

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FILED

JUL 31 2009

Clerk, U.S. District and
Bankruptcy Courts

Damon Lloyd Goffe
2420 Morris Ave; apt 4L
Bronx, NY 10468
(646) 657-6935

Memorandum of Law

Case: 1:09-cv-01438
Assigned To : Unassigned
Assign. Date : 7/31/2009
Description: Pro Se Gen. Civil

Vs.

Oprah Winfrey
Harpo, Inc
110 N. Carpenter St
Chicago, IL 60607
312-633-1000
Fax: 312-633-1976

Complaint

- (a) I am Damon Lloyd Goffe the author (originator) of an original work of authorship in Literature and as such retain the exclusive rights up until 70 years after death. Const. Art 1. Sec 8
- (b) Under Copyright Act of 1976 stat101, changed Copyright Act of 1909 from ownership being up registration and publication to creation. The Berne Convention Implementation Act of 1988 removed the necessity for a

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copyright notice as requirement of copyright ownership in order to comply with Const. Art 1 Sec 8.

- (c) Oprah Winfrey did confess in April of 2008 to seizing original works of authorship in literature and publishing via the internet on web site WWW2.willsmithshow.bravo2.net the first draft of 'A Tome of Poetry' under the title, 'Pieces of My Soul' (site no longer up) without conveyance or operation of law. Defendants sold over 650 million copies for \$20 a copy which calculates to 1.2 Trillion dollars.
- (d) Under MGM v. Grokster: The uploading and downloading of intellectual property without conveyance or operation of law is construed as seizure and infringement.
- (e) Defendants did willfully and deliberately seize and exercise exclusive rights without conveyance or operation of law. Plaintiff is seeking remedies to injuries under title 17 stat201(e) Involuntary Transfer. Since no action of government, official, and organization is so ordered not to recognize or protect Defendants rights. Plaintiff is entitled to all the benefits of the exchange value (profits and interest totaling 1.2 Trillion dollars) and all arguments are to be construed as frivolous.
 - (1) The publication of the first draft of 'A Tome of Poetry' published under the title 'Pieces of My Soul' will be construed as seizure because the ordinary and proper manner in which trade is conducted did not meet accepted standards current in this industry. There was no conveyance or operation of law.
- (f) In suits of common law, where the value in controversy shall exceed \$20 the right of trial by jury shall be preserved Const. Amend VII.
 - (1) This claim is alleged under penalty of perjury and whether or not construed to be frivolous under Con of Pa v. Local Union No. 542, Intern Union of Operating engineers E.D.Pa1972,347 F.Supp.268, Const Law206(1). Plaintiff has right to unlimited and unimpaired access to courts.

(g) Plaintiff moves the court for summary judgment under F.R.C.P rule 56. The circumstances are truistic (commonplace) due to the popularity of the illegal surveillance presented as a reality TV show 'the will smith show,' which was titled 'Real World', on Bravo and Bravo 2 and the internet. All arguments are to be construed as frivolous under paragraph (e)

Also taken into consideration 'the will smith show on the radio,' broadcasted live 24 hrs a day on XM satellite.

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