

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

STRIKE 3 HOLDINGS, LLC,	§	
	§	Civil Action
	§	No. <u>8:20-cv-00676-MSS-CPT</u>
Plaintiff,	§	
v.	§	
	§	
JOHN DOE infringer identified as using IP	§	
address 47.197.99.186,	§	
Defendant.	§	
	§	

JOHN DOE'S EXPERT REPORT BY
DAVID DICKSON

I. **SUMMARY**

I have been retained by counsel for the Defendant JOHN DOE infringer identified as using IP address 47.197.99.186 (“John DOE”) to address the factual allegations filed with this Court in the Complaint on March 24, 2020 (Court Docket 1), the Amended Complaint on August 31, 2020 (Court Docket 17), and the declaration of John Williamson (Court Docket 11-1) and deposition of John Williamson, the actual movies provided to the Defendant by the Plaintiff Strike 3 Holdings, LLC (“Strike 3”).

The purpose of my expert report is to provide an opinion that other witnesses may rely upon in this proceeding. My understanding is that Strike 3 has the right to ask for actual damages as the in the event infringement is found. Also, there is evidence that the works are not wholly “original” insofar that the plots and themes in the films are so standard and boilerplate that it is apparent the purpose of the films are not for intellectual stimulation.

My background is that I have assisted with the production of several Hollywood movies, including successful ones, “Margin Call”¹ and unsuccessful ones, “Parts per Billion”.² I have been a movie producer for over three decades.

Plaintiff Strike 3 Holdings, LLC (“Strike 3”) makes this allegation in their complaint:

3. Strike 3’s motion pictures are distributed through the Blacked, Tushy, Vixen, and Blacked Raw, adult websites and DVDs. With millions of unique visitors to its websites each month, the brands are famous for redefining adult content, creating high-end, artistic, and performer-inspiring motion pictures produced with a Hollywood style budget and quality.

It is fair to say that there is nothing “...**high-end, artistic, and performer-inspiring...**” about Strike 3 movies or that the Strike 3 movies are “...**produced with a Hollywood style budget and quality...**”. Rather, each Strike 3 movie was produced with a cost of \$ 2,000.00-\$ 6,000.00. This appears to be in-line with the costs of producing pornographic films.

¹ https://en.wikipedia.org/wiki/Margin_Call

² https://en.wikipedia.org/wiki/Parts_per_Billion

II. BACKGROUND AND COMPENSATION

I have not testified in as an expert at trial or by deposition during the past four years. I am charging a flat fee for this expert report of \$ 3,875.00. I will charge \$ 300.00 per hour to have my deposition taken or to provide trial testimony with a four hour minimum to prepare for my deposition or trial.

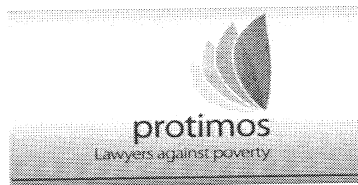
I have been in the film business for 35 years, producing and directing feature films and documentaries. I have been a consulting producer and executive producer on many films. I have also worked as a mentor for aspiring film makers and film artists and as a guest lecturer at London University, Goldsmiths collage for the film and documentary courses.

My expert opinion is not a legal opinion and I will not provide any opinions as to any law in this case.

My past projects have included:



Talk Of Home – documentary shot in the UK and China exploring the creative assimilation of 2nd generation immigrants as they become the people of the future. See <https://www.imdb.com/title/tt2094952/>.



Protimos – documentary exposing three miscarriages of justice in South Africa and Lesotho. This resulted in the resettlement and reparations in full for an entire tribe displaced by the construction of the Katse Dam, losing their farmland and homes, their burial grounds and religious land as well as their traditions and security. See <https://www.youtube.com/watch?v=npuXIS7A66c>



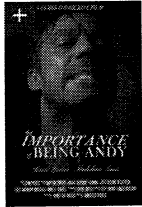
Once Upon A Crime (aka – Beyond Black & Blue) – feature documentary exposing the wrongful conviction of two NYPD detectives for a mob assassination in Denver. At the end of the film we meet the real assassin. Best Documentary Feature – Austin Film Festival



Margin Call – feature drama exploring the life of a Wall Street banker the night he discovers the bank has no choice but to initiate the financial crash of 2008. Kevin Spacey, Stanley Tucci, Jeremy Irons, Demi Moore. This movie received an Oscar nomination and a Spirit Award among others. https://en.wikipedia.org/wiki/Margin_Call



Flutter – feature drama about a gambler who does a deal with the devil. Now he is forced to make bets against himself and as the odds ramp up, people start to die. Joe Anderson, Laura Frazer, Billy Zane, Ricky Tomlinson <https://www.imdb.com/title/tt1579951/>



The Importance Of Being Andy – charts the effects of drugs and alcohol on the mind of a once famous Reality Star, now sinking rapidly into insane paranoia.

Jamie Lomas, Madelina Anea.

Best Actor – Hollywood Film Festival

See https://www.imdb.com/title/tt5147372/fullcredits/?ref_=tt_cl_sm



The Rambler – now a cult horror movie. A quiet drifter leaves prison and finds a new home on the road.

Dermot Mulroney, Natasha Lyonne.

https://www.imdb.com/title/tt2381355/fullcredits/?ref_=tt_cl_sm



Parts Per Billion – follows a small group of loosely associated people as they decline in their last days, succumbing to a lethal virus wiping out the earth's population.

Josh Hartnett, Rosario Dawson, Frank Langella, Gene Rowlands.

https://www.imdb.com/title/tt2495104/?ref_=fn_al_tt_1

III. REPORT

A. **THERE IS NO BASIS TO THE ASSERTION BY MR. WILLIAMSON THAT STRIKE 3'S MOVIES ARE MADE TO "HOLLYWOOD INDUSTRY STANDARDS"**

David Williamson has asserted, in his statement, that Strike 3 Holdings adult movie productions are made to 'Hollywood industry standards', this is an illusionary term. Firstly, I have researched Mr. Williamson's work and nowhere can I find a reference to his expertise in film production that would enable him to describe a film as being made to "Hollywood industry standards". The statement is designed to suggest that the scale, quality, production methods and delivery requirements are the same for both Strike 3 adult movies and mainstream Hollywood movies. While both genre's provide filmed entertainment, the manner of going about making that entertainment and a movies main purpose are very different. I also don't see copyright marks on any of the films, or titles on the copies I have reviewed. There is no notice of ownership of rights on these films, as I have seen them.

The apples and oranges comparison does not deny the effectiveness or entertainment value of an adult movie, but to say that any of the adult movies I have reviewed for this statement compare with a Hollywood movie in terms of production, resources and acting talent is misleading at best and most likely false.

B. **STRIKE 3'S PLOT AND FILMING TECHNIQUES ARE NOT COMPARABLE TO "HOLLYWOOD MOVIES".**

Each of the films I have reviewed follow the same basic plot lines and narrative formula:

- Scene One – Girl or girls introduce themselves, usually in voice over or brief conversation about how much they enjoy sex.
- Scene Two – The girl or girls, enjoy some kind of joint or solo foreplay, possibly meeting a guy in a location such as the beach front.
- Scene Three – The couple or threesome have sex. This scene accounts for well over 80% the running time (RT) of the movie.

Like the plot lines, the techniques used to film these adult movies are very basic. The craftsmanship and skills expected from a mainstream movie are not on display in these films. They show an economy of scale, usually using no more than three primary locations and employing a shooting technique where a single moving camera will capture all the required action to provide enough footage to edit a full length film. Using bright daylight and sunny locations removes any lighting issues, allowing the film maker to work with natural light at all times. This is the single biggest time saver on a production. Then the editing process becomes straight forward and simple. Using the very few number of shots and almost no second takes or cover (the term used to describe all the smaller shots a mainstream director would use to make a scene) the editor can layer the time lines and cut in and out of one shot to build a whole scene. The nature of sex lends itself to this

approach of shooting and editing, because the action is repetitious and can be shot from different angles in one take.

The comparison between a mainstream movie and an adult movie in terms of production values and investment does not really exist. The comparison being referred to is the on-screen sharpness of the shot, luxury surroundings and eroticism of the action. This is easily achieved in the case of the adult movies by using bright natural light and a camera used by smaller scale mainstream film makers. With the rise of digital production it is a simple matter to achieve the illusion of this similarity in quality. The Strike 3 Holdings movies have a sharp bright image with little contrast or depth. High quality digital cameras are very inexpensive today and by switching it on and keeping focus, capturing a clean and sharp image is very simple. By the very nature of mainstream film making the movement and demands on the camera and lighting equipment are much more complex in order to tell a story in moving pictures, as opposed to documenting an act – in this case sex. The budgets alone illustrate this point well – an adult movie can be shot for \$4,000 or less sometimes. A mainstream movie budget is considered between \$1MM to over \$250MM, in the case of James Bond, ‘No Time To Die.’

Good films can be made for very little money, Paranormal Activity, the 2009 horror movie cost \$15,000 and went on to be one of the most profitable film in history, up to that point, grossing \$193MM.

An anomaly like “Paranormal Activity” is bound to occur in any industry. It is fair to say that the producers of “Paranormal Activity” cannot mimic this movie a thousand times and expect the same profit margins.

To summarize, Strike 3’s assertion that their pornographic movies can be compared in the same way as a movie made to “Hollywood industry standards” is not only inaccurate but also disingenuous.

Strike 3 has produced over a thousand movies. The economy of scale for Strike 3’s production of an adult/pornographic movie is very straight forward with this format:

1. Use as few locations as possible. The adult movie will often have just two or three sets. In the case of these Strike 3 Holdings films. They are usually shot in the same location or in locations in close proximity, often in the same house.
 - Scene 1 – Girl lounges by the pool talking to her friend about how she loves sex.
 - Scene 2 – Girls walk along the beach meeting a guy and they start to have sex.
 - Scene 3 – Girls and guy have sex under the trees by the pool.

This requires two locations.

2. With a cast of two or three people and a crew of maybe eight or nine people (there is no need for more in these cases) the simplicity of physical shooting enables the adult movie maker to shoot very quickly.
3. Shooting ‘out of sequence’ is a technique used by both genres to minimize the time taken to move locations and return another time to shoot another scene in the same place. The making of multiple Adult Movies in three main locations means that many films can be shot in one day, using the same crew and bring in different cast for each movie. Shoot out one location then move upstairs to the next location appearing in three movies.
4. Adult movies require almost no post production as the edit is simple and there is no track laying for audio because the sound is live or possibly dubbed slightly later. Once the picture is locked the same edit machine can provide color correction of the quality required. This will enhance what the camera has already done by possibly opening up the aperture artificially to make a shot brighter and flatter. With very few colors in the shots its simple and quick to add the same caste to each scene.

C. STRIKE 3’s COSTS RANGE FROM \$3,156 to \$7,569

1. PAY-SCALE FOR ADULT MOVIE STARS AND CREW:

There are sliding scales and negotiated fees in both genres (mainstream and adult movie making). In the mainstream, professional safeguards are in place to protect the cast and crew from unfair practices and poor treatment.

Unions – performers in adult movies and other aspects of adult entertainment such as stripping can be represented by the Adult Performers Acting Guild crew members can also choose to be represented by the Adult Film Crew Local 424, however, membership of a union is not required. In mainstream movies cast and crew are all required to belong to major unions such as SAG/AFTRA (Screen Actors Guild - American Federation of Television and Radio Artists) and IATSE (International Alliance of Theatrical Stage Employees). Cast and crew members in these cases are permitted to work on non-union sets, however, the producer is required to pay health and welfare contributions based on the union scale for the members, ensuring that the basic needs of its members are satisfied and they are supported. In adult movies the cast and crew unions have very limited scope to enforce any of their rules.

Budget scale for adult movies:

TALENT	Salary
FEMALE PERFORMER, MAN/WOMAN SCENE	\$300-\$1,500
FEMALE PERFORMER, ALL-WOMAN SCENE	\$700-\$1,200
MALE PERFORMER	\$500-\$1,500

DIRECTOR	\$1,000-\$3,000
CAMERAPERSON	\$500-\$700
SOUND TECHNICIAN	\$300-\$400
PRODUCTION ASSISTANT	\$100-\$250
WRITERS	\$250-\$400
STILL PHOTOGRAPHERS	\$500
MAKEUP ARTISTS	\$500

Source: CNBC 'Porn's Dirty Little Secret' Jan 2016

The editor is not mentioned above because they are working in the post-production phase and not the shooting phase. If they are on a rate of \$500/day, cutting and delivering a minimum of two movies a day, to put nine films through post production with one editor post production will cost - \$2,500 and take four and a half days. A Hollywood industry production can take six months in post-production and cost approximately 35% of the movies budget.

If the location shoot is working at a leisurely 2 films/day, each with three scenes and two cast, to make 9 movies at minimum scale:

Low rate budget = $\$28,400/9 = \$3,156$ per movie.
 High Rate budget = $\$68,125/9 = \$7,569$ per movie.
 + editor @ \$500/title = \$2,500

The difference lies in how much a producer will be paying their 'porn-star'. At the very high end, performing extreme sexual acts, a female performer can make a lot of money, being paid by the scene unlike the male performers who are usually paid a day rate, as is the case with the crew.

Greg Lansky, former owner/operator of Strike 3 Holdings made the point in his 2018 interview with Jennifer Swann for Rolling Stone Magazine, that he is trying to create a 'life style' brand, providing entertainment. He was making this happen by providing sexually explicit promotional content for his 'brand', which is often displayed in the movies themselves – vixen bikini's, characters watching vixen porn sites and so on.

This is only product placement but hastily made, brand sensitive pornography trying to create a 'life style' brand based around a specific image style created for their pornographic movies. Hollywood movies also carry a lot of product placement but this is usually designed to reduce the budget rather than add to the 'life style' of the movie brand.

The Adult Movie industry works in its own world. Actors are immediate stars and hired for their sexual and physical prowess. Small independent movies for cinema or streaming would usually have a crew of at least 20 people, increasing with budget scale to hundreds of people, while there is no reason to have a crew of more than 6 or 7 people on an adult movie shoot. This speaks

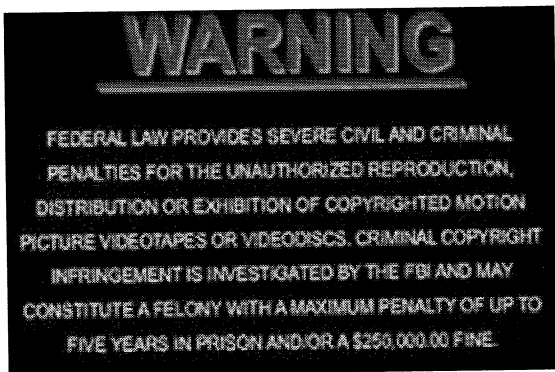
to genre productions being fundamentally different.

Mainstream movies have a complex narrative structure, requiring the director to be a good storyteller with the ability to use many different ‘takes’ and camera positions and angles to capture the meaning of a single scene, where-as adult movies have a very linear and single focused narrative. It is not the character or intricate plot that carries the movie along but, instead, it’s the constant display of sex and the promise of more sex that holds the story together.

Shooting a mainstream, Hollywood standard movie, is time consuming and very complex, taking weeks or months to complete, in some cases even years. Adult movies on the other hand can be shot very quickly, using just days to shoot multiple movies.

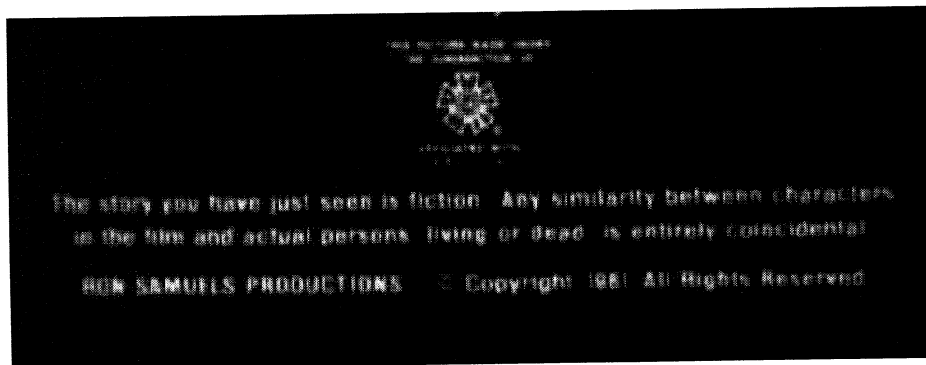
**D. STRIKE 3’S MOVIES DO NOT HAVE “HOLLYWOOD INDUSTRY STANDARD”
COPYRIGHT MARKINGS ON THE FRONT OR END ROLLERS**

Hollywood has adopted standard notices regarding warnings of infringement and copyright notices. A typical warning notice would look like this:



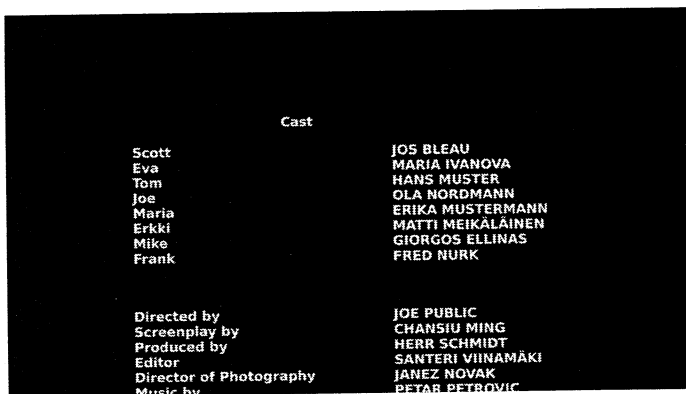
In the films I reviewed, there was no notice like this either in the front roller or the end roller.

Also, Hollywood films adopt a copyright notice of this type which is usually on the end roller. I did not see anything that resembled this type of notice.



E. STRIKE 3’S MOVIES DO NOT HAVE “HOLLYWOOD INDUSTRY STANDARD” CAST AND CREW CREDITS

Hollywood has adopted standard cast and crew credits, and also location information where the movies were shot. An example of this is shown here:



https://en.wikipedia.org/wiki/Closing_credits#/media/File:Example_movie_end_credits.png

Strike 3 does not have anything that resembles this in the end roller. Occasionally Strike 3 will put the name of the star in the front roller, but it is unclear if the name is a pseudonym (e.g. stage name) or their actual name. Further, unlike Hollywood Movies, where the film has “characters” and names associated with them, no such association is shown in the film. By way of example one would expect to see:

Pizza Delivery Boy	Joe Blow
Hot Model	Jane Chasm

Also, it is usually a contractual obligation to the investors who fund “Hollywood Movies”, and that they are usually recognized in either the front roller or the end roller. Further, countries or cities will frequently be recognized on the end roller, usually under a similar contractual obligation.

F. STRIKE 3’S S DO NOT SEEK RATINGS FROM THE MPA

Almost all of the “Hollywood Movies” solicit ratings from the MPA. ([www.https://www.carafilmratings.com/](https://www.carafilmratings.com/)) which rates movies from “G” to “NC-17”. The application process requires an investment of time and money. The amount of money for an application for a film rating ranges from \$ 750.00 to \$ 25,000.00 which would be a significant increase in the production budget.

G. SEVERAL OF THE SAME LOCATION SHOTS ARE USED IN MULTIPLE MOVIES

Unlike movies produced by the same director or the same studio, in these films I found that the same location shot was used in multiple movies. Shooting out of sequence is an industry standard technique, but at this scale it suggests a factory line of production.

	Location #1	Location #2	Location #3	Location #4	Location #5	Location #6	Location #7	Location #8	Location #9	Location #10	Location #11	Location #12	Location #13	Location #14
PUSHING BUTTONS							✓							
TRAVELLING TOGETHER			✓											
CHECK THEM OUT													✓	
BBC TO GO		✓												
IT WAS MY DREAM TO MEET HIM			✓											
SOMETHING TO LOOK FORWARD TO			✓											
NOSTALGIA												✓		
WHERE TO			✓											
GIRLS NIGHT IN											✓			
A QUIET WEEKEND IN MYKONOS		✓												
ALONE IN MYKONOS						✓								
VACATION WITH BENEFITS		✓												
WITH A VIEW			✓											
PROVING MY WORTH		✓												
HER COMMISSION		✓												
HONEY LOOK WHAT I FOUND											✓			
WE ALL DO IT								✓						
STIR ME UP		✓												
DO I KNOW YOU		✓												
ONE NIGHT ONLY											✓			

HOT GIRL SUMMER	✓																		
GET EVEN		✓																	
WEST COAST DREAMING		✓																	
OUR SECRET PLACE			✓																
TAKE ME AWAY						✓													
TYING UP LOOSE ENDS																			
TRAIN HER	✓																		
CAM TO ME	✓																		
ANAL DEPENDENCE													✓						
PARTING GIFT									✓										
GOOD BUSINESS																			✓
ONE IN A MILLION													✓						
HE CHOSE ME						✓													
AMAZING BENEFITS									✓										
A DREAM PAIRING		✓																	
PUSHED IN THE RIGHT DIRECTION						✓													

This type of production indicates two things. First, Strike 3 engages in filmmaking with an economy of scale by shooting multiple scenes in the same location, at the same time for different movies. This type of filming is contradictory to the declaration of "...Our movies are known for having some of the highest production budgets of any in the industry..." In 2019 the production budgets for the top ten movies were:

Highest production budgets in 2019 Title	Budget \$
Avengers : Endgame	400,000,000
Star Wars: The Rise Of Skywalker	275,000,000
The Lion King	260,000,000
Toy Story 4	200,000,000
Fast & Furious Presents: Hobbs & Shaw	200,000,000
Dark Phoenix	200,000,000
Maleficent: Mistress of Evil	185,000,000
Terminator: Dark Fate	185,000,000
Aladdin	182,000,000
Captain Marvel	175,000,000
Dumbo	170,000,000

H. THE ACTIONS OF THE ACTORS AND ACTRESSES IN THE FILMS APPEAR NOT TO BE COPYRIGHTABLE SUBJECT MATTER AND THE NON COPYRIGHTABLE MATTER IN THESE FILMS DOES NOT APPEAR TO BE DISCLAIMED ON THE REGISTRATIONS NAMELY THE SEX ACTS BEING FILMED.

I am not a copyright lawyer and I do not attempt to give an opinion on Copyright Law. I have read the Compendium from the Copyright Office and reproduce it here:

807.6 Derivative Audiovisual Works

An audiovisual work is considered a derivative work if it recasts, transforms, or adapts one or more preexisting works. See 17 U.S.C. § 101 (definition of “derivative work”). The preexisting material may or may not be audiovisual material. For example, a videogame may be based on a motion picture or a graphic novel. The author of the derivative work must have permission to use the preexisting material if that material is protected by copyright, and the author must contribute a sufficient amount of new original authorship in order to register the new work as a derivative work. See Chapter 300, Sections 311.2 and 313.6(B)

I have reviewed the Copyright Certificates that were provided as “BATES 12” by the Plaintiff. There were twelve copyright certificates provided appear to be templated in nature. After a review of the twelve copyright certificates, none of the certificates indicate either the movies were derivative works or disclaimed uncopyrightable subject matter. Further the description under “Author Created” is odd since the end product would be an audio visual work, but what is claimed is “production, direction, script/screenplay, cinematography”.

None of these descriptive words describe what the end product (e.g. the film) is. By way of example, Strike 3 uses the word “...production...”. “...Production..” is a process of making a film, it is not the film itself. The same is true with “..direction..” which is also a process.

As for “script/screenplay”, there is no indication that GL Web Media, Inc. created any scripts or screenplays as none were filed with the Copyright Office for this work and Strike 3 did not produce any underlying scripts or screenplays when requested in discovery by John Doe.

There is no indication that the registrations indicate that these films were derived from the scripts or screenplays of other works.

The seminal pornographic movies go back to 1915 and beyond. The early movies depicted different sex acts between different characters and now, over one hundred years later, nothing has changed at all. Along the way there have been porn movies that have managed to receive a general cinema (or theatrical) release to the public, but those films generally followed the basic rules of dramatic story telling as encapsulated by Syd Field (legendary Hollywood screen writing

guru) – Drama is conflict. The Green Door (1972, The Mitchell Brothers) was one of the first of these movies to receive a mainstream US deal. Adult, or porn movies today, in the case of the titles I have reviewed, all fail to deliver a dramatic ingredient so we are left with a basic introduction to “a character” who then spends almost the entire movie having sex.

What makes the films derivative, one of another, is that they are all one movie, just retold over and over again. There is no dramatic imperative, so the content doesn’t have to involve any drama. The action is reduced to a series of repetitive moves, the same in every movie. The order of events doesn’t change and the cast are interchangeable. One Strike 3 movie is the same as another Strike 3 movie.

Considering the key elements of these derivative films you immediately notice that the story is always the same. There may be a small scripted beginning to each film, or a voice over, but every time the content is exactly the same, it doesn’t matter how you re-tread the script it always starts with – “I just love sex.” Then people have sex, doing the same things billions of people around the world do to each other.

The filming techniques are always the same and facilitate the quick capture of action. Most locations are shot “right to left of left to right” in order to use the same locations multiple times without it being recognized immediately. The images themselves are all the same, so except for the faces of the cast, the action is interchangeable between different titles.

The work of a director becomes superfluous in these movies with each title presenting the same content in the same order over and over. This style of production is not limited to Strike 3. These productions are generic, I viewed several movies made by a competitor of Strike 3’s – Malibu Media, and found that they presented in exactly the same way, using the same techniques. There is no originality in pornographic movies because the producers have landed on a formula that requires no original and creative input but can be pressed out for the same effect every time.

I. Summary of the Movies in this Case.

I reviewed the 36 movies provided by the Plaintiff in this case. For those movies.

'Pushing Buttons'

Produced by: Jake King

RT: 33:33

Shot in a familiar LA home location used in many films under the Vixen brand. Young girl relaxes by the pool and explains in scripted voice over that she is spoiled and gets whatever she likes. Cut to her bedroom where she masturbates while explaining in V/O that her favorite thing is anal sex. Her home-schooling math teacher arrives at the house and in no time they are having anal sex. This storyline follows the same formulaic narrative as all the other films under review here from the Strike 3 brand.

Real Budget: \$3,500

'Travelling Together'

Produced and directed by – Julia Grandi

RT _ 52.54

Kenna establishes herself and her body on a beach in a swimsuit. She's typing in her bedroom explaining that she had just broken up with her boyfriend and was setting up some dates for her solo vacation. She arrives at the airport, possibly in Costa Rica. Soon she meets her first date in a street café. They head for the beach where they start to have sex. Then suddenly they are having sex on a cliff top. Suddenly they are by a pool in the hills having sex. This scene is the bulk of the movie.

Real Budget: \$4,500

'Check Them Out'

Produced & Directed by Julia Grandi

RT: 49:38

Opens with a three minute sequence of basic shots establishing the three girls and how much they like each other. Seems to be shot in Greece. More establishing shots of the pool area where the three girls and one boyfriend meet and head out on a boat then onto a beach scene for sex. This is all natural light and I would expect a profession crew to shoot this film in a morning.

Real budget: \$4,500

'BBC To Go'

RT: 48:28

A college student applies makeup, telling us in voice over how much she likes sex and trying new things. The one thing she hasn't done "is have sex with a black guy". Outside now, she looks over her apartment balcony to see a muscular black guy who lives below. They hang out on the deck together starting to have sex then they are in the bedroom having sex. The usual narrative – meet the girl, meet the sex partner and start to have sex, go somewhere to fill the last 60% or 70% of the movie in one continuous sex scene. This is filmed in natural light in an LA location.

Real Budget: \$3,000

'Girls Share'

Produced by Jake King

RT – 47.46

Husband and wife at home with his secretary, working. Wife and husband have decided to share his secretary for sex. Quick seduction of the secretary and they all move up to the bedroom – a regular set for vixen.com movies. The two women have sex with each other before the husband joins them for anal sex. The husband finishes on the girls faces. As with all of these formatted movies the shooting is very basic and the whole film can be shot out in a matter of hours. The cast are the imponderable element.

Real budget: \$3,500

'It Was My Dream To Meet Him'

RT – 37.39

Girl is introduced to major fashion designer. He takes her as his muse and she visits his studio where they have sex. Some exteriors but the vast majority of the movie is shot in natural light in the fashion designer's studio.

Real Budget: \$2,500

'Something To Look Forward To'

Produced & Directed by Julia Grandi

RT: 53:08

Following the previous Greek location solutions providing an economy of scale, this was made in the south of France, just like 'Our Secret Place'. Same locations, two girls and one guy. The same actor in both and essentially the same movie.

Real Budget: \$4,000.

'Nostalgia'

RT – 37.38

Single woman voice over about cheating on her boyfriend. Shoot various rooms in the house. The next day a handsome guy in a suit turns up at the door and within moments they are enjoying oral and anal sex in the sitting room. Very basic shoot.

Real Budget: \$3,500

'Where To'

Produced and Directed by Julia Grandi

RT – 47.02

A girl poses by the ocean as the sun sets in her Vixen trade marked bikini.

She sits in daylight in a garden texting with a friend. Cut to girl and guy enjoying drinks in the vixen standard ocean side pool. Move to the beech where they start to have sex. Then we're back at the pool for continuing sex.

Real Budget: \$2,500

'Girls Night In'

Produced by: Mike Moz

RT: 45:37

A young girl applies makeup intercut with night shots of downtown Los Angeles. This appears to be a mix of stock library footage perhaps and shots from the night shoot itself. The girl meets her friend on the streets of LA later the night. They buy some beer from a store so we assume they partied that evening. One girl is making out with a black guy in a parking lot. The other girl walks by then joins in. They go to an apartment and have three-way sex. Being a night shoot with three characters this film may have cost a little more than the usual daylight formula.

Real Budget: \$5,000,

'A Quiet Weekend In Mykonos'

Directed – Julia Grandi

RT – 39.44

Establishing the main girl walking around Mykanos and on the beach. Her friend asleep in bed. A voice over

explains that she is about to get married but her friend is partying all the time and spoiling her weekend. Back at the house she walks into the bedroom and sees her friend giving oral sex to a local guy. She watches for a while then joins in. while this was filmed in natural light throughout making the cost of physical production low, it was centered around anal and lesbian sex, which are expensive castings.
Real Budget: \$4,000

‘Alone In Mykonos’

Produced by: Julia Grandi

RT: 43:07

Girl and a guy. Possibly shot in Greece, as the title suggests. Simple locations – beach, beach bar, a deck and a pool house next to a horizon pool. Natural light and simple shooting practice. From what is on screen there is no reason to think this film took more than a part of a day to shoot. The economy of scale achieved by having three locations used in many films and shooting them out for every film at the same time in a block means that you could have possibly shot 3 or four or more 30 minute sex scenes in one day.
Real Budget: \$5,000.

‘Vacation With Benefits’

Produced by: Julia Grandi

RT: 38:48

Two main cast members to have sex and one fleeting moment with an extra – the man’s daughter and her friend leaving the house. This film has the usual format with a scripted voice over in a foreign language with subtitles. The girl sunbathes naked and is joined by her friend’s father. They have anal sex. This film looks like it was shot in the same Mykanos location as other films under the Vixen brand. In terms of budget and schedule, this film follows the same formula as the others – single location, natural light with two cast members.
Real budget: \$3,500

‘With A View’

Produced & Directed by: Julia Grandi

RT: 52:32

This film uses the same south of France locations – beach scene and house, exterior by the pool and follows the same formula as the others. Two girls and a guy meeting on the beach and going back to the house. The economy of scale for all of these films shot in the same locations require every beach scene to be shot together for each movie and then every house location scene to be shot back-to-back for every film.
Real Budget: \$4,500.

‘Proving My Worth’

Produced by – Jake King

RT – 48.34

Girl and guy on the beach, she’s running on the shore line. She is giving a guy oral sex until he ejaculates. Next morning, she is cooking breakfast. Carries it to the bedroom for the main sex scene.
Real Budget: \$2,500

‘Commission’

Produced by Jake King

RT – 45.47

Girl at computer waiting for her boss to close a big deal. The deal closes and the girl embarrasses herself mentioning sex. Next morning, in her bedroom as she is naked, preparing for work. At work, her boss is watching a tushy.com anal video and asks if she wants to try. This film involves some basic lighting.
Real Budget: \$3,000

'Honey Look What I Found'

Produced by – Mike Moz

RT – 51.20

A girl cruises the streets of LA texting someone to meet up. She driving along with her black date beside her when she attracts the attention of another black guy on the street. He walks over to the car and starts to get oral sex through the open window with the girl driving the car. The three go back to her hotel room and have three way sex. All shots, interior and exterior are cheaply and badly lit.

Real Budget - \$2,000

'We All Do It'

RT – 46.34

Two friends in LA, dancing by the pool in swimwear. One woman is married and cheating on her husband with her trainer. She suggests her friend should try it. The friend wrestles with her conscience and decides to try it. Then a 43 minute three-way sex scene in the living room. This film might have used a second camera.

Real Budge: \$4,000

'Do I Know You'

Producer/Director: unknown

RT: 53:18

Two girls find themselves across a swimming pool from a male porn star. The girl's video themselves kissing and entice the porn star to their room. This is all one location – one house, different rooms. Possibly the same house used in the Vixen movie – 'West Coast Dreaming'. As usual with all of these formulaic narratives this shouldn't be more than a half day shoot.

Real Budget: \$5,000.

'One Night Only'

RT – 43.49

Night time in LA. Girls is driven to a party. She is in a pool talking to camera about having only a few days left in LA. She goes up to an apartment where a black guy is waiting for her. They start to have sex right away and she is filming on her phone. In to a sequence of more than 40 minutes of the couple having sex in the same location.

Real Budget: \$2,500

'Hot Girl Summer'

Produced by – Jake King

RT – 40.57

Girls in bikini's, holding hand's walk along the dry bed of what looks like the LA river. In voice over they explain that they are vest friends and do everything together, as they dance on the cement river bed then to a house where they dance on the bed in a regularly seen set in Strike 3/Vixen productions. The owner of the house comes home and they all have sex together.

Real Budget: \$3,500

'Get Even'

Produced by Jake King

Staring: Tyler Quinn

RT: 36:35

Shot in Los Angeles this film tells the story of a married woman having sex with her personal trainer while her young daughter spies on them. The daughter then initiates sex with the trainer because she is jealous of her mother's casual hookup. One location using different rooms and exterior.

Real Budget: \$4,000.

‘West Coast Dreaming’

Produced by: Jake King

Staring: Gina Valentina & Eliza Ibarra

RT: 43:27

Two girls and a guy. The young girls in their bedroom with some short, improvised and scripted dialogue. Shots of NYC and LA appear to be bought stock footage. Some voice over under shots of a car rolling along the PCH. Next location is a poolside area where the three characters start having sex then we jump cut to a room for more sex. Aside from the PCH car shots and bought footage of cityscapes the other scenes were all shot in one LA location. In the first minute of this film there are 10 shooting angles and 15 cuts. Therefore, in this case multiple angles were taken from a single moving shot. It appears to be shot in natural light. I would expect an experienced professional crew to shoot this final sex scene in less than an hour using fewer takes to create a more elegant edit with single takes producing multiple cutting points.

Real budget: \$3500

‘Our Secret Place’

Director – Julia Grandi

RT – 40:20

This film follows two young girls on vacation together, possibly in the south of France. An opening sequence with dialogue in the girl’s bedroom leads to posed shots showing of their bodies before meeting a guy in a natural pool by a waterfall. They start to have sex then return to poolside at the house to continue – this scene makes up the bulk of the movie. Again, this is three actors and two locations, house Interior and exterior and the waterfall. This whole film could easily be shot in less than one day.

Real Budget: \$5000.

‘Take Me Away’

Director – Julia Grandi

Staring: Red Fox & Angelika Grays

RT – 53:52

Set in an exotic location overlooking the sea, shot in natural light. The location might be somewhere on the Mediterranean coast. The film opens with establishing shots of two girl’s poolside, there is a captioned voice over, I think the girl is speaking Russian. There are a handful of shots of an exterior of a house with four actors, then three drive off to the location overlooking the sea to have sex. This appears to be a one camera shoot, although, shot in natural light a B camera would not be expensive.

Real Budget: \$4,000

‘Tying Up Loose Ends’

RT – 43:59

Usual intro – two girls one guy having drinks, setting up date for future fantasy. Next meeting the two girls go up to a bedroom with the guy and start to make out with each other while he watches from the sofa before joining in. They move to the bedroom and continue with their threesome which makes up for 40 minutes of the movie.

Real cost: \$4,000

‘Train Her’

RT – 55:34

Girl drives through Beverly Hills in her sports car, to the house of an older man. There is an older woman waiting with the man. He goes up stairs so the girl is greeted by the older woman. The girl willing submits to lesbian anal sex, a training for the man waiting up stairs. She is finally sent up wearing a collar and leash. The man and girl have sex, oral, anal, vaginal.

This is a more expensive production because of casting and industry pricing for anal and lesbian work.

Real Budget: \$5,000

'Cam To Me'

Producer/Director: unknown

RT: 31:41

Cast of two. One girl comes to stay with her sister and her husband in their large LA home. The visiting sister gets into "camming" – this is videoing yourself having sex to post on line or live stream. While doing this her sister's husband comes home and they have anal sex. There is scripted dialogue and one location. This looks like the natural light might have been enhanced with a modest lighting kit. Once again, I don't see any elements here that would require more than a half a day to shoot the entire movie.

Real budget: \$3,500

'Anal Dependence'

RT: 42:33

Staring: Alice Pink.

A young girl is lying down, smoking a hookah and watching a Tushy.com anal video on her laptop. She masturbates. Cut to – expensive looking living room. The girl lies on the couch distracted by her phone and dressed provocatively as her psychiatrist paces around asking questions – they have anal sex. Once again, this film follows the same structure as all the others. Single location, lots of natural light.

Real Budget: \$4,000.

'Parting Gift'

Producer/Director: unknown

Staring: Bella Rolland

RT: 42:30

Woman seduces her boss into having anal sex as a good by gift on her last day at work. This is a single location, all in one house, different rooms. This is an anal sex movie which is one of the highest paying brands in porn movies for girls.

Real Budget: \$4,000.

'Good Business'

Black guy, white woman. She circles back in her car to pick up a forgotten item at the guys apartment. When she has arrived at the apartment they start to make out and have sex in the living room, balcony and bedroom. This is a night shoot with very basic lighting.

Real Budget: \$,2000

'One In A Million'

RT – 46.10

Two girls hanging out in LA. Night and day shots on the street and stock location footage. Girls are going to hook up with an older guy. They arrive at his house and he tells them to make out with each other. After a while, he joins in and there is lots of sex.

Real Budget: \$4,000

'He Chose Me'

RT – 40.38

Open on two young women sitting at a table about to argue. One of them has been chosen to accompany their boss on a trip to LA. At the house after bad dialogue about the evenings restaurant books and other business they end up poolside. The sex starts by the pool and they then go into the house. They are in the bedroom enjoying more sex. This single scene runs for Over 38 minutes.

Real Budget: \$2,500

‘Amazing Benefits’

RT – 43.10

Single location with four sets – bathroom, bedroom, poolside and living room.

This is a day and a night shoot with a female and male. Having sex repeatedly throughout the location. Allowing for the possible extra cost of a night shoot, which in this case would be minimal the schedule can still be worked across other titles shooting in the same location.

Real Budget: \$4,500

‘A Dream Pairing’

RT: 43:00

A model is applying makeup while talking on the phone to a Tushy.com booking agent. They want her and her friend for a shoot. This turns the girl on and she text’s with her friend asking if he wants to rehearse with her.

Poolside for a voice over explaining how excited she gets when she is booked for a shoot. Suddenly the guy is sitting with her and they move inside to a bedroom to rehearse their anal sex scene. This has a promo reel feel to it as the girl keeps praising Tushy.com in the script but in every other way it conforms to the usual tropes.

Real Budget: \$3,500

‘Pushed In The Right Direction’

RT – 44.59

There are several archive shot of LA in this movie. Opens - Two girls preening themselves on in a cabana by the pool. One friend is trying to talk the other into moving in. This is her sister’s house and she is already having an affair with her husband. Various flirtations before one guest start to have sex with her friends brother-in-law. The sister-in-law returns and spies on the couple having sex. She masturbates in the whole excitement of the moment before joining in.

Real Budget: \$4,000

Presented on April 3, 2022



CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2022 I electronically served the foregoing document on:

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