

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GETTY IMAGES (US), INC.,  
Plaintiff,

v.

MICROSOFT CORPORATION,  
Defendant.

CIVIL ACTION NO. \_\_\_\_\_

**COMPLAINT FOR INJUNCTIVE  
RELIEF AND DAMAGES**

Plaintiff Getty Images (US), Inc. (“Getty Images”), for its complaint against Defendant Microsoft Corporation (“Microsoft”), avers as follows:

**NATURE OF THE CASE**

1. Plaintiff Getty Images brings this action to enjoin Defendant Microsoft from infringing and facilitating the massive infringement of Plaintiff’s copyrights through a new service that Defendant introduced less than two weeks ago. Plaintiff also seeks damages and other appropriate remedies for that infringement, as specified below.

2. On or about August 22, 2014, Defendant Microsoft released a new service called “Bing Image Widget,” which Defendant markets to website publishers as a tool for enhancing the visual quality of their websites. The Bing Image Widget allows website publishers to embed a panel on their websites that will display digital images supplied by Defendant through its proprietary “Bing Image Search” search engine, based on search queries of the website publisher’s choosing. The resulting display, Defendant tells website publishers, “enhances your web site . . . and provides your users with beautiful, configurable image galleries and slideshows.”<sup>1</sup>

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<sup>1</sup> <http://www.bing.com/widget/image>

3. What Defendant fails to mention, however, is that these “beautiful, configurable image galleries and slideshows” typically consist of copyrighted images, including images whose copyrights are owned or controlled by Plaintiff. Rather than draw from a licensed collection of images, Defendant gathers these images by crawling as much of the Internet as it can, copying and indexing every image it finds, without regard to the copyright status of the images and without permission from copyright owners like Plaintiff. The supply of images for the Bing Image Widget is therefore in the billions – essentially, the entire universe of images that Defendant can find on the Internet – including Plaintiff’s highly valuable copyrighted works. In effect, Defendant has turned the entirety of the world’s online images into little more than a vast, unlicensed “clip art” collection for the benefit of those website publishers who implement the Bing Image Widget, all without seeking permission from the owners of copyrights in those images.

4. The injury that Defendant’s Bing Image Widget causes Plaintiff – and, if not enjoined immediately, will cause further – is immense and irreparable. Plaintiff is one of the world’s largest providers of commercial visual content and the leading provider of commercial images online, representing more than 80 million unique works of digital imagery. Plaintiff’s business is thus critically dependent on licensing to others the right to use Plaintiff’s images in precisely the manner that Defendant now uses them illegally. By freely providing these images to websites after having copied them from other websites (without any permission to do so), Defendant has all but eliminated the incentive of website publishers to seek proper licenses from Plaintiff for the right to display its images on their websites. Given the nature and scale of Defendant’s conduct, the actual injury to Plaintiff is incalculable and cannot be remedied by monetary damages alone. Plaintiff asks, therefore, that the Court immediately enjoin

Defendant's Bing Image Widget and award damages arising out of Defendant's unlawful conduct.

**JURISDICTION AND VENUE**

5. This is a civil action seeking injunctive relief and damages for copyright infringement under the Copyright Act, 17 U.S.C. § 101 *et seq.*

6. This Court has original subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. The Court has personal jurisdiction over Defendant pursuant to N.Y. C.P.L.R. §§ 301 and 302(a) because Defendant (i) transacts or solicits business within the State of New York through, *inter alia*, its office in this District; (ii) has designated an agent for service of process in the State; (iii) has committed acts of copyright infringement within the State and in this District; (iv) has committed acts of copyright infringement outside the State, which caused injury to Plaintiff within the State and which Defendant expected or should reasonably have expected to have consequences within the State; (v) derives substantial revenue from interstate or international commerce; and (vi) previously subjected itself to jurisdiction in the State by filing numerous suits in this Court.

8. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391 and 1400(a).

**PLAINTIFF AND ITS BUSINESS**

9. Plaintiff Getty Images is a corporation organized under the laws of New York with its principal place of business in New York, New York.

10. Getty Images is one of the world's leading content providers. It supplies imagery, video, and music to business customers for a wide variety of uses, including websites, books, newspapers, magazines, film and television production, advertisements, and product packaging.

It is one of the world's largest providers of commercial visual content and the leading provider of commercial images online. Included among Getty Images' collection of works are many of the most iconic, creative and engaging photographic images ever created.

11. Getty Images' revenue is generated primarily by licensing the rights to use its content. Getty Images owns much of the content it licenses, but also acts as a distributor for more than 150,000 other content suppliers, including photographers, illustrators, filmmakers, media organizations, and other stock photo companies, all of whom depend on Getty Images for the collection and distribution of royalties and management of their intellectual property. These content suppliers retain ownership of the copyrights in their works but grant Getty Images by contract the right to market, distribute, and license those works to third parties. Getty Images owns or represents more than 80 million unique works of digital imagery.

12. Getty Images was the first company to license imagery via the Internet and currently delivers virtually all of its content through digital means. Getty Images maintains websites at [www.gettyimages.com](http://www.gettyimages.com) and [www.istock.com](http://www.istock.com), where visitors can search and view millions of images and obtain licenses to use them. Getty Images has invested and continues to invest substantial resources in operating these websites in order to provide potential customers with the means to browse its images and acquire rights to use them.

13. In March 2014, Getty Images revolutionized the way in which images are licensed and distributed online. Through its innovative "Embed" offering, Getty Images now permits noncommercial websites and users of social media to use any of approximately 50 million of Getty Images' copyrighted images without payment of any fees whatsoever, provided that the image is displayed using Getty Images' new "Embed" tool. The "Embed" tool consists of a short snippet of code (computer instructions) that a website publisher includes in a webpage

or a social media user includes in a post in order to embed a specific image within their content. This code causes the computer of a website visitor or a social media participant to obtain the specified image from a Getty Images server, where the image is actually hosted, and displays the selected image in an embedded viewer that includes photographer attribution and the Getty Images name and logo. A click on the image leads the viewer to a page where he or she may license commercial uses on a paid basis.

14. A non-exhaustive, illustrative list of Getty Images' federally copyrighted works that Defendant has illegally reproduced, distributed, and displayed is attached hereto as Exhibit A. Getty Images has received Certificates of Copyright Registration from the Register of Copyrights for these copyrighted works.

#### **THE DEFENDANT AND ITS UNLAWFUL CONDUCT**

15. Defendant is a corporation organized under the laws of the State of Washington, with its principal place of business in Redmond, Washington, and has at least two offices in the State of New York, including an office in this District.

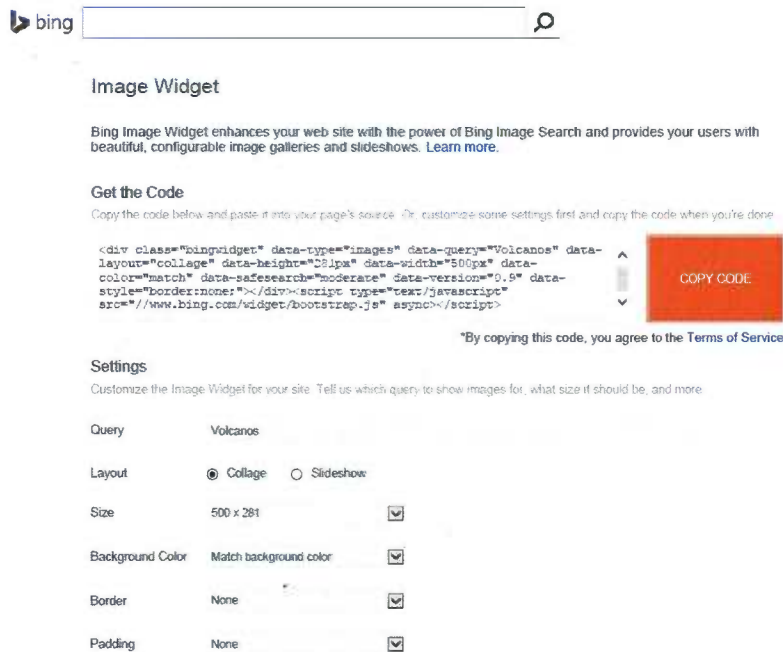
16. Defendant is a multinational company that develops, produces, licenses and/or sells a wide variety of products and services, including computer software, electronics, and online services.

17. One of Defendant's services is an Internet search engine known as "Bing," which includes a specialized, image-oriented search engine known as "Bing Image Search." Like other search engines, Bing crawls the Internet for online content and creates an index of that content in a database stored on Bing's own servers. Bing responds to user search queries by consulting its index and providing to the user the content that Bing determines is most relevant to the user's query.

18. In crawling the Internet for online content, Bing also makes at least one copy of every image that it finds online and stores at least a reduced-size, “thumbnail” copy of each image on its servers. Bing Image Search distributes and displays the thumbnails to users in response to image search queries along with larger-sized images and links to the third-party source websites that host the full-sized images, from which Bing’s copies were derived.

### The Bing Image Widget

19. On or about August 22, 2014, Defendant released its Bing Image Widget, which Defendant markets to website publishers as a tool that “enhances your web site with the power of Bing Image Search and provides your users with beautiful, configurable image galleries and slideshows.”<sup>2</sup> Similar to Plaintiff’s “Embed” tool, the Bing Image Widget consists of a snippet of code that website publishers can copy from the Bing Image Widget website, [www.bing.com/widget/image](http://www.bing.com/widget/image), and paste directly into the source code of pages on the publisher’s own website:



The screenshot shows the Bing Image Widget website interface. At the top, there is a Bing search bar. Below it, the heading "Image Widget" is displayed. A descriptive paragraph states: "Bing Image Widget enhances your web site with the power of Bing Image Search and provides your users with beautiful, configurable image galleries and slideshows. [Learn more.](#)"

The "Get the Code" section includes the instruction: "Copy the code below and paste it into your page's source code. Or, customize some settings first and copy the code when you're done." Below this is a code editor with the following HTML and JavaScript code:

```
<div class="bingwidget" data-type="images" data-query="Volcanos" data-layout="collage" data-height="281px" data-width="500px" data-color="match" data-safesearch="moderate" data-version="0.9" data-style="border:none" ></div><script type="text/javascript" src="//www.bing.com/widget/bootstrap.js" async></script>
```

To the right of the code editor is a red "COPY CODE" button. Below the code editor, a note reads: "\*By copying this code, you agree to the Terms of Service".

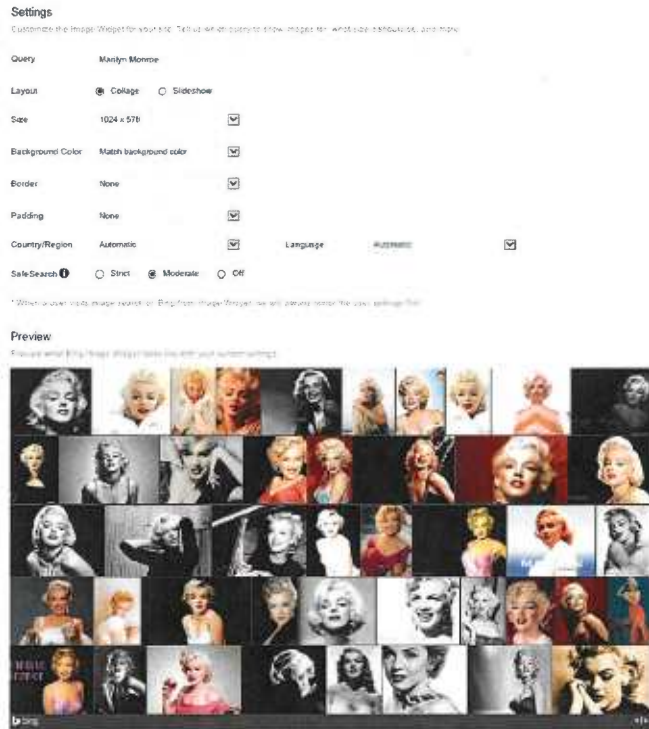
The "Settings" section is titled "Customize the Image Widget for your site. Tell us which query to show images for, what size it should be, and more." It contains several configuration options:

- Query: Volcanos
- Layout:  Collage  Slideshow
- Size: 500 x 281 (with a dropdown arrow)
- Background Color: Match background color (with a dropdown arrow)
- Border: None (with a dropdown arrow)
- Padding: None (with a dropdown arrow)

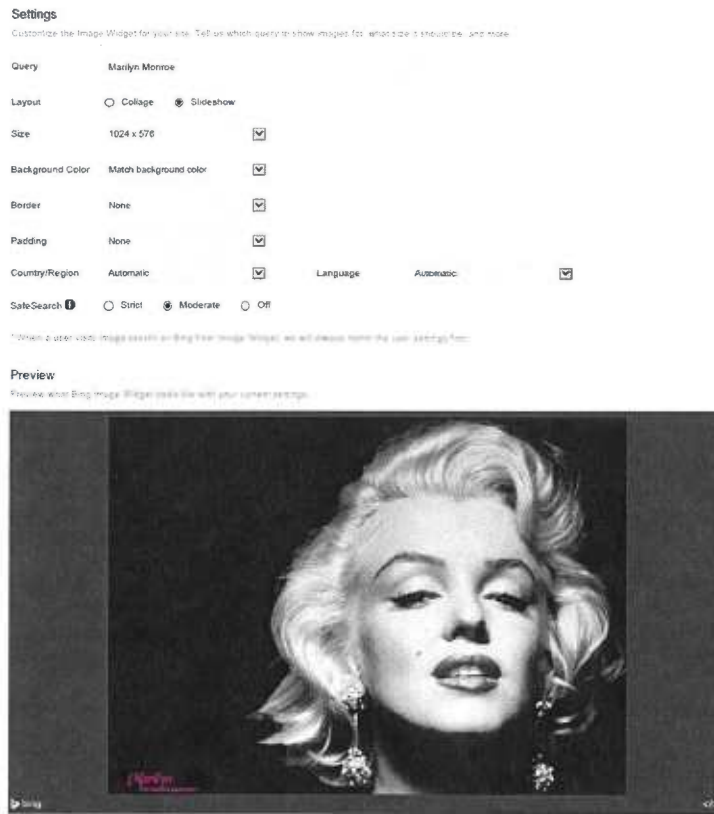
<sup>2</sup> <http://www.bing.com/widget/image>

20. Once the Bing Image Widget code has been added to a page on the publisher's website, that page will include an embedded panel, bearing the "Bing" logo, in which will be displayed images from Bing Image Search that Defendant has determined are most responsive to a search query of the publisher's choosing.

21. Certain features of the display can be customized by the website publisher before he or she copies and pastes the Bing Image Widget code into his or her own pages (the code will change depending on the choices that the website publisher makes). For example, Defendant gives the website publisher the option to have the images presented in either a "collage" or "slideshow" format. If the publisher chooses the "collage" format, the display panel will include a number of different thumbnail-sized images that Bing Image Search determines are relevant to the particular search query. To illustrate using the preview feature on [www.bing.com/widget/image](http://www.bing.com/widget/image), a query for the words "Marilyn Monroe" yields a collection of thumbnail-sized images of Marilyn Monroe in the display panel:



22. If the website publisher chooses instead to have a “slideshow,” then the display panel will include a number of larger-sized images – between 1 and 25, at the publisher’s election – that will appear one at a time, swapping out every few seconds. Again, a query for “Marilyn Monroe” yields a series of larger-sized, interchanging images of Marilyn Monroe in the display panel, which can be limited to a single, static image if the “slideshow” is limited to only one image:



23. Although the Bing Image Widget was released only recently and is designated by Defendant as a “beta” version, it has already been implemented by websites around the world – including in commercial settings – such as in the following example of a website for The Oak Store furniture store in Oakwood, Georgia, which selected the “slideshow” view of images based on a search query for “oak trees”:



Welcome to The Oak Store, located in Oakwood, Georgia.

This August 2014, we will be celebrating our 20 year anniversary.  
 We are a locally owned business that specializes in solid wood furniture.  
 We are proud to sell quality furniture that can last a lifetime.  
 From solid oak tables to unfinished solid pine, check out our selection as you browse our website.  
 Made in USA is important to us and we carry a large selection of American made products.  
 We offer layaway, 12 month interest free financing and delivery.  
 Customer satisfaction is our #1 priority.




**FIND MORE.** **GO northgeorgia.com**  
LOCAL BUSINESSES PROMOTIONS COUPONS JOBS EVENTS

Already have a website?  
 Transfer Easily

24. In another example, a website that sells fitness equipment and focuses on issues of health, fitness and nutrition selected the “slideshow” view based on a search query for “fitness”:

BEAUTIFUL FITNESS PHOTOS



CURRENT HEALTH NEWS

**Weekend Link Love – Edition 310**  
AUGUST 23, 2014

I did a few podcasts recently. First, I talked about the basics of Primal living on the Low Carb Paleo Show. I also chatted with Sam Feltham of Smash the Fat and Chris Martenson of the Peak Prosperity podcast about the primacy of diet in determining our health ... [\[Read More .\]](#)

**Botox for stomach cancer? No, but the research is fascinating**  
AUGUST 21, 2014

Amid continuing tales of global woe, Thursday morning's news carried one of those quirky 'fancy-

<sup>3</sup> <http://www.theoakstorega.com>

25. In yet another example, a website for a business that rents vacation accommodations on the Markaska Riveira in Croatia selected the “collage” view based on a search query for “croatia markaska”:



26. The images that Defendant uses to populate the Bing Image Widget display panel with content are not from some collection for which Defendant or users of the Bing Image Widget have obtained licenses to use in this manner. Instead, Defendant draws from the vast repository of images that Bing Image Search has already copied and indexed from the Internet at

<sup>4</sup> <http://healthnexercise.com>

<sup>5</sup> <http://www.makar80.eu/index.html>

large, including Plaintiff's copyrighted images, even though Defendant has no license or permission from Plaintiff to do so.

27. If the user of the Bing Image Widget has selected the "collage" view option, then Defendant simply populates the display panel with Defendant's own thumbnail-sized copies of the images that Defendant stores on its own servers. If the "slideshow" view is selected, then Defendant directs the user's browser (in a manner that is invisible to the user) to download and display the larger-sized image from the third-party website that hosts the image and from which Defendant, through Bing Image Search, made its copy of the thumbnail version of the image. Although the larger-sized image that appears in the display panel is hosted and served from the third-party source's server, Defendant intentionally masks the third-party source website and any context that surrounds the image as it appears on that third-party site, creating the appearance that the image is instead coming from the Bing-branded display panel. Further masking the image's origin (and serving Defendant's own commercial interests), clicking the image takes the user not to the third-party source website, but instead to Defendant's own Bing Image Search site.

28. Although Defendant draws on images and data that it collected through the operation of the Bing search engine, the Bing Image Widget does not function – nor does Defendant promote it – as a search engine that directs users to third-party sources of information online. To the contrary, Defendant expressly markets the Bing Image Widget as a website enhancement tool, designed to make websites on which the Widget is installed more visually attractive to users and to keep users from leaving the website, thereby increasing the website's

economic value. As Defendant itself proclaims, the Bing widgets “driv[e] engagement, time-on-site, and user satisfaction.”<sup>6</sup>

29. Moreover, Defendant derives significant economic value from the fact that clicking an image in the Bing Image Widget display panel takes the user not to the third-party source website, but instead to Defendant’s own Bing Image Search website. Drawing users to its own universe of websites and maximizing the time that users remain there allows Defendant to derive valuable data about those users and increases the value of Defendant’s websites for advertising purposes, among others. Indeed, Defendant has expressly reserved the right to charge direct fees for the use of the Bing Image Widget and to further monetize the service by placing advertisements in the Bing results in the display panel. *See* Exhibit B (terms of service).

30. Defendant, through its Bing Image Widget, competes directly with Plaintiff by supplying imagery to website publishers in order to enhance the appearance, attractiveness and value of websites on which that imagery is displayed, and to attract users to its own websites. Unlike Plaintiff, however, Defendant has no license or other permission to use Plaintiff’s copyrighted images in this manner, and pays nothing to the photographers and contributors who created the images.

31. Defendant’s unlawful reproduction, distribution and display of Plaintiff’s copyrighted works has harmed, and will continue to harm, Plaintiff. If website publishers can obtain from Defendant a virtually limitless collection of online images for display on their websites for free and without restriction, they will have little or no incentive to license such uses of Plaintiff’s copyrighted images from Plaintiff. Defendant’s services thus have acted and will continue to act as a substitute that displaces significant numbers of legitimate licensing

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<sup>6</sup> <http://www.bing.com/webmaster/help/bing-knowledge-widget-how-to-install-and-configure-a0de7aba> (discussing the Bing Knowledge Widget).

agreements. Moreover, Defendant supplies images to the Bing Image Widget with no controls on their downstream use, leaving users free to copy and further distribute Plaintiff's images in ways that cause additional, and incalculable, damages. In short, with each day of its continued use, the Bing Image Widget poses a significant threat to the economic viability of Plaintiff's business, its photographers and content suppliers, and, indeed, the entire photographic industry.

### **FIRST CAUSE OF ACTION**

#### **Copyright Infringement, 17 U.S.C. § 501, et seq.**

32. Getty Images repeats and incorporates by this reference each and every allegation set forth in paragraphs 1 through 31, as if set forth herein.

33. Getty Images is the owner and/or exclusive licensee of copyrights in the images that are the subject of this action, including but not limited to the works listed in Exhibit A hereto.

34. Defendant, without the permission or consent of Plaintiff, has reproduced, distributed to the public, and publicly displayed Plaintiff's copyrighted images, and has knowingly encouraged, materially contributed and/or facilitated the unauthorized reproduction, distribution, and display of Plaintiff's copyrighted images by others, including but not limited to the copyrighted works listed in Exhibit A hereto. Such reproduction, distribution and display of Plaintiff's works constitutes infringement of Plaintiff's exclusive rights under copyright in violation of 17 U.S.C. § 106(1), (3) and (5).

35. Defendant is directly and indirectly liable for these acts of infringement under the Copyright Act.

36. Defendant has the right and ability to stop or limit infringement occurring through the use of the Bing Image Widget and has a direct financial interest in such infringing activities.

37. The infringement of Plaintiff's rights in each of its copyrighted works constitutes a separate and distinct act of infringement.

38. Defendant's acts of infringement are willful, intentional and purposeful, in disregard of and with indifference to the rights of Plaintiff.

39. Defendant's conduct is causing, and, unless enjoined by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law.

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

- (a) for a declaration that Defendant willfully infringes Plaintiff's copyrights;
- (b) for such equitable relief under Titles 17 and 28 as is necessary to prevent or restrain infringement of Plaintiff's copyrights, including a preliminary injunction and a permanent injunction requiring that Defendant and its officers, agents, servants, employees, attorneys, and others in active concert or participation with each or any of them, (i) cease infringing, or causing, enabling, facilitating, encouraging, promoting or participating in the infringement of, any of Plaintiff's copyrights or exclusive rights protected by the Copyright Act or common law, whether now in existence or hereafter created; and (ii) cease to use, offer, provide or otherwise support the Bing Image Widget unless and until Defendant satisfies the Court that Defendant has ceased to infringe Plaintiff's copyrights;
- (c) for statutory damages pursuant to 17 U.S.C. § 504(c), in the maximum amount provided by law, as may be proven at trial, arising from Defendant's violations of Plaintiffs' rights under the Copyright Act or, in the alternative, at Plaintiff's election pursuant to 17 U.S.C. § 504(b), Plaintiff's actual damages, including Defendant's profits from infringement, in amounts to be proven at trial;

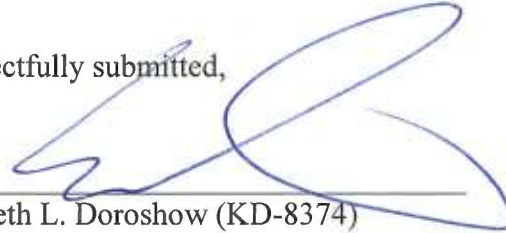
(d) for Plaintiff's costs, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505 and otherwise;

(e) for pre- and post-judgment interest on any monetary award made part of the judgment against Defendant; and

(f) for such other relief as the Court may deem just and proper.

Dated: September 4, 2014

Respectfully submitted,



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# **EXHIBIT A**



GETTY IMAGES ASSET ID	COPYRIGHT REGISTRATION NUMBER	COPYRIGHT REGISTRATION DATE	TITLE OF WORK
dv052006d	VA 1-729-668	8/18/2010	Multicultural business discussion. Getty Images number dv052006d
BF1429-001	VA 1-850-730	3/8/2013	Businessman falling over, legs in air (blurred motion) (BF1429-001)
200137589-001	VA 1-881-277	4/1/2013	Pit bull mix dog with tongue out, close-up (200137589-001)
200518841-002	VA 1-881-280	3/21/2013	Mixed breed dog with paws covering eyes (200518841-002)
BD8365-001	VA 1-881-285	3/19/2013	Chinchilla cat wearing diamond tiara, resting on cushion (BD8365-001)
88301298	VA 1-903-785	2/7/2014	Cat and dog taking pictures of themselves (88301298)
136251724	VA 1-904-816	2/21/2014	Bad Kitty (136251724)
103863352	VA 1-909-979	4/22/2014	Red Satin Theatre Curtains With Black Copy Space (103863352)
EB9822-002	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
999111-005	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
999117-004	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
996108-001	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
993072-001	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
992648-002	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
992645-001	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
988582-001	VA-1-304-333	11/26/2004	O'Clair 008/published stock images 1995 : Group registration of 108 published photos
BA65295	VA-1-385-319	8/13/2007	Mature woman wearing blue polo neck, portrait, close-up. Getty Images number BA65295.
414366-001	VA-1-419-398	7/11/2007	Words projected on hand pointing to page in dictionary. Getty images no. 414366-001.
200028913-001	VA-1-419-399	7/11/2007	Young woman with wet face laughing, close-up. Getty images number 200028913-001.
200012519-001	VA-1-420-480	7/17/2007	Two brothers (12-14) in football uniforms, portrait. Getty images number 200012519-001.
200019259-001	VA-1-420-481	7/17/2007	Question mark on road sign, close-up, low angle view. Getty images number 200019259-001.
BC3300-003	VA-1-420-483	7/17/2007	Woman sitting, with wistful expression, portrait. Getty images number BC3300-003.
200132982-001	VA-1-623-011	11/14/2007	Young woman lying down, eyes closed, close-up. Getty Images number 200132982-001.
AR1337-001	VA-1-623-582	12/6/2007	Chocolate truffles, close up. Getty images number AR1337-001.
AB68203	VA-1-623-736	12/7/2007	Cup of coffee and coffee beans. Getty Images number AB68203.
AB26324	VA-1-623-739	12/7/2007	Lab technician removing flasks from refrigerator. Getty Images number AB26324.
EA3962-001	VA-1-623-801	12/7/2007	Men sampling water from clarifier tank at waste treatment plant. Getty Images number EA3962-001.
BC7447-003	VA-1-623-937	12/7/2007	Common housefly (Musca domestica), close-up. Getty Images number BC7447-003.

GETTY IMAGES ASSET ID	COPYRIGHT REGISTRATION NUMBER	COPYRIGHT REGISTRATION DATE	TITLE OF WORK
AB68278	VA-1-623-938	12/7/2007	Family having picnic in meadow, Burgundy, France. Getty Images number AB68278.
BA61273	VA-1-623-943	12/11/2007	Signing will. Getty Images number BA61273.
AB01733	VA-1-623-959	12/13/2007	Woman writing check at bank counter, rear view. Getty Images number AB01733.
CA26551	VA-1-623-977	12/11/2007	Two wedding bouquets. Getty Images number CA26551.
816420-001	VA-1-624-240	12/17/2007	Selection of fruits arranged in a bowl, still life, overhead view. Getty Images number 816420-001.
6136-000102	VA-1-624-541	12/27/2007	Moisture on bottle of beer. Getty Images number 6136-000102.
ba17693	VA-1-625-100	1/2/2008	Calendar pages, close-up (grainy). Getty Images number BA17693.
200167546-003	VA-1-625-102	1/3/2008	Businesswoman catching falling money. Getty Images number 200167546-004.
10197811	VA-1-625-122	1/3/2008	Crowd cheering at baseball game. Getty Images number 10197811.
10197228	VA-1-625-123	1/3/2008	Jetty extending into sea, Cancun, Yucatan, Mexico. Getty Images number 10197228.
200009356-001	VA-1-625-124	1/3/2008	Young man with eye open wide, close-up. Getty Images number 200009356-001.
ab16310	VA-1-625-134	1/3/2008	Crowd of people walking on city street. Fifth Avenue, New York City, New York, USA. Getty Images number AB16310.
ba11057	VA-1-625-160	1/4/2008	Spain, Barcelona, crowd in La Rambla. Getty Images number BA11057.
AV1359-001	VA-1-625-303	1/9/2008	Surgeon wearing scrubs in operating room. Getty Images number AV1359-001.
DA60444	VA-1-626-056	1/9/2008	Man cooking food on barbecue, people dining in background. Getty Images number DA60444.
DA60456	VA-1-626-056	1/9/2008	Grandfather and grandson (6-8) by pool, low section, rear view. Getty Images number DA0456.
DA60447	VA-1-626-056	1/9/2008	Young woman and mature man in kitchen, man chopping tomatoes. Getty Images number DA60447.
83454508	VA-1-658-847	1/26/2009	Miley Cyrus Berlin Concert. Getty Images number 83453610 et al
83655539	VA-1-661-930	2/9/2009	83657222- The 56th Annual BMI Country Awards
2685663	VA-1-850-739	2/8/2013	Group Registration of Published Photographs, pub. Oct 31, 2003; 4 photos
a0003-000302	Vau-619-616	4/13/2004	DKlumpp 203PR, 303CARIB, 402TX4, 803USA, safe, 594CA,57823, 1203TX, 204MW1, 28123, 998EURO, 678TX, 683TX, 699JAX, 2021.
200397095-001	Vau-619-616	4/13/2004	DKlumpp 203PR, 303CARIB, 402TX4, 803USA, safe, 594CA,57823, 1203TX, 204MW1, 28123, 998EURO, 678TX, 683TX, 699JAX, 2021.

# **EXHIBIT B**