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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHRONICLE BOOKS, LLC; HACHETTE BOOK  
GROUP, INC.; HARPERCOLLINS PUBLISHERS  
LLC; MACMILLAN PUBLISHING GROUP, LLC;  
PENGUIN RANDOM HOUSE LLC;  
SCHOLASTIC INC.; AND SIMON & SCHUSTER,  
INC.

Plaintiffs,

- against -

AUDIBLE, INC.

Defendant.

Case No. \_\_\_\_\_

ECF Case

**COMPLAINT**

Plaintiffs Chronicle Books, LLC (“Chronicle”), Hachette Book Group, Inc. (“Hachette”), HarperCollins Publishers LLC (“HarperCollins”), Macmillan Publishing Group, LLC. (“Macmillan”), Penguin Random House LLC (“PRH”), Scholastic Inc. (“Scholastic”), and Simon & Schuster, Inc. (“S&S”) (collectively, “Publishers” or “Plaintiffs”), by and through their attorneys, Kirkland & Ellis LLP, for their Complaint, hereby allege against Defendant Audible, Inc. (“Audible”) as follows.

## NATURE OF THE ACTION

1. Audible, Inc. unilaterally—without permission from or any notice to Publishers—has decided to introduce a new, unauthorized, feature for its mobile application called, “Audible Captions.” Audible Captions takes Publishers’ proprietary audiobooks, converts the narration into unauthorized text, and distributes the *entire* text of these “new” digital books to Audible’s customers. Audible’s actions—taking copyrighted works and repurposing them for its own benefit without permission—are the kind of quintessential infringement that the Copyright Act directly forbids.

2. All of the Publishers are member companies of the Association of American Publishers, the mission of which is to be the voice of American publishing on matters of law and public policy. Plaintiffs are seven of the world’s preeminent publishers, and the exclusive publishers and licensees of tens of thousands of the world’s most sought after authors and books. Plaintiffs have collectively spent hundreds of years cultivating well-established sales, licensing and other distribution channels through which books are provided in different formats, e.g., print books, eBooks, and audiobooks, resulting in a vibrant marketplace, of books and ways to consume them. They have been able to do so because of the protections of the Copyright Act and its aim “[t]o promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries.”

3. Despite these protections, and despite not holding the rights necessary to do so, Audible seeks to seize for itself a competitive advantage against other audiobook providers who are not violating copyright law, and to cut Publishers out from a business model that already exists, by unlawfully creating derivative works of, reproducing, distributing, and publicly

displaying unauthorized copies of the Works.<sup>1</sup> Audible did not seek a license for the creation and provision of the transcriptions provided to consumers (the “Distributed Text”), does not plan to compensate Publishers or their authors for this feature, nor will it allow them to decide what titles will be made available as Distributed Text. Moreover, Audible Captions does not maintain the quality control that readers have come to expect from Publishers and authors. Indeed, Audible has admitted to Publishers that up to 6% of the Distributed Text may contain transcription errors, the equivalent of 18 full pages of a 300-page book (6,000 errors in a 100,000 word book). And, critically, Audible Captions could directly compete with both books (physical and eBooks) and authorized cross-format (incorporating both text and audio) products, the latter which benefit consumers by not relying on faulty transcription technology and for which Publishers and authors are compensated.

4. If Audible is not enjoined, Audible will take for itself a format of digital distribution it is not authorized to provide, devalue the market for cross-format products, and harm Publishers, authors, and the consumers who enjoy and rely on books. To avoid these results, Publishers asked Audible not to launch the Distributed Text with Publishers’ Works and suggested that Audible limit the Distributed Text to works in the public domain. Audible rebuffed those good faith attempts at resolution and, upon information and belief, intends to launch its new feature on September 10, 2019—a few weeks from now. Accordingly, due to Audible’s refusal to cease and desist or to prevent these imminent harms, Publishers have no choice but to file this lawsuit.

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<sup>1</sup> “Works,” as used herein, is defined further in Paragraph 36.

## **PARTIES**

5. Publishers are seven of the preeminent trade publishers in the United States, responsible for developing, publishing, distributing, and marketing tens of thousands of titles a year, spanning a wide variety of topics.

6. Plaintiff Chronicle is a publishing company, having its principal place of business in San Francisco, and is qualified to do business and is doing business in the State of New York and in this District. With over fifty years of history, Chronicle publishes approximately 300 titles every year, and has a print and digital catalog of thousands of titles. Writing across dozens of genres, Chronicle authors, including, among others, Dave Effers, David Borgenicht, Katherine Paterson, Snoop Dogg, Annie Barrows and Gary Soto, are winners of the Pulitzer Prize, the Golden Kite Award, the Caldecott and Newbery Medals, Coretta Scott King Award, and the National Book Award.

7. Plaintiff Hachette is a publishing company, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of New York and in this District. Hachette has been publishing books since 1837, and its publishing brands currently include Little, Brown and Company; Little, Brown Books for Young Readers; Grand Central Publishing; Basic Books; Public Affairs; Orbit; FaithWords; and Center Street. Hachette's books and authors have garnered major awards including Pulitzer Prizes, National Book Awards, Newbery Medals, Caldecott Medals, and Nobel Prizes. Hachette's bestselling authors have been published all over the world and include David Baldacci, Michael Connelly, Malcolm Gladwell, Elin Hilderbrand, N. K. Jemisin, Stephenie Meyer, James Patterson, J.K. Rowling, Nicholas Sparks, Rick Steves, Donna Tartt, and Malala Yousafzai.

8. Plaintiff HarperCollins is a publishing company, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of

New York and in this District. With over two hundred years of history and more than 120 branded imprints around the world, HarperCollins publishes approximately 10,000 new books every year in 16 languages, and has a print and digital catalog of more than 200,000 titles. Writing across dozens of genres, HarperCollins' authors are winners of the Nobel Prize, the Pulitzer Prize, the National Book Award, the Newbery and Caldecott Medals, and the Man Booker Prize.

9. Plaintiff Macmillan is a publishing company, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of New York and in this District. Macmillan is part of a global trade publishing group operating worldwide, with trade publishing companies in the United States, Germany, the United Kingdom, Australia, South Africa, and India. Macmillan operates eight divisions in the US: Celadon Books; Farrar, Straus and Giroux; Flatiron Books; Henry Holt and Company; Macmillan Audio; Macmillan Children's Publishing Group; St. Martin's Press and Tor/Forge. Its writers, including, among others, Jeff VanderMeer, Senator Elizabeth Warren, James Comey, Orson Scott Card, and Paul Beatty, come from a vast array of literary backgrounds and have won awards including the Caldecott Medal, the Nobel Prize, the Man Booker Prize, the Pulitzer Prize, the National Book Award, and the Printz Award.

10. Plaintiff PRH is a publishing company, organized under the laws of Delaware, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of New York and in this District. With a rich history dating back to the 1800s, PRH's expansive publishing portfolio includes nearly 275 independent publishing imprints and brands on five continents and contains books and products for readers of all ages at every stage of life. PRH publishes 15,000 new titles annually and sells close to 800 million

print, audio, and eBooks annually. PRH operates a dedicated audiobooks division that publishes 1400 new titles annually and has garnered 15 Grammy awards for Best Spoken Word Album. PRH's many authors include more than 80 Nobel Laureates and hundreds of the world's most widely read authors.

11. Plaintiff Scholastic is a publishing company, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of New York and in this District. Scholastic is the world's largest publisher and distributor of children's books, and a leading provider of literacy curriculum, professional services and classroom magazines, and a producer of educational and entertaining children's media. With a history spanning a century, Scholastic creates and distributes quality books and eBooks, learning programs for pre-K to grade 12, and other products and services that support children's learning and literacy at school and at home.

12. Plaintiff S&S is a publishing company, organized under the laws of New York, having its principal place of business in New York City, and is qualified to do business and is doing business in the State of New York and in this District. It publishes 2000 titles annually in numerous well-known imprints and divisions such as Simon & Schuster, Scribner, Atria Books, Gallery Books, Pocket Books, Adams Media, Simon & Schuster Children's Publishing and Simon & Schuster Audio and international companies in Australia, Canada, India and the United Kingdom. S&S proudly brings the works of its authors, which include, among others, Dale Carnegie, Sharon Draper, Jennifer Egan, Joseph Heller, Ernest Hemingway and Stephen King, to more than 200 countries and territories. Its books, authors and audiobook productions have been winners of the Pulitzer Prize, National Book Award, National Book Critics Circle Award, Grammy Award, Newbery Medal, and Caldecott Medal.

13. Defendant Audible is a Delaware corporation with its principal place of business in Newark, New Jersey. Audible is a subsidiary of Amazon.com, Inc. Audible's headquarters, with an address of One Washington Park Newark, NJ 07102, is located within 100 miles of this District. Audible advertises and sells audiobooks and related products and services on www.audible.com and www.amazon.com, among other places. It is registered with the New York Secretary of State and is doing business in the State of New York and in this District, including distributing audiobooks to consumers in the District. Moreover, upon information and belief, the Audible Captions feature is marketed to, will be available to, and is targeted at consumers throughout this District. Thus, harm to the Publishers will be felt in this District. Further, many of the events set forth in this Complaint concerning Audible's copyright infringement took place within this District.

### **JURISDICTION AND VENUE**

14. This action arises under the Copyright Act of 1976, 17 U.S.C. §§ 101, *et seq.* This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

15. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400.

### **ALLEGATIONS COMMON TO ALL CLAIMS FOR RELIEF**

#### **I. Publishers' Valuable Rights in the Works**

16. Publishers are preeminent producers of high-quality books, which they offer to consumers in a variety of print and digital formats for reading and/or listening. Publishers either own the copyrights to the books they publish or are the exclusive licensee of rights relevant to this lawsuit. They are therefore the appropriate protectors of their authors' interests. In filing this action, they also benefit smaller publishers who may lack the resources to litigate.

17. Publishers promote literacy, defend freedom of speech, advance scientific progress, stimulate the intellectual and cultural discourse that is central to a healthy democratic society, and foster the joy of storytelling.

18. Publishers invest heavily in the identification, editing, promotion, and distribution of original works of fiction and non-fiction by new and existing authors. They spend time and resources in identifying and supporting talented authors, providing advances on future royalty earnings to those authors, editing their manuscripts, and determining the best ways to design, market, and promote works so that a rich variety of titles are readily available for readers. Publishers' Works are imbued with their authors' creative expression and enrich our society. Publishers expend significant resources determining how a particular work should be presented (including, for example, the cover art, typeface, page layout and other book design elements) and marketed. Publishers can afford to expend these resources, and thus benefit authors and readers, because of the protections afforded by copyright law.

19. Copyright law was specifically and originally intended to incentivize the creation and dissemination of books. The United States Constitution sets forth in Article 1, Section 8, Clause 8 that, Congress shall have the power to "promote the Progress of Science and useful Arts," by securing to authors the exclusive rights to their works. Within a year, this notion was codified in the first Copyright Act of 1790. Under today's Copyright Act, authors and their exclusive licensees have the right to reproduce the work, prepare derivative works, distribute copies, perform the work publicly, and display the work publicly. Put colloquially, each of those separate rights is a "stick" in the "bundle of sticks" that a copyright owner may choose to exploit. A copyright owner may even decide not to exploit one of these rights in a way that is



inconsistent with their business model or literary vision. Those are the exclusive rights that copyright law ensures are retained by the holders of the exclusive rights in those copyrights.

20. No longer do publishers merely distribute hardback versions of books. As technology and consumer preferences have changed and developed, so have the markets for books. These include the rise of paperbacks, serialized books, translated versions of books, large-print books, Braille, audiobooks (i.e., recordings of the text), and numerous other formats, such as movies and plays. More recently, as technology has evolved to permit digital distribution of books, Publishers actively develop, promote, and distribute their authors' works as eBooks (electronic formats of print works) and digital audiobooks. All of these different distribution formats, which benefit consumers by providing multiple avenues for accessing and appreciating books, are made possible pursuant to copyright law, and the revenues secured from each method help to encourage authors to create more books, compensate Publishers for their efforts in bringing such works to the public, and ensure the quality and long-term success of the books.

21. Publishers do not lightly decide to change a format from one medium to another; for example, they invest substantial additional time, money, professional expertise and resources in creating high-quality eBooks and audiobooks to ensure that the reader and listener reads or hears the content of the work as intended. Authors rely on Publishers to do this well. Accordingly, each new format for Publishers' books requires careful consideration of the means and presentation of the work in that market.

22. Publishers depend on sales, licensing, and other revenues from their catalog of books to maintain profitability, ensure royalty compensation to their authors, and continue to respond to consumer trends. As the industry has become increasingly digital, Publishers have

entered into separate agreements to prepare and sell eBooks and digital audiobooks of their catalogs. As with any copyright arrangement, the rights are divisible and may be granted on an individual basis; thus, the right to perform or distribute an audiobook does not automatically include the right to perform or distribute the book's text, and vice versa. Authors and Publishers carefully control and allocate the exclusive copyright rights for each of these formats and markets to ensure a vibrant, nimble marketplace benefiting creators, distributors, and readers.

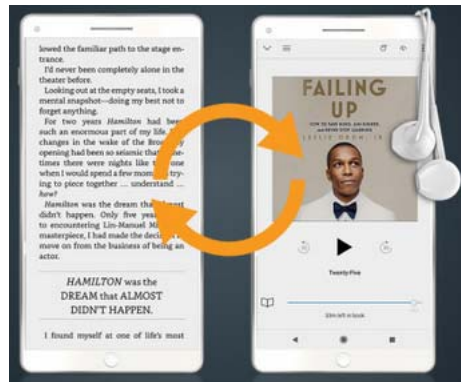
## **II. Audible's Infringement and Commercial Exploitation of Publishers' Copyrighted Works**

23. Upon information and belief, Audible was launched in 1995 and is engaged in the business of offering and providing to the public digital audiobooks and other audio materials. Audible distributes audiobooks created by Publishers or by third parties with Publishers' authorization and engages in the production of its own original audiobooks. Audible is a distributor of Publishers' audiobooks and no more has the right to create and offer Distributed Text than a physical book store selling physical books would have the right to make and sell eBooks.

24. Audible distributes content in a number of ways. In addition to the digital distribution of standard audiobooks, Audible has for years offered cross-format features that integrate and synchronize text and audio.

25. One cross-format offering is called Whispersync for Voice. As depicted below using an image from Audible's website, Whispersync allows Audible users to switch between reading the Amazon Kindle edition of the eBook and listening to its audiobook version with the tap of a button. According to Audible, "As long as your Whispersync for Voice-ready device

has access to a Wi-Fi connection, the playback position, bookmarks, and notes will be kept across devices without any action required.”<sup>2</sup>



26. Another offering is called Immersion Reading. Immersion Reading allows Audible users to “Read and listen simultaneously with real-time highlighting.”<sup>3</sup> Audible markets Immersion Reading as “a valuable tool to boost reading comprehension and overall retention of content.”<sup>4</sup> All users have to do is: “1. Open your eBook. 2. Tap on the screen. 3. Tap the Play button at the bottom of the screen.”<sup>5</sup> Then, the “narration will play and highlight the text as it narrates.”

27. For both Whispersync and Immersion Reading, Audible users are required to purchase both the audiobook *and* the Amazon Kindle edition of the eBook versions of the title. Consequently, Publishers actively participate in these cross-format features, and they and their authors enjoy revenues from the sales of works that employ them.

28. On July 15, 2019, Audible announced, without any advance notice or discussion with Publishers, that Audible would be adding an “Audible Captions” feature to its Audible app.

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<sup>2</sup> What is Whispersync for Voice?, AUDIBLE, [https://audible.custhelp.com/app/answers/detail/a\\_id/7371/~what-is-whispersync-for-voice%3F](https://audible.custhelp.com/app/answers/detail/a_id/7371/~what-is-whispersync-for-voice%3F).

<sup>3</sup> Keep the Story Going, AUDIBLE, <https://www.audible.com/ep/wfs>.

<sup>4</sup> What is Immersion reading?, AUDIBLE, [https://audible.custhelp.com/app/answers/detail/a\\_id/5176/~what-is-immersion-reading%3F](https://audible.custhelp.com/app/answers/detail/a_id/5176/~what-is-immersion-reading%3F)

<sup>5</sup> How can I use Immersion Reading on a Kindle device?, AUDIBLE, [https://audible.custhelp.com/app/answers/detail/a\\_id/4538/c/3087](https://audible.custhelp.com/app/answers/detail/a_id/4538/c/3087).

As a result, in addition to supplying the audio version of Publishers' Works, Audible generates the Distributed Text without Publisher or author (a) approval or involvement, (b) compensation, (c) curation, or (d) control over the quality and presentation of the text.

29. Specifically, as demonstrated in the promotional video released with the announcement, Audible has selected the titles in its audiobook library that will have Audible Captions capability. When its users choose to listen to one these pre-selected "Caption-ready" books and enable Audible Captions, Audible, on demand, generates and distributes the Distributed Text to the user's screen in a matter of milliseconds, synchronized to the audiobook, which continues to play in the background. Users can rewind, fast-forward, and pause the audiobook, viewing the newly generated Distributed Text as they wish. Audible's reproduction, distribution, and display of the Distributed Text, when it has only been authorized to deliver the work in audiobook format, is a misappropriation of the copyright owner's exclusive rights.

30. For this reason, Audible touts the Audible Captions feature as one that "will allow listeners to follow along with a few lines of text as they hear the audiobook performed."<sup>6</sup> The Distributed Text is a clear reproduction of Publishers' copyrighted text and is a quintessential derivative of Publishers' audiobooks, both of which require a license from the owner of the rights. A true and correct copy of the promotional video is attached hereto as **Exhibit 1**.

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<sup>6</sup> Audible Captions: A Demonstration, AUDIBLE, <https://www.audible.com/about/newsroom/audible-captions-a-demonstration/>

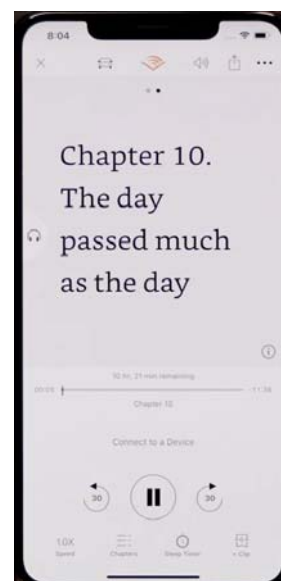
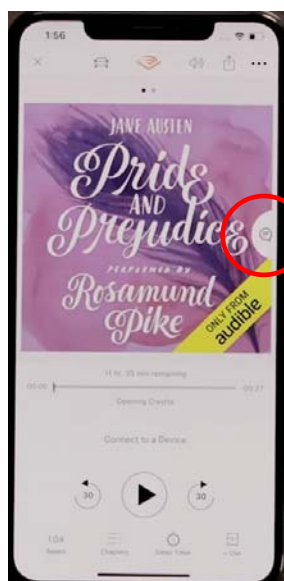


31. The Distributed Text is only as good as Audible’s transcription technology, which does not transcribe accurate text, making it especially error-ridden when, for example, works are used that include foreign or fanciful author-created words (as often appear in science fiction or fantasy books), or when narrators speak in an accent.

32. As a result, Audible conceded to Publishers that it would choose not to offer Audible Captions for a percentage of the available audiobooks on its service due to these errors. Audible, however, admitted that even for those audiobooks that would be included, up to 6% of the Distributed Text would contain transcription errors, such as transcribing the common Yiddish phrase “mazel tov” as “mazel tough.” As noted above, in a 300-page book, a 6% error rate is the equivalent of 18 full pages of pure errors. Of course, this is a tacit admission that Audible already has engaged in the creation of Distributed Text, and copied Publishers’ audiobooks, as it would be unable to make determinations as to the error rates without having done so. Moreover, the Distributed Text is not presented in the same thoughtfully selected typeface as the eBook versions of the Works and because it is not done in partnership with Publishers, it denies

Publishers or authors as rights holders any say in the Works chosen for the feature or in any creative choices on how to present their books.

33. Upon learning of Audible's announcement, many of the Publishers immediately informed Audible in writing through cease-and-desist letters that Audible Captions, among other things, constituted copyright infringement. In response to receiving those objections, and under the pretense of trying to allay Publishers' fears, Audible belatedly offered to provide Publishers with a demonstration of Audible Captions and the resulting Distributed Text. Far from allaying concerns, the demonstrations provided to several Publishers only served to confirm them. Publishers again communicated their objections to the new feature. Audible has nevertheless insisted on moving forward with the Audible Captions launch. Following Publishers' initial objections, Audible released a July 31, 2019 advertisement depicting a slightly revised version of Audible Captions that reduced the number of words presented on the screen at a given time. But, as shown below, while fewer words are presented on the screen at any given time, the Distributed Text is still the *entirety* of the text of the book, top-to-bottom, left-to-right. A true and correct copy of the advertisement is attached hereto as **Exhibit 2**.



34. Upon information and belief, Audible expects Distributed Text to drive additional users to Audible’s offerings, from which Audible will benefit financially through both subscription and audiobook purchase revenue. Audible has refused to grant Publishers’ request to limit Distributed Text to public domain works or, alternatively, to allow them to “opt-out” of the Audible Captions feature, even though Audible could do so.

35. As discussed above, Audible already has created Distributed Text for use in various private and public demonstrations, as well as its own internal testing. Further, Audible has selected and made audiobooks “Captions-ready” for the initial launch of Audible Captions, which will be available to “students, parents and listeners everywhere.”<sup>7</sup> Audible has also indicated that Audible Captions will be made available for all works (other than those that contain too many foreign or fanciful words).

36. Identified below are a representative sample of Publishers’ Works that, upon information and belief, are, or will be, available with Audible Captions (the “Works”). The Works—which feature unique stories and characters by Publishers’ authors, various graphics and images, the selection of distinctive and stylized typeface and layout, and many other choices—are creative expressions that were the product of the ingenuity and efforts of authors, editorial discretion, and substantial skills, resources, and creative energies. They have a large following of fans throughout the world. The Works include:

- *The Adoration of Jenna Fox* by Mary E. Pearson (Macmillan)
- *Atomic Habits: An Easy & Proven Way to Build Good Habits & Break Bad Ones* by James Clear (PRH)
- *Balto of the Blue Dawn* by Mary Pope Osborne (PRH)
- *Catch-22* by Joseph Heller (S&S)

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<sup>7</sup> Audible Captions: A Demonstration, AUDIBLE, <https://www.audible.com/about/newsroom/audible-captions-a-demonstration/>.

- *David and Goliath: Underdogs, Misfits, and the Art of Battling Giants* by Malcolm Gladwell (Hachette)
- *A Dog's Purpose* by W. Bruce Cameron (Macmillan)
- *Echo* by Pam Munoz Ryan (Scholastic)
- *Educated: A Memoir* by Tara Westover (PRH)
- *Feck Perfuction: Dangerous Ideas on the Business of Life* by James Victore (Chronicle)
- *The Finisher* by David Baldacci (Scholastic)
- *The Friend* by Sigrid Nunez (PRH)
- *Girl, Stop Apologizing: A Shame-Free Plan for Embracing and Achieving Your Goals* by Rachel Hollis (HarperCollins)
- *God Save Texas: A Journey Into the Soul of the Lone Star State* by Lawrence Wright (PRH)
- *The Hate U Give* by Angie Thomas (HarperCollins)
- *How to Win Friends & Influence People* by Dale Carnegie (S&S)
- *The Hunger Games* by Suzanne Collins (Scholastic)
- *In the Unlikely Event* by Judy Blume (PRH)
- *Kingdom of the Blind: A Chief Inspector Gamache Novel* by Louise Penny (Macmillan)
- *Let the Great World Spin* by Colum McCann (PRH)
- *Little Fires Everywhere* by Celeste Ng (PRH)
- *The Lost City of the Monkey God: A True Story* by Douglas Preston (Hachette)
- *Manhattan Beach* by Jennifer Egan (S&S)
- *Masterpiece* by Elise Broach (Macmillan)
- *The Monster of Florence* by Douglas Preston and Mario Spezi (Hachette)
- *The Old Man and the Sea* by Ernest Hemingway (S&S)
- *On Writing: A Memoir of the Craft* by Stephen King (S&S)
- *Out of My Mind* by Sharon Draper (S&S)



- *Past Tense: A Jack Reacher Novel* by Lee Child (PRH)
- *A Path Appears: Transforming Lives, Creating Opportunity* by Nicholas D. Kristof and Sheryl WuDunn (PRH)
- *Perfidia* by James Ellroy (PRH)
- *The Pharaoh Key* by Douglas Preston and Lincoln Child (Hachette)
- *Refugee* by Alan Gratz (Scholastic)
- *The Secret Art of Being a Parent: Tips, Tricks, and Lifesavers You Don't Have to Learn the Hard Way* by Bridget Watson Payne (Chronicle)
- *Simon vs The Homo Sapiens Agenda* by Becky Albertalli (HarperCollins)
- *The Sports Gene: Inside the Science of Extraordinary Athletic Performance* by David Epstein (PRH)
- *The Tipping Point* by Malcolm Gladwell (Hachette)
- *To Kill a Mockingbird* by Harper Lee (HarperCollins)
- *Turtles All the Way Down* by John Green (PRH)
- *Under the Dome* by Stephen King (S&S)
- *Wintergirls* by Laurie Halse Anderson (PRH)
- *The Woman in the Window* by A.J. Finn (HarperCollins)
- *The Worst-Case Scenario Survival Handbook* by Joshua Piven and David Borgenicht (Chronicle)

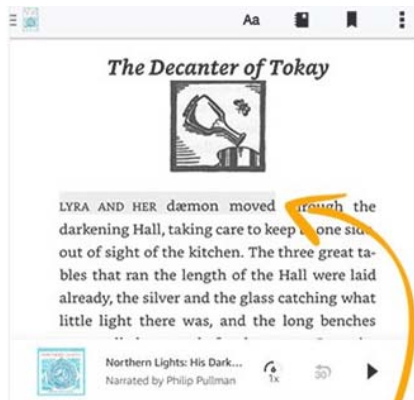
Each of the Works has been registered with the U.S. Copyright Office. Attached hereto as **Exhibit 3**, and incorporated herein by reference, are true and correct copies of Certificates of Registration and other documents reflecting the Works' registration. Publishers are, and at all times material herein were, the owners or exclusive licensees of the eBook and audiobook rights for the Works.

### **III. The Harm to Publishers**

37. Publishers produce and distribute high-quality Works on behalf of themselves and their authors, from which they receive revenues. Without Publishers' permission, Audible is unilaterally (and over the objections of the Publishers) exploiting an existing market, and new potential markets, while exercising rights not licensed to it, causing the authors and Publishers of the Works to face substantial irreparable harm. The harm is at least three fold.

38. *First*, the Distributed Text could directly compete with Publishers' existing markets for the Works, allowing Audible to profit commercially without paying Publishers for use of the text. The Distributed Text could act as a direct substitute for the Works' text in a physical book or eBook. Indeed, Audible's admitted goal is to give users a *reading* experience, despite Audible only having the right to distribute *audiobooks*. Moreover, this convenience is not an innovation, as synchronized text and audio markets already exist. In fact, as discussed above, Audible already offers the Immersion Reading feature to allow users to listen to an audiobook while simultaneously reading the book's original text. The reading experience of Immersion Reading and Audible Captions is remarkably similar aside from the errors that appear in the Distributed Text. If you compare an image from Audible's own website regarding the Immersion Feature to its depiction of Audible Captions from its promotional video, this is obvious:

### Immersion Reading



### Audible Captions



The critical difference between Immersion Reading and Audible Captions is that Immersion Reading requires the purchase of both the audiobook and the Kindle edition of the eBook of the title. This means that the books' authors and relevant Publishers are compensated for the use of both versions of the books. Audible Captions, by contrast, does not require the purchase of an eBook, misappropriating the right to distribute text and depriving authors and Publishers compensation for distribution of their written works thereby lessening their incentive and ability to create and publish works for consumers. It is hard to compete with free. In addition, Publishers have other authorized cross-format technology products with which Audible Captions will directly compete. For example, there has long been an existing market for educational products in the children's book industry that provide a combined offering allowing children to listen while they read. Finally, upon information and belief, Audible has indicated that, in time, it would like to provide Distributed Text in other languages, which would undercut Publishers' translation market.

39. *Second*, by unilaterally offering the unauthorized Distributed Text for free, Audible is devaluing the price point for cross-format technology, causing consumers to believe that there is little value in receiving the text of the Works when they already have an audiobook. This is entirely inconsistent with Publishers' existing markets where consumers using cross-

format technologies pay for both the eBook and the audiobook. The Copyright Act entitles Publishers and their authors to receive compensation for the text of Works, and Audible's infringement will cause them to lose unquantifiable revenues and good will and provide consumers with less incentive to participate in the properly authorized Audible Immersion market.

40. *Third*, Publishers are irreparably harmed by the Distributed Text because they do not have the control that copyright ensures they can exert over the quality, presentation, and distribution choices for the Works. As detailed above, Whispersync and Immersion Reading offer a quality combined reading and audio experience, including the Publishers' carefully selected presentation of text. In sharp contrast, the Distributed Text contains extensive errors that, of course, are not approved by the Works' authors or Publishers, and does not reflect Publishers' desired presentation. Authors and Publishers invest time and financial resources to create quality works that are then distributed to the public as written. By using the Distributed Text in lieu of the actual text of the Works, Audible is irreparably harming the reputation of the Publishers as trusted and valued stewards of their authors' works and that of the authors as careful and thoughtful writers. The Audible Captions feature further harms Publishers and the authors they represent by misappropriating their right to decide which works will be distributed in which format and at which time. Instead, as noted above, Audible will not provide Publishers with the right to opt-in, or out, of the Audible Captions feature, thereby appropriating for itself the right to determine which works are best suited for distribution in the Audible Captions format.

41. Audible has attempted to justify Audible Captions to Publishers as being targeted for educational purposes because it claims the availability of text, together with the audiobook,

would benefit “listeners who face challenges understanding words.”<sup>8</sup> This half-hearted attempt to justify infringement is inconsistent with the facts. **First**, to the extent there is a benefit to seeing words while listening to the audio, this functionality is already offered by Audible in a manner approved by Publishers and through which authors and Publishers share in the revenue (*i.e.*, Immersion Reading). **Second**, Audible admits that the Distributed Text may have as high as a 6% error rate. As a result, the Distributed Text provides a jarring, misleading, and inaccurate reading experience, which undermines and is contrary to its alleged educational goal. **Third**, although Audible claims that Audible Captions is intended for students, upon information and belief, the Distributed Text will not be limited to the educational market, but rather will be available for all audiobooks offered by Audible, in its sole discretion, and without limiting the demographics of the users to whom it is made available by age, location, or any other factor. Audible’s own statement asserted that the Distributed Text would be helpful to “students, parents and listeners everywhere.” The likely inclusion of works inappropriate for students further belies the claimed justification. And, in any case, the educational market has long been a key market for Publishers, where they have provided quality books and technology-based products and services to meaningfully enhance student learning. The Audible Captions feature is not filling a void and, if anything, is adding an error-filled alternative that would undermine the learning experience Audible claims it wants to enhance. **Fourth**, Audible’s mantle of “education” is a loophole that would justify any form of copying and violation of a copyright owner’s exclusive rights. This same “education” argument could be used to justify the creation of unauthorized audiobooks themselves, as audiobooks too would help those who are reluctant to read. It cannot seriously be argued, however, that audiobooks are not within a copyright owner’s exclusive

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<sup>8</sup> Audible Captions: A Demonstration, AUDIBLE, <https://www.audible.com/about/newsroom/audible-captions-a-demonstration/>.

ability to license and distribute. ***Finally***, Audible could provide an education-targeted product for students using just public domain works. For instance, it is extremely telling that the two works that Audible has used to demonstrate the Distributed Text in its own public advertisements have been *David Copperfield* and *Pride and Prejudice*, both of which are in the public domain. Yet, Audible has told Publishers that it will not so limit its feature.

42. Audible has made clear that it intends to release Audible Captions without receiving authorization from Publishers. In fact, upon information and belief, Audible Captions' release is intended to be September 10, 2019.

43. In sum, Audible is attempting to seize for itself a competitive advantage against other audiobook providers who are not violating copyright law, undercut an existing market, and undermine Publishers' well-established business model by creating derivative works of, reproducing, distributing, and publicly displaying copies of the Works in the form of Distributed Text accompanying an audiobook. Audible is aware that its gained profits would come at the expense of content producers like Publishers. Publishers told Audible that the Distributed Text infringes their exclusive rights. Nevertheless, without receiving Publishers' authorization, Audible plans to release Audible Captions, monetize the Distributed Text, and keep the profits for itself, thereby undermining Publishers' investment and ability to control their own Works. In so doing, Audible also undermines the incentive for authors to create high-quality publications and for Publishers to support, edit, design, and distribute them. As Publishers will suffer irreparable harm unless Audible's actions alleged above are enjoined by this Court, and they have no adequate remedy at law to redress all of the injuries that Audible causes and intends to cause by its conduct, Publishers seek injunctive relief from this Court.

## **CLAIMS FOR RELIEF**

### **COUNT I**

#### **Direct Copyright Infringement (17 U.S.C. § 101 *et seq.*)**

44. Publishers repeat and reallege each and every allegation above as if fully set forth herein.

45. The Works are original, creative and copyrightable subject matter under the laws of the United States.

46. The copyrights in the Works are registered, and the Copyright Office has issued the valid Certificates of Registration for the Works indicated in **Exhibit 3**.

47. Publishers have complied in all respects with 17 U.S.C. §§ 101, *et seq.*, and have secured the exclusive rights and privileges in and to the copyrights in their written Works and content.

48. By its actions, alleged above, Audible has infringed and will infringe Publishers' copyrights in and to the Works by, *inter alia*, making derivative works of, reproducing, distributing, and publicly displaying the Works without any authorization or other permission from Publishers.

49. Audible, moreover, selects the works for which Distributed Text will be offered, and designed and interfaced the functionality of Audible Captions with its Audible App. Audible has further arranged for software programs and servers to generate Distributed Text and transmit it to its paying consumers.

50. Audible's infringement of Publishers' copyrights is deliberate, willful, and in utter disregard of Publishers' rights.

51. Upon information and belief, as a direct and proximate result of its wrongful conduct, Audible will obtain benefits, including, but not limited to, profits to which Audible is not entitled.

52. As a direct and proximate result of Audible's wrongful conduct, Publishers will be substantially and irreparably harmed in an amount not readily capable of determination. Unless restrained by this Court, Audible will cause further irreparable injury to Publishers.

53. Publishers are entitled to injunctive relief enjoining Audible, its agents and employees, and all persons acting in concert or participation with it, from infringing Publishers' Works in the manner alleged above.

54. Publishers are further entitled to recover from Audible the damages, including attorney's fees and costs, they have sustained and will sustain, and any gains, profits and advantages obtained by Audible as a result of its acts of infringement alleged above. At present, the amount of such damages, gains, profits and advantages cannot be fully ascertained by Publishers. Publishers also are entitled to recover statutory damages for Audible's willful infringement of their copyrights.

**COUNT II**  
**Secondary Copyright Infringement (17 U.S.C. § 101 *et seq.*)**

55. Publishers repeat and reallege each and every allegation above as if fully set forth herein.

56. Although it is clear that Audible is directly liable, Publishers also bring claims for secondary liability in the alternative because to the extent Audible attempts to disguise its own direct liability by blaming the conduct of its users, it is equally clear that Audible is secondarily liable under theories of contributory liability, inducement liability, and vicarious liability for the



underlying creation of infringing derivatives of Publishers' Works, reproduction of Publishers' Works, distribution of Publishers' Works, and display of Publishers' Works.

57. Audible is contributorily liable as it knows or has reason to know that the Distributed Text necessarily infringes Publishers' Works each time it is created, and Audible has caused and/or materially contributed to the creation of the infringing Distributed Text, which is available exclusively on Audible's platform.

58. Audible has been informed by Publishers that the Distributed Text infringes the Publishers' copyrights. Furthermore, Audible is responsible for curating and selecting the works for which the Audible Captions feature is enabled. Moreover, it provides the platform on which the infringing activity occurs, which, upon information and belief, tracks what works exist on each of Audible's users' devices and what Audible features are being engaged by those users. Audible thus has specific knowledge that specific infringing material is available on its platform.

59. Audible could take simple measures to prevent further infringement, such as by limiting Audible Captions to works in the public domain or to those it has properly licensed. Nonetheless, it has indicated that it will continue to create and provide access to the infringing Distributed Text.

60. As demonstrated by its high-profile rollout of the Audible Captions feature, facilitating the infringement of Publishers' copyrighted material is a central component of Audible's business strategy. Thus, Audible is secondarily liable for contributory infringement.

61. Audible also is secondarily liable under a theory of inducement because the Audible Captions are capable of working only on books that Audible has selected, and Audible is and will be actively encouraging users to receive Distributed Text for those books. As noted

above, Audible has already actively marketed Audible Captions to users touting the benefits of the Distributed Text.

62. Finally, Audible is vicariously liable because it has the right and ability to supervise the infringement and possesses a financial interest in continuing the infringement.

63. As detailed above, Audible has the right and ability to supervise the infringement of Publishers' copyrighted Works because it can start or stop offering the Distributed Text at any time for any work.

64. Moreover, Audible possesses an obvious and direct financial interest in the continuing exploitation of Publishers' Works as, upon information and belief, Audible believes the Distributed Text will enhance users' Audible experience, leading to more users paying subscription fees and purchasing audiobooks. Thus, Audible is secondarily liable for vicarious infringement.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs Chronicle, Hachette, HarperCollins, Macmillan, PRH, Scholastic, and S&S respectfully request judgment against Defendant Audible as follows:

- A. Find that Audible Captions and its Distributed Text infringe the rights of Publishers' copyrights in the Works;
- B. Find a substantial likelihood that Audible will infringe Publishers' copyrights unless enjoined from doing so;
- C. Issue a preliminary and permanent injunction enjoining Audible, and its agents, servants, employees, attorneys, successors and assigns, and all persons, firms and corporations acting in concert with it, from directly or indirectly infringing Publishers' copyrights, including, but not limited to, making derivative works of, reproducing, distributing, or publicly displaying any of Publishers' works

(including without limitation the Works) as Distributed Text, and from participating or assisting in any such activity;

- D. Order Audible to render a full and complete accounting to Publishers for Audible's profits, gains, advantages or the value of the business opportunities received from the foregoing acts of infringement;
- E. Enter judgment for Publishers against Audible for all damages suffered by Publishers and for any profits or gain by Audible attributable to the infringements alleged above of Publishers' copyrights in amounts to be determined at trial;
- F. Enter judgment for Publishers against Audible for statutory damages based upon Audible's willful acts of infringement as alleged above pursuant to the Copyright Act, 17 U.S.C. §§ 101, *et seq.*;
- G. Award Publishers costs and disbursement of this action, including reasonable attorney's fees, pursuant to 17 U.S.C. § 505;
- H. Award Publishers pre-judgment and post-judgment interest, to the fullest extent available, on the foregoing; and
- I. Grant such other, further and different relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiffs demand a trial by jury on all issues so triable in this action.

Dated: New York, New York  
August 23, 2019



Dale M. Cendali  
Joshua L. Simmons  
Jordan Romanoff  
KIRKLAND & ELLIS LLP  
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New York, New York 10022  
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joshua.simmons@kirkland.com  
jordan.romanoff@kirkland.com

*Attorneys for Plaintiffs*

# **EXHIBIT 1**

**PHYSICAL EXHIBIT TO BE LODGED**

**INTRODUCING AUDIBLE CAPTIONS.MP4**

**[HTTPS://WWW.YOUTUBE.COM/WATCH?V=TBQGYZKRzJY](https://www.youtube.com/watch?v=TbQGYZKRzJY)**

# **EXHIBIT 2**

**PHYSICAL EXHIBIT TO BE LODGED**

**AUDIBLE CAPTIONS - A DEMONSTRATION.MP4**

**[HTTPS://WWW.AUDIBLE.COM/ABOUT/NEWSROOM/AUDIBLE-  
CAPTIONS-A-DEMONSTRATION/](https://www.audible.com/about/newsroom/audible-captions-a-demonstration/)**

# **EXHIBIT 3**

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number:

TX 6-940-616

Effective date of  
registration:

June 16, 2008

Title \_\_\_\_\_

Title of Work: The Adoration of Jenna Fox

Completion/ Publication \_\_\_\_\_

Year of Completion: 2007

Date of 1st Publication: April 29, 2008

Nation of 1st Publication: United States

Author \_\_\_\_\_

■ Author: Mary E. Pearson

Author Created: Original Text

Work made for hire: No

Citizen of: United States

Anonymous: No

Pseudonymous: No

Copyright claimant \_\_\_\_\_

Copyright Claimant: Mary E. Pearson

6502 La Paloma Court, Carlsbad, CA, 92009

Limitation of copyright claim \_\_\_\_\_

Previously registered: No

Certification \_\_\_\_\_

Name: Mimi Ross

Date: June 12, 2008



**IPN#:**

**Registration #:** TX0006940616

**Service Request #:** 1-79947438

Henry Holt and Company, LLC  
Mimi Ross  
175 5th Avenue, 10th Floor  
New York, NY 10010

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kary A. Lush*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-695-641**

Effective Date of Registration:  
December 19, 2018

## Title

Title of Work: ATOMIC HABITS: An Easy and Proven Way to Build Good Habits and Break Bad Ones

## Completion/Publication

Year of Completion: 2018  
Date of 1st Publication: October 16, 2018  
Nation of 1st Publication: United States  
International Standard Number: ISBN 978-0-7352-1129-2

## Author

• Author: James Clear  
Author Created: text (excluding brief excerpts from other sources)  
Work made for hire: No  
Citizen of: United States

## Copyright Claimant

Copyright Claimant: James Clear  
c/o Penguin Random House LLC, 1745 Broadway, New York, NY, 10019,  
United States

## Limitation of copyright claim

Material excluded from this claim: brief excerpts from other sources

New material included in claim: text (excluding brief excerpts from other sources)

## Certification

Name: Sharon Watson  
Date: December 18, 2018

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Karen Leigh Clayett*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-331-852**

Effective Date of Registration:

March 11, 2016

## Title

Title of Work: BALTO OF THE BLUE DAWN

Series Title: MAGIC TREE HOUSE #54, A MERLIN MISSION

## Completion/Publication

Year of Completion: 2015

Date of 1st Publication: January 05, 2016

Nation of 1st Publication: United States

International Standard Number: ISBN 9780553510867

## Author

- Author: Mary Pope Osborne
- Author Created: text
- Citizen of: United States

## Copyright Claimant

Copyright Claimant: Mary Pope Osborne  
c/o Brandt & Hochman Literary Agents, 1501 Broadway #2310, New York, NY,  
10036, United States

## Rights and Permissions

Organization Name: Random House Children's Books  
Address: c/o Penguin Random House LLC  
1745 Broadway  
New York, NY 10019 United States

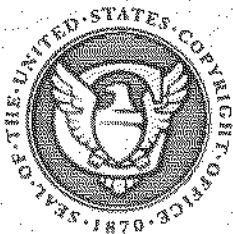
## Certification

Name: Melanie Flaherty  
Date: March 02, 2016

Registration #: TX0008331852  
Service Request #: I-3177739262

Penguin Random House LLC  
Melanie Flaherty  
1745 Broadway  
New York, NY 10019 United States

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Karen Taylor Clayett*

Acting United States Register of Copyrights and Director

Registration Number

**SR 808-509**

Effective Date of Registration:

December 07, 2017

## Title

Title of Work: Catch-22

## Completion/Publication

Year of Completion: 2017

Date of 1st Publication: August 29, 2017

Nation of 1<sup>st</sup> Publication: United States

International Standard Number: ISBN 9781508251521

## Author

- Author: Simon & Schuster, Inc.  
Author Created: sound recording  
Work made for hire: Yes  
Domiciled in: United States

- Author: Jay O. Sanders  
Author Created: Performance  
Citizen of: United States

## Copyright Claimant

Copyright Claimant: Simon & Schuster, Inc.  
1230 Avenue of the Americas, New York, NY, 10020, United States

Transfer statement: By written agreement

## Limitation of copyright claim

Material excluded from this claim: Archival recording

New material included in claim: sound recording

## Rights and Permissions

Organization Name: Simon & Schuster, Inc.

Address: 1230 Avenue of the Americas  
Attn: Permissions  
New York, NY 10020 United States

## Certification

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Name: Lauren Horvath  
Date: December 04, 2017  
Applicant's Tracking Number: SS 10002295 (Heller)

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# CERTIFICATE OF RENEWAL REGISTRATION

**FORM RE**

UNITED STATES COPYRIGHT OFFICE



This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 304 of title 17, United States Code, attests that renewal registration has been made for the work identified below. The information has been made a part of the Copyright Office records.

*[Signature]*

REGISTER OF COPYRIGHTS  
United States of America

REGISTRATION NUMBER	
RE	419 328
EFFECTIVE DATE OF RENEWAL REGISTRATION	
(Month) FEB	(Day) 16 (Year) 1989

OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

<b>1</b> Renewal Claimant(s)	RENEWAL CLAIMANT(S), ADDRESS(ES), AND STATEMENT OF CLAIM: (See Instructions)	
	1	Name <u>Joseph Heller</u> Address <u>68 Skim Hampton Road, East Hampton, NY 11937</u> Claiming as <u>the author</u> <small>(Use appropriate statement from instructions)</small>
	2	Name ..... Address ..... Claiming as ..... <small>(Use appropriate statement from instructions)</small>
	3	Name ..... Address ..... Claiming as ..... <small>(Use appropriate statement from instructions)</small>

TITLE OF WORK IN WHICH RENEWAL IS CLAIMED:

CATCH-22

RENEWABLE MATTER:

The entire work except for the first chapter which appeared as a short story in The Western Quarterly in 1955.

CONTRIBUTION TO PERIODICAL OR COMPOSITE WORK:

Title of periodical or composite work: .....  
 if a periodical or other serial, give: Vol. .... No. .... Issue Date .....

<b>3</b> Author(s)	AUTHOR(S) OF RENEWABLE MATTER:  Joseph Heller
-----------------------	---

<b>4</b> Facts of Original Registration	ORIGINAL REGISTRATION NUMBER:  A 531822	ORIGINAL COPYRIGHT CLAIMANT:  Joseph Heller
	ORIGINAL DATE OF COPYRIGHT: • If the original registration for this work was made in published form, give: DATE OF PUBLICATION: <u>October 10, 1961</u> <small>(Month) (Day) (Year)</small>	
		• If the original registration for this work was made in unpublished form, give: DATE OF REGISTRATION: ..... <small>(Month) (Day) (Year)</small>

025160947



RE 419 328	EXAMINED BY: <i>TPB</i> CHECKED BY: <i>RW</i>	RENEWAL APPLICATION RECEIVED: 12.16.1989	FOR COPYRIGHT OFFICE USE ONLY
	DEPOSIT ACCOUNT FUNDS USED: <input checked="" type="checkbox"/>	REMITTANCE NUMBER AND DATE:	

**DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY**

<b>RENEWAL FOR GROUP OF WORKS BY SAME AUTHOR:</b> To make a single registration for a group of works by the same individual author published as contributions to periodicals (see instructions), give full information about each contribution. If more space is needed, request continuation sheet (Form RE/CON).		<div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; text-align: center; line-height: 40px; margin: 0 auto;">5</div> <b>Renewal for Group of Works</b>
1	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
2	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
3	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
4	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
5	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
6	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	
7	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....	

<b>DEPOSIT ACCOUNT:</b> (If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.)  Name: <u>Simon &amp; Schuster Inc.</u> Account Number: <u>DA013137</u>	<b>CORRESPONDENCE:</b> (Give name and address to which correspondence about this application should be sent.) Name: <u>Mr. Peter Anderson</u> Address: <u>as below</u> (Apt.) <u>tel 212-698-7045</u> (City) (State) (ZIP)	<div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; text-align: center; line-height: 40px; margin: 0 auto;">6</div> <b>Fee and Correspondence</b>
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<b>CERTIFICATION:</b> I, the undersigned, hereby certify that I am the: (Check one) <input type="checkbox"/> renewal claimant <input checked="" type="checkbox"/> duly authorized agent of <u>Joseph Heller</u> of the work identified in this application, and that the statements made by me in this application are correct to the best of my knowledge. Handwritten signature: (X) <i>Peter Anderson</i> Typed or printed name: <u>Peter Anderson</u> Date: <u>February 9, 1989</u>	<div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; text-align: center; line-height: 40px; margin: 0 auto;">7</div> <b>Certification (Application must be signed)</b>
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<div style="border: 1px solid black; border-radius: 15px; padding: 10px; margin: 10px;"> <u>Peter Anderson, Simon &amp; Schuster Inc.</u>  <u>1230 Avenue of the Americas, 10th flr.</u>  <u>New York, NY 10020</u>  <small>(City) (State) (ZIP code)</small> </div>	<b>MAIL CERTIFICATE TO</b>  (Certificate will be mailed in window envelope)	<div style="border: 1px solid black; border-radius: 50%; width: 40px; height: 40px; text-align: center; line-height: 40px; margin: 0 auto;">8</div> <b>Address for Return of Certificate</b>
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Type of Work: Text

Registration Number / Date:  
TX0007814165 / 2013-11-15

Application Title: DAVID AND GOLIATH: UNDERDOGS, MISFITS, AND THE ART OF  
BATTLING GIANTS.

Title: DAVID AND GOLIATH: UNDERDOGS, MISFITS, AND THE ART OF  
BATTLING GIANTS.

Description: Book, 305 p.

Copyright Claimant:  
Malcolm Gladwell.

Date of Creation: 2013

Date of Publication:  
2013-10-01

Nation of First Publication:  
United States

Authorship on Application:  
Malcolm Gladwell. Authorship: text.  
Malcolm Gladwell, employer for hire. Authorship: editing.

Copyright Note: C.O. correspondence.  
Regarding limitation of claim: Deposit contains some  
preexisting quotations from a variety of sources.

ISBN: 9780316204361

Names: Gladwell, Malcolm

=====

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-251-076**

**Effective date of  
registration:**

September 29, 2010

**Title** \_\_\_\_\_

**Title of Work:** A Dog's Purpose

**Completion/Publication** \_\_\_\_\_

**Year of Completion:** 2009

**Date of 1st Publication:** June 17, 2010

**Nation of 1st Publication:** United States

**Author** \_\_\_\_\_

■ **Author:** W. Bruce Cameron

**Author Created:** Text

**Work made for hire:** No

**Anonymous:** No

**Pseudonymous:** No

**Copyright claimant** \_\_\_\_\_

**Copyright Claimant:** W. Bruce Cameron

C/o Tom Doherty Associates, LLC, 175 5th Avenue, New York, NY 10010-7848

**Limitation of copyright claim** \_\_\_\_\_

**Previously registered:** No

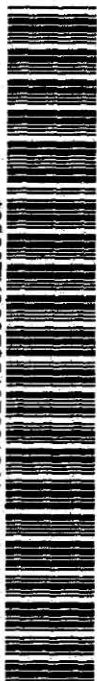
**Certification** \_\_\_\_\_

**Name:** Ria Almestica

**Date:** June 30, 2010

**Registration #:** TX0007251076

**Service Request #:** 1-497441866



Tom Doherty Associates, LLC  
Ria Almestica  
175 Fifth Avenue, Room 603  
New York, NY 10010-7848

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

**Registration Number**

**TX 8-049-954**

**Effective Date of Registration:**

March 27, 2015

## Title

Title of Work: ECHO

## Completion/Publication

Year of Completion: 2015

Date of 1st Publication: March 01, 2015

Nation of 1st Publication: United States

## Author

- Author: Pam Munoz Ryan  
Author Created: text  
Citizen of: United States  
Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Pam Munoz Ryan  
c/o Scholastic Inc., 557 Broadway, New York, NY, 10012, United States

## Certification

Name: Heather T. Irving

Date: March 20, 2015

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kary A. Lush*

Acting United States Register of Copyrights and Director

**Registration Number**

**TX 8-577-472**

**Effective Date of Registration:**

March 19, 2018

## Title

**Title of Work:** EDUCATED A Memoir

## Completion/Publication

**Year of Completion:** 2017

**Date of 1st Publication:** February 20, 2018

**Nation of 1st Publication:** United States

**International Standard Number:** ISBN 9780399590504

## Author

- Author:** Tara Westover
- Author Created:** Text excluding text from other sources
- Citizen of:** United States
- Year Born:** 1986

## Copyright Claimant

**Copyright Claimant:** Second Sally, Ltd.  
c/o ICM Partners, 65 East 55th Street, New York, NY, 10022, United States

**Transfer statement:** By written agreement

## Limitation of copyright claim

**Material excluded from this claim:** Text from other sources

**New material included in claim:** Text excluding text from other sources

## Rights and Permissions

**Organization Name:** Penguin Random House LLC

**Address:** 1745 Broadway  
15th Floor  
New York, NY 10019 United States

## Certification

---

**Name:** Deborah Foley  
**Date:** March 16, 2018

---



**Registration #:** TX0008577472  
**Service Request #:** 1-6390622925

Penguin Random House LLC  
Deborah Foley  
1745 Broadway  
15th Floor  
New York, NY 10019 United States

\*0000TX00085774720201\*





# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

Registration Number  
**TX 7-877-719**

Effective date of  
registration:

March 31, 2014

## Title

Title of Work: The Finisher

## Completion/Publication

Year of Completion: 2014

Date of 1st Publication: March 4, 2014

Nation of 1st Publication: United States

## Author

■ Author: David Baldacci

Author Created: text

Citizen of: United States

Domiciled in: United States

## Copyright claimant

Copyright Claimant: David Baldacci

c/o Scholastic Inc., 557 Broadway, New York, NY, 10012, United States

## Certification

Name: Heather T. Irving

Date: March 28, 2014

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink, reading "Kay A. Leigh".

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-581-248**

Effective Date of Registration:

April 26, 2018

Title Riverhead

Title of Work: THE FRIEND

Completion/Publication \_\_\_\_\_

Year of Completion: 2017

Date of 1st Publication: February 06, 2018

Nation of 1<sup>st</sup> Publication: United States

International Standard Number: ISBN 978-0-7352-1944-1

Author \_\_\_\_\_

• Author: Sigrid Nunez

Author Created: text

Work made for hire: No

Citizen of: United States

Copyright Claimant \_\_\_\_\_

Copyright Claimant: Sigrid Nunez

c/o Penguin Random House LLC, 375 Hudson Street, New York, NY, 10014,  
United States

Certification \_\_\_\_\_

Name: Heather Lewis

Date: April 24, 2018



000017X00055812480202

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink, reading "Kay A. Leahy".

United States Register of Copyrights and Director

Registration Number

**TX 8-736-797**

Effective Date of Registration:

March 20, 2019

## Title

Title of Work: Girl, Stop Apologizing

## Completion/Publication

Year of Completion: 2019

Date of 1st Publication: March 11, 2019

Nation of 1st Publication: United States

International Standard Number: ISBN 9781400209606

## Author

• Author: Rachel Hollis  
Author Created: text  
Work made for hire: No  
Citizen of: United States  
Year Born: 1983

## Copyright Claimant

Copyright Claimant: Rachel Hollis  
HarperCollins Leadership, 501 Nelson Place, Nashville, TN, 3/214, United States

## Limitation of copyright claim

Material excluded from this claim: Pages i - ii

New material included in claim: text

## Rights and Permissions

Organization Name: HarperCollins Publishing  
Name: Linda R. Russell  
Email: linda.russell@harpercollins.com  
Telephone: (615)902-1188  
Address: Thomas Nelson Publishing

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kay A. Lusk*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-600-133**

Effective Date of Registration:

July 20, 2018

## Title

Title of Work: GOD SAVE TEXAS: A Journey into the Soul of the Lone Star State

## Completion/Publication

Year of Completion: 2017  
Date of 1st Publication: April 17, 2018  
Nation of 1<sup>st</sup> Publication: United States  
International Standard Number: ISBN 9780525520108

## Author

• Author: Lawrence Wright  
Author Created: text  
Work made for hire: No  
Citizen of: United States

## Copyright Claimant

Copyright Claimant: Lawrence Wright  
c/o The Wylie Agency, LLC, 250 West 57th Street, Suite 2114, New York, NY,  
10107

## Limitation of copyright claim

Material excluded from this claim: artwork, brief quotes from other sources and some previously published material

New material included in claim: text, excluding some previously published material, artwork and brief quotes from other sources

## Rights and Permissions

Organization Name: Alfred A. Knopf  
Address: c/o Penguin Random House LLC  
1745 Broadway  
New York, NY 10019

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Karen Taylor Clayton*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-436-954**

Effective Date of Registration:  
August 23, 2017

## Title

Title of Work: THE HATE U GIVE

## Completion/Publication

Year of Completion: 2017  
Date of 1st Publication: February 01, 2017  
Nation of 1<sup>st</sup> Publication: United States

## Author

• Author: Angela Thomas  
Author Created: text  
Citizen of: United States  
Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Angela Thomas  
c/o HarperCollins Publishers, 195 Broadway, New York, NY, 10007, United States

## Certification

Name: Leigh Browne  
Date: August 22, 2017

R

328107

DO NOT WRITE HERE

# Certificate of Registration of a Claim to Renewal Copyright

This Is To Certify that the statements set forth on this certificate have been made a part of the records of the Copyright Office. In witness whereof the seal of the Copyright Office is hereto affixed.

NOT VALID WITHOUT  
COPYRIGHT OFFICE  
IMPRESSION SEAL

## 1. Renewal Claimant(s), Address(es), and Statement of Claim:

Register of Copyrights  
United States of America

(a) Name Dorothy Carnegie

Address 27 Wendover Road, Forest Hills 75, New York

Claiming as widow \*  
-wife of deceased author

(b) Name .....

Address .....

Claiming as .....

(c) Name .....

Address .....

Claiming as .....

## 2. (a) Title:

HOW TO WIN FRIENDS AND INFLUENCE PEOPLE

## (b) Renewable Matter:

## (c) Contribution to Periodical or Other Composite Work:

(Title of periodical or composite work)

If a periodical, give: Vol. ....; No. ....; Date .....

## 3. Authors of Renewable Matter:

Dale Carnegie

## 4. Facts of Original Registration:

Original registration number: Class A No. 99796

If registered as published, give date of publication November 4, 1936

If registered as unpublished, give date of registration .....

Deposit account:

Simon and Schuster, Inc.

Send correspondence to:

Name

Patricia White

Address

Simon and Schuster

Send certificate to:

Name

Patricia White  
Norman Moldau c/o Simon and Schuster, Inc.

Address

630 Fifth Avenue

(Number and street)

New York

(City)

20

(Zone)

N.Y.

(State)

### Information concerning renewal copyright

Two important points must be kept in mind with respect to renewal copyright: (1) there are strict time limits for securing and (2) it can be claimed only by certain specified persons named in the law.

#### Time limits

**When to renew.** The original term of copyright in a published work lasts for 28 years from the date of publication; in the case of a work originally registered in unpublished form, the copyright term lasts for 28 years from the date of registration in the Copyright Office. In either case, the copyright may be renewed for a second 28-year term only if an acceptable claim is registered in the Copyright Office within the last (28th) year of the original copyright term. For example, a work copyrighted on

January 1, 1940, would be eligible for renewal between January 1, 1967, and January 1, 1968.

**Caution:** Unless a valid renewal claim and fee are received in the Copyright Office before the first copyright term expires, copyright protection is lost permanently and the work enters the public domain. The Copyright Office has no discretion to extend the renewal time limits.

#### How to register your claim

**Procedure to follow.** Complete an application for renewal registration on Form R and send it to the Register of Copyrights,

Washington 25, D. C. The application should be accompanied by the registration fee of \$2.00. Do not send copies of the work.

#### Who may claim renewal

Except in the case of five specific types of works, the law gives the right to claim renewal to the individual author of the work, regardless of who owned the copyright during the original term. If the author is deceased, the statute gives the right to claim renewal to certain of his statutory beneficiaries as explained below. The present owner (proprietor) of a copyright is entitled to claim renewal *only* in the five cases listed in Paragraph B, below.

The following persons may claim renewal in all types of works except those enumerated in Paragraph B, below:

1. The author, if living. State the claim as: *the author*.
2. The widow, widower, and/or children of the author, if the author is not living. State the claim as: *the widow (widower) of the author and/or the child (children) of the deceased author*.
3. The author's executors, if the author left a will and if

there is no surviving widow, widower, or child. State the claim as: *the executors of the author*.

4. The next of kin of the author, if the author left no will and if there is no surviving widow, widower, or child. State the claim as: *the next of kin of the deceased author, there being no will*.

In the case of the following five types of works, the proprietor (owner of the copyright at the time of renewal registration) may claim renewal:

1. Posthumous work (work first published and copyrighted after the death of the author). State the claim as: *proprietor of copyright in a posthumous work*.
2. Periodical, cyclopedic, or other composite work. State the claim as: *proprietor of copyright in a composite work*.
3. "Work copyrighted by a corporate body otherwise than as assignee or licensee of the individual author." State the claim as: *proprietor of copyright in a work copyrighted by*

*a corporate body otherwise than as assignee or licensee of the individual author.* (This type of claim is considered appropriate in relatively few cases.)

4. Work copyrighted by an employer for whom such work was made for hire. State the claim as: *proprietor of copyright in a work made for hire*.
5. Print or label originally registered in the Patent Office prior to July 1, 1940. State the claim as: *proprietor of copyright in a print or label*.

#### FOR COPYRIGHT OFFICE USE ONLY

Application received

DEC 23 1963

Fee received

\*Amended by Copyright Office (Cert.)



Type of Work: Text

Registration Number / Date:  
TX0007036191 / 2008-12-22

Application Title: The Hunger Games 978-0-439-02348-1.

Title: The Hunger Games 978-0-439-02348-1.

Description: Book, 374 p.

Copyright Claimant:  
Suzanne Collins.

Date of Creation: 2008

Date of Publication:  
2008-10-01

Nation of First Publication:  
United States

Authorship on Application:  
Suzanne Collins; Citizenship: United States. Authorship:  
Text.

Names: Collins, Suzanne

=====

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

**Registration Number**

**TX 8-071-643**

**Effective Date of Registration:**

August 12, 2015

*Maria A. Pallante*

Register of Copyrights, United States of America

## Title

**Title of Work:** IN THE UNLIKELY EVENT

## Completion/Publication

**Year of Completion:** 2014

**Date of 1st Publication:** June 02, 2015

**Nation of 1st Publication:** United States

**International Standard Number:** ISBN 9781101875049

## Author

- Author:** Judy Blume
- Author Created:** text, excluding brief quote from other source
- Work made for hire:** No
- Citizen of:** United States

## Copyright Claimant

**Copyright Claimant:** Judy Blume  
c/o William Morris Endeavor Entertainment, LLC, 1325 Avenue of the Americas, New York, NY, 10019

## Limitation of copyright claim

**Material excluded from this claim:** brief quote from other source

**New material included in claim:** text, excluding brief quote from other source

## Rights and Permissions

**Organization Name:** Alfred A. Knopf  
**Address:** c/o Penguin Random House LLC  
1745 Broadway  
New York, NY 10019

## Certification

**Name:** Michele Park

**Registration #:** TX0008071643  
**Service Request #:** 1-2617017258

Penguin Random House LLC  
Michele Park  
1745 Broadway, 15th Fl.  
New York, NY 10019

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kary A. Lush*

United States Register of Copyrights and Director

Registration Number

**TX 8-745-884**

Effective Date of Registration:

November 16, 2018

## Title

Title of Work: KINGDOM OF THE BLIND

## Completion/Publication

Year of Completion: 2017  
Date of 1st Publication: November 06, 2018  
Nation of 1st Publication: United States

## Author

- Author: LOUISE PENNY  
Author Created: text  
Domiciled in: Canada

## Copyright Claimant

Copyright Claimant: THREE PINES CREATIONS, INC  
\*C/O MACMILLAN PUBLISHING GROUP LLC D/B/A ST. MARTIN'S  
PRESS, 175 FIFTH AVENUE, NEW YORK, NY, 10010  
Transfer statement: by written agreement

## Certification

Name: RIA ALMESTICA  
Date: November 13, 2018

Correspondence: Yes

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number  
**TX 6-993-636**

Effective date of  
registration:

July 6, 2009

Title \_\_\_\_\_

Title of Work: LET THE GREAT WORLD SPIN A Novel

Completion/ Publication \_\_\_\_\_

Year of Completion: 2009

Date of 1st Publication: June 23, 2009

Nation of 1st Publication: United States

International Standard Number: ISBN 9781400063734

Author \_\_\_\_\_

■ Author: Colum McCann

Author Created: Entire text excluding epigraph

Citizen of: Ireland

Copyright claimant \_\_\_\_\_

Copyright Claimant: Colum McCann

c/o The Wylie Agency, Inc., 250 West 57th Street, Suite 2114, New York,  
NY, 10107, United States

Limitation of copyright claim \_\_\_\_\_

Material excluded from this claim: photographs, Epigraph

New material included in claim: Entire text excluding epigraph

Rights and Permissions \_\_\_\_\_

Organization Name: Random House

Address: 1745 Broadway

3rd Floor

New York, NY 10019 United States

Certification \_\_\_\_\_

**Name:** Deborah Foley

**Date:** July 2, 2009

---

**Registration #:** TX0006993636

**Service Request #:** 1-211035631

Random House  
Deborah Foley  
1745 Broadway  
3rd Floor  
New York, NY 10019 United States

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kay A. Leahy*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-531-981**

Effective Date of Registration:

November 06, 2017

*25 July 18*

*Penguin Press*

Title

Title of Work: LITTLE FIRES EVERYWHERE

## Completion/Publication

Year of Completion: 2017

Date of 1st Publication: September 12, 2017

Nation of 1st Publication: United States

International Standard Number: ISBN 978-0-7352-2429-2

Author

• Author: Celeste Ng  
Author Created: text  
Work made for hire: No  
Citizen of: United States

## Copyright Claimant

Copyright Claimant: Celeste Ng  
c/o Penguin Random House LLC, 375 Hudson Street, New York, NY, 10014

## Certification

Name: Tsuyako Uehara  
Date: November 02, 2017

Correspondence: Yes



Type of Work: Text

Registration Number / Date:  
TX0008404360 / 2017-04-27

Application Title: The Lost City of the Monkey God.

Title: The Lost City of the Monkey God.

Description: Book, 326 p.

Copyright Claimant:  
Splendide Mendax, Inc., Transfer: By written agreement.

Date of Creation: 2016

Date of Publication:  
2017-01-03

Nation of First Publication:  
United States

Authorship on Application:  
Douglas Preston; Domicile: United States; Citizenship:  
United States. Authorship: text.

Pre-existing Material:  
photograph(s), previously published text.

Basis of Claim: text.

ISBN: 9781455540006

Names: Preston, Douglas  
Splendide Mendax, Inc.

=====

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kary A. Lingle*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-564-674**

Effective Date of Registration:

April 17, 2018

## Title

Title of Work: Manhattan Beach

## Completion/Publication

Year of Completion: 2017  
Date of 1st Publication: October 03, 2017  
Nation of 1<sup>st</sup> Publication: United States  
International Standard Number: ISBN 9781476716732

## Author

• Author: Jennifer Egan  
Author Created: text  
Work made for hire: No  
Citizen of: United States

## Copyright Claimant

Copyright Claimant: Jennifer Egan  
1230 Avenue of the Americas, New York, NY, 10020, United States

## Rights and Permissions

Organization Name: Simon & Schuster Permissions Dept.  
Address: c/o Simon & Schuster, Inc.  
1230 Avenue of the Americas  
New York, NY 10020 United States

## Certification

Name: Lauren Horvath  
Date: April 13, 2018

**Applicant's Tracking Number:** Scribner 10083490

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\*0000TX00085646740202\*

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

**Registration Number:**

**TX 6-895-400**

**Effective date of  
registration:**

October 10, 2008

**Title** \_\_\_\_\_

**Title of Work:** Masterpiece

**Completion/ Publication** \_\_\_\_\_

**Year of Completion:** 2008

**Date of 1st Publication:** September 30, 2008

**Nation of 1st Publication:** United States

**Author** \_\_\_\_\_

■ **Author:** Elise Broach

**Author Created:** text

**Work made for hire:** No

**Citizen of:** United States

**Domiciled in:** United States

■ **Author:** Kelly Murphy

**Author Created:** artwork

**Work made for hire:** No

**Citizen of:** United States

**Domiciled in:** United States

**Copyright claimant** \_\_\_\_\_

**Copyright Claimant:** Elise Broach

129 Adams Road, Easton, CT, 06612, United States

**Copyright Claimant:** Kelly Murphy

470 Towne Street, North Attleboro, MA, 02760, United States

**Rights and Permissions** \_\_\_\_\_

**Organization Name:** Henry Holt and Company

**Name:** Mimi Ross

**Email:** mimi.ross@hholt.com

**Telephone:** 646-307-5299

**Address:** 175 5th Ave

10th Floor

New York, NY 10010

## Certification

---

**Name:** Mimi Ross

**Date:** October 8, 2008

---

**IPN#:**

**Registration #:** TX0006895400

**Service Request #:** 1-102955121

Henry Holt and Company  
Mimi Ross  
175 5th Ave  
10th Floor  
New York, NY 10010

Type of Work: Text

Registration Number / Date:  
TX0006932508 / 2008-06-24

Application Title: The Monster of Florence.

Title: The Monster of Florence.

Description: Book.

Copyright Claimant:  
Splendide Mendax, Inc.and Mario Spezi, Transfer: By  
Agreement.

Date of Creation: 2008

Date of Publication:  
2008-06-10

Authorship on Application:  
Douglas Preston; Citizenship: United States. Authorship:  
Author of Text.  
Mario Spezi; Citizenship: United States. Authorship:  
Author of Text.

Names: Preston, Douglas  
Spezi, Mario

=====

This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 304 of title 17, United States Code, attests that renewal registration has been made for the work identified below. The information has been made a part of the Copyright Office records.

*Barbara Ringer*  
Register of Copyrights  
United States of America

REGISTRATION NUMBER  RE 52-130
EFFECTIVE DATE OF RENEWAL REGISTRATION JAN 22 1980 (Month) (Day) (Year)

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

1 Renewal Claimant(s)	RENEWAL CLAIMANT(S), ADDRESS(ES), AND STATEMENT OF CLAIM: (See Instructions)	
	1	Name <u>Mary Hemingway,</u> Address <u>c/o Alfred Rice, 40 West 55th Street, New York, N.Y. 10019</u> Claiming as <u>Widow of Author</u> (Use appropriate statement from instructions)
	2	Name ..... Address ..... Claiming as ..... (Use appropriate statement from instructions)
	3	Name ..... Address ..... Claiming as ..... (Use appropriate statement from instructions)

2 Work Renewed	TITLE OF WORK IN WHICH RENEWAL IS CLAIMED:  <u>THE OLD MAN AND THE SEA</u>
	RENEWABLE MATTER:  <u>THE OLD MAN AND THE SEA</u>
	CONTRIBUTION TO PERIODICAL OR COMPOSITE WORK: Title of periodical or composite work: <u>Life Magazine</u> If a periodical or other serial, give: Vol. <u>33*</u> No. <u>9*</u> Issue Date <u>August 26, 1952</u> <u>9/1/52 *</u>

3 Author(s)	AUTHOR(S) OF RENEWABLE MATTER:  <u>ERNEST HEMINGWAY</u>
----------------	---

4 Facts of Original Registration	ORIGINAL REGISTRATION NUMBER: <u>B5-21683</u>	ORIGINAL COPYRIGHT CLAIMANT: <u>ERNEST HEMINGWAY</u>
	ORIGINAL DATE OF COPYRIGHT: • If the original registration for this work was made in published form, give: DATE OF PUBLICATION: <u>August 28, 1952</u> (Month) (Day) (Year)	
		• If the original registration for this work was made in unpublished form, give: DATE OF REGISTRATION: ..... (Month) (Day) (Year)



EXAMINED BY: *ja*  
CHECKED BY: .....

22 JAN 1980

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DEPOSIT ACCOUNT  
FUNDS USED:



REMITTANCE NUMBER AND DATE:

122055 JAN 22 80

RE

52-130

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

**RENEWAL FOR GROUP OF WORKS BY SAME AUTHOR:** To make a single registration for a group of works by the same individual author published as contributions to periodicals (see instructions), give full information about each contribution. If more space is needed, request continuation sheet (Form RE/CON).

5

Renewal  
for Group  
of Works

1	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
2	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
3	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
4	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
5	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
6	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)
7	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... Registration Number: ..... (Month) (Day) (Year)

**DEPOSIT ACCOUNT:** (If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.)

Name: .....  
Account Number: .....

**CORRESPONDENCE:** (Give name and address to which correspondence about this application should be sent.)

Name: Alfred Rice .....  
Address: 40 West 55th Street ..... (Apt.)  
New York, New York 10019 .....  
(City) (State) (ZIP)

6

Fee and  
Correspondence

**CERTIFICATION:** I, the undersigned, hereby certify that I am the: (Check one)

☐ renewal claimant

☒ duly authorized agent of:

Mary Hemingway

(Name of renewal claimant)

of the work identified in this application, and that the statements made by me in this application are correct to the best of my knowledge.



Handwritten signature: (X) .....

Typed or printed name: Alfred Rice

Date: January 15, 1980

7

Certification  
(Application must be signed)

Alfred Rice

(Name)

40 West 55th Street

(Number, Street and Apartment Number)

New York, New York 10019

(City)

(State)

(ZIP code)

MAIL  
CERTIFICATE  
TO

27 MAR 1980  
(Certificate will be mailed in window envelope)

8

Address for  
Return of  
Certificate

# CERTIFICATE OF REGISTRATION



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

REGISTER OF COPYRIGHTS  
United States of America

FORM 1A  
For a Literary Work  
UNITED STATES COPYRIGHT OFFICE  
REGISTRATION NUMBER

TX 5-327-522



EFFECTIVE DATE OF REGISTRATION

Month *Dec* Day *6* Year *00*

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK  
ON WRITING

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appears.

If published in a periodical or serial give: Volume Number Issue Date On Pages

2

NAME OF AUTHOR  
a Stephen King

DATES OF BIRTH AND DEATH  
Year Born Year Died

Was this contribution to the work  
☐ Yes "work made for hire"  
☒ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of  
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☒ No  
Pseudonymous? ☐ Yes ☒ No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.  
entire work (excluding excerpts as noted)

NAME OF AUTHOR

DATES OF BIRTH AND DEATH  
Year Born Year Died

Was this contribution to the work  
☐ Yes "work made for hire"  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of  
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☐ No  
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.

NAME OF AUTHOR

DATES OF BIRTH AND DEATH  
Year Born Year Died

Was this contribution to the work  
☐ Yes "work made for hire"  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country  
OR { Citizen of  
Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK  
Anonymous? ☐ Yes ☐ No  
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed.

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED  
2000 Year

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK  
Complete this information ONLY if this work has been published.  
Month October Day 3 Year 2000  
USA Nation

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

STEPHEN KING  
c/o Simon & Schuster, Inc.  
1230 Avenue of the Americas - 17th floor  
New York, NY 10020

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED  
DEC 10 2000  
ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED  
DEC 10 2000  
REMITTANCE NUMBER AND DATE

See instructions before completing this space.

MORE ON BACK

- Complete all applicable spaces (numbers 5-11) on the reverse side of this page.
- See detailed instructions.
- Sign the form at line 10.

DO NOT WRITE HERE  
Page 1 of 2 pages

CHECKED BY 

☐ CORRESPONDENCE  
Yes

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

**PREVIOUS REGISTRATION** Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box)

- a. ☐ This is the first published edition of a work previously registered in unpublished form.  
b. ☐ This is the first application submitted by this author as copyright claimant.  
c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," Previous Registration Number ▼ Year of Registration ▼  
give:

**DERIVATIVE WORK OR COMPILATION** Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates.  
excerpts used by permission

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.  
entire work (excluding excerpts as noted)

See instructions  
before completing  
this space.

---space deleted---

**REPRODUCTION FOR USE OF BLIND OR PHYSICALLY HANDICAPPED INDIVIDUALS** A signature on this form at space 10, and a check in one of the boxes here in space 8, constitutes a non-exclusive grant of permission to the Library of Congress to reproduce and distribute solely for the blind and physically handicapped and under the conditions and limitations prescribed by the regulations of the Copyright Office: (1) copies of the work identified in space 1 of this application in Braille (or similar tactile symbols); or (2) phonorecords embodying a fixation of a reading of that work; or (3) both.

- a. ☐ Copies and Phonorecords b. ☒ Copies Only c. ☐ Phonorecords Only

See instructions.

**DEPOSIT ACCOUNT** If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of  
Account Number ▼

Simon & Schuster, Inc.

DA066001

**CORRESPONDENCE** Give name and address to which correspondence about this application should be

Name/Address/Apt/City/State/ZIP ▼

Heather McNallie  
(below)

Area Code & Telephone Number ▶ (212) 698-7249

Be sure to  
give your  
daytime phone  
number.

**CERTIFICATION\*** I, the undersigned, hereby certify that I am the

Check only one ▶

- ☐ author  
☐ other copyright claimant  
☐ owner of exclusive  
right(s)  
☒ authorized agent of

Simon & Schuster, Inc.

Name of author or other copyright claimant, or owner of exclusive right(s) ▶

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Kathleen Nolan

date ▶ 10-3-0



Handwritten signature (X) ▼

MAIL  
CERTIFICATE  
TO

Certificate  
will be  
mailed in  
window  
envelope

Name ▼	Heather McNallie	trade
Number/Street/Apartment Number ▼	c/o Simon & Schuster, Inc. 1230 Avenue of the Americas - 17th floor	
City/State/ZIP ▼	New York, NY 10020	

**YOU MUST**  
• Complete all necessary spaces  
• Sign your application in space 10

**SEND ALL 3 ELEMENTS  
IN THE SAME PACKAGE**

1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO  
Register of Copyrights  
Library of Congress  
Washington, D.C. 20559

The Copyright Office has the authority to adjust fees at 5-year intervals, based on changes in the Consumer Price Index. The next adjustment is due in 1996. Please contact the Copyright Office after July 1995 to determine the actual fee schedule.



# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

United States Register of Copyrights and Director

Registration Number

**SR 769-751**

Effective Date of Registration:

March 31, 2016

## Title

Title of Work: Out of My Mind

## Completion/Publication

Year of Completion: 2015

Date of 1st Publication: March 29, 2016

Nation of 1st Publication: United States

International Standard Number: ISBN 9781508222460

## Author

• Author: Simon & Schuster, Inc.  
Author Created: sound recording, Performance  
Work made for hire: Yes  
Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Simon & Schuster, Inc.  
1230 Ave of the Americas, New York, NY, 10020, United States

## Rights and Permissions

Organization Name: Simon & Schuster, Inc.  
Address: 1230 Ave of the Americas - 12th Floor  
New York, NY 10020 United States

## Certification

Name: Danny LeMar  
Date: March 30, 2016  
Applicant's Tracking Number: Ath 10078128 (Draper)

\*000SR00007697510202\*

Type of Work: Text

Registration Number / Date:  
TX0007152543 / 2010-03-16

Application Title: Out of My Mind.

Title: Out of My Mind.

Description: Book, 295 p.

Copyright Claimant:  
Sharon M. Draper.

Date of Creation: 2010

Date of Publication:  
2010-03-09

Nation of First Publication:  
United States

Authorship on Application:  
Sharon M. Draper; Citizenship: United States. Authorship:  
text.

Rights and Permissions:  
Atheneum, Simon & Schuster, Inc.-17th Floor, 1230 Avenue of  
the Americas, New York, NY, 10020

ISBN: 9781416971702

Names: Draper, Sharon M.

=====

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

A handwritten signature in black ink, reading "Kay A. Leahy".

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-677-455**

Effective Date of Registration:

November 29, 2018

## Title

Title of Work: PAST TENSE A Jack Reacher Novel

## Completion/Publication

Year of Completion: 2018

Date of 1st Publication: November 05, 2018

Nation of 1st Publication: United States

International Standard Number: ISBN 9780399593512

## Author

- Author: Lee Child
- Author Created: text
- Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Lee Child  
c/o Darley Anderson Literary, TV and Film Agency, 11 Eustace Road, London,  
SW6 1JB, United Kingdom

## Limitation of copyright claim

Material excluded from this claim: Title page photograph

New material included in claim: text

## Rights and Permissions

Organization Name: Delacorte Press  
Address: 1745 Broadway  
5th Floor  
New York, NY 10019 United States

## Certification



**Name:** Deborah Foley  
**Date:** November 28, 2018

---



**Registration #:** TX0008677455  
**Service Request #:** 1-7170904791

Delacorte Press  
Deborah Foley  
1745 Broadway  
14th Floor  
New York, NY 10019 United States

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

**Registration Number**

**TX 7-990-221**

**Effective Date of Registration:**

December 22, 2014

## Title

**Title of Work:** A PATH APPEARS: Transforming Lives, Creating Opportunity

## Completion/Publication

**Year of Completion:** 2014

**Date of 1st Publication:** September 23, 2014

**Nation of 1st Publication:** United States

**International Standard Number:** ISBN 9780385349918

## Author

- Author:** Nicholas D. Kristof  
**Author Created:** text, photograph(s), excluding quotes and additional photos from other sources  
**Work made for hire:** No  
**Citizen of:** United States
- Author:** Sheryl WuDunn  
**Author Created:** text, photograph(s), excluding quotes and additional photos from other sources  
**Work made for hire:** No  
**Citizen of:** United States

## Copyright Claimant

**Copyright Claimant:** Nicholas D. Kristof  
c/o Janklow & Nesbit Associates, 445 Park Avenue, New York, NY, 10022

**Copyright Claimant:** Sheryl WuDunn  
c/o Janklow & Nesbit Associates, 445 Park Avenue, New York, NY, 10022

## Limitation of copyright claim

**Material excluded from this claim:** photographs, and quotes from other sources

**New material included in claim:** text, photographs, excluding quotes and additional photos from other sources

## Rights and Permissions

**Organization Name:** Alfred A. Knopf

**Registration #:** TX0007990221  
**Service Request #:** 1-1951193874

Penguin Random House LLC  
Michele Park  
1745 Broadway, 15th Fl.  
New York, NY 10019

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

**Registration Number**

**TX 7-991-120**

**Effective Date of Registration:**

December 05, 2014

## Title

**Title of Work:** PERFIDIA

## Completion/Publication

**Year of Completion:** 2013

**Date of 1st Publication:** September 09, 2014

**Nation of 1st Publication:** United States

**International Standard Number:** ISBN 9780307956996

## Author

- Author:** James Ellroy
- Author Created:** text, excluding brief epigraph
- Work made for hire:** No
- Citizen of:** United States

## Copyright Claimant

**Copyright Claimant:** James Ellroy  
c/o Sobel Weber Associates, Inc., 146 East 19th Street, New York, NY, 10003

## Limitation of copyright claim

**Material excluded from this claim:** brief epigraph from other source

**New material included in claim:** text, excluding brief epigraph

## Rights and Permissions

**Organization Name:** Alfred A. Knopf  
**Address:** c/o Penguin Random House LLC  
1745 Broadway  
New York, NY 10019

## Certification

**Name:** Michele Park  
**Date:** December 03, 2014

**Registration #:** TX0007991120  
**Service Request #:** 1-1947635062

Penguin Random House LLC  
Michele Park  
1745 Broadway, 15th Fl.  
New York, NY 10019

Type of Work: Text

Registration Number / Date:  
TX0008625531 / 2018-07-26

Application Title: The Pharaoh Key.

Title: The Pharaoh Key : A Gideon Crew Novel.

Description: Book, 311 p.

Copyright Claimant:  
Lincoln Child.  
Splendide Mendax, Inc., Transfer: By written agreement.

Date of Creation: 2018

Date of Publication:  
2018-06-12

Nation of First Publication:  
United States

Authorship on Application:  
Douglas Preson; Domicile: United States; Citizenship:  
United States. Authorship: text.  
Lincoln Child; Citizenship: United States. Authorship:  
text.

Pre-existing Material:  
excerpt from "In Praise of Limestone" and "Atlantis".

Basis of Claim: text.

ISBN: 9781455525829

Names: Preson, Douglas  
Child, Lincoln  
Splendide Mendax, Inc.

=====

Type of Work: Text

Registration Number / Date:  
TX0008490580 / 2017-09-07

Application Title: Refugee.

Title: Refugee.

Description: Book, 338 p.

Copyright Claimant:  
Alan Gratz.

Date of Creation: 2017

Date of Publication:  
2017-08-01

Nation of First Publication:  
United States

Authorship on Application:  
Alan Gratz; Domicile: United States; Citizenship: United  
States. Authorship: text.

Names: Gratz, Alan

=====

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

Registration Number

**TX 8-021-205**

Effective Date of Registration:

April 14, 2015

## Title

Title of Work: SIMON VS. THE HOMO SAPIENS AGENDA

## Completion/Publication

Year of Completion: 2015

Date of 1st Publication: April 01, 2015

Nation of 1<sup>st</sup> Publication: United States

## Author

- Author: Becky Albertalli
- Author Created: text
- Citizen of: United States
- Domiciled in: United States

## Copyright Claimant

Copyright Claimant: Becky Albertalli

c/o HarperCollins Publishers LLC, 195 Broadway, New York, NY, 10007

## Certification

Name: Eboni Walker

Date: April 06, 2015



# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Maria A. Pallante*

Register of Copyrights, United States of America

Registration Number  
**TX 7-771-878**

Effective date of  
registration:  
September 13, 2013

*6 Jan 2014*

*Current*

## Title

Title of Work: THE SPORTS GENE: Inside the Science of Extraordinary Athletic Performance

## Completion/Publication

Year of Completion: 2013

Date of 1st Publication: August 1, 2013

Nation of 1st Publication: United States

## Author

ISBN: 978-1-59184-511-9

■ Author: David Epstein

Author Created: text

Work made for hire: No

Citizen of: United States

## Copyright claimant

Copyright Claimant: David Epstein

c/o Penguin Group (USA), 375 Hudson Street, New York, NY, 10014,  
United States

## Certification

Name: Tsuyako Uehara

Date: September 11, 2013

**Registration #:** TX0007771878  
**Service Request #:** 1-987056328



Penguin Group (USA) --- Copyrights Department  
Tsuyako Uehara  
375 Hudson Street  
New York, NY 10014 United States

Type of Work: Text

Registration Number / Date:  
TX0005161206 / 2000-03-27

Title: The tipping point : how little things can make a big  
difference / Malcolm Gladwell.

Edition: 1st ed.

Imprint: Boston : Little, Brown, c2000.

Description: 279 p.

Copyright Claimant:  
Malcolm Gladwell

Date of Creation: 2000

Date of Publication:  
2000-03-01

Names: Gladwell, Malcolm

=====

# CERTIFICATE OF RENEWAL REGISTRATION

FORM RI

UNITED STATES COPYRIGHT OFFICE



This certificate, issued under the seal of the Copyright Office in accordance with the provisions of section 304 of title 17, United States Code, attests that renewal registration has been made for the work identified below. The information has been made a part of the Copyright Office records.

*[Signature]*

REGISTER OF COPYRIGHTS  
United States of America

REGISTRATION NUMBER

RE 387 164

EFFECTIVE DATE OF RENEWAL REGISTRATION

JUN 13 1966  
(Month) (Day) (Year)

OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY

1

Renewal  
Claimant(s)

RENEWAL CLAIMANT(S), ADDRESS(ES), AND STATEMENT OF CLAIM: (See Instructions)

1	Name..... Harper Lee Address..... c/o McIntosh & Otis, 310 Madison Ave., New York, NY 10017 Claiming as..... author <small>(Use appropriate statement from instructions)</small>
2	Name..... Address..... Claiming as..... <small>(Use appropriate statement from instructions)</small>
3	Name..... Address..... Claiming as..... <small>(Use appropriate statement from instructions)</small>

TITLE OF WORK IN WHICH RENEWAL IS CLAIMED:

TO KILL A MOCKINGBIRD

RENEWABLE MATTER:

CONTRIBUTION TO PERIODICAL OR COMPOSITE WORK:

Title of periodical or composite work: .....  
If a periodical or other serial, give: Vol. .... No. .... Issue Date .....

3

Author(s)

AUTHOR(S) OF RENEWABLE MATTER:

Harper Lee

4

Facts of  
Original  
Registration

ORIGINAL REGISTRATION NUMBER:

A 448971

ORIGINAL COPYRIGHT CLAIMANT:

Harper Lee

ORIGINAL DATE OF COPYRIGHT:

• If the original registration for this work was made in published form, give: DATE OF PUBLICATION: APR 11 25, 1960 (Month) (Day) (Year) OR • If the original registration for this work was made in unpublished form, give: DATE OF REGISTRATION: (Month) (Day) (Year)



RE 387 164	EXAMINED BY: <i>W</i> CHECKED BY: .....	RENEWAL APPLICATION RECEIVED:	FOR COPYRIGHT OFFICE USE ONLY
	DEPOSIT ACCOUNT FUNDS USED: <i>✓</i>	REMITTANCE NUMBER AND DATE	

**DO NOT WRITE ABOVE THIS LINE. FOR COPYRIGHT OFFICE USE ONLY**

<b>RENEWAL FOR GROUP OF WORKS BY SAME AUTHOR:</b> To make a single registration for a group of works by the same individual author published as contributions to periodicals (see instructions), give full information about each contribution. If more space is needed, request continuation sheet (Form RE/CON).				<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 0 auto;">5</div> Renewal for Group of Works
1	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
2	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
3	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
4	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
5	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
6	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			
7	Title of Contribution: ..... Title of Periodical: ..... Vol. .... No. .... Issue Date ..... Date of Publication: ..... (Month) (Day) (Year) ..... Registration Number: .....			

<b>DEPOSIT ACCOUNT:</b> (If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.) Name: <b>HARPER &amp; ROW, PUBLISHERS, INC.</b> Account Number: <b>DAO 56707</b>	<b>CORRESPONDENCE:</b> (Give name and address to which correspondence about this application should be sent.) Name: <b>HARPER &amp; ROW, PUBLISHERS, INC.</b> Address: <b>10 EAST 53rd STREET</b> (Apt.) <b>NEW YORK, N.Y. 10022</b> (City) (State) (ZIP)	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 0 auto;">6</div> Fee and Correspondence
--	--	---

<b>CERTIFICATION:</b> I, the undersigned, hereby certify that I am the: (Check one) <input type="checkbox"/> renewal claimant <input checked="" type="checkbox"/> duly authorized agent of: <b>Harper Lee</b> (Name of renewal claimant) of the work identified in this application, and that the statements made by me in this application are correct to the best of my knowledge. Handwritten signature: (X) <i>Nancy Bernaschina</i> Typed or printed name: <b>Nancy Bernaschina</b> Date: <b>6 June 1988</b>	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 0 auto;">7</div> Certification (Application must be signed)
--	---

<div style="border: 1px solid black; padding: 10px; text-align: center;"> <b>COPYRIGHT DEPARTMENT</b> (Name)  <b>HARPER &amp; ROW, PUBLISHERS, INC.</b>  <b>10 EAST 53rd STREET</b> (Street and Apartment Number)  <b>NEW YORK, N.Y. 10022</b> (City) (State) (ZIP code)       </div>	<b>MAIL CERTIFICATE TO</b>  (Certificate will be mailed in window envelope)	<div style="border: 1px solid black; border-radius: 50%; width: 30px; height: 30px; text-align: center; line-height: 30px; margin: 0 auto;">8</div> Address for Return of Certificate
---	---	---

# Certificate of Registration



3 May 2018

This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kay A. Lusk*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-522-411**

Effective Date of Registration:

October 26, 2017

## Copyright Registration for One Work by One Author

Registration issued pursuant to 37 CFR §202.3

### Title

*Dutton YR*

Title of Work: TURTLES ALL THE WAY DOWN

### Completion/Publication

Year of Completion: 2017

Date of 1st Publication: October 10, 2017

Nation of 1st Publication: United States

International Standard Number: ISBN 978-0-525-55536-0

### Author

• Author: John Green  
Author Created: text  
Citizen of: United States

### Copyright Claimant

Copyright Claimant: John Green  
c/o Penguin Random House LLC, 375 Hudson Street, New York, NY, 10014,  
United States

### Certification

Name: Sharon Watson  
Date: October 24, 2017



SCANNED



00000TX00085224110202



# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

**Registration Number**  
**TX 7-111-966**

**Effective date of  
registration:**  
December 1, 2009

**Title** \_\_\_\_\_

**Title of Work:** Under the Dome

**Completion/ Publication** \_\_\_\_\_

**Year of Completion:** 2009

**Date of 1st Publication:** November 10, 2009

**Nation of 1st Publication:** United States

**International Standard Number:** ISBN

9781439148501

**Author** \_\_\_\_\_

■ **Author:** Stephen King

**Author Created:** text

**Citizen of:** United States

**Copyright claimant** \_\_\_\_\_

**Copyright Claimant:** Stephen King

c/o Simon & Schuster, 1230 Avenue of the Americas, New York, NY, 10020

**Limitation of copyright claim** \_\_\_\_\_

**Material excluded from this claim:** Maps, noted lyrics

**New material included in claim:** text

**Rights and Permissions** \_\_\_\_\_

**Organization Name:** Scribner

**Address:** Simon & Schuster, Inc.-17th Floor  
1230 Avenue of the Americas  
New York, NY 10020

**Certification** \_\_\_\_\_



**Name:** Emily Keyes

**Date:** November 11, 2009

**Applicant's Tracking Number:** JW's office

---

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

Register of Copyrights, United States of America

Registration Number  
**TX 7-032-013**

Effective date of  
registration:  
May 27, 2009

*28 Jan 2010*

Title \_\_\_\_\_

Title of Work: WINTERGIRLS

Completion/ Publication \_\_\_\_\_

Year of Completion: 2008

Date of 1st Publication: March 19, 2009

Nation of 1st Publication: United States

Author \_\_\_\_\_

■ Author: Laurie Halse Anderson

Author Created: entire text

Work made for hire: No

Citizen of: United States

Anonymous: No

Pseudonymous: No

Copyright claimant \_\_\_\_\_

Copyright Claimant: Laurie Halse Anderson

c/o Penguin Group (USA) Inc., 375 Hudson Street, New York, NY, 10014

Limitation of copyright claim \_\_\_\_\_

Previously registered: No

Certification \_\_\_\_\_

Name: Sasha Kellner

Date: April 3, 2009

**Registration #:** TX0007032013

**Service Request #:** 1-200980777

**Penguin Group (USA) Inc.**  
**Copyrights Department**  
**375 Hudson Street**  
**New York, NY 10014**

# Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Kory A. Lusk*

Acting United States Register of Copyrights and Director

Registration Number

**TX 8-540-540**

Effective Date of Registration:

January 03, 2018

## Title

Title of Work: THE WOMAN IN THE WINDOW

## Completion/Publication

Year of Completion: 2018

Date of 1st Publication: January 01, 2018

Nation of 1<sup>st</sup> Publication: United States

## Author

• Author: A. J. Finn  
Author Created: text  
Work made for hire: No  
Citizen of: United States  
Domiciled in: United States  
Pseudonymous: Yes

## Copyright Claimant

Copyright Claimant: A.J. Finn, Inc.  
c/o HarperCollins Publishers, 195 Broadway, New York, NY, 10007, United States

Transfer statement: By written agreement

## Certification

Name: Leigh Browne  
Date: January 02, 2018

Correspondence: Yes