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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VHT, INC., a Delaware corporation,

Plaintiff,

v.

ZILLOW GROUP, INC., a Washington
corporation; and ZILLOW, INC., a Washington
corporation,

Defendants.

No. 2:15-cv-1096

**COMPLAINT FOR
COPYRIGHT INFRINGEMENT**

JURY DEMAND

Plaintiff VHT, Inc., d/b/a VHT Studios (“VHT”) by its undersigned attorneys, Davis Wright Tremaine LLP, as and for its complaint against defendants Zillow Group, Inc. (“Zillow Group”) and Zillow, Inc. (“Zillow, Inc.” and Zillow Group, “Zillow”), alleges as follows:

INTRODUCTION

1. This is an action arising from Zillow’s massive and intentional infringement of copyrights that VHT owns in thousands of unique photographic images of real estate properties around the United States. Zillow claims to be the world’s largest online marketplace for real estate property listings, but as its CEO recently publicly admitted, “we sell ads, not houses.”¹ The focus of this complaint is not Zillow’s central listing site of properties for sale or rental (the “Listing Site”), but rather Zillow Digs – an independent section of its website and a stand-

¹ Ben Lane, Housing Wire.com, *Zillow CEO: “We sell ads not houses”* (quoting Zillow CEO Spencer Rascoff) <http://www.housingwire.com/articles/33882-zillow-ceo-we-sell-ads-not-houses>.

1 alone mobile app (together, the “Digs Site”) – which showcases groups of photographs of
2 particular elements of home design, such as kitchen countertops, plumbing fixtures, or art deco
3 sofas, and pairs them with advertising from vendors who sell the goods depicted in the
4 photographs or offer related services.

5 2. As Zillow well knows, VHT – the leading full-service provider of professional
6 photographs for the real estate industry – owns the copyrights in many of these photographs.
7 Zillow is also abundantly aware that the photographs transmitted by listing agents and brokers
8 to the Zillow Listing Site are licensed by VHT only for purposes of marketing the properties for
9 sale. Nonetheless, when Zillow launched its Digs Site, it populated it with these photographs –
10 not for purpose of marketing the properties – but rather for the purpose of selling advertising
11 for design elements depicted in these photographs. VHT’s photographs remain on the Digs
12 Site to date without license or authority.

13 3. VHT’s photographs are extremely valuable assets, each of which has
14 independent economic value for multiple purposes, including licensing for the very purpose
15 Zillow uses them on Zillow Digs. VHT is just now poised to leverage the very significant
16 economic value of these photographs. It has taken great pains to get to this point. It currently
17 offers listing agents and brokers non-exclusive license agreements that are specifically tailored
18 to permit use of VHT’s photographs only for the marketing of the properties listed for sale.
19 VHT retains control over all other and future use of these photographs to maximize its future
20 business prospects and to ensure it can make its own business decisions as to the proper
21 manner, means and extent of future exploitation of these photographs, both individually and as
22 a database.

23 4. That Zillow knew the value of VHT’s photographs cannot be questioned.
24 Shortly after it launched the Digs Site in 2013, Zillow and VHT specifically discussed the
25 possibility of Zillow licensing VHT’s photographs for use on the Digs Site. No deal was ever
26 reached because Zillow advised VHT at that time that it had decided *not* to use the VHT
27 photographs displayed on the Zillow Listing Site on the Digs Site. Yet, that is exactly what

1 Zillow did and continues to do, without license or authority, and in blatant derogation of VHT's
2 copyrights.

3 5. Despite transparent efforts to immunize itself from copyright infringement
4 claims by pointing its corporate finger at both its users and the listing agents and brokers who
5 post their photographs on Zillow to sell their properties, it is Zillow itself which posted many of
6 VHT's images to the Digs Site; Zillow uses photographs from homes that are not for sale and
7 makes no effort whatsoever to remove those images once properties are sold; it induces users to
8 post images to the Digs Site; it uses those images to induce advertisers to fill Zillow's coffers
9 with advertising revenue; and it tags and groups the photographs and pastes advertisements
10 directly on top of VHT's images. Zillow cannot hide behind safe harbors and blame others for
11 its own brazen theft.

12 6. As detailed hereinafter, VHT's very preliminary analysis of a random sample of
13 the many photographs on the Zillow Digs Site revealed a minimum of 316 individual VHT
14 images infringed on the Digs Site. In discovery, VHT intends to seek access to the back-end
15 databases that support the Digs Site so that it can determine the full extent of Zillow's
16 infringements, which VHT believes to number in the thousands. VHT will seek to amend its
17 complaint accordingly to add those additional acts of infringement as this case progresses.

18 **JURISDICTION AND VENUE**

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

21 8. This Court has original subject matter jurisdiction over all claims pleaded herein
22 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

23 9. This Court has personal jurisdiction over defendants. Defendants Zillow Group
24 and Zillow, Inc. do continuous and systematic business in Washington State and in this
25 District. They have their principal places of business in this District, employ personnel in this
26 District, have transacted business in this District in connection with the matters giving rise to
27 this suit, and have committed infringing acts within this District.

1 10. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(1) and (2) and
2 28 U.S.C. § 1400(a).

3 **PARTIES**

4 11. Plaintiff VHT, a Delaware corporation with its principal place of business in
5 Rosemont, Illinois, is the leading full-service provider of professional photographs for the real
6 estate industry. VHT and its predecessor company have been in business since 1998 and VHT
7 derives most of its income from shooting and licensing those photographs nationwide.

8 12. Defendant Zillow, Inc. is a Washington corporation with its principal place of
9 business in Seattle, Washington. Zillow claims to be the leading online real estate purchase,
10 sale and rental marketplace. It also claims to have partnered with the owners of over 180
11 newspapers and with Yahoo! Real Estate to create the largest real-estate advertising network on
12 the web.

13 13. Defendant Zillow Group was formed in 2014, following the announcement of
14 the planned merger of Zillow, Inc. and Trulia, Inc. (“Trulia”). Zillow Group is a Washington
15 corporation, with its principal place of business in Seattle, Washington. Following the closing
16 of the merger transaction on or about February 17, 2015, Zillow Group owns 100% of the stock
17 of both Zillow, Inc. and Trulia. On information and belief, Zillow, Inc. is currently a wholly
18 owned subsidiary of Zillow Group, which controls or has the power to control Zillow, Inc.

19 **FACTUAL BACKGROUND**

20 **A. VHT’s Business Model**

21 14. VHT is the leading full-service provider of visual marketing services specially
22 designed for the real estate industry. VHT serves over 75,000 real estate professionals
23 nationwide by commissioning high quality photographs of properties that listing agents and
24 brokers have listed for sale, and then licensing them the right to use to those photographs to
25 market the properties for sale.

26 15. When a real estate broker or an individual agent prepares to put a house on the
27 market, one of the first and most important steps she or he needs to undertake is to obtain

1 photographs of that property. In today's world, nearly every home buyer begins their search on
2 the Internet rather than in person, which makes having high-quality photographs of the property
3 a paramount concern for home sellers and their listing agents and brokers. In order to attract
4 buyers, listing agents and brokers need photographs that are attractive, and that effectively use
5 lighting and camera angles to best showcase the property. The properties must be
6 photographed thoroughly, covering interior and exterior spaces, and highlighting the positive
7 features that are unique to each property.

8 16. To achieve these results, listing agents and brokers need photographs taken by
9 experienced professional photographers. Many agents and brokers turn to VHT to provide
10 them with professional photographs of the highest quality. VHT has invested considerable
11 resources in building a network of reliable, highly-skilled photographers, who are independent
12 contractors. Not only must these professionals be talented and experienced photographers,
13 knowledgeable about real estate and capable of taking high-quality images, they also must be
14 extremely trustworthy. People allow photographers into their homes because they recognize
15 that photographs are crucial to selling a property in today's Internet-driven marketplace, and
16 listing agents and brokers rely on VHT's trusted network to insure that this process is
17 conducted in a secure and professional manner. Therefore, VHT conducts background checks
18 on and/or otherwise investigates each of the photographers it contracts, reviews their portfolio
19 of work, and provides training for them.

20 17. The photographers receive a monetary payment from VHT for each shoot they
21 conduct and, in exchange, all photographs they take of the properties are owned by VHT.
22 Under the terms of the photographers' contracts, these photographs are created as works-for-
23 hire for VHT's benefit and subject to its ownership. For the avoidance of doubt, the
24 photographers also assign any arguable rights in those photographs to VHT by contract. Thus,
25 VHT owns all copyright interest in and to all of these photographs.

26 18. VHT takes these pains to obtain and retain ownership of its photographs for
27 good reason. The professional-quality photographs of real property it commissions are the

1 primary asset VHT owns, and the entire basis of its business model. VHT invests substantial
2 resources to that end, including but not limited to creating and maintaining its network of
3 photographers, the relationships it has cultivated with listing agents and brokers, its state-of
4 the-art post-production facility and its sophisticated website. VHT has invested these resources
5 and years of “sweat equity” into creating this system, not just so it can license the photographs
6 to listing agents and brokers, but also because each of the photographs in its database has
7 additional, independent value beyond its initial use to market property listed for sale.

8 19. VHT places a copy of the photographs it commissions and owns into a master
9 database that currently contains more than 4 million unique images of the interiors and
10 exteriors of residential properties. The photographs are extremely high-quality, professionally
11 taken and digitally finished to meet the highest aesthetic standards. VHT believes that its
12 database is the largest of its kind in the country.

13 20. The millions of photographs in the VHT database have significant monetary
14 value, both individually and as a collective whole. Professional photographs like those in
15 VHT’s database are in high demand in the marketplace and are used everywhere, from listing
16 agents’ and brokers’ active property listings, to television shows, to magazines, to websites.

17 21. It is for this reason that VHT grants all but one of its brokerage clients only a
18 non-exclusive license to use the photographs for the narrowly limited purpose of marketing the
19 specific properties they depict and the listing broker, and then only while those properties are
20 on the market. VHT retains ownership of the copyright in these photographs so it can realize
21 the full fruits of its labors by licensing the photographs in its database, either collectively or
22 individually, to third parties for a myriad of other purposes.

23 22. But VHT has been, and continues to be, deprived of the fruits of those labors
24 because Zillow has been stealing its photographs *en masse* and illegally using them for its own
25 profit and gain, as hereinafter detailed.
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1 **B. Creation of VHT's Photographs**

2 23. The process begins when a listing agent or broker contacts VHT and requests
3 photographs of a particular property. VHT then sends one of its photographers to the site of the
4 property to do the photo shoot, capturing high-quality images of both the interior and exterior
5 of the property.

6 24. VHT maintains its own state-of-the-art production studio. Once a photographer
7 transmits to VHT the photographs of a particular property s/he has been commissioned to take,
8 the VHT studio then selects the best of them and digitally edits and enhances those images
9 selected for aesthetic purposes.

10 25. When the photographs are ready for dissemination, high-resolution digital
11 copies are uploaded to the VHT website, where they can be accessed by the listing agent or
12 broker licensed to use them to market the subject property. A typical shoot results in
13 approximately 16 finished, high-quality photographs of each property. Prices paid by VHT's
14 customers vary, but generally range from \$60-\$600 per property or \$10 to \$100 per
15 photograph.

16 **C. VHT's Copyright Registrations**

17 26. Given the unique and valuable nature of its photographs, VHT takes all steps
18 necessary to protect its rights in and to those photographs.

19 27. Because of the sheer volume of photographs at issue—over 4 million images in
20 its database to date – VHT registers its copyrights in those images (both individually and as a
21 whole) by filing periodic group registrations with the United States Copyright Office. It began
22 filing its applications to register the photographs in its database in January of 2014. As VHT
23 continues to create new photographs, it has been filing additional registrations, generally on a
24 quarterly basis, including its latest filing in mid-June 2015 for photographs created and
25 distributed during the first quarter of 2015. In addition, because these photographs have
26 independent economic value to VHT long after the property has been sold, in 2014, VHT also
27 filed applications to register many of the photographs that were already in its database before it

1 started filing on a periodic basis. As of today, VHT has filed applications to register
2 photographs in its database created from the beginning of 2010 through the end of the first
3 quarter of 2015. Those applications are pending. True and correct copies of the applications
4 for VHT's registrations are annexed hereto as **Exhibits 1-9**.

5 28. VHT has duly maintained the copyrights that it has applied to register with the
6 Copyright Office, which provide valid and subsisting copyright protection for each of the
7 photographs therein.

8 **D. VHT's Licensing of Images for Use In Marketing Properties Listed for Sale**

9 29. Listing agents and brokers either hire VHT on a project-by-project basis, or
10 enter into longer-term umbrella agreements with VHT under which they automatically contract
11 with VHT to provide photographs of some or all new properties the agent or broker represents;
12 VHT grants the listing agent or broker a non-exclusive license that gives them the right to use
13 the photographs to market that property for sale. (The *only* exception is one brokerage agency
14 which, by agreement, owns the copyright in the photographs of its listings. Those photographs
15 are not the subject of VHT's copyright applications, are not maintained in the VHT database,
16 and no allegation of copyright infringement of that brokerage's photographs is made herein).

17 30. The umbrella agreements provide that VHT licenses the photographs to the
18 listing agent or broker for the limited purpose of "the sales and marketing of the subject
19 property or the company/agent representing the property." The scope and term of this umbrella
20 license, both for marketing the property and for marketing the agent "representing" the
21 property, is, by definition, limited to the time while the property is on the market and the agent
22 is trying to sell it.

23 31. For those listing agents and brokers who contract with VHT on a one-off basis,
24 the Terms of Use on the VHT website govern their use of the VHT images. Those Terms of
25 Use provide that "[a]ll images and media ('Content') created by VHT is the sole property of
26 VHT. VHT retains ownership and licensing rights to all Content. Content is made available to
27 clients for property specific marketing purposes only. Any publication of content for non-

1 specific property marketing purposes is strictly prohibited by law without the express written
2 consent of VHT.” See <https://www.vht.com/Terms-Of-Use.aspx>.

3 32. The listing agents and brokers then incorporate VHT’s photographs into their
4 property listings and, in many cases, send those listings to Multiple Listing Services
5 (“MLS’s”). MLS’s are database services that aggregate property listings for the convenience of
6 real estate industry professionals. Generally speaking, listing agents and brokers pay
7 membership dues to join an MLS, which allows them to upload all of their new listings to the
8 MLS’s database. Some MLS’s then serve as a “middleman” by bundling a large number of
9 listings together and transmitting them to consumer-facing real-estate websites such as Zillow
10 and Trulia, and to other brokers.

11 33. In many cases, MLS’s feed their aggregated listings to an additional
12 “middleman” such as ListHub, which has been described as a “listing syndicator.” ListHub
13 receives the data feeds from many different MLS’s and aggregates them into an even larger
14 bundle of listings, which it then provides to consumer-facing websites such as Zillow in a daily
15 “feed.” There are approximately 800 separate MLS’s in the country, many of which ultimately
16 feed (whether through ListHub or directly) into consumer-facing sites.

17 34. In this way, the listing agents and brokers are able to utilize VHT’s photographs
18 for the licensed purpose, *i.e.*, to market their properties for sale.

19 **E. Independent Economic Value of VHT’s Photographs**

20 35. Notwithstanding the group registration of its copyrights, each of the photographs
21 in the VHT database has independent economic value, both on an aggregate basis and/or on a
22 per photograph basis for various purposes, including but not limited to home design, use in
23 television or film, on news, entertainment and social media websites, and on mobile apps;
24 indeed, in virtually any other medium where there is a need for high-quality photographic
25 content.

26 36. Over the past several years, VHT has been approached by various third parties
27 about potential licenses of some or all of its photographs for purposes other than use in active

1 real estate listings, including requests to potentially license the entire database as a resource for
2 websites and other media entities that require a large supply of professional photographs to
3 create visually-striking content for their audiences. In addition, VHT has been approached by
4 TV producers about the possibility of licensing photographs from its database for use on
5 lifestyle and design programs. VHT has also licensed certain of its photos on an individual or
6 small-group basis, including for a coffee table book and a residential community website.

7 37. For example, both HGTV and Better Homes and Gardens have approached VHT
8 about potentially licensing access to its entire database for use in connection with proposed web
9 pages for home design applications, such as remodeling and/or redecorating projects. More
10 recently, a company called Glossre.com contacted VHT about potentially licensing certain of
11 VHT's images for use on a home design social media website, which is currently being test-
12 marketed in Chicago.

13 38. In or around February of 2013, shortly after Zillow launched the Digs Site,
14 Zillow and VHT began discussing the possibility of Zillow licensing VHT's images for use on
15 the Digs Site. Although the negotiations never advanced to the point of monetary offer or
16 demand, the mere fact that Zillow discussed a license with VHT demonstrates *both* that Zillow
17 knew it needed permission to use the photographs on the Listing Site for the Digs Site, and that
18 Zillow recognized that those photographs have independent economic value, either on a
19 database or individual license basis. When Zillow terminated these negotiations in May 2013,
20 it advised VHT that it did not intend to use photographs from the Listing Site on the Digs Site.
21 Yet that is exactly what Zillow did: without obtaining a license from VHT, Zillow used untold
22 thousands of VHT's photographs on the Digs Site in order to sell advertising and line its own
23 pockets, in willful infringement of VHT's copyrights.

24 39. As more fully described hereinafter, Zillow's own unauthorized use of VHT's
25 images on the Digs Site also underscores the independent economic value in each of the
26 photographs. Zillow monetizes many of the VHT photographs which appear on the Digs Site
27 by pairing them with advertisements from local companies that sell goods and services depicted

1 in, or illustrated by, those photographs; in some cases, Zillow actually implants those
2 advertisements directly into VHT's copyright-protected photographs.

3 40. On information and belief, Zillow uses the individual VHT-owned photographs,
4 or groups of them, to attract advertisers and to induce them to advertise on its website and sells
5 advertisements that are directly linked to specific content in specific VHT-owned photographs.

6 **F. Zillow's Overall Business Model**

7 41. Zillow, founded in 2006, features a "database of more than 110 million U.S.
8 homes - including homes for sale, homes for rent and homes not currently on the market." *See*
9 <http://www.zillow.com/corp/About.htm>. Many of those homes are included in its Listing Site.

10 42. On information and belief, Zillow built all or a significant portion of its Listing
11 Site by contracting with the MLS's to obtain property listings — paying fees to the MLS's to
12 transmit daily feeds of all of their listings to Zillow's site. Until very recently, Zillow also paid
13 ListHub a fee to receive its feed of listings, but its agreement with ListHub ended this past
14 April and, upon information and belief, Zillow now obtains the bulk of its listings directly from
15 MLS's or from individual listing agents or brokers.

16 43. Zillow has been on an aggressive campaign to consolidate and indeed
17 monopolize the market for online real estate listings. In April 2011, it acquired Postlets, an
18 online real estate listing creation and distribution platform. In November of that year, it
19 acquired Diverse Solutions, which provides technology and websites to real estate
20 professionals. In May 2012, it acquired Rent Juice, an online real estate marketplace for rental
21 listings. Next, Zillow acquired Buyfolio, a real estate shopping and collaboration platform in
22 October 2012. The very next month, it acquired both Mortech, a mortgage technology
23 company, and Hot Pads, which provides real estate listings on a map-based web interface.
24 Continuing its path to domination, in August 2013 Zillow acquired Street Easy, an online real
25 estate sale and rental marketplace for New York City. Then in July of last year, it acquired
26 Retsly, which helps developers access data from MLSs. Most recently, in July 2014, Zillow
27 announced a \$3.5 billion deal to purchase Trulia, its biggest competitor, and closed that

1 transaction in February of this year. According to the *New York Times*, the new combined
2 entity, Zillow Group, will now have 137 million users, controlling 61% of the Internet market
3 for the real estate listings category, and “will dominate the traffic for online home listings.”²

4 44. As described above, VHT licenses its photographs to listing agents and brokers
5 for the limited purpose of marketing the subject properties. They in turn incorporate the
6 photographs into their listings, which they then transmit, individually or through the MLS’s
7 and/or ListHub, to consumer-facing websites such as Zillow. Because Zillow is by far the most
8 prominent consumer-facing real estate website, VHT’s photographs are routinely posted to
9 Zillow’s Listing Site as part of listing agents’ and brokers’ efforts to sell the properties
10 depicted. On information and belief, there are literally tens of thousands of VHT-owned
11 photographs appearing on Zillow’s Listing Site at any given time, many of properties that have
12 already been sold.

13 **G. Zillow’s Listing Site**

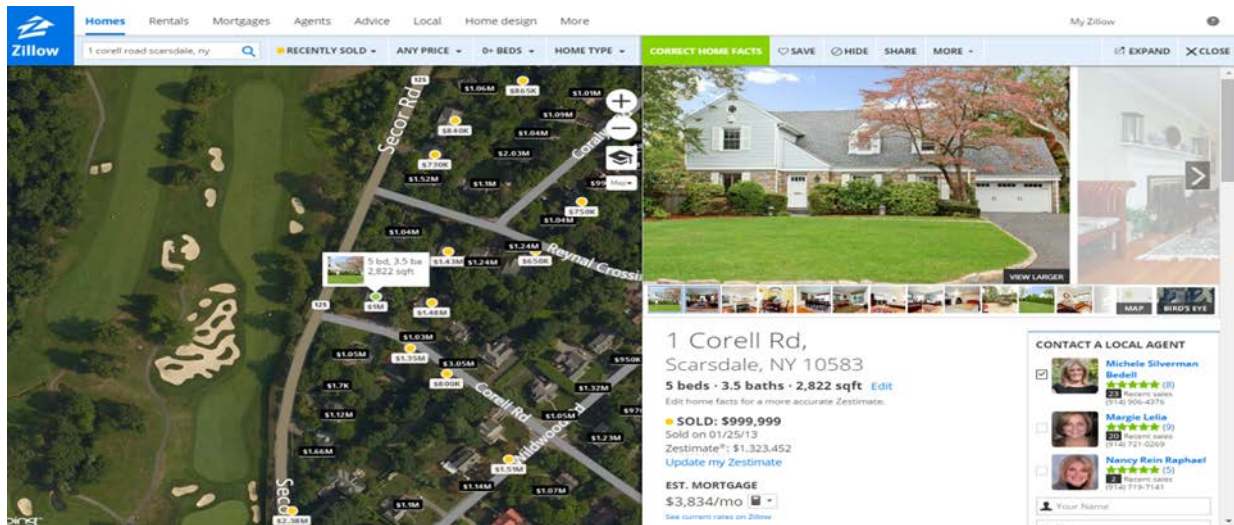
14 45. Zillow’s Listing Site is a searchable database of property listings that consumers
15 can search by inputting their desired specifications (such as price range, location, number of
16 bedrooms, etc.). Zillow then provides users with lists of properties matching those
17 specifications. For each property, Zillow displays relevant information, such as asking price,
18 square footage and amenities, and allows consumers to contact the listing agent directly.
19 Zillow also offers a mobile app that provides substantially the same services.

20 46. The most prominent feature of the Listing Site is the display of multiple
21 photographs of each of the listed properties. On information and belief, it is these photographs
22 that attract users to the Zillow website, and they also appear in the Google searches that drive
23 traffic to Zillow’s site.

24 47. Each listing on the Zillow Listing Site has several medium-sized photographs of
25 the property displayed prominently at the top, as well as numerous smaller, thumbnail-sized
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27 ² Michael J. De La Merced, *The New York Times*, July 28, 2014, http://dealbook.nytimes.com/2014/07/28/zillow-to-buy-trulia-for-3-5-billion/?_r=0.

1 photographs below. Users can scroll through the photographs in slideshow format and click on
 2 any of them to enlarge it so that it nearly fills the entire screen.



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 12 48. Alongside each listing, Zillow displays a menu of other, similar properties, each
 13 one also accompanied by thumbnail photographs. Clicking on those thumbnails takes the user
 14 to the listing page for that property where there are still more photographs, each of which can
 15 likewise be scrolled through and enlarged.

16 49. Zillow does not charge consumers to shop for real estate on its Listing Site.
 17 Rather, as its CEO recently admitted, Zillow makes its money primarily from advertising.
 18 Agents and brokers who pay for ads on Zillow's Listing Site are advertised all over that Site,
 19 not just next to listings of properties those agents and brokers represent. Many times, the name
 20 and face of an agent or broker who has paid Zillow for advertising will appear next to a
 21 particular property, even though that agent or broker has nothing whatsoever to do with that
 22 property. In those cases, the listing agent or broker to whom the listing actually belongs (and
 23 who has a license to use the photographs to sell the property) may be identified only in a
 24 barely-noticeable position at the bottom of the page. On information and belief, for this reason,
 25 many listing agents and brokers have to pay Zillow for ads to appear on their *own* listings,
 26 since it is the only way to insure that their names will be prominently displayed alongside the
 27 photographs of the properties they are marketing.

1 **H. Zillow’s Continued Inclusion of Photographs**
2 **of Sold Properties On the Listing Site**

3 50. Because most MLS’s require that individual listing agents and brokers keep
4 their listings in the feeds up to date, when an agent or broker sells a property, s/he promptly
5 either removes it from the feed or changes the description in the feed to indicate that it is
6 “SOLD.” Thus, the feed that Zillow receives from the MLS’s and/or in the past from ListHub,
7 explicitly advises Zillow which of the properties on its Listing Site are no longer on the market.

8 51. Notwithstanding that express notice, Zillow does not remove all of the “SOLD”
9 listings from its site, although it does remove the listing agent or broker’s name once the
10 property is sold. Instead, Zillow continues to display many of the SOLD listings with the
11 accompanying photographs in an apparent effort to drive further web traffic to its site and to
12 sell more ads. It is readily apparent that the continued appearance of these “SOLD” listings is
13 not the result of some automated process by which any data that comes in through the feeds is
14 automatically posted to Zillow; to the contrary, Zillow takes affirmative steps to remove the
15 listing agent’s or broker’s name and yet fails to remove the listings or the photographs of the
16 sold property, even when they have been removed from the feeds provided by the MLS’s.

17 52. Zillow well knows that VHT owns the copyright in all of its photographs and
18 that VHT licenses listing agents and brokers to use the photographs solely for marketing of the
19 homes. These facts are not only widely known in the real estate industry, but VHT has
20 expressly informed Zillow of those facts. VHT’s ownership of the copyrights was central in
21 the discussions between VHT and Zillow back in the spring of 2013 about potentially licensing
22 VHT images for use on the Digs Site, and VHT reiterated that point and highlighted the
23 limitations on the licenses it grants to listing agents and brokers in a July 2014 letter to Zillow.

24 53. Nonetheless, Zillow continues to use photographs owned by VHT in listings for
25 properties that were sold weeks, months, or even years ago. These uses of the photographs
26 cannot serve to market or advertise the properties that are pictured because the properties have
27 already been sold.

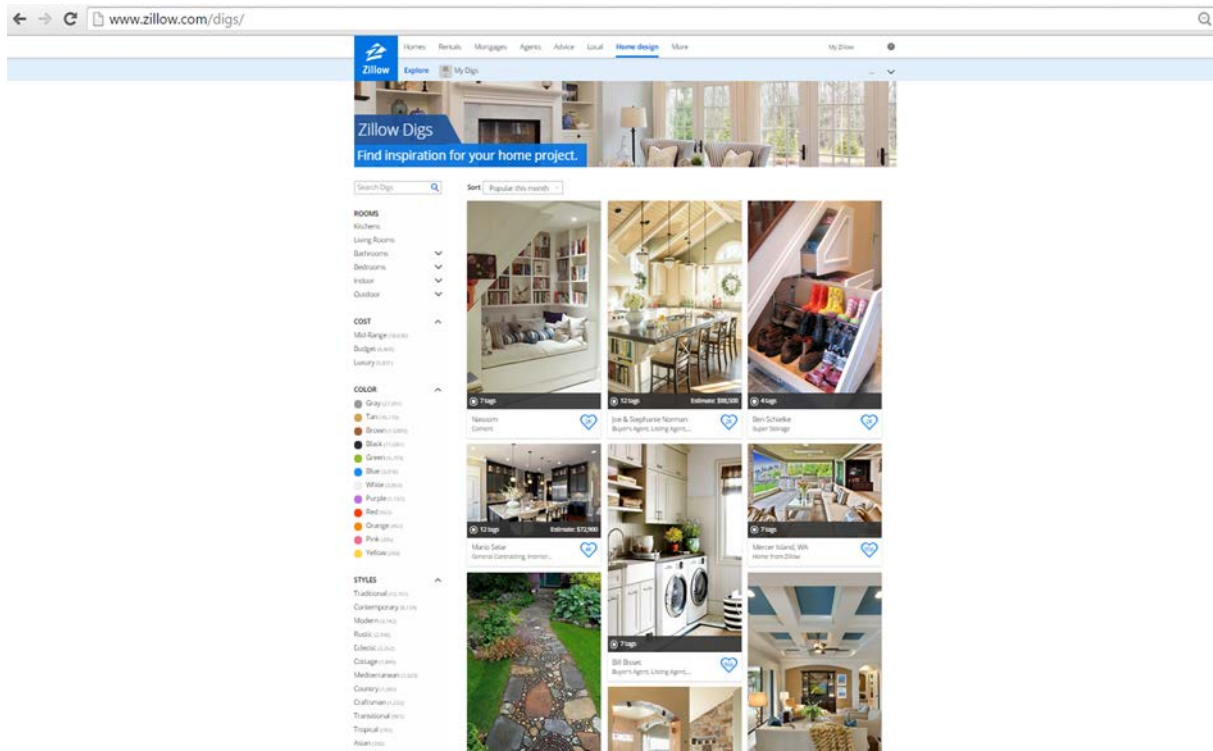
1 **I. Zillow Digs**

2 54. In or around February of 2013, Zillow first introduced the Digs Site, a home
3 design section of its website that is separate from its Listing Site and is independently
4 supported by a totally different type of advertising. Unlike the Listing Site, which is devoted to
5 listing properties for sale and advertises brokers and listing agents offering similar properties,
6 Digs is not designed for or aimed at the marketing of real property in any way. Rather, Zillow
7 touts Digs as a place where users can go to “[f]ind inspiration for your home project.”
8 <http://www.zillow.com/digs/>.

9 55. Zillow has launched an aggressive marketing campaign to promote Digs,
10 including but not limited to promotional efforts by Zillow on Facebook and Pinterest. Zillow
11 also encourages its users to share photos from Digs on social media. Consequently, images
12 from Digs also appear on a wide variety of highly-trafficked sites and mobile applications such
13 as Twitter, Tumblr and Instagram.

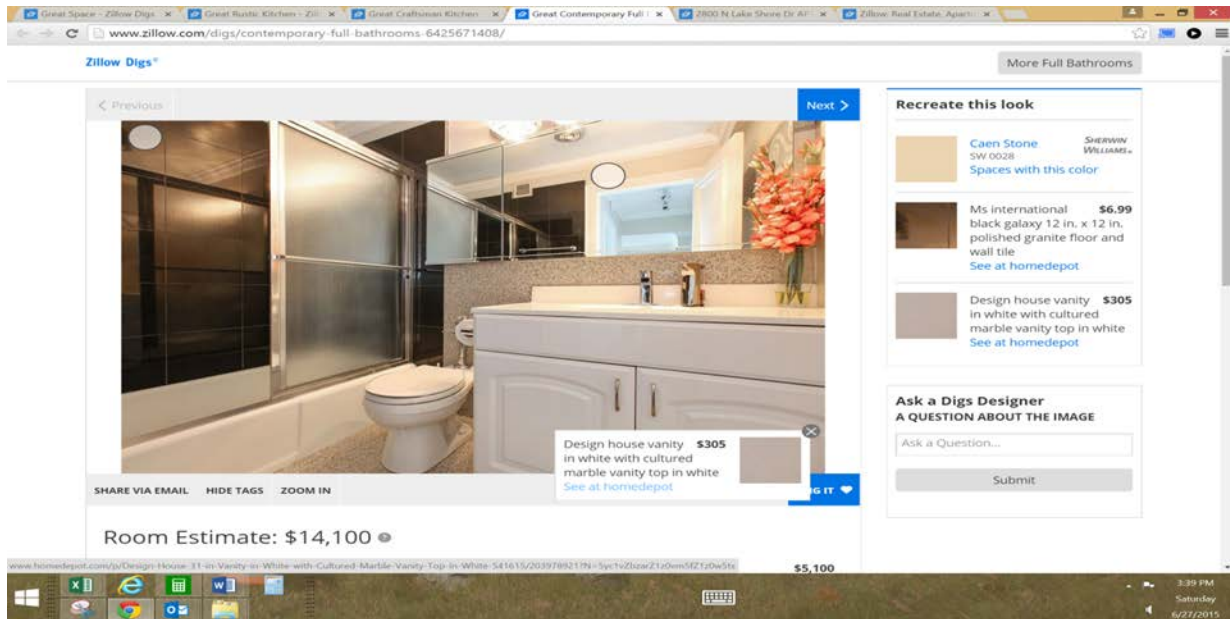
14 56. The home page of Zillow.com features a link at the top of the page labeled
15 “Home Design,” which leads users to the Digs Site.

16 57. Once a user clicks on that link, s/he is directed to the main landing page of the
17 Digs Site where s/he sees a screen filled with medium-sized photographs of all different
18 elements of home design. The user can scroll through thousands upon thousands of
19 photographs grouped by Zillow to depict various elements of home design—everything from
20 roofs to bathroom fixtures to kitchen tables, to chandeliers to dining room chairs to marble
21 countertops. For example:
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58. A menu on the left side of the Digs landing page allows the user to refine their search in various ways. For example, a user can search for only “kitchens” or only items in a “mid-range” budget, or only items in the “art deco” style.” The top of the page also has a “search box” which allows users to enter their own search terms.

59. The user can click on the images to view larger versions which appear centered on a new screen page. Whenever a user clicks to view an enlarged photograph, s/he becomes the target of paid advertisements that have absolutely nothing to do with the marketing of the homes depicted in the photographs. These advertisements appear in at least two different forms on the Digs website, both of which appear in the following screenshot.



60. First, Zillow has affixed small bubbles to targeted areas of many of the enlarged photographs, indicating where an advertised product can be seen in the image. For example, a picture of a bathroom might have bubbles marking the cabinets, the paint on the wall and tile in the shower. When a user clicks on the bubble, a box appears showing the name of the product, the price and a link to where users can buy the product directly from a vendor.

61. Second, to the right of the enlarged photo, under the heading “Recreate this look”, Zillow posts a list of vendors with prices and links to those vendors’ websites, advertising and promoting those vendors.

62. Zillow has publicly admitted that it has hired a team of designers to go through each photograph individually and insert the advertising bubbles, which it calls “product tags,” onto the copyright-protected photographs.³ Zillow then sells advertising to vendors based on items that are depicted in the particular photograph, and the advertising appears each time future users see the photograph on the Digs Site.

³ March 18, 2015 Zillow Press Release, “From Inspiration to Realization: Zillow Digs Now Helps Consumers Find Products Similar to Those Featured In Popular Home Design Photos.” Available at <http://zillow.mediaroom.com/2015-03-18-From-Inspiration-to-Realization-Zillow-Digs-Now-Helps-Consumers-Find-Products-Similar-to-Those-Featured-In-Popular-Home-Design-Photos>.

1 63. Zillow has carefully designed the Digs Site as a tool for it to sell advertising
2 space, generating significant advertising revenue for itself from sources other than those trying
3 to sell or rent out real estate. On information and belief, these features of the Digs Site have
4 been intentionally designed to encourage browsing (and shopping). The more photographs on
5 the site to browse, the longer users are likely to stay on the site, and thus Zillow can sell more
6 ads at higher prices to vendors advertising the wares shown in the photographs.

7 64. On information and belief, Zillow also uses a practice called Search Engine
8 Optimization (“SEO”) so that Zillow’s links will be more prominently or more highly
9 displayed in results on search engines such as Google. Having a large number of professional
10 quality photographs on its site, regardless of whether those photographs are actually being used
11 to market properties, necessarily increases Zillow’s ranking in search results. It has been
12 publicly reported that “Zillow dominates SEO in the real estate space.”⁴ On information and
13 belief, Zillow touts its high-ranking position in web searches, driven in large part by its huge
14 database of copyright-protected photographs owned by others, including VHT, to its investors
15 and advertisers.

16 **J. The Digs App**

17 65. Separate and apart from the Digs platform on the Zillow website (“Digs
18 Desktop”), Zillow also offers a mobile application by which users can access Digs on their
19 iPads and iPhones (the “Digs App”). The Digs App provides functionality that is essentially
20 the same as that of Digs Desktop, featuring the same types of advertisements, including both
21 advertising bubbles and “recreate this look” links to vendor websites.

22 66. In addition, the Digs App offers a game that users can play using the
23 photographic images on Digs, called “Dueling Digs.” In the game, users are asked to pick their
24 favorite example of an image from a particular category – for example, their favorite “cottage
25 kitchen” – and Zillow displays two different photographs of kitchens from the Digs database;

26
27 ⁴ Rohin Dhar, “The SEO Dominance of Zillow,” Pricenomics.com (Nov. 6, 2014). Available at
<http://priceonomics.com/theseodominanceofzillow/>.

1 the user is invited to eliminate whichever image she likes the least and the remaining image is
2 the “winner” of the “duel.” The rejected image is automatically replaced with a new image
3 which again faces off against the “winning” image. After several rounds of round-robin, the
4 tournament ends and the user is invited to type comments into a dialogue box explaining their
5 choice, or to “share” their “favorite” with other users.

6 67. The “Dueling Digs” game provides no opportunity whatsoever for users to view
7 the underlying real estate listings from which the copyright-protected photographs have been
8 taken. And like the rest of the Digs Site, the game has nothing whatsoever to do with
9 marketing the underlying properties. It serves only as a means to keep people using the Digs
10 App, remaining in the Zillow online universe, and thereby increasing the number of eyeballs
11 for which Zillow can charge its advertisers. Indeed, Zillow itself has publicly boasted that “the
12 Zillow Digs iPad App experiences 10 times the page views per session versus the desktop.”⁵

13 68. On information and belief, every time one of VHT’s copyrighted photographs
14 appears on the Digs App, Zillow makes and distributes another copy of the infringing
15 photograph.

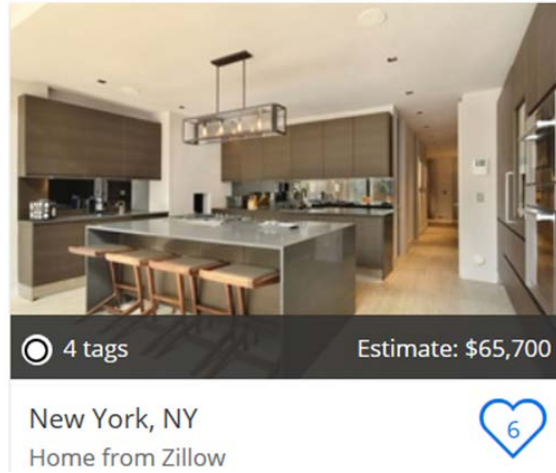
16 **K. Zillow’s Involvement and Control of Postings on the Digs Website**

17 69. On information and belief, when Zillow launched Digs, it initially populated the
18 Digs Site with photographs from the Listing Site. Thus, for more than a year, the vast majority
19 of the photographs on the Digs Site were selected, copied and displayed by Zillow for uses that
20 it knew or should have known were outside the scope of the limited license the listing agents
21 and brokers had to use those photographs.

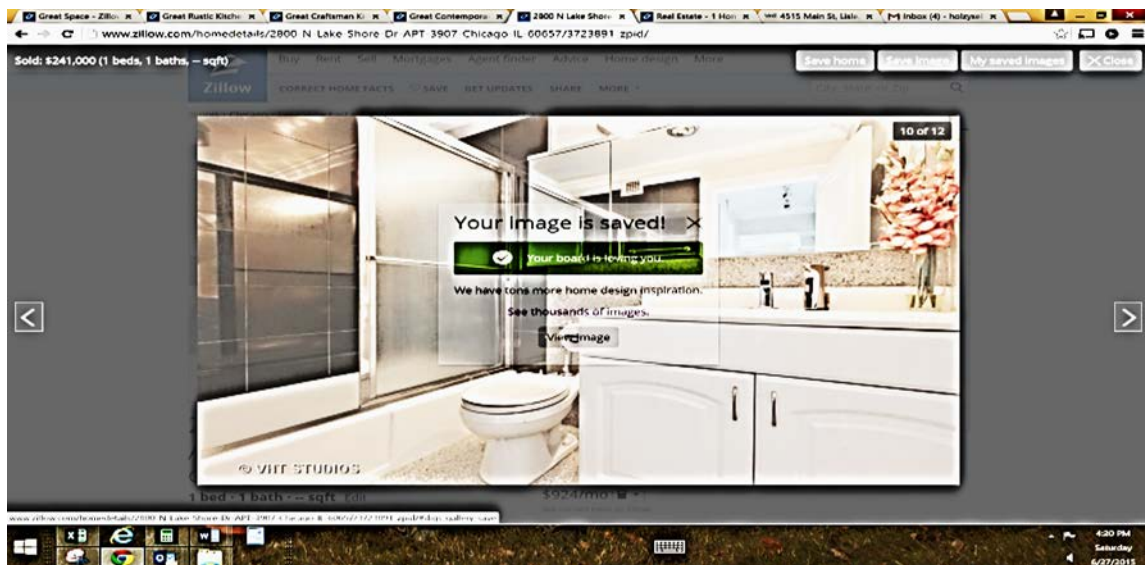
22 70. At some point in mid to late 2014, *after* VHT complained to Zillow in writing
23 that its practice of including VHT-owned photographs on the Digs Site constituted copyright
24 infringement, on information and belief, Zillow began encouraging users of its Listing Site to
25 add photographs to the Digs Site. However, some of the photographs on the Digs Site are still
26

27 ⁵ May 15, 2013 Zillow Press Release, “Zillow Digs’ User-Generated Content Drives Rapid Growth.” Available at <http://zillow.mediaroom.com/2013-05-15-Zillow-Digs-User-Generated-Content-Drives-Rapid-Growth>.

1 designated “Home From Zillow,” suggesting that Zillow itself is still involved in selecting and
 2 posting some of the infringing photographs and/or that the images Zillow posted before it
 3 started encouraging user posts remain on the site to this day. *E.g.:*



71. Since the latter part of 2014, when a user views a photograph on the Listing Site,
 s/he is presented with a button marked “Add to Digs” or “Save” or “Save Image.” If the user
 clicks on that button, the photograph is then saved directly to their “My Digs” board on the
 Digs Site. Users can also save images that are already part of the Digs database to their
 personal “My Digs” boards by clicking a button marked “Dig it.”



1 72. On information and belief, once a user has saved a photograph from the Listing
2 Site to their Digs board, that image is tagged by Zillow with Digs description tags (*e.g.*, “living
3 room,” “lamps,” “art deco”) and becomes part of the database of images that is available to all
4 users who are browsing on the Digs Site. If the user clicks on one of the description tags, s/he
5 is directed to another screen page with still more photographs of other items in that same
6 product category.

7 73. On information and belief, the photographs added to the Digs Desktop by users
8 and/or by Zillow itself are copied and then displayed with corresponding advertising, on the
9 Digs App.

10 74. On both the Digs Desktop and the Digs App, Zillow has the right and ability to
11 control what the users post, and actively induces them to post photographs by providing them
12 with prominently placed buttons urging them to save every photograph, even photographs of
13 homes that have already been sold, and exhorting users to “keep filling up your board,” and
14 reminding them that “tons more” images are available.

15 75. Since Zillow knows that the Listing Site contains tens of thousands of VHT-
16 owned images and that VHT has licensed the use of those photographs solely for the marketing
17 of the subject properties, these exhortations to users are blatant invitations to post infringing
18 content. Indeed, Zillow even brags in the “About” section of its Listing Site that it features
19 photographs of “homes not currently on the market,” so by inviting users to take photographs
20 from its Listing Site and post them to the Digs Site, Zillow is specifically inducing users to post
21 material that Zillow knows is infringing.

22 76. Zillow continues to take active steps to monetize the specific infringing content,
23 even when posted by users. On information and belief, it does not passively host those images,
24 but rather actually goes through the photographs, either by human review or an automated
25 program designed for the purpose or some combination of the two, to cull the ones appropriate
26 for inclusion in the Digs database and to categorize them with its “tags” so that they are
27 searchable by pre-defined groups on the Digs Site, and can be sold to advertisers based on that

1 categorization. In addition, Zillow has publicly admitted it uses a team of human designers to
2 go through the photographs and superimpose the “bubbles” on at least some of the photographs
3 so that users will click on them to see the prices for goods depicted in the photographs, along
4 with links to vendor websites where they can purchase those goods.

5 77. On information and belief, the advertising Zillow sells on Digs and which
6 appears in the bubbles and alongside the images, is specifically matched to the particular
7 photograph. That is to say, a picture of a kitchen will feature advertisers from vendors selling
8 kitchen wares in the area where the user is located; a dining room picture will feature ads for
9 sellers of home furnishings in that same area, etc.

10 78. On information and belief, vendors are more likely to advertise their goods and
11 services in connection with photographs that are of sufficient aesthetic quality to induce users
12 to copy or recreate the look depicted in those photographs. The more high-end the vendor, the
13 greater the need for eye-catching, high-quality photographs, and the more money Zillow can
14 charge vendors for related advertising.

15 79. Therefore, Zillow’s profits from the advertising it sells on Digs are *directly*
16 attributable to the use of *specific* photographs owned by VHT.

17 **L. Specific Acts of Infringement Identified to Date and Likelihood That**
18 **Discovery Will Reveal Significant Numbers of Additional Infringements**

19 80. On information and belief, there are tens of thousands of photographs on the
20 Digs Site at any given time, a substantial portion of which are photographs that were submitted
21 to Zillow for use on the Listing Site in order to market the properties they depict. Given VHT’s
22 leading role in creating and licensing to listing agents and brokers a significant number of the
23 photographs that end up on Zillow’s Listing Site and the professional quality of the VHT
24 images, a large number of VHT’s images are likely being used or have been used on the Digs
25 Site over the past three years and continuing to date.

26 81. VHT has attempted to determine just how many of its photographs have been
27 infringed by Zillow and/or by users on the Digs Site by comparing a sampling of the

1 photographs it owns to a sampling of the photographs appearing on the Digs Site. As of the
2 date of this filing, VHT has been able to identify 316 of its photographs displayed on the Digs
3 website (the “Infringed Images”). Annexed hereto as **Exhibit 10** is a spreadsheet listing each
4 of the specific Infringed Images identified to date, the copyright application disc on which that
5 Infringed Image was submitted to the Copyright Office for registration, and a URL at which
6 that Infringed Image appears or has appeared during the past three years on the Digs Site.

7 82. VHT cannot identify the total population of VHT-owned photographs that
8 Zillow or Zillow Digs users have infringed on the Digs Site or know when they were posted or
9 by whom, without access to Zillow’s back-end systems and databases supporting the Digs Site.
10 Given the small sampling to date and the use by Zillow of multiple copies of the same image, it
11 is clear that VHT’s initial search has revealed but a small fraction of the number of VHT
12 images used on the Digs Site.

13 83. VHT intends to conduct focused discovery of Zillow’s databases and records
14 relating to the reproduction, public display and distribution of VHT’s registered copyrighted
15 photographs on the Digs Site. Given the number of Infringed Images that VHT’s limited
16 search to date has identified, VHT anticipates that this process will reveal widespread use of
17 thousands of its registered copyrighted photographs on the Digs Desktop and separately on the
18 Digs App, and therefore will evidence a vast number of separate acts of infringement. After
19 identifying the full scope of this infringement, VHT intends to amend its complaint to add these
20 additional infringements.

21 **CLAIMS FOR RELIEF**

22 **COUNT I**

23 **(Direct Copyright Infringement)**

24 84. VHT incorporates by reference paragraphs 1 through and including 83 set forth
25 hereinabove, as if the same were fully set forth herein.

26 85. VHT is, and at all relevant times has been, the owner of all copyright interest in
27 and to each of its works at issue and the subject of pending registration issuance, and has the

1 exclusive rights under 17 U.S.C. § 106 to, *inter alia*, reproduce, publicly display and distribute
2 those works, and to create derivative works therefrom.

3 86. Each of VHT's works at issue is copyrightable subject matter under 17 U.S.C.
4 §102(a)(5).

5 87. VHT has complied in all respects with the provisions of the Copyright Act and
6 all regulations thereunder, including timely applications to register its works and the copyrights
7 therein are valid and subsisting.

8 88. Beginning at a time currently unknown, and continuing through the present,
9 defendants, without the permission or consent of VHT, and without authority, have:

- 10 a. made, caused to be made, and purported to authorize the making of
11 unauthorized copies of the Infringed Images;
- 12 b. publicly displayed and purported to authorize the public display of
13 unauthorized copies of the Infringed Images;
- 14 c. distributed and purported to authorize the distribution of the Infringed
15 Images; and
- 16 d. created unauthorized derivative works.

17 89. Defendants' conduct in connection with the Digs Site (including both Desktop
18 Digs and the Digs App) constitutes direct infringement of VHT's exclusive rights under the
19 Copyright Act to reproduce, publicly display and distribute the Infringed Images, and to create
20 derivative works therefrom under 17 U.S.C. §§ 106(1), (2), (3) and (5).

21 90. Defendants' acts of direct infringement have been willful, intentional, and
22 purposeful, in wholesale disregard of and indifferent to the rights of VHT.

23 91. As a direct and proximate result of defendants' infringement of VHT's
24 copyrights and exclusive rights under the Copyright Act, VHT is entitled to the maximum
25 statutory damages for each photograph infringed on each of the Digs Desktop and the Digs
26 App, under and pursuant to 17 U.S.C. § 504(c), for those of the Infringed Images first infringed
27 by Zillow after the effective date of VHT's registration thereof.

1 92. Alternatively, at VHT's election pursuant to 17 U.S.C. § 504(b) for all
2 Infringing Images, and for any images first infringed by Zillow prior to the effective date of
3 VHT's registration thereof, VHT is entitled to its actual damages, plus all of defendants' profits
4 attributable to the infringements, in an amount to be proved at trial.

5 93. Defendants' conduct is causing, and unless enjoined by this Court will continue
6 to cause VHT great and irreparable injury that cannot be fully compensated or measured in
7 money. VHT has no adequate remedy at law.

8 COUNT II

9 (Contributory Copyright Infringement by Material Contribution)

10 94. VHT incorporates by reference paragraphs 1 through and including 83 and 85
11 through and including 88 set forth hereinabove, as if the same were fully set forth herein.

12 95. If and to the extent VHT's photographs were posted to the Digs Site (including
13 both Desktop Digs and the Digs App) by Zillow Digs users, those users have infringed and are
14 infringing VHT's rights in its registered works by, *inter alia*, posting infringing copies of
15 VHT's copyrighted works onto the Digs Site and publicly displaying such infringing copies, all
16 without authorization. Those Zillow Digs users are consequently directly infringing VHT's
17 exclusive rights of reproduction, distribution, and public display under 17 U.S.C. §§ 106(1), (3)
18 and (5).

19 96. Defendants are liable as contributory copyright infringers for the above-
20 described infringing acts of Digs users because they have enabled, facilitated, and materially
21 contributed to each of those acts of direct infringement.

22 97. Defendants designed the Digs Site with features specifically intended to enable
23 and facilitate infringement, such as the ability for users to save copyright-protected images,
24 including the Infringing Images, from the Listing Site to the Digs Site (where they would be
25 used to market home goods) and to select particular images they favor on the Digs App.
26 Defendants did this with the specific intention of facilitating and enabling infringement.
27

1 98. Defendants have actual and constructive knowledge that certain Digs users are
2 using the features provided by the Digs Site for the copying, distributing and public displaying
3 VHT's copyrighted works without VHT's authorization or consent, as defendants know of the
4 limited scope of the VHT license and therefore know that it is limited to use to market the
5 properties, *not* to market home design goods and services, nor for game play, and *not* for any
6 purpose whatsoever once the subject property has been sold. Despite this knowledge,
7 defendants have taken no steps to prevent users from using the Digs Site to infringe.

8 99. Acting with this actual and constructive knowledge, defendants have enabled,
9 facilitated, and materially contributed to Digs users' copyright infringement, which could not
10 occur without defendants' enablement.

11 100. Defendants directly profit from enabling users' infringement, by selling
12 advertising that is directly tied to, and generated by reason of, specific Infringing Images.

13 101. Defendants' acts of infringement have been willful, intentional, and purposeful,
14 in wholesale disregard of and indifferent to the rights of VHT.

15 102. As a direct and proximate result of defendants' contributory infringement of
16 VHT's copyrights and exclusive rights under the Copyright Act, VHT is entitled to the
17 maximum statutory damages for each photograph infringed on each of the Digs Desktop and
18 the Digs App, under and pursuant to 17 U.S.C. § 504(c) for those of the Infringed Images first
19 infringed by Zillow after the effective date of VHT's registration thereof.

20 103. Alternatively, at VHT's election, pursuant to 17 U.S.C. § 504(b), for all
21 Infringing Images, and for any images first infringed by Zillow prior to the effective date of
22 VHT's registration thereof, VHT is entitled to its actual damages, plus all of defendants' profits
23 attributable to the infringements, in an amount to be proved at trial.

24 104. Defendants' conduct is causing, and unless enjoined by this Court, will continue
25 to cause VHT great and irreparable injury that cannot be fully compensated or measured in
26 money. VHT has no adequate remedy at law.

27 **COUNT III**

1 **(Contributory Copyright Infringement by Inducement)**

2 105. VHT incorporates by reference paragraphs 1 through and including 83 and 85
3 through and including 88 set forth hereinabove, as if the same were fully set forth herein.

4 106. If and to the extent VHT's photographs were posted to the Digs Site (including
5 both Desktop Digs and the Digs App) by Zillow Digs users, those users have infringed and are
6 infringing VHT's rights in its registered works by, *inter alia*, posting infringing copies of
7 VHT's copyrighted works onto the Digs Site, and distributing and publicly displaying such
8 infringing copies, all without authorization. Zillow Digs users are consequently directly
9 infringing VHT's exclusive rights of reproduction and public display under 17 U.S.C.
10 §§ 106(1) and (5).

11 107. Defendants are liable for inducing those infringing acts by those Zillow Digs
12 users since they operate the Digs Site with the object of promoting its use to infringe VHT's
13 copyrights and, by their clear expression and other affirmative steps including but not limited to
14 (i) inviting and encouraging Digs users to post for unauthorized and unlicensed uses; (ii) failing
15 to monitor the Digs Site for infringements; (iii) failing to provide filtering tools or other means
16 to prevent or discourage users from importing infringing images to the Digs Site; and (iv)
17 selling advertising that is directly linked to specific Infringing Images. In so doing, defendants
18 are actively, knowingly and intentionally taking steps to induce copyright infringement by
19 Zillow Digs users.

20 108. Defendants at all times have been and are fully aware that VHT's works,
21 including the Infringing Images, are subject to valid and subsisting copyright protection and
22 available for authorized licensing. Defendants at all times have been and are also aware that
23 Digs users are employing the Digs Site and the services provided through that site to
24 unlawfully reproduce, distribute and publicly display VHT's copyrighted works. Defendants
25 intend, encourage, and induce Zillow Digs users to employ the Digs Site in this fashion so that
26 defendants have monetary gain directly attributable to those infringements.

1 109. Defendants' acts have been willful, intentional, and purposeful, in wholesale
2 disregard of and indifferent to the rights of VHT.

3 110. As a direct and proximate result of defendants' contributory infringement of
4 VHT's copyrights and exclusive rights under the Copyright Act, VHT is entitled to the
5 maximum statutory damages for each photograph infringed on each of the Digs Desktop and
6 the Digs App, under and pursuant to 17 U.S.C. § 504(c) for those of the Infringed Images first
7 infringed by Zillow after the effective date of VHT's registration thereof.

8 111. Alternatively, at VHT's election, pursuant to 17 U.S.C. § 504(b), for all
9 Infringing Images, and for any images first infringed by Zillow prior to VHT's registration
10 thereof, VHT is entitled to its actual damages plus all of defendants' profits attributable to the
11 infringements, in an amount to be proved at trial.

12 112. Defendants' conduct is causing, and unless enjoined by this Court, will continue
13 to cause VHT great and irreparable injury that cannot be fully compensated or measured in
14 money. VHT has no adequate remedy at law.

15 **COUNT IV**

16 **(Vicarious Copyright Infringement)**

17 113. VHT incorporates by reference paragraphs 1 through and including 83 and 85
18 through and including 88 set forth hereinabove, as if the same were fully set forth herein.

19 114. If and to the extent VHT's photographs were posted to the Digs Site (including
20 both Desktop Digs and the Digs App) by Zillow Digs users, those users have infringed and are
21 infringing VHT's rights in its registered works by, *inter alia*, posting infringing copies of
22 VHT's copyrighted works onto the Digs Site, distributing and publicly displaying such
23 infringing copies, all without authorization. Zillow Digs users are consequently directly
24 infringing VHT's exclusive rights of reproduction, distribution and public display under 17
25 U.S.C. §§ 106(1), (3) and (5).

26 115. Defendants are vicariously liable for the infringing acts of Zillow Digs users.
27 Defendants provide a forum, *i.e.* the Digs Site, to which users can post and do post and display

1 the Infringing Images. Defendants have both the right and the ability to supervise and/or
2 control Digs users' posting and display of infringing conduct, and to prevent Digs users from
3 infringing VHT's copyrighted works and purposefully and wantonly fail to do so.

4 116. Defendants significantly and directly benefit from the infringement by Zillow
5 Digs users. On information and belief, the availability of the additional infringing copyrighted
6 works on the Digs Site (in addition to the images posted by Zillow itself) acts as a substantial
7 added draw, attracting more users to the Digs Site and increasing the amount of time they
8 spend there once they visit, optimizing search engine results, and maximizing Zillow's
9 revenues therefrom.

10 117. On information and belief, defendants derive substantial advertising revenue tied
11 directly to the volume of traffic they are able to attract to the Digs Site as the direct and
12 proximate result of the number, quality, popularity, and variety of copyrighted images,
13 including the Infringed Images, which appear on the site.

14 118. Defendants' acts of infringement have been willful, intentional, and purposeful,
15 in wholesale disregard of and indifferent to the rights of VHT.

16 119. As a direct and proximate result of defendants' infringement of VHT's
17 copyrights and exclusive rights under the Copyright Act, VHT is entitled to the maximum
18 statutory damages for each photograph infringed on each of the Digs Desktop and Digs App,
19 under and pursuant to 17 U.S.C. § 504(c) for those of the Infringed Images first infringed by
20 Zillow after the effective date of VHT's registration thereof.

21 120. Alternatively, at VHT's election pursuant to 17 U.S.C. § 504(b) for all
22 Infringing Images and for any images first infringed by Zillow prior to VHT's registration
23 thereof, VHT is entitled to its actual damages plus all of defendants' profits attributable to the
24 infringements, in an amount to be proved at trial.

25 121. Defendants' conduct is causing, and unless enjoined by this Court, will continue
26 to cause VHT great and irreparable injury that cannot be fully compensated or measured in
27 money. VHT has no adequate remedy at law.

PRAYER FOR RELIEF

1 WHEREFORE, VHT prays for judgment against defendants and each of them as
2 follows:

3 A. For a declaration that defendants have infringed VHT’s copyrights in each of the
4 Infringed Images which appear on the Digs Site, both directly and secondarily, both in Desktop
5 Digs and the Digs App.

6 B. For a permanent injunction requiring that defendants and their agents, servants,
7 employees, officers, attorneys, successors, licensees, partners and assigns, and all persons
8 acting in concert or participation with each or any of them, cease directly or indirectly
9 infringing, or causing, enabling, facilitating, encouraging, promoting, inducing or participating
10 in the infringement of any of VHT’s copyrights or exclusive rights protected by the Copyright
11 Act, whether now in existence or hereafter created.

12 C. For maximum statutory damages including such damages for willful
13 infringement for each separate act of infringement in each of the Digs Desktop and the Digs
14 App, pursuant to 17 U.S.C. § 504(c).

15 D. Alternatively, at VHT’s election pursuant to 17 U.S.C. § 504(b) and/or for each
16 VHT-owned image or derivative thereof first posted, reproduced, displayed, or distributed on
17 the Digs Site prior to the effective date of VHT’s registration thereof, actual damages plus
18 defendants’ infringing profits attributable to the infringements, in an amount to be proved at
19 trial.

20 E. For VHT’s costs, including its reasonable attorneys’ fees, pursuant to 17 U.S.C.
21 § 505.

22 F. For pre- and post-judgment interest according to law.

23 G. For such other and further relief as this Court may deem just and proper.
24
25
26
27

1 DATED this 8th day of July, 2015.

2
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Exhibit 1

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



REGISTRATION NUMBER _____

VA _____ VAU _____

EFFECTIVE DATE OF REGISTRATION _____

Month _____ Day _____ Year _____

Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. §705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

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

1 TITLE OF THIS WORK ▼ **NATURE OF THIS WORK ▼** See instructions

Group registration for automated database titled "VHT Photographs"; published from November 1, 2013 to November 30, 2013 Database of photographs

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

November 30, 2013; updated on a daily basis

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

2 a NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH

VHT, Inc. Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

Citizen of _____ Domiciled in United States

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No

Pseudonymous? Yes No

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

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

- 3-Dimensional sculpture
- 2-Dimensional artwork
- Reproduction of work of art
- Map
- Photograph
- Jewelry design
- Technical drawing
- Text
- Architectural work

b NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

Citizen of _____ Domiciled in _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No

Pseudonymous? Yes No

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

- 3-Dimensional sculpture
- 2-Dimensional artwork
- Reproduction of work of art
- Map
- Photograph
- Jewelry design
- Technical drawing
- Text
- Architectural work

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED **b** DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Year ► 2013 This information must be given in all cases. Month ► November Day ► 30 Year ► 2013

Complete this information ONLY if this work has been published. Nation ► United States

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

VHT, Inc., an Illinois corporation
9500 Bryn Mawr Ave., Ste. 650, Rosemont, IL 60018

APPLICATION RECEIVED _____

ONE DEPOSIT RECEIVED _____

TWO DEPOSITS RECEIVED _____

FUNDS RECEIVED _____

DO NOT WRITE HERE OFFICE USE ONLY

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

See instructions before completing this space.

EXAMINED BY	FORM VA
CHECKED BY	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> Yes	

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

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

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

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

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

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

6

a See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

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

Name ▼ Account Number ▼

Alain Villeneuve, Vedder Price PC

95815

7

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 N. LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

check only one ►

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

8

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

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

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

Alain Villeneuve

Date January 3, 2014

Handwritten signature (X) ▼

X

Certificate will be mailed in window envelope to this address:

Name ▼	Alain Villeneuve
Number/Street/Apt ▼	222 N. LaSalle Street, Ste. 2400
City/State/Zip ▼	Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

 **Davis Wright
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Anchorage
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New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.

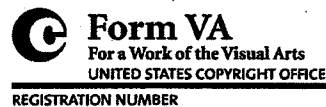
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**VHT - November 2013
Studio Photo 5**

**January 3, 2014
Copyright Filing**

Exhibit 2

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



REGISTRATION NUMBER

VA VAU

EFFECTIVE DATE OF REGISTRATION

Month Day Year

Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. §705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

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

1 TITLE OF THIS WORK ▼ NATURE OF THIS WORK ▼ See instructions

VHT Database; version as of 1/15/2014 Database of Photographs

PREVIOUS OR ALTERNATIVE TITLES ▼
 Unpublished database of published photographs; database contains approx. 600,000 photographs

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

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

2 a NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH

VHT, Inc., employer for hire Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No

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

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

If the answer to either of these questions is "Yes," see detailed instructions.

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

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

b NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No

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

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

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Year 2014 Month _____ Day _____ Year _____
This information must be given in all cases. **b** Complete this information ONLY if this work has been published. Nation _____

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

VHT, Inc.,
 9500 W BRYN MAWR AVE, STE 650, ROSEMONT 60018

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

DO NOT WRITE HERE OFFICE USE ONLY

APPLICATION RECEIVED _____

ONE DEPOSIT RECEIVED _____

TWO DEPOSITS RECEIVED _____

FUNDS RECEIVED _____

See instructions before completing this space.

EXAMINED BY _____	FORM VA
CHECKED BY _____	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> Yes	

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

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

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

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

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

Year of Registration ▼

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published photographs

a 6

See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Compilation of photographs in unpublished database and photographs contained in the database.

b

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

Name ▼

Account Number ▼

Vedder Price, P.C.

95,815

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve,
222 N. LaSalle St., Suite 2600, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of VHT, Inc.

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

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

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

Alain Villeneuve

Date January 29, 2014

Handwritten signature (X) ▼

X

8

Certificate will be mailed in window envelope to this address:

Name ▼	Alain Villeneuve
Number/Street/Apt ▼	222 N. LaSalle Street, Ste. 2400
City/State/Zip ▼	Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

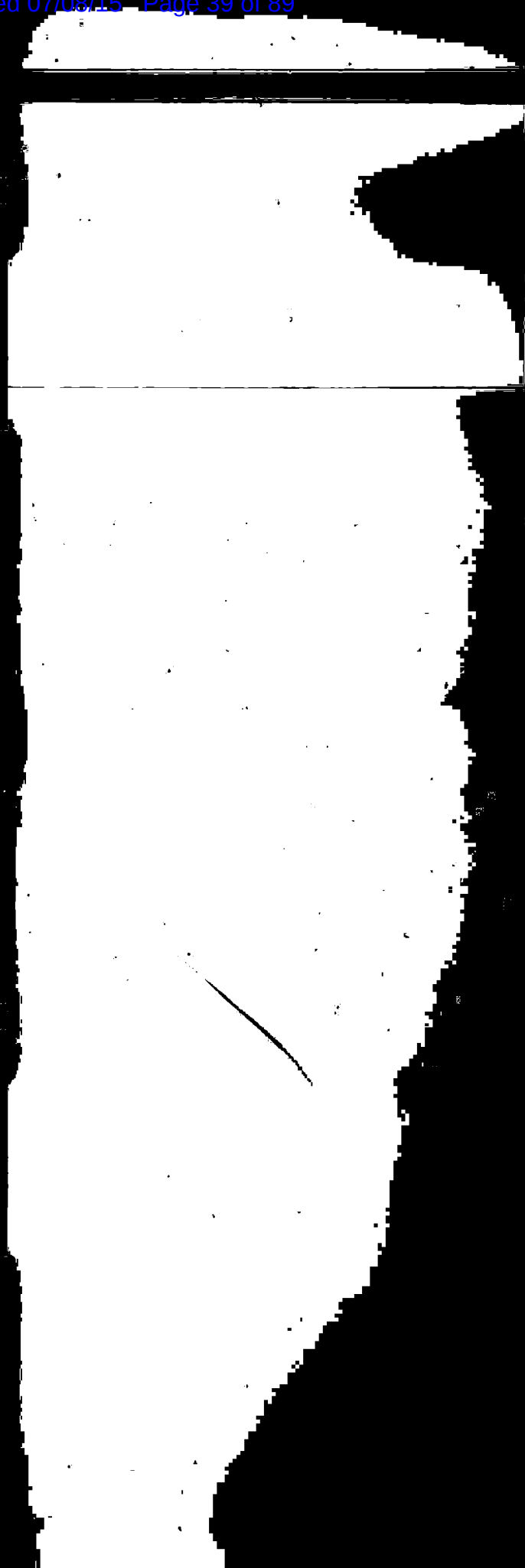
1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.





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January 29, 2014
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Exhibit 3

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



Privacy Act Notice: Sections 408-410 of title 17 of the *United States Code* authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration. By providing this information you are agreeing to routine uses of the information that include publication to give legal notice of your copyright claim as required by 17 U.S.C. §705. It will appear in the Office's online catalog. If you do not provide the information requested, registration may be refused or delayed, and you may not be entitled to certain relief, remedies, and benefits under the copyright law.

VA _____ VAU _____
 EFFECTIVE DATE OF REGISTRATION

 Month Day Year

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

1 TITLE OF THIS WORK ▼ VHT Database; update version as of March 31, 2014
 NATURE OF THIS WORK ▼ See instructions Database of Photographs

PREVIOUS OR ALTERNATIVE TITLES ▼ Unpublished database of published photographs; update to database contains approximately 92,000 photographs

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

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

2 a NAME OF AUTHOR ▼ VHT, Inc. (employer for hire) DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No
 AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of _____ Domiciled in _____
 WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NOTE

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

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions
 3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

b NAME OF AUTHOR ▼ DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No
 AUTHOR'S NATIONALITY OR DOMICILE Name of Country OR Citizen of _____ Domiciled in _____
 WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Yes No Pseudonymous? Yes No

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions
 3-Dimensional sculpture Map Technical drawing
 2-Dimensional artwork Photograph Text
 Reproduction of work of art Jewelry design Architectural work

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED 2014
 This information must be given in all cases. **b** DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK
 Complete this information ONLY if this work has been published. Month _____ Day _____ Year _____
 Nation _____

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼
 VHT, Inc.
 9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED
 ONE DEPOSIT RECEIVED
 TWO DEPOSITS RECEIVED
 FUNDS RECEIVED

See instructions before completing this space.

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

DO NOT WRITE HERE OFFICE USE ONLY

EXAMINED BY	FORM VA
CHECKED BY	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> Yes	

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

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

- Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼
- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.
- If your answer is "Yes," give: Previous Registration Number ▼ Year of Registration ▼

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published photographs

a 6
See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Compilation of photographs in unpublished database and photographs contained in the database

b

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

Name ▼	Account Number ▼
Vedder Price, PC	95,815

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745 Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

- check only one →
- author
 - other copyright claimant
 - owner of exclusive right(s)
 - authorized agent of VHT, Inc.

8

Name of author or other copyright claimant, or owner of exclusive right(s) ▲
of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

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

Alain Villeneuve Date April 18, 2014

Handwritten signature (X) ▼

X

Certificate will be mailed in window envelope to this address:

Name ▼	Alain Villeneuve, Vedder Price PC
Number/Street/Apt ▼	222 North LaSalle Street, Suite 2400
City/State/Zip ▼	Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:
Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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Shanghai
Washington, D.C.

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46149.00.0002 - VHT Database Updates
1/1/2014 - 3/31/2014

Disc 1 of 1

Exhibit 4

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

VA VAU EFFECTIVE DATE OF REGISTRATION Month Day Year

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

1

TITLE OF THIS WORK VHT Database; update version as of December 31, 2010 NATURE OF THIS WORK Database of Photographs PREVIOUS OR ALTERNATIVE TITLES Unpublished database of published photographs; update to database contains approximately 273,900 PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.

2

a NAME OF AUTHOR VHT, Inc. (employer for hire) DATES OF BIRTH AND DEATH Year Born Year Died WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No AUTHOR'S NATIONALITY OR DOMICILE Citizen of Domiciled in WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Pseudonymous? NATURE OF AUTHORSHIP Check appropriate box(es). See instructions 3-Dimensional sculpture 2-Dimensional artwork Reproduction of work of art Map Photograph Jewelry design Technical drawing Text Architectural work

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

b

b NAME OF AUTHOR DATES OF BIRTH AND DEATH Year Born Year Died WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? Yes No AUTHOR'S NATIONALITY OR DOMICILE Citizen of Domiciled in WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK Anonymous? Pseudonymous? NATURE OF AUTHORSHIP Check appropriate box(es). See instructions 3-Dimensional sculpture 2-Dimensional artwork Reproduction of work of art Map Photograph Jewelry design Technical drawing Text Architectural work

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED 2010 DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Month Day Year Nation

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. VHT, Inc. 9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED ONE DEPOSIT RECEIVED TWO DEPOSITS RECEIVED FUNDS RECEIVED

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

EXAMINED BY

FORM VA

CHECKED BY

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

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

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

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

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

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

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published photographs

a

6

See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Compilation of photographs in unpublished database and photographs contained in the database

b

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

Name ▼ Account Number ▼

Vedder Price, PC 95,815

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312) 609-7745 Fax number (312) 609-5005

Email avilleneuve@vedderprice.com

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

check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of VHT, Inc.

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

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

8

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

Alain Villeneuve Date June 3, 2014

Handwritten signature (X) ▼

X

Certificate will be mailed in window envelope to this address:

Name ▼
Alain Villeneuve, Vedder Price PC

Number/Street/Apt ▼
222 North LaSalle Street, Suite 2400

City/State/Zip ▼
Chicago, IL 60601

YOU MUST:
• Complete all necessary spaces
• Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

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**Davis Wright
Tremaine LLP**

Anchorage
Bellevue
Los Angeles

New York
Portland
San Francisco

Seattle
Shanghai
Washington, D.C.



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VHT Copyright Application
Archive 2010

BW1
46149.00.0002

June 3, 2014
Copyright Filing

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Tremaine LLP**

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Los Angeles

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San Francisco

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Washington, D.C.



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VHT Copyright Application
Archive 2010

API
46149.00.0002

June 3, 2014
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San Francisco

Seattle
Shanghai
Washington, D.C.

www.dwt.com

VHT Copyright Application
Archive 2010

CBF

46149.00.0002

June 3, 2014

Copyright Filing



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Bellevue
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New York
Portland
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Seattle
Shanghai
Washington, D.C.

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VHT Copyright Application
Archive 2010

CBI

46149.00.0002

June 3, 2014

Copyright Filing



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VHT Copyright Application

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Exhibit 5

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

VA VAU EFFECTIVE DATE OF REGISTRATION Month Day Year

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

1

TITLE OF THIS WORK NATURE OF THIS WORK See instructions

VHT Database; update version as of December 31, 2011 Database of Photographs

PREVIOUS OR ALTERNATIVE TITLES Unpublished database of published photographs; update to database contains approximately 267,526

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

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

2

NAME OF AUTHOR VHT, Inc. (employer for hire) DATES OF BIRTH AND DEATH Year Born Year Died

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? AUTHOR'S NATIONALITY OR DOMICILE WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

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

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions 3-Dimensional sculpture Map Technical drawing 2-Dimensional artwork Photograph Text Reproduction of work of art Jewelry design Architectural work

NAME OF AUTHOR DATES OF BIRTH AND DEATH Year Born Year Died

WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE"? AUTHOR'S NATIONALITY OR DOMICILE WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions 3-Dimensional sculpture Map Technical drawing 2-Dimensional artwork Photograph Text Reproduction of work of art Jewelry design Architectural work

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. VHT, Inc. 9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED ONE DEPOSIT RECEIVED TWO DEPOSITS RECEIVED FUNDS RECEIVED

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

EXAMINED BY

FORM VA

CHECKED BY

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

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

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

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

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

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

Year of Registration

5

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

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

Previously published photographs

a 6

See instructions before completing this space.

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

Compilation of photographs in unpublished database and photographs contained in the database

b

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

Name

Account Number

Vedder Price, PC

95,815

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312) 609-7745

Fax number (312) 609-5005

Email avilleneuve@vedderprice.com

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

check only one

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of VHT, Inc.

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

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

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

Alain Villeneuve

Date June 5, 2014

Handwritten signature (X)

X

8

Certificate will be mailed in window envelope to this address:

Name
Alain Villeneuve, Vedder Price PC

Number/Street/Apt
222 North LaSalle Street, Suite 2400

City/State/Zip
Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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**VHT Copyright Application
Archive 2011**

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Copyright Filing

Exhibit 6

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



REGISTRATION NUMBER

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

VA VAU
EFFECTIVE DATE OF REGISTRATION
Month Day Year

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

1 TITLE OF THIS WORK: VHT Database; update version as of June 30, 2014
NATURE OF THIS WORK: Database of Photographs
PREVIOUS OR ALTERNATIVE TITLES: Unpublished database of unpublished photographs; update to database contains approximately 197,942 images
PUBLICATION AS A CONTRIBUTION: If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.

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

2 a NAME OF AUTHOR: VHT, Inc. (employer for hire)
DATES OF BIRTH AND DEATH: Year Born Year Died
WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": Yes
AUTHOR'S NATIONALITY OR DOMICILE: Citizen of
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? No Pseudonymous? No
NATURE OF AUTHORSHIP: 3-Dimensional sculpture, 2-Dimensional artwork, Reproduction of work of art, Map, Photograph, Jewelry design, Technical drawing, Text, Architectural work

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

b NAME OF AUTHOR:
DATES OF BIRTH AND DEATH: Year Born Year Died
WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": No
AUTHOR'S NATIONALITY OR DOMICILE: Citizen of
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymous? No Pseudonymous? No
NATURE OF AUTHORSHIP: 3-Dimensional sculpture, 2-Dimensional artwork, Reproduction of work of art, Map, Photograph, Jewelry design, Technical drawing, Text, Architectural work

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED: 2014
DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK: Month Day Year Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.
VHT, Inc.
9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED
ONE DEPOSIT RECEIVED
TWO DEPOSITS RECEIVED
FUNDS RECEIVED
DO NOT WRITE HERE OFFICE USE ONLY

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

EXAMINED BY _____ FORM VA

CHECKED BY _____

CORRESPONDENCE

Yes

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COPYRIGHT
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USE
ONLY

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

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

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

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

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

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

Previously published photographs

a 6
See instructions
before completing
this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

Compilation of photographs in unpublished database and photographs contained in the database

b

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

Name ▼ Account Number ▼

Vedder Price, PC 95,815

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

- check only one ► {
- author
 - other copyright claimant
 - owner of exclusive right(s)
 - authorized agent of VHT, Inc.
- Name of author or other copyright claimant, or owner of exclusive right(s) ▲

8

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

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

John Burke

Date 7-14-14

Handwritten signature (X) ▼

X

Certificate will be mailed in window envelope to this address:

Name ▼
Alain Villeneuve, Vedder Price PC

Number/Street/Apt ▼
222 North LaSalle Street, Suite 2400

City/State/Zip ▼
Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:
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*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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Disc 2 of 2

Exhibit 7

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



REGISTRATION NUMBER

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

Form fields for EFFECTIVE DATE OF REGISTRATION with sub-fields for VA, VAU, Month, Day, Year.

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

Section 1: TITLE OF THIS WORK (VHT Database; updates from July through September 30, 2014) and NATURE OF THIS WORK (Database of Photographs).

Section 2: PUBLICATION AS A CONTRIBUTION table with columns for Volume, Number, Issue Date, and On Pages.

Section 2a: NAME OF AUTHOR (VHT, Inc.), DATES OF BIRTH AND DEATH, and WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?"

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

NATURE OF AUTHORSHIP section with checkboxes for 3-Dimensional sculpture, 2-Dimensional artwork, and various other categories like Map, Photograph, Text, etc.

Section 2b: NAME OF AUTHOR, DATES OF BIRTH AND DEATH, and WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?"

NATURE OF AUTHORSHIP section with checkboxes for 3-Dimensional sculpture, 2-Dimensional artwork, and various other categories like Map, Photograph, Text, etc.

Section 3: YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED (2014) and DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK.

Section 4: COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. (VHT, Inc., 9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018)

Vertical box for APPLICATION RECEIVED, ONE DEPOSIT RECEIVED, TWO DEPOSITS RECEIVED, FUNDS RECEIVED.

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

EXAMINED BY

FORM VA

CHECKED BY

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
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ONLY

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

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

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

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

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

Year of Registration ▼

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

a

6

See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

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

Vedder Price, PC

95,815

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of VHT, Inc.

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

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

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

Alain Villeneuve

Date 11-19-14

Handwritten signature (X) ▼

X

8

Certificate will be mailed in window envelope to this address:

Name ▼	Alain Villeneuve, Vedder Price PC
Number/Street/Apt ▼	222 North LaSalle Street, Suite 2400
City/State/Zip ▼	Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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**VEDDER PRICE
VHT - Q3 2014**

**November 19 2014
Copyright Filing**

Exhibit 8

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



REGISTRATION NUMBER

Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

VA VAU
EFFECTIVE DATE OF REGISTRATION
Month Day Year

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

1 TITLE OF THIS WORK: VHT Database; updates from October through December 31, 2014
NATURE OF THIS WORK: Database of Photographs
PREVIOUS OR ALTERNATIVE TITLES: Unpublished database of unpublished photographs; update to database contains approximately 89,743 images
PUBLICATION AS A CONTRIBUTION: If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared.

2 a NAME OF AUTHOR: VHT, Inc. (employer for hire)
DATES OF BIRTH AND DEATH: Year Born, Year Died
WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": Yes
AUTHOR'S NATIONALITY OR DOMICILE: Citizen of
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymosity, Pseudonymosity
NATURE OF AUTHORSHIP: 2-Dimensional artwork, Photograph

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

b NAME OF AUTHOR
DATES OF BIRTH AND DEATH: Year Born, Year Died
WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": No
AUTHOR'S NATIONALITY OR DOMICILE: Citizen of
WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymosity, Pseudonymosity
NATURE OF AUTHORSHIP: 2-Dimensional artwork, Photograph

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED: 2014
DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK: Month, Day, Year, Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.
VHT, Inc.
9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED
ONE DEPOSIT RECEIVED
TWO DEPOSITS RECEIVED
FUNDS RECEIVED
DO NOT WRITE HERE OFFICE USE ONLY

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

See instructions before completing this space.

EXAMINED BY _____ FORM VA

CHECKED BY _____

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

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

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

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

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

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

Year of Registration ▼

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

a

6

See instructions before completing this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

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

Vedder Price, PC

95,815

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email avilleneuve@vedderprice.com

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

check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of VHT, Inc.

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

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

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

Alain Villeneuve

Date January 29, 2015

Handwritten signature (X) ▼

X

8

Certificate will be mailed in window envelope to this address:

Name ▼	Alain Villeneuve, Vedder Price PC
Number/Street/Apt ▼	222 North LaSalle Street, Suite 2400
City/State/Zip ▼	Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

*17 U.S.C. §506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



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VHT - 01/29/2015 Copyright Filing

Exhibit 9

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



Privacy Act Notice: Sections 408-410 of title 17 of the United States Code authorize the Copyright Office to collect the personally identifying information requested on this form in order to process the application for copyright registration.

REGISTRATION NUMBER: VA VAU EFFECTIVE DATE OF REGISTRATION: Month Day Year

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

1 TITLE OF THIS WORK: VHT Database, update version as of April 30, 2015 NATURE OF THIS WORK: Database of photographs PREVIOUS OR ALTERNATIVE TITLES: Unpublished database of published photographs; update to database contains approximately 136,938 photographs.

2 a NAME OF AUTHOR: VHT, Inc. (employer for hire) DATES OF BIRTH AND DEATH: Year Born Year Died WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": Yes AUTHORITY'S NATIONALITY OR DOMICILE: Citizen of Domiciled in WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymosity? Pseudonymosity? NATURE OF AUTHORSHIP: 3-Dimensional sculpture, 2-Dimensional artwork, Reproduction of work of art, Map, Photograph, Jewelry design, Technical drawing, Text, Architectural work

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

b NAME OF AUTHOR: DATES OF BIRTH AND DEATH: Year Born Year Died WAS THIS CONTRIBUTION TO THE WORK A "WORK MADE FOR HIRE?": Yes AUTHORITY'S NATIONALITY OR DOMICILE: Citizen of Domiciled in WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK: Anonymosity? Pseudonymosity? NATURE OF AUTHORSHIP: 3-Dimensional sculpture, 2-Dimensional artwork, Reproduction of work of art, Map, Photograph, Jewelry design, Technical drawing, Text, Architectural work

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED: 2015 b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK: Month Day Year Nation

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. VHT, Inc. 9500 Bryn Mawr Avenue, Suite 650, Rosemont, IL 60018

APPLICATION RECEIVED ONE DEPOSIT RECEIVED TWO DEPOSITS RECEIVED FUNDS RECEIVED

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

EXAMINED BY _____ FORM VA

CHECKED BY _____

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

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

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

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

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

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

Year of Registration ▼

5

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

a. **Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼

6

a
See instructions
before completing
this space.

b. **Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

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

Name ▼

Account Number ▼

Vedder Price, P.C.

95,815

7

a

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/Zip ▼

Alain Villeneuve, Vedder Price PC
222 North LaSalle Street, Suite 2400, Chicago, IL 60601

b

Area code and daytime telephone number (312)609-7745

Fax number (312)609-5005

Email

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

check only one ▶

author

other copyright claimant

owner of exclusive right(s)

authorized agent of VHT, Inc.

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

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

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

Alain Villeneuve

Date June 18, 2015

Handwritten signature (X) ▼

X

8

Certificate will be mailed in window envelope to this address:

Name ▼
Alain Villeneuve, Vedder Price PC
Number/Street/Apt ▼
222 North LaSalle Street, Suite 2400
City/State/Zip ▼
Chicago, IL 60601

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

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

MAIL TO:

Library of Congress
Copyright Office-VA
101 Independence Avenue SE
Washington, DC 20559

9

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Docket No. 46149.00.0002
VHT DATABASE UPDATES
2015 Q1 01/01/2015 - 04/30/2015

(1 OF 2)

June 18, 2015

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Docket No. 46149.00.0002
VHT DATABASE UPDATES
2015 Q1 01/01/2015 - 04/30/2015

(1 of 2)

June 18, 2015

Filing

Exhibit 10

VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs	
1	Archive 2010 API	API\T50084271\103.jpg	http://www.zillow.com/digs/modern-living-rooms-1291705104/
2	Archive 2011 API	API\T50487255\54.jpg	http://www.zillow.com/digs/modern-home-offices-1148294915/
3	Archive 2011 API	API\T50408485\366.jpg	http://www.zillow.com/digs/eclectic-dining-rooms-940226075/
4	Archive 2011 API	API\T50408485\5.jpg	http://www.zillow.com/digs/traditional-kitchens-940225879/
5	Archive 2011 API	API\T50420348\149.jpg	http://www.zillow.com/digs/traditional-entryways-1541551290/
6	Archive 2011 API	API\T50421860\5.jpg	http://www.zillow.com/digs/traditional-kitchens-1329135622/
7	Archive 2011 API	API\T50421864\8.jpg	http://www.zillow.com/digs/3-4-bathrooms-1380448670/
8	Archive 2011 API	API\T1196312\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-1159587280/
9	Archive 2011 API	API\T50428010\13.jpg	http://www.zillow.com/digs/modern-3-4-bathrooms-940220217/
10	Archive 2011 API	API\T50528096\98.jpg	http://www.zillow.com/digs/modern-playrooms-951036738/
11	Archive 2011 API	API\T50530125\9.jpg	http://www.zillow.com/digs/modern-full-bathrooms-1329178381/
12	Archive 2011 API	API\T50547982\13.jpg	http://www.zillow.com/digs/traditional-powder-rooms-1099175021/
13	Archive 2011 API	API\T50559106\154.jpg	http://www.zillow.com/digs/modern-kids-bedrooms-1172637622/
14	Archive 2011 API	API\T50566454\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-983341550/
15	Archive 2011 API	API\T50574269\4.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-1027821465/
16	Archive 2011 API	API\T50365849\1.jpg	http://www.zillow.com/digs/modern-living-rooms-940221556/
17	Archive 2011 API	API\T50396282\2.jpg	http://www.zillow.com/digs/dining-rooms-1018319376/
18	Archive 2011 API	API\T50396282\2.jpg	http://www.zillow.com/digs/transitional-dining-rooms-1018319376/
19	Archive 2011 API	API\T50396282\5.jpg	http://www.zillow.com/digs/kitchens-1018319374/
20	Archive 2011 API	API\T50396282\91.jpg	http://www.zillow.com/digs/contemporary-great-rooms-1018319375/
21	Archive 2011 API	API\T50400459\5.jpg	http://www.zillow.com/digs/traditional-kitchens-1541540208/
22	Archive 2011 API	API\T50311000\101.jpg	http://www.zillow.com/digs/traditional-entryways-1406189973/
23	Archive 2011 API	API\T50311000\165.jpg	http://www.zillow.com/digs/traditional-living-rooms-1406190269/
24	Archive 2011 API	API\T50311000\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-1406189954/
25	Archive 2011 API	API\T50311000\358.jpg	http://www.zillow.com/digs/country-dining-rooms-1406189971/
26	Archive 2011 API	API\T50315201\102.jpg	http://www.zillow.com/digs/modern-living-rooms-1380451796/
27	Archive 2011 API	API\T50315201\13.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-1380451718/
28	Archive 2011 API	API\T50315201\168.jpg	http://www.zillow.com/digs/modern-master-bathrooms-1380451798/
29	Archive 2011 API	API\T70060445\13.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-993917514/
30	Archive 2011 API	API\T50690520\13.jpg	http://www.zillow.com/digs/modern-3-4-bathrooms-1596781641/
31	Archive 2011 API	API\T50701981\44.jpg	http://www.zillow.com/digs/modern-laundry-rooms-1316471019/
32	Archive 2011 API	API\T70052635\5.jpg	http://www.zillow.com/digs/traditional-kitchens-1596783742/
33	Archive 2011 API	API\T50154764\13.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-1418523092/
34	Archive 2011 API	API\T50161703\177.jpg	http://www.zillow.com/digs/modern-kitchens-1541547258/
35	Archive 2011 API	API\T70062976\178.jpg	http://www.zillow.com/digs/traditional-3-4-bathrooms-951038983/
36	Archive 2011 API	API\T70062976\9.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-951038984/
37	Archive 2011 API	API\T50628912\13.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-1068430649/
38	Archive 2011 API	API\T50637355\2.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-1541539727/
39	Archive 2011 API	API\T50642383\5.jpg	http://www.zillow.com/digs/traditional-kitchens-6184086543/
40	Archive 2011 API	API\T50457737\13.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-1514282112/
41	Archive 2011 API	API\T50582140\18.jpg	http://www.zillow.com/digs/eclectic-kids-bedrooms-951039423/
42	Archive 2011 API	API\T50582192\101.jpg	http://www.zillow.com/digs/asian-entryways-1224869307/
43	Archive 2011 API	API\T50582192\14.jpg	http://www.zillow.com/digs/craftsman-guest-bedrooms-1224869304/
44	Archive 2011 API	API\T50586802\366.jpg	http://www.zillow.com/digs/eclectic-dining-rooms-1529215463/
45	Archive 2011 API	API\T50586807\14.jpg	http://www.zillow.com/digs/traditional-guest-bedrooms-971867971/
46	Archive 2011 API	API\T50587279\101.jpg	http://www.zillow.com/digs/cottage-porches-961580740/
47	Archive 2011 API	API\T50601441\7.jpg	http://www.zillow.com/digs/contemporary-powder-rooms-983338346/
48	Archive 2011 API	API\T50609799\57.jpg	http://www.zillow.com/digs/traditional-kitchens-1006920141/
49	Archive 2011 API	API\T50611863\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-971862871/
50	Archive 2011 API	API\T50615254\5.jpg	http://www.zillow.com/digs/traditional-kitchens-1514297912/
51	Archive 2011 API	API\T50622407\13.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-1047185692/
52	Archive 2011 API	API\T50622418\57.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-1036804311/
53	Archive 2011 API	API\T70069013\177.jpg	http://www.zillow.com/digs/traditional-kitchens-1172630232/
54	Archive 2011 API	API\T70064342\177.jpg	http://www.zillow.com/digs/modern-kitchens-1006923378/
55	Archive 2011 API	API\T70065575\68.jpg	http://www.zillow.com/digs/eclectic-staircases-1087842631/
56	Archive 2011 API	API\T70066036\2.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-6279623385/
57	Archive 2011 API	API\T70066036\97.jpg	http://www.zillow.com/digs/tropical-living-rooms-1660646219/
58	Archive 2011 API	API\T70066589\8.jpg	http://www.zillow.com/digs/modern-full-bathrooms-1329135514/
59	Archive 2011 API	API\T70066869\14.jpg	http://www.zillow.com/digs/modern-guest-bedrooms-1056104946/

VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs
60 Archive 2011 BWI	BWI\T50604940\57.jpg	http://www.zillow.com/digs/modern-kitchens-1596785108/
61 Archive 2011 CBF	CBF\T70067393\10001.jpg	http://www.zillow.com/digs/mediterranean-living-rooms-6127439318/
62 Archive 2011 CGNY	CGNY\T50644805\5.jpg	http://www.zillow.com/digs/traditional-kitchens-5314095488/
63 Archive 2011 CGNY	CGNY\T70060393\165.jpg	http://www.zillow.com/digs/contemporary-great-rooms-6372014243/
64 Archive 2011 CGNY	CGNY\T70052771\5.jpg	http://www.zillow.com/digs/modern-kitchens-5316795484/
65 Archive 2011 HLN	HLN\T390045395\57.jpg	http://www.zillow.com/digs/modern-fronts-of-homes-1354068511/
66 Archive 2011 HLN	HLN\T390045395\84.jpg	http://www.zillow.com/digs/craftsman-staircases-1354068421/
67 Archive 2011 HLN	HLN\T50546462\8.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-909182507/
68 Archive 2011 HLN	HLN\T50408380\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-747584345/
69 Archive 2011 HLN	HLN\T50453263\5.jpg	http://www.zillow.com/digs/traditional-kitchens-721025026/
70 Archive 2011 HLN	HLN\T50164439\177.jpg	http://www.zillow.com/digs/traditional-kitchens-640662343/
71 Archive 2011 HLN	HLN\T50367850\9.jpg	http://www.zillow.com/digs/modern-full-bathrooms-747602751/
72 Archive 2011 HLN	HLN\T50382801\154.jpg	http://www.zillow.com/digs/traditional-kids-bedrooms-661658769/
73 Archive 2011 KSI	KSI\T70064008\94.jpg	http://www.zillow.com/digs/modern-living-rooms-819650083/
74 Archive 2011 KSI	KSI\T50542120\1.jpg	http://www.zillow.com/digs/unknowns-843092287/
75 Archive 2011 KSI	KSI\T50578627\1.jpg	http://www.zillow.com/digs/modern-living-rooms-917954581/
76 Archive 2011 KSI	KSI\T50665733\32.jpg	http://www.zillow.com/digs/modern-hallways-1599047641/
77 January 29, 2014 Copyright Filing 1 of 8	API\T70068564\13.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-1555946995/
78 January 29, 2014 Copyright Filing 4 of 8	CGNY\T391501041\18.jpg	http://www.zillow.com/digs/traditional-living-rooms-5177131856/
79 VHT - 01/29/2015 Copyright Filing	C21TI\T433179018\153.jpg	http://www.zillow.com/digs/transitional-master-bedrooms-6517388365/
80 VHT - 01/29/2015 Copyright Filing	API\T433175242\1.jpg	http://www.zillow.com/digs/traditional-living-rooms-6462126546/
81 VHT - 01/29/2015 Copyright Filing	API\T433171318\7.jpg	http://www.zillow.com/digs/unknowns-6484727574/
82 VHT - 01/29/2015 Copyright Filing	BWI\T433171339\8.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6425671408/
83 VHT - 01/29/2015 Copyright Filing	BWI\T433171573\14.jpg	http://www.zillow.com/digs/contemporary-unknowns-6486360763/
84 VHT - 01/29/2015 Copyright Filing	API\T433164202\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6380861893/
85 VHT - 01/29/2015 Copyright Filing	API\T433164202\13.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-6380861900/
86 VHT - 01/29/2015 Copyright Filing	API\T433158081\9.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-6366162363/
87 VHT - 01/29/2015 Copyright Filing	API\T433159737\153.jpg	http://www.zillow.com/digs/traditional-kids-bedrooms-6336310420/
88 VHT - 01/29/2015 Copyright Filing	BWI\T433162005\10.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6368706787/
89 VHT - 01/29/2015 Copyright Filing	BWI\T433164155\8.jpg	http://www.zillow.com/digs/contemporary-unknowns-6589274119/
90 VHT - 01/29/2015 Copyright Filing	HLN\T433177125\8.jpg	http://www.zillow.com/digs/cottage-powder-rooms-6603685022/
91 VHT - 01/29/2015 Copyright Filing	HLN\T433185157\165.jpg	http://www.zillow.com/digs/transitional-living-rooms-6605402152/
92 VHT - 01/29/2015 Copyright Filing	API\T433181789\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6635395642/
93 VHT - 01/29/2015 Copyright Filing	API\T433181789\21.jpg	http://www.zillow.com/digs/transitional-living-rooms-6635397627/
94 VHT - 01/29/2015 Copyright Filing	API\T433181789\3.jpg	http://www.zillow.com/digs/transitional-living-rooms-6635395763/
95 VHT - 01/29/2015 Copyright Filing	API\T433181789\32.jpg	http://www.zillow.com/digs/traditional-entryways-6635395761/
96 VHT - 01/29/2015 Copyright Filing	API\T433181789\5.jpg	http://www.zillow.com/digs/craftsman-kitchens-6635397626/
97 VHT - 01/29/2015 Copyright Filing	API\T433183818\1.jpg	http://www.zillow.com/digs/living-rooms-6572517133/

	VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs
98	VHT - 01/29/2015 Copyright Filing	API\T433183818\32.jpg	http://www.zillow.com/digs/traditional-entryways-6635408749/
99	VHT - 01/29/2015 Copyright Filing	BWI\T433181285\177.jpg	http://www.zillow.com/digs/rustic-kitchens-6631264831/
100	VHT - 01/29/2015 Copyright Filing	RNKS\T433170485\572.jpg	http://www.zillow.com/digs/transitional-unknowns-6572741770/
101	VHT - 01/29/2015 Copyright Filing	RNKS\T433182860\22.jpg	http://www.zillow.com/digs/craftsman-wine-cellar-6677840221/
102	VHT - 01/29/2015 Copyright Filing	CGNY\T433172729\92.jpg	http://www.zillow.com/digs/contemporary-kitchens-6506762181/
103	VHT - 01/29/2015 Copyright Filing	CGNY\T433173830\18001.jpg	http://www.zillow.com/digs/eclectic-kids-bedrooms-6473757989/
104	VHT - 01/29/2015 Copyright Filing	CGNY\T433175925\18001.jpg	http://www.zillow.com/digs/contemporary-guest-bedrooms-6477505400/
105	VHT - 01/29/2015 Copyright Filing	CGNY\T433175925\191.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-6477540277/
106	VHT - 01/29/2015 Copyright Filing	CGNY\T433175968\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6542441221/
107	VHT - 01/29/2015 Copyright Filing	CGNY\T433176021\1.jpg	http://www.zillow.com/digs/art-deco-living-rooms-6556706472/
108	VHT - 01/29/2015 Copyright Filing	CGNY\T433176913\17.jpg	http://www.zillow.com/digs/eclectic-kids-bedrooms-6486845145/
109	VHT - 01/29/2015 Copyright Filing	CGNY\T433178059\14.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-6566417096/
110	VHT - 01/29/2015 Copyright Filing	CGNY\T433180154\14.jpg	http://www.zillow.com/digs/master-bedrooms-6508632244/
111	VHT - 01/29/2015 Copyright Filing	CGNY\T433180504\14.jpg	http://www.zillow.com/digs/traditional-unknowns-6499639115/
112	VHT - 01/29/2015 Copyright Filing	CGNY\T433186142\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6594921089/
113	VHT - 01/29/2015 Copyright Filing	RSWA\T433170519\57.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-6399954436/
114	VHT - 01/29/2015 Copyright Filing	CGNY\T433160019\32.jpg	http://www.zillow.com/digs/traditional-hallways-6346083104/
115	VHT - 01/29/2015 Copyright Filing	CGNY\T433162983\101.jpg	http://www.zillow.com/digs/contemporary-great-rooms-6372002721/
116	VHT - 01/29/2015 Copyright Filing	CGNY\T433162983\18.jpg	http://www.zillow.com/digs/contemporary-guest-bedrooms-6366234388/
117	VHT - 01/29/2015 Copyright Filing	CGNY\T433162983\8.jpg	http://www.zillow.com/digs/3-4-bathrooms-6372002900/
118	VHT - 01/29/2015 Copyright Filing	CGNY\T433164099\323.jpg	http://www.zillow.com/digs/traditional-3-4-bathrooms-6486788676/
119	VHT - 01/29/2015 Copyright Filing	CGNY\T433164099\8.jpg	http://www.zillow.com/digs/eclectic-full-bathrooms-6486790017/
120	VHT - 01/29/2015 Copyright Filing	CGNY\T433165617\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6392456966/
121	VHT - 01/29/2015 Copyright Filing	CGNY\T433165756\5.jpg	http://www.zillow.com/digs/traditional-kitchens-6451018282/
122	VHT - 01/29/2015 Copyright Filing	CGNY\T433167545\84.jpg	http://www.zillow.com/digs/traditional-entryways-6421539500/
123	VHT - 01/29/2015 Copyright Filing	CGNY\T433170696\8.jpg	http://www.zillow.com/digs/traditional-unknowns-6494780028/
124	VHT - 01/29/2015 Copyright Filing	CGF\T433162629\1.jpg	http://www.zillow.com/digs/unknowns-6425380490/
125	VHT - 01/29/2015 Copyright Filing	CGF\T433168421\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6578093645/
126	VHT - 01/29/2015 Copyright Filing	CGF\T433168421\93.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6578093380/

	VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs
127	VHT - 01/29/2015 Copyright Filing	MSF\T433175031\10001.jpg	http://www.zillow.com/digs/rustic-unknowns-6532191757/
128	VHT - 01/29/2015 Copyright Filing	STD\T433182865\154.jpg	http://www.zillow.com/digs/eclectic-unknowns-6539544996/
129	VHT - 01/29/2015 Copyright Filing	STD\T433171886\18.jpg	http://www.zillow.com/digs/traditional-guest-bedrooms-6430333586/
130	VHT - 01/29/2015 Copyright Filing	STD\T433181155\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6628264403/
131	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392045313\165.jpg	http://www.zillow.com/digs/traditional-living-rooms-5795489936/
132	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392045313\56.jpg	http://www.zillow.com/digs/traditional-playrooms-5730899248/
133	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392045313\9.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-5730899256/
134	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392045624\92.jpg	http://www.zillow.com/digs/contemporary-kitchens-6131538618/
135	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392021322\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-5772307334/
136	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392021322\8.jpg	http://www.zillow.com/digs/cottage-full-bathrooms-5772307343/
137	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392021322\93.jpg	http://www.zillow.com/digs/traditional-great-rooms-5772307332/
138	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392021800\168.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-6323981984/
139	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392026226\40.jpg	http://www.zillow.com/digs/traditional-playrooms-5795471241/
140	VHT Database Updates 1/1/2014 - 3/31/2014	BWI\T392010931\5.jpg	http://www.zillow.com/digs/craftsman-kitchens-5611586346/
141	VHT Database Updates 1/1/2014 - 3/31/2014	API\T391890728\5.jpg	http://www.zillow.com/digs/traditional-kitchens-5730903327/
142	VHT Database Updates 1/1/2014 - 3/31/2014	API\T391941972\8.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-5674390451/
143	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392111105\178.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-5866552488/
144	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392111105\56.jpg	http://www.zillow.com/digs/traditional-home-offices-5876785920/
145	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392111105\62.jpg	http://www.zillow.com/digs/traditional-home-theaters-6059373572/
146	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392111813\93.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-6150965055/
147	VHT Database Updates 1/1/2014 - 3/31/2014	API\T70059833\5.jpg	http://www.zillow.com/digs/traditional-kitchens-1148296546/
148	VHT Database Updates 1/1/2014 - 3/31/2014	BWI\T392111874\1.jpg	http://www.zillow.com/digs/modern-living-rooms-5759873174/
149	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392108070\148.jpg	http://www.zillow.com/digs/traditional-living-rooms-5895279170/
150	VHT Database Updates 1/1/2014 - 3/31/2014	API\T392108070\153.jpg	http://www.zillow.com/digs/traditional-kids-bedrooms-5895279179/
151	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392021623\8.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-5824024761/
152	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392026609\8.jpg	http://www.zillow.com/digs/contemporary-3-4-bathrooms-5665402575/
153	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392029943\84.jpg	http://www.zillow.com/digs/mediterranean-entryways-6486836364/
154	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392045269\165.jpg	http://www.zillow.com/digs/contemporary-living-rooms-5702599989/
155	VHT Database Updates 1/1/2014 - 3/31/2014	BWI\T392035057\13.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-6479518509/

	VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs
156	VHT Database Updates 1/1/2014 - 3/31/2014	BWI\T392078346\2.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-5729378846/
157	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T391890267\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-5593680249/
158	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T391890613\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-5610388538/
159	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T391890750\32.jpg	http://www.zillow.com/digs/contemporary-bars-5617969536/
160	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T391939759\1.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6055663975/
161	VHT Database Updates 1/1/2014 - 3/31/2014	PNJ\T392020175\2.jpg	http://www.zillow.com/digs/traditional-unknowns-6478037945/
162	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392065197\301.jpg	http://www.zillow.com/digs/contemporary-hallways-6486837607/
163	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392065199\2.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-5702636365/
164	VHT Database Updates 1/1/2014 - 3/31/2014	CGNY\T392071418\5.jpg	http://www.zillow.com/digs/traditional-kitchens-5705595261/
165	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T391924931\165.jpg	http://www.zillow.com/digs/mediterranean-living-rooms-5602007754/
166	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392051846\153.jpg	http://www.zillow.com/digs/traditional-kids-bedrooms-5823950762/
167	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392051846\161.jpg	http://www.zillow.com/digs/traditional-kids-bedrooms-5823950764/
168	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392051846\2.jpg	http://www.zillow.com/digs/craftsman-dining-rooms-5823950758/
169	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392051846\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-5823950757/
170	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392051846\9.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-5823950766/
171	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392078038\85.jpg	http://www.zillow.com/digs/traditional-porches-5751443248/
172	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392078072\57.jpg	http://www.zillow.com/digs/traditional-home-exterior-5703550951/
173	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392108990\153.jpg	http://www.zillow.com/digs/contemporary-kids-bedrooms-5747984319/
174	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392108990\154.jpg	http://www.zillow.com/digs/contemporary-kids-bedrooms-5747984320/
175	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392108990\161.jpg	http://www.zillow.com/digs/contemporary-kids-bedrooms-5747984321/
176	VHT Database Updates 1/1/2014 - 3/31/2014	HLN\T392108990\177.jpg	http://www.zillow.com/digs/transitional-kitchens-5785922830/
177	VHT-Q2 2014	API\T392207135\13.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-5996189945/
178	VHT-Q2 2014	API\T392106349\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6059361974/
179	VHT-Q2 2014	API\T392071320\358.jpg	http://www.zillow.com/digs/traditional-dining-rooms-5933913525/
180	VHT-Q2 2014	API\T392079748\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-5954588262/
181	VHT-Q2 2014	API\T392174013\14.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-6380884015/
182	VHT-Q2 2014	API\T392174013\7.jpg	http://www.zillow.com/digs/traditional-powder-rooms-6380884019/
183	VHT-Q2 2014	BWI\T392181346\14.jpg	http://www.zillow.com/digs/traditional-guest-bedrooms-6368722565/
184	VHT-Q2 2014	API\T392159244\55.jpg	http://www.zillow.com/digs/libraries-6196610259/
185	VHT-Q2 2014	API\T392159376\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6131545873/
186	VHT-Q2 2014	API\T392253365\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6150978818/
187	VHT-Q2 2014	API\T392253365\40.jpg	http://www.zillow.com/digs/modern-basements-6150978825/
188	VHT-Q2 2014	API\T392132296\13.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-5975574915/
189	VHT-Q2 2014	API\T392132296\153.jpg	http://www.zillow.com/digs/modern-guest-bedrooms-5975574916/
190	VHT-Q2 2014	API\T392132296\6.jpg	http://www.zillow.com/digs/contemporary-hallways-5975574913/
191	VHT-Q2 2014	API\T392237321\165.jpg	http://www.zillow.com/digs/contemporary-great-rooms-5975562988/
192	VHT-Q2 2014	API\T392251053\54.jpg	http://www.zillow.com/digs/craftsman-home-offices-6401788486/
193	VHT-Q2 2014	API\T392251273\176.jpg	http://www.zillow.com/digs/rustic-living-rooms-6037959007/

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194	VHT-Q2 2014	API\T392251273\44.jpg	http://www.zillow.com/digs/traditional-laundry-rooms-6037959012/
195	VHT-Q2 2014	API\T392251273\9.jpg	http://www.zillow.com/digs/cottage-3-4-bathrooms-6037958907/
196	VHT-Q2 2014	API\T392197045\8.jpg	http://www.zillow.com/digs/eclectic-full-bathrooms-5926839399/
197	VHT-Q2 2014	API\T392197113\32.jpg	http://www.zillow.com/digs/craftsman-staircases-5975576013/
198	VHT-Q2 2014	BWI\T392259424\57.jpg	http://www.zillow.com/digs/unknowns-5995169045/
199	VHT-Q2 2014	BWI\T392124622\8.jpg	http://www.zillow.com/digs/traditional-full-bathrooms-5787652500/
200	VHT-Q2 2014	BWI\T392189042\14.jpg	http://www.zillow.com/digs/cottage-unknowns-5875662694/
201	VHT-Q2 2014	BWI\T392189042\18.jpg	http://www.zillow.com/digs/traditional-unknowns-5875662695/
202	VHT-Q2 2014	BWI\T392189042\2.jpg	http://www.zillow.com/digs/dining-rooms-5875662693/
203	VHT-Q2 2014	BWI\T392238390\1.jpg	http://www.zillow.com/digs/traditional-living-rooms-6368731217/
204	VHT-Q2 2014	BWI\T392265225\1.jpg	http://www.zillow.com/digs/art-deco-living-rooms-6368709714/
205	VHT-Q2 2014	BWI\T392265225\14.jpg	http://www.zillow.com/digs/art-deco-master-bedrooms-6368709806/
206	VHT-Q2 2014	BWI\T392265225\149.jpg	http://www.zillow.com/digs/art-deco-dining-rooms-6368709713/
207	VHT-Q2 2014	BWI\T392265225\32.jpg	http://www.zillow.com/digs/traditional-entryways-6368709712/
208	VHT-Q2 2014	CBI\T392133027\32.jpg	http://www.zillow.com/digs/transitional-living-rooms-6652763115/
209	VHT-Q2 2014	CGNY\T392174887\13.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-5865730981/
210	VHT-Q2 2014	CGNY\T392183052\1.jpg	http://www.zillow.com/digs/cottage-great-rooms-6189708934/
211	VHT-Q2 2014	CGNY\T392183763\369.jpg	http://www.zillow.com/digs/modern-dining-rooms-6069266583/
212	VHT-Q2 2014	CGNY\T392106293\14.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-6070499266/
213	VHT-Q2 2014	CGNY\T392106293\153.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-6070499270/
214	VHT-Q2 2014	CGNY\T392133863\5.jpg	http://www.zillow.com/digs/modern-kitchens-5942626892/
215	VHT-Q2 2014	CGNY\T392138992\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6070816814/
216	VHT-Q2 2014	CGNY\T392143960\9.jpg	http://www.zillow.com/digs/modern-3-4-bathrooms-5843624928/
217	VHT-Q2 2014	CGNY\T392143962\18.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-5828056983/
218	VHT-Q2 2014	CGNY\T392159010\1.jpg	http://www.zillow.com/digs/craftsman-living-rooms-5934426231/
219	VHT-Q2 2014	CGNY\T392207944\8.jpg	http://www.zillow.com/digs/modern-full-bathrooms-6577936180/
220	VHT-Q2 2014	CGNY\T392212928\27.jpg	http://www.zillow.com/digs/traditional-patios-5945451200/
221	VHT-Q2 2014	CGNY\T392219119\1.jpg	http://www.zillow.com/digs/eclectic-master-bathrooms-5916861361/
222	VHT-Q2 2014	CGNY\T392226189\14.jpg	http://www.zillow.com/digs/craftsman-master-bedrooms-6008644760/
223	VHT-Q2 2014	CGF\T392219640\14.jpg	http://www.zillow.com/digs/cottage-master-bedrooms-5987170350/
224	VHT-Q2 2014	CGLI\T392117105\93.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6425380579/
225	VHT-Q2 2014	CGLI\T392227654\21.jpg	http://www.zillow.com/digs/rustic-living-rooms-6027829372/
226	VHT-Q2 2014	CGNY\T392226538\18.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-6142243992/
227	VHT-Q2 2014	CGNY\T392226538\3.jpg	http://www.zillow.com/digs/modern-kitchens-6070655908/
228	VHT-Q2 2014	CGNY\T392226893\8.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6056063134/
229	VHT-Q2 2014	CGNY\T392279478\17.jpg	http://www.zillow.com/digs/contemporary-guest-bedrooms-6052486289/
230	VHT-Q2 2014	HLN\T392197866\101.jpg	http://www.zillow.com/digs/rustic-playrooms-5953074192/
231	VHT-Q2 2014	HLN\T392237179\3.jpg	http://www.zillow.com/digs/traditional-living-rooms-5997783212/
232	VHT-Q2 2014	HLN\T392241942\154.jpg	http://www.zillow.com/digs/rustic-guest-bedrooms-6413132731/
233	VHT-Q2 2014	HLN\T392165077\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-5909990389/
234	VHT-Q3 2014	API\T392307941\45.jpg	http://www.zillow.com/digs/modern-closets-6259817286/
235	VHT-Q3 2014	API\T392310746\1.jpg	http://www.zillow.com/digs/traditional-living-rooms-6345908752/
236	VHT-Q3 2014	API\T392302661\161.jpg	http://www.zillow.com/digs/eclectic-playrooms-6082451223/
237	VHT-Q3 2014	API\T392302661\168.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-6131565973/
238	VHT-Q3 2014	API\T392302661\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6131566882/
239	VHT-Q3 2014	API\T392302661\44.jpg	http://www.zillow.com/digs/contemporary-laundry-rooms-6082451319/
240	VHT-Q3 2014	API\T392312318\14.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-6216720705/
241	VHT-Q3 2014	API\T392314088\14.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-6216739403/
242	VHT-Q3 2014	API\T392316540\188.jpg	http://www.zillow.com/digs/contemporary-decks-6216740588/
243	VHT-Q3 2014	API\T392316540\67.jpg	http://www.zillow.com/digs/modern-bars-6216740586/
244	VHT-Q3 2014	API\T392251625\32.jpg	http://www.zillow.com/digs/craftsman-staircases-6216728506/
245	VHT-Q3 2014	API\T392251625\370.jpg	http://www.zillow.com/digs/craftsman-dining-rooms-6216728514/
246	VHT-Q3 2014	API\T392251737\32.jpg	http://www.zillow.com/digs/traditional-entryways-6131539809/
247	VHT-Q3 2014	API\T392277182\13.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-6366157143/
248	VHT-Q3 2014	API\T392277182\165.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6366157120/
249	VHT-Q3 2014	API\T392277182\21.jpg	http://www.zillow.com/digs/contemporary-great-rooms-6366157139/
250	VHT-Q3 2014	API\T392277182\9.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-6366157149/
251	VHT-Q3 2014	API\T392277208\177.jpg	http://www.zillow.com/digs/craftsman-kitchens-6870315598/
252	VHT-Q3 2014	BWI\T392310378\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6085378915/

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253	VHT-Q3 2014	API\T433149848\9.jpg	http://www.zillow.com/digs/eclectic-full-bathrooms-627962997/
254	VHT-Q3 2014	API\T392332960\13.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-6251006141/
255	VHT-Q3 2014	API\T392334296\353.jpg	http://www.zillow.com/digs/traditional-patios-6323951747/
256	VHT-Q3 2014	API\T392335054\8.jpg	http://www.zillow.com/digs/craftsman-3-4-bathrooms-6635401813/
257	VHT-Q3 2014	API\T392325076\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6233883611/
258	VHT-Q3 2014	API\T392328160\8.jpg	http://www.zillow.com/digs/cottage-full-bathrooms-6196622817/
259	VHT-Q3 2014	BW\T392307309\54.jpg	http://www.zillow.com/digs/traditional-home-offices-6368730054/
260	VHT-Q3 2014	BW\T392307965\154.jpg	http://www.zillow.com/digs/living-rooms-6107994102/
261	VHT-Q3 2014	API\T392305546\165.jpg	http://www.zillow.com/digs/transitional-living-rooms-6587588051/
262	VHT-Q3 2014	API\T392316770\91.jpg	http://www.zillow.com/digs/contemporary-great-rooms-6215291719/
263	VHT-Q3 2014	API\T392317665\161.jpg	http://www.zillow.com/digs/unknowns-6138049329/
264	VHT-Q3 2014	API\T392317665\2.jpg	http://www.zillow.com/digs/contemporary-dining-rooms-6138049326/
265	VHT-Q3 2014	API\T392317665\91.jpg	http://www.zillow.com/digs/unknowns-6138049229/
266	VHT-Q3 2014	API\T392319052\107.jpg	http://www.zillow.com/digs/traditional-kitchens-6635396492/
267	VHT-Q3 2014	API\T392323651\328.jpg	http://www.zillow.com/digs/contemporary-home-theaters-6259784887/
268	VHT-Q3 2014	CGF\T433151748\2.jpg	http://www.zillow.com/digs/dining-rooms-6602646513/
269	VHT-Q3 2014	CGNY\T392226874\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6070822703/
270	VHT-Q3 2014	CBH\T392285399\57.jpg	http://www.zillow.com/digs/unknowns-5833292462/
271	VHT-Q3 2014	CBH\T392316675\154.jpg	http://www.zillow.com/digs/craftsman-guest-bedrooms-6260815317/
272	VHT-Q3 2014	CBH\T392251856\44.jpg	http://www.zillow.com/digs/traditional-laundry-rooms-6664276265/
273	VHT-Q3 2014	CGNY\T392277453\18.jpg	http://www.zillow.com/digs/contemporary-master-bedrooms-6091857419/
274	VHT-Q3 2014	CGNY\T392285392\1.jpg	http://www.zillow.com/digs/traditional-guest-bedrooms-6421675600/
275	VHT-Q3 2014	CGNY\T392305379\153.jpg	http://www.zillow.com/digs/modern-kids-bedrooms-6238077710/
276	VHT-Q3 2014	CGNY\T392305815\1.jpg	http://www.zillow.com/digs/contemporary-living-rooms-6182871045/
277	VHT-Q3 2014	CGNY\T392309368\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6148100575/
278	VHT-Q3 2014	CGNY\T392316480\1.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6256413609/
279	VHT-Q3 2014	CGNY\T392316515\91.jpg	http://www.zillow.com/digs/modern-kitchens-6271724967/
280	VHT-Q3 2014	CGNY\T392323667\1.jpg	http://www.zillow.com/digs/eclectic-unknowns-6486860011/
281	VHT-Q3 2014	BW\T433158194\165.jpg	http://www.zillow.com/digs/craftsman-living-rooms-6368666654/
282	VHT-Q3 2014	PNJ\T392302967\57.jpg	http://www.zillow.com/digs/unknowns-6076709543/
283	VHT-Q3 2014	PNJ\T392302967\9.jpg	http://www.zillow.com/digs/traditional-powder-rooms-6076709544/
284	VHT-Q3 2014	PNJ\T392302968\9.jpg	http://www.zillow.com/digs/cottage-3-4-bathrooms-6070035013/
285	VHT-Q3 2014	PNJ\T392316409\154.jpg	http://www.zillow.com/digs/contemporary-full-bathrooms-6414590396/
286	VHT-Q3 2014	HLN\T392277892\1.jpg	http://www.zillow.com/digs/traditional-living-rooms-6124711701/
287	VHT-Q3 2014	HLN\T392277892\165.jpg	http://www.zillow.com/digs/transitional-living-rooms-6124711702/
288	VHT-Q3 2014	HLN\T392277892\92.jpg	http://www.zillow.com/digs/transitional-dining-rooms-6124711704/
289	VHT-Q3 2014	PNJ\T392316993\94.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6211592382/
290	VHT-Q3 2014	CGNY\T392326188\1.jpg	http://www.zillow.com/digs/eclectic-unknowns-6231702341/
291	VHT-Q3 2014	CGNY\T392330220\93.jpg	http://www.zillow.com/digs/eclectic-great-rooms-6251689273/
292	VHT-Q3 2014	CGNY\T433148871\14.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-6659286479/
293	VHT-Q3 2014	CGNY\T433148871\177.jpg	http://www.zillow.com/digs/contemporary-kitchens-6659277983/
294	VHT-Q3 2014	CGNY\T433151168\20.jpg	http://www.zillow.com/digs/contemporary-kids-bedrooms-6424943808/
295	VHT-Q3 2014	CGNY\T433155106\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6346154345/
296	VHT-Q3 2014	STD\T433149581\32.jpg	http://www.zillow.com/digs/traditional-entryways-6274784534/
297	VHT-Q3 2014	RRIL\T392334358\32.jpg	http://www.zillow.com/digs/traditional-entryways-6250430988/
298	VHT-Q3 2014	PNJ\T433157598\1.jpg	http://www.zillow.com/digs/traditional-living-rooms-6368671448/
299	VHT-Q3 2014	PNJ\T433159006\165.jpg	http://www.zillow.com/digs/asian-unknowns-6495205022/
300	VHT-Q3 2014	REGL\T433157081\177.jpg	http://www.zillow.com/digs/traditional-kitchens-6378274516/
301	VHT-Q3 2014	REGL\T433157081\178.jpg	http://www.zillow.com/digs/traditional-master-bedrooms-6378274518/
302	VHT-Q3 2014	REGL\T433157081\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6375935766/
303	VHT-Q3 2014	UIL\T392316330\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-6200038535/
304	VHT-Q3 2014	UIL\T392316330\57.jpg	http://www.zillow.com/digs/unknowns-6199957372/
305	VHT-QC 2014 CD2 Compare	LARF\T392244552\57.jpg	http://www.zillow.com/digs/traditional-master-bathrooms-5971274775/
306	VHT-QC 2014 CD2 Compare	IPF\T392285096\32.jpg	http://www.zillow.com/digs/traditional-entryways-6283239147/
307	VHT-QC 2014 CD2 Compare	PNJ\T392259844\57.jpg	http://www.zillow.com/digs/contemporary-master-bathrooms-6085559833/

	VHT Copyright Application	VHT Photograph Name*	Infringing Use on Zillow Digs
308	VHT-QC 2014 CD2 Compare	PNJ\T392183843\5.jpg	http://www.zillow.com/digs/contemporary-kitchens-5935299874/
309	VHT-QC 2014 CD2 Compare	PNJ\T392207106\93.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6009710955/
310	VHT-QC 2014 CD2 Compare	PNJ\T392226298\57.jpg	http://www.zillow.com/digs/craftsman-kitchens-6124934952/
311	VHT-QC 2014 CD2 Compare	PNJ\T392226819\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-6047010960/
312	VHT-QC 2014 CD2 Compare	STD\T392238535\14.jpg	http://www.zillow.com/digs/traditional-guest-bedrooms-5956575879/
313	VHT-QC 2014 CD2 Compare	STD\T392238535\2.jpg	http://www.zillow.com/digs/traditional-dining-rooms-5956575877/
314	VHT-QC 2014 CD2 Compare	STD\T392238535\22.jpg	http://www.zillow.com/digs/craftsman-basements-5956575766/
315	VHT-QC 2014 CD2 Compare	STD\T392174881\57.jpg	http://www.zillow.com/digs/traditional-living-rooms-5855920506/
316	VHT-QC 2014 CD2 Compare	STD\T392165134\148.jpg	http://www.zillow.com/digs/contemporary-living-rooms-5875437282/

* The VHT Photograph Name is the file path within each copyright registration application disc where the photograph can be found, though the actual file name of the corresponding photograph on the disc will also include a descriptive term such as "web" or "viewer" that is not included in the file name above. For example, the VHT image in line #1 of the spreadsheet (API\T50084271\103.jpg), is "web_103.jpg" and can be found in subfolder T50084271, within folder API, on disc Archive 2010 API.