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4

Attorneys for Plaintiffs  
5 CAN'T STOP PRODUCTIONS AND  
SCORPIO MUSIC (BLACK SCORPIO) S.A.  
6

7 UNITED STATES DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA  
9

10 SCORPIO MUSIC (BLACK SCORPIO)  
11 S. A. and CAN'T STOP PRODUCTIONS,  
INC.

Case No. '11CV1557 BTM RBB

12 Plaintiff,

COMPLAINT FOR DECLARATORY  
RELIEF

13 vs.

14 VICTOR WILLIS

15 Defendant.  
16 \_\_\_\_\_/

17 By this action, Plaintiffs Scorpio Music, S.A. and Can't Stop Productions, Inc., seek  
18 a declaration of this Court that Defendant Victor Willis' attempt to exercise rights of  
19 recapture pursuant to Section 203(a) of the United States Copyright Act (17 U. S. C. §  
20 203(a)) is void and of no force or effect and in support thereof allege as follows:  
21

22 The Parties

23 1. Plaintiff Scorpio Music (Black Scorpio), S.A. ("Scorpio Music") is a corporation  
24 duly organized and existing under the laws of the nation of France and having as its  
25 principal place of business at 92, Avenue Kleber, 75116 Paris, France. At all relevant  
26

1 times Scorpio Music was, and continues to be a company engaged in the business of  
2 publishing and otherwise commercially exploiting musical compositions.

3 2. Plaintiff Can't Stop Productions, Inc. ("Can't Stop") is a corporation duly  
4 organized and existing under the laws of the State of New York and having its principal  
5 place of business at 1995 Broadway, 16<sup>th</sup> Floor, New York, New York 10023. At all  
6 relevant times Can't Stop, through its division, Can't Stop Music, was and continues to  
7 be a company engaged in the business of publishing and otherwise commercially  
8 exploiting musical compositions.

9 3. Defendant Victor Willis, upon information and belief, is a citizen of the  
10 State of California residing at 9115 Judicial Drive, No. 4521, San Diego, California  
11 92122

12 4. Plaintiff Can't Stop, at all relevant times was and continues to be the  
13 exclusive sub-publisher and administrator in the United States of musical compositions  
14 published and owned by Scorpio Music. In that capacity Can't Stop represents  
15 Scorpio Music in the commercial exploitation of Scorpio Music's musical compositions,  
16 including enforcing Scorpio Music's rights in those compositions.

17  
18 Jurisdiction and Venue

19  
20 5. The jurisdiction of this Court is based upon 28 U.S.C. Sections 1331 and  
21 1338(a) in that the controversy arises under an Act of Congress relating to copyright;  
22 to wit, the copyright laws of the United States (17 U.S.C. Section 101 *et seq.*). This  
23 action, to the extent that it seeks declaratory relief, is also brought under 28 U.S.C.  
24 Section 2201 and Rule 57 of the Federal Rules of Civil Procedure.



1                   Defendant Willis Wrongly Seeks to Terminate Copyright Ownership

2  
3           14. In January 2011 defendant Willis served upon Can't Stop a "Notice of  
4 Termination of Post 1977 Grants of Copyright on Certain Works of Victor Willis" (the  
5 "Notice"). A true and exact copy of the Notice is attached hereto as Exhibit "A" and  
6 incorporated herein by this reference.

7           15. The Notice purports to terminate the rights of, among others, Scorpio Music  
8 and its agent, Can't Stop, in certain of the compositions (the "Compositions") which are  
9 enumerated in Schedule A of the Notice.

10           16. The Notice incorrectly states that Defendant Willis is "the author of the  
11 Works and the sole grantor of the rights under the Agreements," and wrongfully  
12 suggests that the entire copyright in all the Compositions should be reassigned to him  
13 at the expiration of the thirty- five year period set forth in the Copyright Law for songs in  
14 which the grant of a transfer of copyright was allegedly executed by defendant Willis on  
15 or after January 1, 1978.

16  
17                   Defendant Willis Refuses to Withdraw Notice Despite Can't Stop's  
18                   Response Setting Forth the Errors in His Position

19  
20           17. Can't Stop responded to the Notice by writing to Defendant Willis' attorney  
21 explaining that Defendant Willis had no legitimate right to seek the termination of Scorpio  
22 Music's copyright ownership, and demanding that the Notice be withdrawn.

23           18. Defendant Willis, through his attorney, has refused to withdraw the Notice.

24           19. That refusal is contrary to the facts and the governing law.

1 Defendant Willis Cannot Terminate Copyright Assignment in Joint Work

2 20. The Compositions, in their English language versions, are joint works written  
3 by more than one person.

4 21. In accordance with the Copyright Law joint works are considered as a "unitary  
5 whole" with each contributor's part "merged into inseparable or interdependent parts of a  
6 unitary whole" 17 U.S.C. Section 101.

7 22. Each of writers of the Compositions granted their copyright interests, if any,  
8 either to Can't Stop, as the agent of Scorpio Music, or to Scorpio Music itself.

9 23. While defendant Willis signed the Agreements, the other writers of the  
10 Compositions signed songwriter agreements with Scorpio Music.

11 24. 17 U.S.C. Section 203(a)(1) provides that "[i]n the case of a grant executed by  
12 two or more authors of a joint work, termination of the grant may be effected by a majority  
13 of the authors who executed it."

14 25. Defendant Willis, simply because he signed documents different from the ones  
15 signed by the other authors of the same joint works, is neither the sole grantor nor only  
16 author of any of the Compositions and hence, he is not a "majority of authors." As a result,  
17 defendant Willis could not terminate the copyright assignment for any of the Compositions  
18 without at least one other writer joining with him for such Composition. Willis' attempt to  
19 do so is, therefore, void as to all of the Compositions.

20 -  
21 Alternatively, Can't Stop Employed Defendant Willis as a Writer for Hire and He  
22 Therefore Has No Rights in Copyrights

23  
24 26. In the alternative, pursuant to the Agreements, Can't Stop employed defendant  
25 Willis and, hence, he is a writer for hire with no right in the copyrights to the Compositions  
26 for which he provided some English lyrics.

1           27. In addition to the Agreements establishing defendant Willis' "writer for hire"  
2 status, the circumstances pursuant to which defendant Willis rendered his services confirm  
3 that he functioned as an employee of Can't Stop.

4           28. Can't Stop, as part of its regular business of representing Scorpio Music in the  
5 United States, supervised and controlled the manner and means by which defendant Willis  
6 worked, including its location and duration, as well as the substance and meaning of the  
7 lyrics to be provided.

8           29. The Compositions, with some of the English lyrics provided by defendant  
9 Willis, appeared as parts of record albums (i.e., collective works), further qualifying  
10 defendant Willis' contribution to the Compositions as being works made for hire pursuant  
11 to the provisions of 17 U.S.C. Section 101(2).

12           30. Section 203(a) of the U. S. Copyright Act, under which Willis purports to  
13 exercise his rights, specifically excludes works made for hire.

14

15

Defendant Willis' Claim is Time-Barred

16

17           31. Defendant Willis entered into the Agreements more than thirty years ago.

18           32. During this period Can't Stop, pursuant to the terms of the Agreements, has  
19 paid him hundreds of thousands of dollars.

20           33. Equitable concepts such as laches and estoppel, as well as the relevant statute  
21 of limitations, preclude any attempt by defendant Willis to contest the validity of his status  
22 as a writer for hire.

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1           Even If Defendant Willis Has Recapture Rights He Cannot Obtain a Greater  
2 Proportion of the Copyright in the Compositions Than His Percentage Set Forth in the  
3 Agreements

4           34. Upon information and belief, defendant Willis claims the right to recapture at  
5 least half (i.e., fifty percent) of the copyrights in each of the Compositions.

6           35. Upon information and belief, defendant Willis ignores the existence of other  
7 people listed as writers of the Compositions to claim that he, alone, wrote all of their lyrics.

8           36. Although, as noted above, defendant Willis has no right to any portion of the  
9 copyrights, and the statute of limitations and equitable doctrines preclude him from  
10 disputing authorship attribution, in the event it is found otherwise, defendant Willis'  
11 maximum reversionary share of the copyright should be governed by, and be equal to, the  
12 percentage of royalties set forth in the Agreements which defendant Willis received as his  
13 compensation for services rendered.

14           37. The percentage referred to in paragraph 36, above, ranges from 12 to 20%.

15           Defendant Willis Cannot Terminate Existing Licenses and Derivative Works

16  
17           38. Even if Willis is found to have the right to terminate his alleged copyright  
18 transfer relating to the Compositions, he is precluded from terminating any licenses issued,  
19 or derivative works authorized, by Plaintiffs, which existed prior to the termination of the  
20 copyright assignment.

21  
22           Claim

23           39. Plaintiff Can't Stop repeats and realleges each and every allegation set forth  
24 in paragraphs 1 through 39 hereof with the same force and effect as if more fully set forth  
25 herein.

1 40. In order to resolve this controversy, plaintiff Can't Stop requests, pursuant to  
2 28 U.S.C. Section 2201 and, Rule 57 of the Federal Rules of Civil Procedure, that this  
3 Court declare the respective rights and duties of the parties in this matter and, in particular,  
4 that the Court (a) declare that the Notice is invalid, (b) that the Notice should be voided *ab*  
5 *initio*, and (c) that it be held that defendant Willis cannot recover any portion of the  
6 copyrights in the Compositions.

7 Declaration

8 41. An actual case and controversy exists sufficient for this Court to declare the  
9 rights and remedies of the parties in that there is a dispute between the parties concerning  
10 whether defendant Willis can terminate the rights of Can't Stop and Scorpio Music in the  
11 Compositions.

12 42. Plaintiffs Can't Stop and Scorpio Music have the requisite standing to request  
13 this declaration since they are the United States sub-publisher and worldwide publisher,  
14 respectively, of the Compositions, and Scorpio Music will lose a portion of its copyright  
15 ownership in the United States in the Compositions in the event that defendant Willis  
16 prevails.

17 43. This controversy is ripe for determination at this time because, according to the  
18 Copyright Law, ownership rights vested on the date the Notice was served and the  
19 termination of copyrights, absent a declaration by the Court to the contrary, will become  
20 effective beginning at the end of thirty-five years from the date of the Agreements. In the  
21 case of specific Compositions, the effective dates, depending on the particular  
22 Composition, begin in 2013.

23 44. The threat of the termination of a portion of the United States copyright in the  
24 Compositions casts a pall on the assets of the Compositions, diminishes their value, and  
25 complicates the ability of Can't Stop to commercially exploit them.

26 45. A decision on this issue is therefore needed as soon as possible.



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46. Plaintiffs have no adequate remedy at law.

WHEREFORE, Plaintiffs Can't Stop Productions, Inc. and Scorpio Music (Black Scorpio) S.A. pray that this Court:

a. Render a declaratory judgment providing that defendant Victor Willis has no right, title or interest in the copyrights to the Compositions;

b. Enter an order requiring defendant Willis to withdraw the Notice of Termination and submit to the United States Copyright Office whatever written document(s) it requires to effectuate such withdrawal, with copies to Plaintiffs;

c. Enter an order enjoining defendant Victor Willis, or any of his agents, licensees, representatives or assignees, from making any claims to the copyrights in the Compositions or in any other manner encumbering or restricting Can't Stop Productions, Inc.'s and Scorpio Music (Black Scorpio) S.A's rights in the Compositions.

d. In the alternative, and in the event defendant Willis is found to have a right to terminate the rights of Can't Stop Productions, Inc. and Scorpio Music (Black Scorpio) S.A. in the Compositions, that such reversion of rights to defendant Willis (i) be limited to the same percentage ownership as he receives as compensation relating to the Compositions and as set forth in the Agreements; and (ii) that defendant Willis be enjoined from terminating any licenses issued, or derivative works authorized, by Plaintiffs, which existed prior to the termination of the copyright assignment.

e. Award plaintiff Can't Stop Productions, Inc. and Scorpio Music (Black Scorpio) S.A. their costs and disbursements incurred in this suit, together with a reasonable allowance for counsel fees as provided by Section 505 of the Copyright Act, 17 U.S.C. Section 505.

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f. Grant such other and further relief as the Court may deem just and proper.

Dated: July 14, 2011

LAW OFFICES OF ROBERT S. BESSER

By   
ROBERT S. BESSER

Attorneys for Plaintiffs, CAN'T STOP  
PRODUCTIONS AND SCORPIO MUSIC  
(BLACK SCORPIO) S.A.

JS 44 (Rev. 12/07)

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

SCORPIO MUSIC (BLACK SCORPIO) S.A. and CAN'T STOP PRODUCTIONS, INC.

(b) County of Residence of First Listed Plaintiff Paris, France  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

LAW OFFICES OF ROBERT S. BESSER (310) 394-6611  
1221 Second Street, Third Floor, Santa Monica, CA 90401

**DEFENDANTS**

VICTOR WILLIS

County of Residence of First Listed Defendant San Diego  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

**'11CV1557 BTM RBB**

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

PERSONAL INJURY	PERSONAL INJURY	PERSONAL INJURY	PERSONAL INJURY	PERSONAL INJURY	PERSONAL INJURY
<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 610 Agriculture	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 620 Other Food & Drug	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input checked="" type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 630 Liquor Laws	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 640 R.R. & Truck	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 650 Airline Regs.		<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 660 Occupational Safety/Health		<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 355 Motor Vehicle Product Liability		<input type="checkbox"/> 690 Other		<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 360 Other Personal Injury		<input type="checkbox"/> 710 Fair Labor Standards Act	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 810 Selective Service
<input type="checkbox"/> 190 Other Contract			<input type="checkbox"/> 720 Labor/Mgmt. Relations	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 850 Securities/Commodities/Exchange
<input type="checkbox"/> 195 Contract Product Liability			<input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act	<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 875 Customer Challenge 12 USC 3410
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 740 Railway Labor Act	<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 441 Voting	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 790 Other Labor Litigation	<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 891 Agricultural Acts
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> Habeas Corpus:	<input type="checkbox"/> 791 Empl. Ret. Inc. Security Act		<input type="checkbox"/> 892 Economic Stabilization Act
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 530 General		<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	<input type="checkbox"/> 893 Environmental Matters
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 444 Welfare	<input type="checkbox"/> 535 Death Penalty		<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 894 Energy Allocation Act
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other	<input type="checkbox"/> 462 Naturalization Application		<input type="checkbox"/> 895 Freedom of Information Act
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee		<input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice
	<input type="checkbox"/> 440 Other Civil Rights		<input type="checkbox"/> 465 Other Immigration Actions		<input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN**

(Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Recopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
17 U.S.C. Sections 101 et seq.

Brief description of cause:  
Declaratory relief re attempt by Defendant to recapture copyrights

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND:  Yes  No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

07/14/2011

SIGNATURE OF ATTORNEY OF RECORD

RSB

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

# **EXHIBIT “A”**

**Harold Seider**

8212 De Longpre Avenue  
Los Angeles, California 90046  
323-650-0130

**VIA FIRST CLASS REGULAR MAIL**

Date: January 21 2011

c/o Can't Stop Productions, Inc.,  
Jay L. Wallberg  
Markum and Kleigman  
655 Third Avenue 16<sup>th</sup> Floor  
New York, NY 10017

and

c/o Can't Stop Music, a division of Can't Stop Productions, Inc  
Stephen L. Kopitko, Esq.,  
1995 Broadway 16<sup>th</sup> Floor  
New York, NY 10023

and

Scorpio Music and Black Scorpio SARL  
92 Avenue Kleber  
75116 Paris France

and

Francis Dreyfus Music and Societe Dreyfus Music Francis  
26 Avenue Kleber  
75116 Paris France

and

Universal Music Publishing MGB France and Le Rideau Rouge Editions SA  
16 Rue Des Fosses Saint Jacques  
75005 Paris France

and

You You Music Editions  
29 Avenue Mac Mahon  
75809 Paris Cedex 17, France

Re: Notice of Termination of Post 1977 Grants of  
Copyright on Certain Works of Victor Willis

Sirs:

**PLEASE TAKE NOTICE** that, pursuant to Section 203(a) of the U.S. Copyright Act of 1976, 17 U.S.C. §203(a), Victor Willis hereby terminates the grants of rights for certain musical works of Victor Willis (the "Work(s)"), including, but not limited to copyright, all publication rights and all rights under

copyright, made pursuant to the applicable agreements ("Agreement(s)") referenced beside each Work set forth on the Schedule "A" attached hereto and incorporated herein by this reference ("Schedule") The attached Schedule identifies for each Work, the applicable (i) Effective Date of Termination, (ii) Agreement and Execution Date, (iii) Original Grantee(s) and /or the Purported Successor(s) in Interest, (iv) Registration Numbers and Dates, and (v) Date(s) of Publication of the Works.

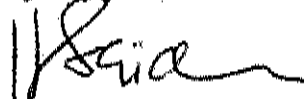
Based upon reasonable investigation of the records of the NYS Department of State Division of Corporations, BMI, SACEM and the United States Copyright Office, it appears that each of you, at the respective addresses noted above, are or may be the current owners of or claimants to the rights in and to one of more of the Works under the Agreements, as specifically set forth on the attached Schedule. Accordingly, service of this Notice of Termination is being made upon each of you at the addresses noted above.

This Notice is served upon you and effected by Victor Willis, the author of the Works and the sole grantor of the rights under the Agreements, by and through his attorney-in-fact and authorized agent, Harold Seider, c/o of the address first listed above.

The undersigned represents that he is the duly authorized agent of Victor Willis

Thank you for your cooperation.

Very truly yours,



HAROLD SEIDER

As Attorney-in-fact and Duly Authorized  
Agent of Victor Willis

cc: Victor Willis w/encls.  
Brian D. Caplan, Esq. w/encls

**SCHEDULE A**  
to  
**NOTICE of TERMINATION**  
**OF A GRANT OF TRANSFER OF COPYRIGHT**  
(pursuant to Section 203 of the Copyright Act, 17 U.S.C. 203)

Dated the \_\_\_\_ day of January, 2011

- 1. **Song Title** Y. M. C. A.
- Author(s) Executing Grant** Victor Willis
- Registration No. and Date** PA-25-983/  
1-22-1979
- Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
- Publication Date** 12 September 1978
- Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
- Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013
  
- 2. **Song Title** I'm A Cruiser
- Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-19-712/  
12/11/1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

3. **Song Title** **Hot Cop**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-19-713/  
12-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978



**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

**4. Song Title** **Ups and Downs**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-19-715/  
12-11-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

**5. Song Title** **My Roomate**

<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-19-714/ 12-11-1978
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
<b>Publication Date</b>	12 September 1978
<b>Agreement and Date</b>	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8 <sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
<b>Effective Date</b>	Termination is to become effective at midnight on the 13 <sup>th</sup> day of September 2013
<b>6. Song Title</b>	<b>The Women</b>
<b>Author(s) Executing Grant</b>	Victor Willis
<b>Registration No. and Date</b>	PA-19-711/ 12-11-1978
<b>Claimant(s)</b>	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and

(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 12 September 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8<sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 13<sup>th</sup> day of September 2013

7. **Song Title** **I Love America**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-38-593/  
6-20-1979 (Supplemental filing)  
to PA-29-910/  
2-15-1979 (initial filing)

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on Supplemental copyright registration (PA-38-593), and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on initial copyright registration (PA-29-910)  
and  
(4) Francis Dreyfus Music, as copyright claimant on initial copyright registration (PA-29-910)

and  
(5) You You Music Editions, as possible successor  
in interest of Lerideau Rouge and Francis  
Dreyfus Music, and described by SACEM as a co-  
publisher

Publication Date 14 June 1978

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 13<sup>th</sup> day of February, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

8. **Song Title** **Got A Feeling**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA29-908/  
2-15-1979 (Initial filing)  
PA-38-592/  
6-20- 1979 (Supplemental filing)

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on Supplemental copyright registration, (38-592) and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on initial copyright registration (PA-29-908)  
and  
(4) Francis Dreyfus Music, as copyright claimant on

initial copyright registration (PA-29-908)  
and  
(5) You You Music Editions, as possible successor  
in interest of Lerideau Rouge and Francis  
Dreyfus Music, and described by SACEM as a co-  
publisher

Publication Date 14 June 1978

Agreement and Date The grant to which this notification applies is  
described on the form used as an "Adaptation  
Agreement" dated the 13<sup>th</sup> day of February, 1978  
by and between Victor Willis, as grantor, but  
described on the form used as "Adapter" and Can't  
Stop Music, a division of Can't Stop Productions,  
Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight  
on the 15<sup>th</sup> day of June 2013

9. **Song Title** **Another Lonely Man**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA29-909/  
2-15-1979 (Initial filing)  
PA-38-594/  
6-20-1979 (Supplemental filing)

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright  
claimant on Supplemental copyright registration,  
(38-594) and as purported successor in interest to  
Can't Stop Music, a division of Can't Stop  
Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't  
Stop Productions, Inc., as original publisher and  
original grantee of the copyright  
and  
(3) Lerideau Rouge, as copyright claimant on  
initial copyright registration (PA-29-909)  
and

(4) Francis Dreyfus Music, as copyright claimant on initial copyright registration (PA-29-909)  
and  
(5) You You Music Editions, as possible successor in interest of Lerideau Rouge and Francis Dreyfus Music, and described by SACEM as a co-publisher

**Publication Date** 14 June 1978

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 13<sup>th</sup> day of February, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**10. Song Title** **Where Is My Woman**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** Pau 25-296/  
6-06-1978

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright of English lyrics  
and  
(3) Lerideau Rouge as original copyright claimant  
and  
(4) Francis Dreyfus Music as original copyright claimant

Publication Date	15 May 1978 or 14 June 1978 (included on Casablanca album NBLP 7101 released as indicated on copyright registration no. SR000001612 dated 1978-06-02 for this album)
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 8 <sup>th</sup> day of August, 1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 16 <sup>th</sup> day of May 2013 or 15 <sup>th</sup> day of June 2013
<b>11. Song Title</b>	<b>In The Navy</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-27-111/ 3-13-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	05 March 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't

	Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 6 <sup>th</sup> day of March 2014
<b>12. Song Title</b>	<b>Go West</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-29-525/ 4-9-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	23 March 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 24 <sup>th</sup> day of March 2014
<b>13. Song Title</b>	<b>Get Away Holiday</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA29-528/ 4-9-1979



Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	23 March 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12 <sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 24 <sup>th</sup> day of March 2014
<b>14. Song Title</b>	<b>I Wanna Shake Your Hand</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-29-527/ 4-9-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	23 March 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation

Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 24<sup>th</sup> day of March 2014

**15. Song Title Citizens of the World**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA-29-526/  
4-9-1979

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

Publication Date 23 March 1979

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 24<sup>th</sup> day of March 2014

**16. Song Title Manhattan Woman**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-27-112/  
3-13-1979

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 05 March 1979

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 12<sup>th</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 6<sup>th</sup> day of March 2014

**17. Song Title** **Where Are The Men**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-40-226/  
8-3-1979

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and

(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

Publication Date 02 July 1979

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15<sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 3<sup>rd</sup> day of July 2014

**18. Song Title It's A Man's World**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA-40-225/  
8-3-1979

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

Publication Date 02 July 1979

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15<sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
<b>19. Song Title</b>	<b>Sexy Man</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-40-227/ 8-3-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	02 July 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15 <sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
<b>20. Song Title</b>	<b>Bad Reputation</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-40-224/ 8-3-1979

Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
Publication Date	02 July 1979
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 15 <sup>th</sup> day of May 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 3 <sup>rd</sup> day of July 2014
<b>21. Song Title</b>	<b>Lady Night</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-48-434/ 10-24-1979
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc., and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and (3) You You Music Editions, described by SACEM as a co-publisher
Publication Date	10 April 1979

Agreement and Date                                      The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date    Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014

22.    **Song Title**    **Swiss Kiss**

Author(s) Executing Grant    Victor Willis

Registration No. and Date    PA-48-435/  
10-24-1979

Claimant(s)    (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright and  
(3) You You Music Editions, described by SACEM as a co-publisher.

Publication Date    10 April 1979

Agreement and Date    The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date    Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014

- 23. Song Title** **Viva California**
- Author(s) Executing Grant** Victor Willis
- Registration No. and Date** PA-48-436/  
10-24-1979
- Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) You You Music Editions, described by SACEM as a co-publisher
- Publication Date** 10 April 1979
- Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
- Effective Date** Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014
- 24. Song Title** **The Gay Paris**
- Author(s) Executing Grant** Victor Willis
- Registration No. and Date** PA-48-437/  
10-24-1979



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Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Cant Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright  
and  
(3) You You Music Editions, described by SACEM as a co-publisher

Publication Date 10 April 1979

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014

**25. Song Title French Pillow Talk**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA-48-438/  
10-24-1979

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

and  
(3) You You Music Editions, described by SACEM  
as a co-publisher

**Publication Date** 10 April 1979

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 2<sup>nd</sup> day of February 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

**Effective Date** Termination is to become effective at midnight on the 11<sup>th</sup> day of April 2014

**26. Song Title** **Magic Night**

**Author(s) Executing Grant** Victor Willis

**Registration No. and Date** PA-86-058/  
6-19-1980

**Claimant(s)** (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright

**Publication Date** 20May 1980

**Agreement and Date** The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 14<sup>th</sup> day of August 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date	Termination is to become effective at midnight on the 21 <sup>st</sup> day of May 2015
<b>27. Song Title</b>	<b>Milkshake</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-86-060/ 6-19-1980
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of Victor Willis of the copyright
Publication Date	20May 1980
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" dated the 14 <sup>th</sup> day of August 1979 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 21 <sup>st</sup> day of May 2015
<b>28. Song Title</b>	<b>Saint Louis</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-12-948/ 9-11-1978

Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
Publication Date	14 June 1978
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 15 <sup>th</sup> day of June 2013
<b>29. Song Title</b>	<b>Broadway</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-12-949/ 9-11-1978
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc. and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
Publication Date	14 June 1978
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation

Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**30. Song Title** **Star of Paris**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA-12-950/  
9-11-1978

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc.  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

Publication Date 14 June 1978

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective date Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

**31. Song Title** **Josephine Superstar**

Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-12-952/ 9-11-1978
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Cant Stop Productions, Inc, and (2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright
Publication Date	14 June 1978
Agreement and Date	The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".
Effective Date	Termination is to become effective at midnight on the 15 <sup>th</sup> day of June 2013
<b>32. Song Title</b>	<b>Around the World</b>
Author(s) Executing Grant	Victor Willis
Registration No. and Date	PA-12-951/ 9-11-1978
Claimant(s)	(1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc, and

(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

Publication Date 14 June 1978

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".

Effective Date Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013

33. **Song Title** **Don't Cry Mommy**

Author(s) Executing Grant Victor Willis

Registration No. and Date PA-12-953/  
9-11-1978

Claimant(s) (1) Scorpio Music (aka Black Scorpio) as copyright claimant on original copyright registration, and as purported successor in interest to Can't Stop Music, a division of Can't Stop Productions, Inc,  
and  
(2) Can't Stop Music, a division of Can't Stop Productions, Inc., as original publisher and original grantee of the copyright

Publication Date 14 June 1978

Agreement and Date The grant to which this notification applies is described on the form used as an "Adaptation Agreement" that is undated but reasonably believed to have been entered into subsequent to 1/1/1978 by and between Victor Willis, as grantor, but described on the form used as "Adapter" and Can't

**Stop Music, a division of Can't Stop Productions, Inc., described on the form used as "Publisher".**

**Effective Date**

**Termination is to become effective at midnight on the 15<sup>th</sup> day of June 2013**



AO 121 (6/90)

<p>TO:</p> <p style="text-align: center;"><b>Register of Copyrights Copyright Office Library of Congress Washington, D.C. 20559</b></p>	<p><b>REPORT ON THE FILING OR DETERMINATION OF AN ACTION OR APPEAL REGARDING A COPYRIGHT</b></p>
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In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION	<input type="checkbox"/> APPEAL	COURT NAME AND LOCATION
DOCKET NO. 11CV1557-BTM-RBB	DATE FILED July 14, 2011	United States District Court, Southern District of California 880 Front Street, Room 4290 San Diego, CA 92101-8900
PLAINTIFF Scorpio Music S.A. et al		DEFENDANT Victor Willis
<b>COPYRIGHT REGISTRATION NO.</b>	<b>TITLE OF WORK</b>	<b>AUTHOR OF WORK</b>
1 See Attached Complaint	See Attached Complaint	See Attached Complaint
2		
3		
4		
5		

In the above-entitled case, the following copyright(s) have been included:

DATE INCLUDED	INCLUDED BY		
	<input type="checkbox"/> Amendment	<input type="checkbox"/> Answer	<input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading
<b>COPYRIGHT REGISTRATION NO.</b>	<b>TITLE OF WORK</b>	<b>AUTHOR OF WORK</b>	
1			
2			
3			

In the above-entitled case, a final decision was rendered on the date entered below. A copy of the order or judgment together with the written opinion, if any, of the court is attached.

<p>COPY ATTACHED</p> <p><input type="checkbox"/> Order <input type="checkbox"/> Judgment</p>	<p>WRITTEN OPINION ATTACHED</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>DATE RENDERED</p>
CLERK W. Samuel Hamrick, Jr.	(BY) DEPUTY CLERK Y. Barajas	DATE July 14, 2011

Copy 1 - Upon initiation of action, mail this copy to Register of Copyrights Copy 2 - Upon filing of document adding copyrights, mail this copy to Registrar of Copyrights

Copy 3 - Upon termination of action, mail this copy to Registrar of Copyrights Copy 4 - In the event of appeal, forward this copy to the Appellate Court so they can prepare a new AO 279 for the appeal

Copy 5 - Case file copy