,
27 constant themes of Poppy related to the internet, celebrity, and pop culture, with
28 a focus on the future and technology.

1 77. Over the years, many followers of both Mars Argo and Poppy have
2 publicly commented on how Poppy is copying Mars Argo. One typical
3 comment refers to Poppy as a “complete copycat.”

4 78. For example, on or around February 11, 2014, Mars Argo released
5 the “Delete Your Facebook” video on Grocerybag.tv YouTube Channel. On or
6 around January 23, 2017, Poppy uploaded a video with the same title “Delete
7 Your Facebook” and released it onto her YouTube channel.

8 **Mars Argo**



Poppy Copy

1 79. In April 2014, Ms. Sheets began studying Japanese language at the
2 Fuji School in downtown Los Angeles. Later, in 2015, Ms. Sheets stopped
3 attending when Mr. Mixter and Ms. Pereira became students there as well.

4 80. In July 2015, Ms. Sheets modeled for the brand called “Little
5 Sunny Bite” based out of Tokyo, Japan. The work was published in Nylon
6 Japan magazine and in promotional materials for the brand.



16 **Mars Argo**



17 **Poppy Copy**

18 81. On the left is a photograph of Ms. Sheets wearing a blue skirt by
19 the brand and a long sleeve white button-down shirt. On the right is a
20 photograph of Poppy largely copying this same look, wearing a blue skirt with a
21 long sleeve white button-down shirt.

22 82. Not so coincidentally, in mid- to late-2017, Poppy worked with the
23 Little Sunny Bite brand. Similarly, Mars Argo would regularly wear Sanrio®
24 Hello Kitty items in her videos. Later, Poppy became the face of Sanrio® Hello
25 Kitty in 2017.
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1 83. On or around August 27, 2015, Poppy performed at Island Records
2 Island Life NYC with Mr. Mixer and visually copied Mars Argo’s look,
3 including wearing angel wings.

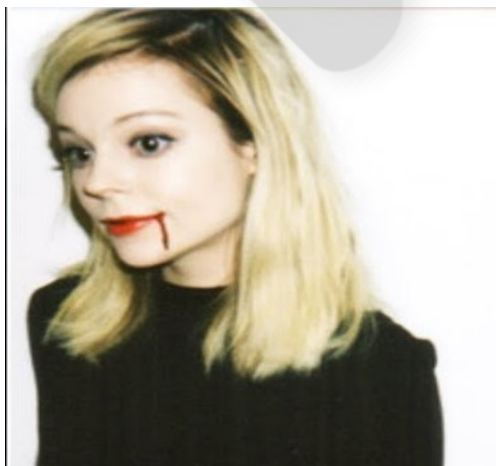


14 **Mars Argo**



15 **Poppy Copy**

16 84. A 2016 Poppy YouTube video also directly copied a Mars Argo
17 photograph in which Mars Argo had blood dripping out of her mouth. As Mars
18 Argo, Ms. Sheets had also previously created a video in which she had blood
19 pouring out of her mouth.



28 **Mars Argo**



Poppy Copy

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Mars Argo



Poppy Copy

87. Poppy has further copied Mars Argo’s use of the curtsy while wearing all white presumably as a commentary on innocence and propriety.



Mars Argo



Poppy Copy

88. There are numerous other examples of Titanic Sinclair’s and Poppy’s use of Mars Argo’s prior work, ideas, aesthetic, and style.

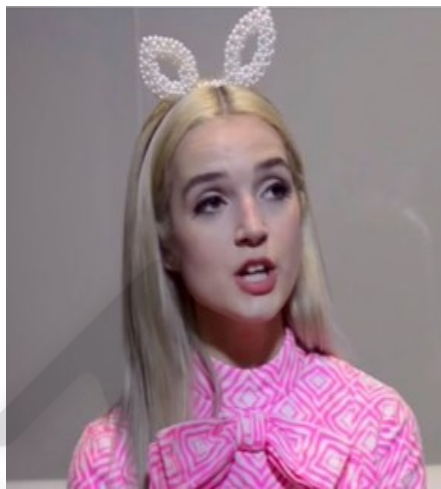
89. In 2013 and 2014, Mars Argo often dressed in a bunny costume or wore a bunny ears headband during segments. In 2016, Poppy similarly both

1 wore a bunny ears headband during one YouTube segment, and dressed in a
2 bunny-like costume in another.



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Mars Argo



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Poppy Copy

14 90. Poppy even did one YouTube segment where she blows up the very
15 same (or if not same identical) inflatable plastic white bunny that Ms. Sheets
16 purchased and used as a prop in her own Mars Argo YouTube videos.

17 91. After a blonde Mars Argo uploaded a YouTube segment of her in a
18 light-colored bathtub filled with bubble bath set against a baby pink backdrop, a
19 blonde “That Poppy” later released an EP on Island Records entitled
20 “Bubblebath,” in which she is in a light-colored bathtub set against a baby pink
21 backdrop.



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Mars Argo



Poppy Copy

1 92. Poppy's copying of Mars Argo continued in February 2017, when
 2 Poppy posted a YouTube segment that reproduced a prior Mars Argo YouTube
 3 video. The Poppy video features Poppy holding up a large bag of brand-name
 4 potato chips and other commercial products and tasting them while looking
 5 directly at the camera. The concept, action, line delivery, and editing style
 6 employed in this video were virtually identical to a Mars Argo segment posted
 7 on the Grocerybag.tv channel in August 2013.



14 **Mars Argo**



15 **Poppy Copy**

16 93. Poppy's imitations of Mars Argo went so far as to even copy Mars
 17 Argo's unique style of make-up, such as shown in the photo below, in which
 18 Ms. Sheets would wear white eye-liner on her waterline and a distinctive blue
 19 eye-liner directly beneath her lower lashes. On the left is Mars Argo, and on the
 20 right is Poppy.



25 **Mars Argo**



26 **Poppy Copy**

27 94. Notably, the name of the original Mars Argo project on its
 28 YouTube channel was the "Computer Show" and Poppy's debut album and tour
 were entitled "Poppy.Computer."

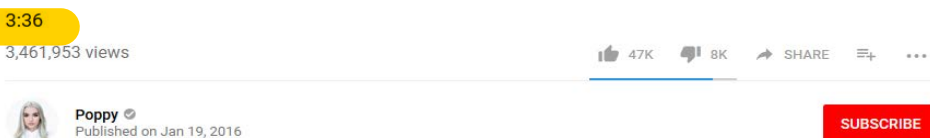
1 95. Taken together, each of these instances – and there are *many* others
2 – cannot be dismissed as mere coincidence; they show a clear, repeated and
3 willful pattern of copying and stealing Ms. Sheets’ work, content, identity, style,
4 aesthetic, likeness, and expression of ideas as Mars Argo.

5 96. In fact, the two projects are so similar, that in August 2016, a
6 potential music manager that Ms. Sheets was interested in working with pulled
7 up the Poppy “Lowlife” music video during a meeting with Ms. Sheets, thinking
8 it was Ms. Sheets in the video.

9 97. To add to the confusion to fans about whether the Poppy project
10 was a continuation of Mars Argo, on November 8, 2016, a friend of Mr.
11 Mixer’s uploaded a video entitled “Everybody Wants It All” (a private video
12 Ms. Sheets made as Mars Argo in 2013) to YouTube without Ms. Sheets’
13 knowledge or consent. The video had been made for a provocative art event in
14 downtown Detroit in 2013, and was never intended by Ms. Sheets to be put
15 online, especially not in 2016 when there were so many questions surrounding
16 Mars Argo’s absence from the internet. Upon learning that the video had been
17 posted, Ms. Sheets immediately sent an email to the individual who posted it,
18 requesting that he remove it immediately. The request was ignored. Thereafter,
19 Ms. Sheets filed a privacy complaint via YouTube.

20 98. Because Mars Argo has a gun in this video and puts it up to her
21 head, many fans speculated that the video showed that Mars Argo was dead and
22 replaced by Poppy, or that Mars Argo was working with Poppy and Poppy was
23 the continuation of the Mars Argo project. On information and belief, Mr.
24 Mixer, through his friend, purposely posted the video online to link Mars Argo
25 to the Poppy project and/or to wrongly imply that Mars Argo chose to end her
26 character so that Poppy could continue it. Ms. Sheets, of course, never
27 consented to Poppy appropriating her persona or stealing her intellectual
28 property.

1 99. Since the nonconsensual release of the “Everybody Wants It All”
2 video, Ms. Sheets further is informed and believes that Mr. Mixer and Ms.
3 Pereira purposely have used the disappearance of Mars Argo to their benefit by
4 making subtle references to Mars Argo in Poppy projects. The Mars Argo
5 “Everybody Wants It All” video was exactly 3:36 long. Poppy then directly
6 referenced 3:36 in her own work several times:



1 100. Part of what has made Poppy so successful is the mystery
2 surrounding her. That mystery would not be possible without Mars Argo’s
3 disappearance.

4 101. In November 2016, an article was published in the Odyssey online
5 discussing Titanic Sinclair, Mars Argo, and Poppy, and commenting on how
6 Poppy is a carbon copy of Mars Argo: “That Poppy seems to be the
7 continuation of his project with Mars Argo, as both she and That Poppy have a
8 bubblegum pop sound full of catchy hooks and choruses. They have similar
9 aesthetics and are both young, pretty, and blonde-the perceived American ideal.
10 **They are carbon copies of each other.**” (emphasis added).

11 102. In January 2017, Vice published an article about Poppy in which
12 the reporter commented that: “It seems as though Poppy’s character is directly
13 based on the character of Mars Argo.”

14 103. A few days later, the publication Noisey also released an article
15 speculating about the relationship between Mars Argo and Poppy.

16 104. In January 2017, Poppy released a show on Comedy Central called,
17 “Internet Famous with Poppy.” The show shares a striking visual resemblance
18 to Mars Argo, which fans pointed out in comments online. Poppy imitates Mars
19 Argo in the videos by saying variations of lines Mars Argo has said in Computer
20 Show episodes in the past.



28 **Mars Argo**



Poppy Copy

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2 105. In January 2017, the publication Motherboard posted an article
3 about Poppy, which discussed the origin of Poppy and noted the “striking
4 resemblance” to Mars Argo: “Starting in the late 2000s, Sinclair hosted a
5 YouTube series called ‘The Computer Show’ along with a woman known as
6 Mars Argo. Most of the videos from the YouTube account that hosted this show
7 have since been deleted, but the ones that remain bear **a striking resemblance**
8 to the videos on Poppy’s YouTube channel. In fact, it seems as though **Poppy’s**
9 **character is directly based on the character of Mars Argo. . . .**” (emphasis
10 added). The author noted that during the email interview Poppy “made a point
11 of not answering any questions about her relationship to Mars Argo.”

12 106. In March 2017, the publication LogoMag released an article that
13 similarly talks about Poppy imitating Mars Argo, stating: “**Poppy both**
14 **physically appears and acts in a similar manner to Mars Argo.**” (emphasis
15 added).

16 107. On June 4, 2017, a Wired Magazine article stated: “Though Titanic
17 says the two projects are unrelated, the timing of his first collaboration with
18 Poppy and the crossover in themes has caused some fans to speculate that Poppy
19 is a continuation of the Mars project. (Or that Poppy stole Mars’ material or, in
20 an even more out-there theory, that Poppy is Mars.)”

21 108. On January 24, 2018, a Refinery29 article about Poppy commented
22 that before Poppy was Mars Argo, and described Mars Argo as a “Poppy
23 prototype,” adding “**it’s certainly not hard to see the similarities between the**
24 **two musical projects.**” (emphasis added).

25 109. On March 5, 2018, thecut.com posted an article about Poppy
26 entitled “Poppy might just be the Warhol of the internet era,” which similarly
27 commented that Mars Argo, whom Titanic Sinclair worked with prior to Poppy
28 was a “Poppy prototype.”

1 110. Recently, beginning in 2017, at public Poppy performances,
2 individuals in the audience have begun yelling “Where’s Mars Argo?” The
3 portions of concerts when fans yell “Where’s Mars Argo?” have been reposted
4 on YouTube multiple times by fans. At one Poppy.Computer Tour show,
5 during the 3:36 interlude, a fan shouted “Where’s Mars Argo?” and Poppy
6 responded, “Should we end this show early? Your choice.”

7 111. Instagram accounts such as “thatargosinclair” available at
8 <https://www.instagram.com/thatargosinclair/> similarly link Titanic Sinclair,
9 Mars Argo, and Poppy together as a unit. The account includes older pictures of
10 Ms. Pereira before her transformation into the Mars Argo clone, Poppy.

11 112. Ms. Sheets expects that Mr. Mixer will claim that he was the
12 creative force behind Mars Argo, or that she was not a joint contributor.
13 However, that is simply untrue. Just the opposite. To this day, Mr. Mixer as
14 Titanic Sinclair is directly copying Ms. Sheets’ photography.

15 113. For example, on the left is a photograph that Ms. Sheets styled,
16 composed, and shot of Mr. Mixer in 2010 and on the right is a photograph of
17 Poppy in which Poppy is shot and composed in the same manner.



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Mars Argo



Poppy Copy

1 114. Similarly, on the right is a 2012 photograph Ms. Sheets took of Mr.
2 Mixer wearing a white bodysuit that Ms. Sheets purchased and styled him in
3 against a plain white backdrop; on the left is a photograph of Poppy in her
4 “Lowlife” music video, which was directed by Mr. Mixer, aka Titanic Sinclair,
5 using a virtually identical white bodysuit against a plain white backdrop.



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Mars Argo



Poppy Copy

23 115. Similarly, Ms. Sheets shot and styled photographs, such as the one
24 below, that Mr. Mixer continues to use on his websites to this day.



116. To this day, Poppy continues to work with Mr. Mixer and they
continue to copy Mars Argo’s work, content, identity, expression of ideas, and
likeness as part of the Poppy project and performances.

117. Neither Mr. Mixer nor Ms. Pereira have requested permission from
Ms. Sheets to use any portion of Ms. Sheets’ prior work, content, identity,
expression of ideas, or likeness as Mars Argo.

1 Ms. Sheets to use any portion of Ms. Sheets' prior work, content, identity,
2 expression of ideas, or likeness as Mars Argo.

3 118. And, Ms. Sheets has never consented to Mr. Mixter or Ms. Pereira
4 using her prior work, content, identity, expression of ideas, or likeness as part of
5 the Poppy project.

6 119. On information and belief, Mr. Mixter and Ms. Pereira know that
7 they are infringing and copying Mars Argo work as evidenced by the fact that
8 Poppy's YouTube channel purposely blocks the use of the words "Mars Argo"
9 in the comments section.

10 120. On information and belief, both Mr. Mixter and Ms. Pereira have
11 received profits from the marketing, promotion and sale of merchandise,
12 performances, tickets to concerts, music sales, and YouTube revenue as a result
13 of their infringement and imitation of Ms. Sheets' work.

14 **COUNT I**

15 **(Copyright Infringement)**

16 **(17 U.S.C. §§ 106 and 501)**

17 **(All Defendants)**

18 121. Plaintiff incorporates herein by reference the preceding paragraphs
19 of this Complaint as though fully set forth herein.

20 122. Plaintiff is an actress and musical artist known by the alter ego and
21 stage name Mars Argo. Between 2009 and 2014, Plaintiff created original
22 content and performed as Mars Argo with Defendant Corey Mixter, aka Titanic
23 Sinclair.

24 123. Ms. Sheets and Mr. Mixter, aka Mars Argo and Titanic Sinclair,
25 hold three joint copyrights for authorship in sound recording, performance,
26 production, music and lyrics, relating to the "Linden Place EP" (compact disc
27 and print material), the "Love in Black and White EP" (compact disc and print
28

1 material), and “Technology is a Dead Bird EP” (compact disc and printed
2 lyrics).

3 124. As evidenced by these copyrights, Ms. Sheets made substantial and
4 valuable contributions to the Mars Argo project. Ms. Sheets’ contributions to
5 Mars Argo videos, songs, recordings and performances included: photography,
6 writing original content and scripts, improvisation, directing, lighting, framing,
7 filming, editing, motion graphics, color correction, hair/make-up, wardrobe,
8 styling, sound design, lyrical composition, imaging and branding. Ms. Sheets
9 photography also contributed to the overall look and feel of Mars Argo.

10 125. In addition the three copyrights, Mars Argo also published a variety
11 of content online in YouTube videos and segments in fixed, tangible medium.
12 Ms. Sheets and Mr. Mixter have previously publicly stated that Mars Argo was
13 a shared project.

14 126. As a copyright owner, Ms. Sheets is entitled to exclude others from
15 creating work based on Mars Argo’s copyrighted work.

16 127. In November 2014, Mr. Mixter, as Titanic Sinclair, began releasing
17 content with Moriah Pereira as the musical artist “That Poppy” also known as
18 “Poppy” or “I’m Poppy” (“Poppy”). The YouTube videos and other content
19 created by Titanic Sinclair and Poppy are substantially similar in the total
20 concept and feel of the works to the YouTube videos and other content created
21 by Titanic Sinclair and Mars Argo. Since November 2014, Titanic Sinclair and
22 Poppy have released numerous such videos.

23 128. Mr. Mixter has never requested permission from Ms. Sheets to
24 allow him to copy, imitate, or use any portion of Mars Argo’s character, work,
25 or content as part of his work with Poppy. Ms. Pereira also has not requested
26 permission to copy, imitate, or use any portion of Mars Argo’s character, work,
27 or content as Mars Argo in her work as Poppy.
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1 129. Mr. Mixer, aka Titanic Sinclair, as the director of Poppy videos,
2 performances, songs, and recordings has directly benefitted financially from the
3 infringing activity. As director, Mr. Mixer had the right and ability to avoid
4 infringing activity, but chose to directly copy the material, content, and
5 expression of ideas of Mars Argo instead of creating original content with
6 Poppy. Indeed, because Mr. Mixer worked closely with Ms. Sheets for almost
7 eight years, Mr. Mixer had access to and knowledge of her copyrighted work.
8 Mr. Mixer's work with Poppy is substantially similar to that of Mars Argo.

9 130. Ms. Pereira also had access to Ms. Sheets' work, both through the
10 internet and her close relationship with Mr. Mixer, and Ms. Pereira had met Ms.
11 Sheets in person on several occasions. Ms. Pereira was very aware of who Ms.
12 Sheets is and her character, work, aesthetic, and style as Mars Argo. Indeed, as
13 illustrated by the many news articles above, Ms. Pereira knows that Mars Argo
14 is typically referenced alongside her whenever Poppy is discussed, and that fans
15 still call out for Mars Argo at Poppy performances. Ms. Pereira cannot claim
16 ignorance.

17 131. On information and belief, Ms. Pereira seeks to block the name
18 "Mars Argo" from appearing in her social media comments on her social media
19 accounts so that she can avoid references or comparisons to Ms. Sheets, aka
20 Mars Argo. Instead of building her own independent career, Ms. Pereira has
21 simply copied what Ms. Sheets worked so hard to create.

22 132. As a joint owner of the Mars Argo project, Ms. Sheets is entitled to
23 her shares of profits attributable to the infringing activity of Corey Mixer, aka
24 Titanic Sinclair, and Moriah Pereira, aka Poppy, relating to Poppy projects, in
25 an amount to be proven at trial. 17 U.S. Code § 504(b). Ms. Sheets also
26 reserves the right to elect to recover statutory damages for infringing activity of
27 Mr. Mixer and Ms. Pereira pursuant to 17 U.S. Code § 504(c) and 17 U.S. Code
28 § 504(c)(2), and all other relief allowed under the Copyright Act.

1 133. Ms. Sheets further is entitled to her attorney's fees and full costs
2 pursuant to 17 U.S.C. § 505 and otherwise according to law.

3 134. Mr. Mixter's and Ms. Pereira's copyright infringement of Mars
4 Argo was willful. Mr. Mixter and Ms. Pereira knew that they did not have
5 permission to use any part of Ms. Sheets' copyrighted work, yet they
6 substantially copied, imitated, and used Mars Argo's copyrighted content as part
7 of the Poppy project.

8 **COUNT II**
9 **(Common Law Right To Publicity)**
10 **(All Defendants)**

11 135. Plaintiff incorporates herein by reference the preceding paragraphs
12 of this Complaint as though fully set forth herein.

13 136. Defendants Mr. Mixter and Ms. Pereira have copied, imitated,
14 mimicked, or otherwise used Plaintiff's identity and likeness as Mars Argo as
15 part of their work in videos, projects and performances involving the artist
16 Poppy.

17 137. Defendants Mr. Mixter and Ms. Pereira appropriated Plaintiff's
18 identity as Mars Argo to their advantage, including for commercial purposes,
19 and have profited as a result.

20 138. Neither Defendants Mr. Mixter nor Ms. Pereira have requested
21 permission from Ms. Sheets to use Ms. Sheets' identity or likeness as Mars
22 Argo.

23 139. Plaintiff has never consented to the use of her identity or likeness
24 as Mars Argo by Mr. Mixter or Ms. Pereira.

25 140. As a direct and proximate result of the tortious, unlawful, and
26 wrongful acts and conduct of Defendants, Plaintiff has suffered past and future
27 special damages and past and future general damages in an amount according to
28 proof at trial. Plaintiff has been damaged emotionally and financially, including

1 but not limited to suffering from fear, anxiety, depression, emotional distress,
2 post-traumatic stress disorder, as well as loss of income, employment, and
3 career benefits.

4 **COUNT III**

5 **(Violation of California’s Unfair Business Laws)**

6 **(Cal. Bus. & Prof. Code §§17200 *et seq.*)**

7 **(All Defendants)**

8 141. Plaintiff incorporates herein by reference the preceding paragraphs
9 of this Complaint as though fully set forth herein.

10 142. California Business and Professions Code section 17200 provides
11 that unfair competition shall mean and include “all unlawful, unfair or
12 fraudulent business act or practices and unfair, deceptive, untrue or misleading
13 advertising.”

14 143. Defendants’ conduct as described above constitutes unlawful,
15 unfair, and fraudulent competition in violation of California Business and
16 Professions Code sections 17200 *et seq.*

17 144. As a direct and proximate result of the tortious, unlawful, and
18 wrongful acts and conduct of Defendants Mixter and Pereira, Plaintiff has
19 suffered past and future special damages and past and future general damages in
20 an amount according to proof at trial. Plaintiff has been damaged emotionally
21 and financially, including but not limited to suffering from anxiety, depression,
22 emotional distress, post-traumatic stress disorder, as well as loss of income,
23 employment, and career benefits.

24 **COUNT IV**

25 **(Domestic Violence Damages)**

26 **(Cal. Code Proc. §340.15)**

27 **(Against Defendant Mixter)**

28 145. Plaintiff incorporates herein by reference paragraphs 1 through 9, 15

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1 through 17, 19, and 35 through 75 of this Complaint as though fully set forth
2 herein.

3 146. Plaintiff is the former girlfriend of Defendant Mixter and the two
4 had a dating relationship between 2008 and 2014.

5 147. Plaintiff and Defendant Mixter also were formerly cohabitants who
6 resided together in Chicago and Los Angeles.

7 148. During and after their relationship, Defendant Mixter emotionally,
8 physically, and psychologically abused Plaintiff, including breaking into Ms.
9 Sheets' apartment, breaking her possessions, and assaulting Ms. Sheets
10 physically. For example, in April 2015, Defendant Mixter waited at Ms. Sheets'
11 apartment complex gate for her to come home and then punched her in the face
12 once she arrived. Ms. Sheets was intimidated by Mr. Mixter and did not make a
13 police report at the time because she was afraid that he would retaliate against
14 her and the abuse would worsen. She feared retribution.

15 149. Plaintiff now seeks the recovery of damages suffered as a result of
16 the domestic violence.

17 150. As a direct and proximate result of the tortious, unlawful, and
18 wrongful acts and conduct of Defendant Mixter, Plaintiff has suffered past and
19 future special damages and past and future general damages in an amount
20 according to proof at trial. Plaintiff has been damaged emotionally and
21 financially, including but not limited to suffering from fear, anxiety, depression,
22 emotional distress, post-traumatic stress disorder, as well as loss of income,
23 employment, and career benefits.

24 151. In engaging in the conduct as herein above alleged, Defendant
25 Mixter acted with malice, fraud, and oppression and/or in conscious disregard of
26 Plaintiff's health, rights, and well-being, and intended to subject Plaintiff to
27 unjust hardship, thereby warranting an assessment of punitive damages in an
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1 amount sufficient to punish Defendant Mixter and deter others from engaging in
2 similar conduct.

3 **PRAYER FOR RELIEF**

4 WHEREFORE, Plaintiff prays for judgment against Defendants as
5 follows:

6 A. For general and special damages in an amount to be determined at
7 trial, including future damages, that Ms. Sheets has sustained or will sustain as a
8 result of the acts complained of herein, and that Ms. Sheets be awarded any
9 profits derived by Mr. Mixter and his companies or Ms. Pereira and her
10 companies, as a result of said acts, or as determined by said accounting;

11 B. For an accounting of, and the imposition of a constructive trust with
12 respect to Defendants' work with and as Poppy attributable to infringement of
13 Plaintiff's copyright, or in Plaintiff's election, an award of statutory damages,
14 including statutory damages for willful infringement; and

15 C. For pre- and post-judgment interest according to proof;

16 D. For punitive and exemplary damages;

17 E. For costs of suit including reasonable attorney's fees and statutory
18 fees, as allowed by law;

19 For all other further relief as the Court deems just and proper.
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Spertus, Landes & Umhofer, LLP

JURY TRIAL DEMAND

Plaintiff hereby demands a trial by jury on all issues so triable.

DATED: April 17, 2018

Respectfully submitted,

/s/ Matthew Donald Umhofer

Matthew Donald Umhofer

Dolly K. Hansen

Spertus, Landes & Umhofer, LLP

Attorneys for Brittany Alexandria Sheets

Spertus, Landes & Umhofer, LLP

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EXHIBIT A

“Trust Fund” Song Lyrics

Oh where, oh where is my trust fund?
Why can't I get ahead?
'Cause I have to work
My daddy's such a jerk
For not giving me all his cash

There's something I can't get off my mind
This happens to me every time I get high
I want to know what it's like to be a regular guy
With a brother and a sister and mom
And a father and we all get along
And we pick money off our family tree
And spend it all happily

Oh where, oh where is my trust fund?
Why can't I get ahead?
'Cause I have to work
My daddy's such a jerk
For not giving me all his cash

There's something I try hard to forget
It fills my little heart with regret
I can't lie
It's when I tried to pretend that I was a good friend
But I always seem to fuck it all up
When there's no more whiskey left in my cup
I guess I'll stop and I'll think
And pour myself a new drink

Oh where, oh where is my trust fund?
Why can't I get ahead?
'Cause I have to work
My daddy's such a jerk
For not giving me all his cash

Oh where, oh where is my trust fund?
Why can't I get ahead?
'Cause I have to work
My daddy's such a jerk
For not giving me all his cash

EXHIBIT B

“Guppy” Song Lyrics

I hope you're having fun in your hotel
I hope you're having fun with my friends
Because we both know that you needed a vacation
In la la land

You've been working so fucking hard
Yeah, you probably wanted a break
You spent a year doing nothing
Now you're in New York on holiday

And we both know that you earned it
Your life is so fucking hard
I know it must be so stressful
On your father's credit card

All I ever wanted to do was to love you
And to need me the same way I needed you

Do you still think I'm a loser?
Because I think you are too
It must be weird being twenty seven years old
Without a clue

But maybe you'll figure it out
I thought you might eight years ago too
I guess I'm back where I started
Before I fell in love with you

All I ever wanted to do was to love you
And to need me the same way I needed you
All I ever wanted to do was to love you
And to need me the same way I needed you
All I ever wanted to do was to love you
And to need me the same way I needed you

Complaints and Other Initiating Documents

[2:18-cv-03204 Sheets v. Mixter et al](#)

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

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Document Number: [1](#)

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