

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

NETFLIX WORLDWIDE
ENTERTAINMENT, LLC; NETFLIX
STUDIOS, LLC,
c/o Rose Leda Ehler
Munger, Tolles & Olson LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426

Plaintiffs, CASE NO.

V.

ABIGAIL BARLOW d/b/a ABIGAIL
BARLOW PUBLISHING; EMILY BEAR
d/b/a JORDAN KING MUSIC USA; PINK
& PURPLE LADY, INC.; and BARLOW
& BEAR, LLC,

Defendants.

COMPLAINT

Defendants Abigail Barlow and Emily Bear and their companies (“Barlow & Bear”) have taken valuable intellectual property from the Netflix original series *Bridgerton* to build an international brand for themselves. *Bridgerton* reflects the creative work and hard-earned success of hundreds of artists and Netflix employees. Netflix owns the exclusive right to create *Bridgerton* songs, musicals, or any other derivative works based on *Bridgerton*. Barlow & Bear cannot take that right—made valuable by others’ hard work—for themselves, without permission. Yet that is exactly what they have done.

On July 26, 2022, over Netflix’s repeated objections, Barlow & Bear staged a massive, for-profit stage show—entitled “*The Unofficial Bridgerton Musical Album Live in Concert*”—to a sold-out audience at the Kennedy Center, with tickets ranging up to \$149 each and VIP

packages. The live show featured over a dozen songs that copied verbatim dialogue, character traits and expression, and other elements from *Bridgerton* the series. It included dramatic portrayals of *Bridgerton* characters by Broadway actors, emoting through the performance of the songs that comprise the “musical.” Throughout the performance, Barlow & Bear misrepresented to the audience that they were using Netflix’s BRIDGERTON trademark “with Permission,” while Netflix vigorously objected.



Barlow & Bear also announced they intend to stage yet another performance of their unauthorized derivative works at the Royal Albert Hall in London, making this a world tour. Barlow & Bear even promoted their own line of *Bridgerton*-themed merchandise.

Barlow & Bear’s conduct began on social media, but stretches “fan fiction” well past its breaking point. It is blatant infringement of intellectual property rights. The copyright and trademark laws do not allow Barlow & Bear to appropriate others’ creative work and goodwill to benefit themselves. Netflix therefore files this action to protect its rights.

INTRODUCTION

1. Netflix¹ owns registered copyrights and trademarks in the wildly popular *Bridgerton* series. The series was created and produced by Shonda Rhimes' pioneering storytelling company Shondaland and is based on Julia Quinn's bestselling romance novels of the same name.



2. Season 1 of *Bridgerton* is set in Grosvenor Square, London in 1813. The audience follows the young women and men of the prominent Bridgerton family as they navigate the high-society marriage market. All the while, Lady Whistledown, the mysterious gossip writer, comments on the spectacle, reveals secrets, and encourages speculation on who will and will not find a match. Fans find escape in the romantic Regency setting, era-appropriate dialogue, and exquisite costumes. Yet *Bridgerton* speaks to a modern audience through its inclusive cast, orchestral versions of modern pop music,² and a female perspective on the characters' struggle against rigid societal norms and rules.

¹ As used herein, “Netflix” refers collectively to plaintiffs Netflix Worldwide Entertainment, LLC and Netflix Studios, LLC.

² For example, Vitamin String Quartet’s instrumental cover of “thank u, next” by Ariana Grande. See <https://www.youtube.com/watch?v=AB1T-68mes0>.

3. *Bridgerton* reflects the substantial creative investment of hundreds: The original author, writers, actors, directors, producers, composer, musicians, and countless others working off camera. It also reflects significant financial investments, all made over the course of many years without knowing whether *Bridgerton* would be a critical and commercial success.

4. *Bridgerton* was a hit. By January 2021, *Bridgerton* had been watched by 82 million households around the world.³ Netflix renewed the series for a second season, released to Netflix’s subscribers on March 25, 2022, and two more seasons are in development. And, to respond to the demand for all things *Bridgerton*, Netflix created a live, in-person event titled “The Queen’s Ball: A Bridgerton Experience” (the “Bridgerton Experience”), which has drawn crowds in six cities; is offering *Bridgerton*-themed merchandise through the Netflix online store and retail outlets; and has released the *Bridgerton* soundtrack on streaming platforms such as Spotify and Apple Music.

5. Netflix Worldwide Entertainment, as the copyright owner of *Bridgerton*, has the exclusive right to authorize derivative works based on the series. And as the registered trademark owner of the BRIDGERTON mark, Netflix Studios alone has the rights to promote the *Bridgerton* brand.

6. After *Bridgerton* was first released in December 2020, Barlow & Bear (along with countless other fans inspired by the series) started posting about the series to TikTok, including creating musical compositions based on characters, scenes, dialogue, and plot points from the series. When asked directly, Netflix told Barlow & Bear, time and time again, that such

³ Nellie Andreeva, ‘Bridgerton’ Smashes Netflix Viewership Records To Become Streamer’s Biggest Series Ever, *Deadline* (Jan. 27, 2021), <https://deadline.com/2021/01/bridgerton-netflix-viewership-record-biggest-series-ever-1234681242/>.

works were *not authorized*. Barlow & Bear chose to move forward with that knowledge and release an album recording, which they titled “The Unofficial Bridgerton Musical.” At each step of the way, Barlow & Bear’s representatives repeatedly assured Netflix that they understood Netflix’s position and led Netflix to believe that Netflix would be consulted before Barlow & Bear took steps beyond streaming their album online in audio-only format. Barlow & Bear’s agent said that they had no interest in interfering with Netflix’s rights or in being known only as the “*Bridgerton* girls.”

7. Barlow & Bear’s representations were false. Despite their assurances to the contrary, Barlow & Bear are now claiming *carte blanche* authorization to profit from Netflix’s protected intellectual property in whatever way they see fit.

THE PARTIES

8. Plaintiff Netflix Worldwide Entertainment, LLC is a limited liability company duly incorporated under the laws of the State of Delaware with its principal place of business in Los Angeles, California. Netflix Worldwide Entertainment, LLC owns the copyrights in the *Bridgerton* series, listed in **Exhibit A**.

9. Plaintiff Netflix Studios, LLC is a limited liability company duly incorporated under the laws of the State of Delaware with its principal place of business in Los Angeles, California. Netflix Studios, LLC owns the registered trademark, BRIDGERTON, No. 6,296,166.

10. Defendant Abigail Barlow is an individual d/b/a Abigail Barlow Publishing (ASCAP), on information and belief, residing in Los Angeles, California.

11. Defendant Pink & Purple Lady, Inc. is a corporation, organized under the laws of the State of California.

12. Defendant Emily Bear is an individual d/b/a Jordan King Music USA, on information and belief, residing in Los Angeles, California.

13. Defendant Barlow & Bear, LLC is a limited liability company duly organized under the laws of the State of California.

14. Together, Defendants perform as the musical act “Barlow & Bear.”

NATURE OF ACTION, JURISDICTION, AND VENUE

15. This is an action for infringement of federally registered copyrights and trademarks in violation of 17 U.S.C. § 501 and 15 U.S.C. § 1114 and declaratory judgment under 28 U.S.C. § 2201.

16. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1338(a) and 1400, because this is a civil action arising under an Act of Congress relating to copyrights.

17. Venue is proper in this court pursuant to 28 U.S.C. §§ 1391 and 1400 based on Barlow & Bear’s infringing July 26, 2022 performance at the Kennedy Center, located in the District of Columbia, and the harm caused in this District.

FACTS

I. NETFLIX’S *BRIDGERTON* STREAMING SERIES

18. Season 1 of the *Bridgerton* streaming series follows Daphne Bridgerton, the eldest daughter of the Bridgerton family, through her debut into the competitive marriage market, with her goal of finding a match sparked by true love (like her parents). Each of the eight episodes is introduced and partially narrated by Lady Whistledown, the mysterious writer of an all-knowing scandal sheet. Queen Charlotte first deems Daphne the “diamond” of the season; however, as the eldest Bridgerton brother, Anthony, begins to rule out her potential suitors, Lady

Whistledown reports that Daphne has fallen out of society's favor. Daphne then decides to engage in a "ruse" with Simon Bassett, the Duke of Hastings, a committed bachelor whom Lady Whistledown deems the catch of the season and who wants none of it. Their façade attraction soon turns true as they also find themselves forced to marry to avoid scandal and then struggle to make their marriage real after experiencing feelings of betrayal.

19. Other Bridgerton siblings and the Featherington family also feature prominently, with each character focused on the trials and tribulations of trying (or not) to find a suitable match. Anthony Bridgerton is smitten with his opera-singing mistress, Siena Rosso, only to be rejected by her after he decides he must focus on his role as head of the household in the wake of his father's passing. Eloise Bridgerton, Daphne's younger sister, rejects high society and wants to travel and finds her calling when directed by the Queen to hunt for Lady Whistledown's true identity. And Eloise's friend, Penelope Featherington, wishes for the affections of Colin Bridgerton, but his eyes are set on the Featheringtons' distant cousin, Marina Thompson, who is secretly pregnant. The season, of course, ends with the promise of more.

20. *Bridgerton* was an instant critical and popular phenomenon. The press lauded the show's design, script, and cast. As just one example, *Vulture* described *Bridgerton* as "a heady cloud of pleasure and true love set in an idealized, more inclusive milieu."⁴ Audiences loved the show even more: Within 4 weeks of *Bridgerton*'s premiere, it had been viewed by 82 million households—at the time the most in Netflix history.⁵ The show was also a massive international

⁴ Kathryn VanArendonk, *Bridgerton* Is a Heady, Inviting Fantasy of Pleasure and True Love, *Vulture* (Dec. 21, 2020), <https://www.vulture.com/article/bridgerton-review-netflix-series-shondaland.html>.

⁵ Rick Porter, Netflix Says 'Bridgerton' Is Its Biggest Series Ever, *The Hollywood Reporter* (Jan. 27, 2021), <https://www.hollywoodreporter.com/tv/tv-news/netflix-bridgerton-biggest-series-ever-4122779/>.

success, ranking number one overall in 83 countries including the United States, the United Kingdom, Brazil, France, India, and South Africa.⁶ *Bridgerton's* first season received 12 nominations at the 2021 Emmys, including for Outstanding Directing and Outstanding Drama Series.

21. Netflix released a second season of *Bridgerton* on March 25, 2022. The third season is scheduled to begin filming in summer 2022, and a fourth season is in development.

II. NETFLIX EXPANDS THE BRIDGERTON BRAND

22. Netflix has also expanded *Bridgerton* beyond the series. In March 2022, Netflix launched “The Queen’s Ball: A Bridgerton Experience.” This immersive, ticketed experience allows fans to enjoy a beautiful ballroom decorated in the Regency-era style, interact with actors dressed in exquisite period costumes, and listen to live music inspired by the iconic *Bridgerton* soundtrack. The Bridgerton Experience also provides guests with the opportunity to purchase exclusive merchandise from the event.

23. Netflix is offering the Bridgerton Experience in six U.S. cities (including in Washington, D.C., around the time of the infringing Kennedy Center performance). Netflix offers general admission tickets for \$45 and VIP tickets for \$85, as well as the opportunity for private parties. Netflix has plans to expand these offerings to new cities in the U.S. and abroad. Netflix markets the Bridgerton Experience using the BRIDGERTON marks, including through online and billboard advertising.

⁶ Nellie Andreeva, ‘Bridgerton’ Smashes Netflix Viewership Records To Become Streamer’s Biggest Series Ever, *Deadline* (Jan. 27, 2021), <https://deadline.com/2021/01/bridgerton-netflix-viewership-record-biggest-series-ever-1234681242/>.

24. Beyond the Bridgerton Experience, Netflix also offers *Bridgerton*-related merchandise, including partnering with licensees to do the same. Netflix's merchandise is branded with the BRIDGERTON marks. Netflix has also released original music composed for *Bridgerton* as a soundtrack album. These are full-length albums for the first season (released in 2020) and second season (released in 2022) of *Bridgerton*, available for streaming.

III. DEFENDANTS MAKE UNAUTHORIZED DERIVATIVE WORKS THAT COPY FROM BRIDGERTON

25. Barlow & Bear began posting songs based on Season 1 of *Bridgerton* on TikTok in early 2021. They were not the only fans celebrating *Bridgerton*. At the time, countless other fans were creating and posting *Bridgerton*-inspired works, dressing in costume, acting out scenes, and performing dances inspired by the hit series.

26. Barlow's initial TikTok post was no different. She started with the question, "Ok but what if Bridgerton was a musical?" Over time, Barlow & Bear posted a series of videos to TikTok about their passion for *Bridgerton* and expressed that passion through their "musical" version of the series. Barlow & Bear have repeatedly admitted that they intentionally based every single song on the creative elements of the series:

- a) Barlow has repeatedly said that she based the songs on dialogue from *Bridgerton*. For instance, Barlow said she wanted to turn *Bridgerton* into a musical: "The opening scene is so theatrical. I could just see each part of the stage lighting up in my brain. And then I kept writing down lines of dialogue that sounded like song titles."⁷

⁷ Julia Jacobs, TikTok to the Grammys: How a 'Bridgerton' Musical Beat Broadway, *New York Times*, (Apr. 4, 2022), <https://www.nytimes.com/2022/04/04/theater/bridgerton-musical-grammy.html>.

- b) Likewise, Barlow explained: “There are just so many pieces of dialogue in this show that write songs themselves. . . . I just kept picking all of these little moments that are so iconically written in the show.”⁸
- c) In particular, Barlow has credited the *Bridgerton* line, “You have no idea what it’s like to be in a room with someone you can’t live without, and feel like they’re oceans away from you,” as inspiration.⁹
- d) Barlow & Bear created the musical by watching certain scenes from *Bridgerton* on repeat. For instance, Bear explained that “When we were writing the opening number, we watched that opening scene so many times because it’s theatrical.”¹⁰
- e) Barlow & Bear’s YouTube channel describes “The (Unofficial) Bridgerton Musical” as a “[f]ull concept album inspired by the hit Netflix show Bridgerton.”¹¹

27. Review of the infringing works also demonstrates Barlow & Bear copied liberally and nearly identically from *Bridgerton* across a number of original elements of expression. Lyrics are lifted verbatim from dialogue and characters, and plot, pace, sequence of events, mood, setting, and themes are replicated faithfully.¹² Rather than restate every infringing lyric

⁸ Ellise Shafer, ‘Bridgerton: The Musical’ Blew Up on TikTok. Could Broadway Be Next?, *Variety* (Jan. 29, 2021), <https://variety.com/2021/music/news/bridgerton-the-musical-tiktok-broadway-abigail-barlow-emily-bear-1234893087/>.

⁹ Andrea Wurzburger, Meet the Creators Behind the *Bridgerton* Musical That’s All Over the Internet, *People*, <https://people.com/tv/bridgerton-the-musical-meet-the-creators-tiktok/>.

¹⁰ Ailsa Chang, ‘The Unofficial Bridgerton Musical’ Creators Nominated For Their First Ever Grammy, *NPR* (Apr. 1, 2022), <https://www.npr.org/transcripts/1090372521>.

¹¹ <https://www.youtube.com/watch?v=GvvMdtaNxKY>;
<https://www.youtube.com/watch?v=6rbWZlpIuPA>.

¹² After the filing of this complaint, Netflix will be lodging copies of the *Bridgerton* series as copyrighted by Netflix as **Exhibit B**. Netflix has also included the lyrics of “The Unofficial

that copies verbatim dialogue, each scene or plot element that is lifted, or every character that is reproduced by Barlow & Bear, Netflix sets forth below representative examples of infringement (with dozens more listed in **Exhibit D** to this Complaint).

28. *First*, in the very first musical track, “Tis the Season,” Barlow & Bear copy *Bridgerton* Episode 1’s opening scenes—making a near identical introduction of its main characters and the 1813 Grosvenor Square setting, while also incorporating substantial dialogue verbatim. For instance, both works include the following dialogue regarding the setting and plot, spoken by Lady Whistledown: “Grosvenor Square, 1813. Dearest reader, the time has come to place our bets for the upcoming social season. Consider the household of the Baron Featherington.” Both works also introduce the key Bridgerton siblings (Daphne, Eloise, Hyacinth, and Anthony) in a nearly identical manner. Eloise, for example, expresses frustration with her sister Daphne’s lengthy dressing routine before her social debut, shouting “DAPHNE! YOU MUST MAKE HASTE! Should you think she heard me?” The musical replicates Eloise’s frustration with nearly identical lyrics: “DAPHNE! YOU MUST. MAKE. HASTE. Oh, so, do you think she heard me?”

29. *Second*, Barlow & Bear’s third musical track, “If I Were a Man,” copies Eloise Bridgerton’s character and the theme of societal constraints on women, and again lifts dialogue verbatim. The track’s title, “If I Were a Man,” is taken from Eloise’s dialogue in Episode 2, Scene 12. Likewise, in the same scene, Eloise states: “Why must our only options be to squawk and settle or to never leave the nest? What if I want to fly?” Barlow & Bear’s track includes nearly identical language: “I don’t want to settle and squawk / or never leave the nest

Musical” as **Exhibit C**. Netflix will work with Defendants to lodge a copy of “The Unofficial Bridgerton Musical” with the Court, which is available on Spotify at the following link: https://open.spotify.com/album/7gXx19GNHliQ3fIbXxeY1U?si=yohTTjRgTH2EX9_-EqxCgA.

for a delicate walk / Whoa, what if I, what if I want to fly?” Both the scene and the track also include the same conversation (between Eloise and her friend, Penelope Featherington) about conception and the secret pregnancy of Marina Thompson, Penelope’s distant cousin. In both cases Eloise professes her ignorance as to how unmarried women can become pregnant, stating “How does a woman come to be with child if she’s not married?” . . . “Well, you need to find out so it doesn’t happen to us!” And the similarity is not just in dialogue: The musical appropriates the essential character of Eloise Bridgerton, enumerating all the ways she could pursue her passions and education if she were a man and the freedom she perceives men have—just as Eloise does in the series.

30. *Third*, Barlow & Bear’s last musical track, “Ocean Away,” copies a key plot point of Episode 7—the emotional rift between Simon Bassett and Daphne Bridgerton—as well as appropriating Season 1, Episode 7’s title (“Oceans Apart”) and dialogue. In Episode 7, Simon and Daphne are emotionally and thematically separated after fighting about Simon’s unwillingness to have children and Daphne’s resulting sense of betrayal. Yet, despite the seemingly insurmountable strife in their union, the couple must pretend to be happy newlyweds. Sir Henry Granville’s dialogue in Episode 7, Scene 53 serves as a metaphor for the couple’s challenge: “You have no idea what it is like to be in a room with someone you cannot live without and yet still feel as though you are oceans apart.” Barlow & Bear’s “Ocean Away” copies Episode 7’s same sense of emotional rift with lyrics that mimic Granville’s “Oceans Apart” dialogue. In the song, the characters of Daphne and Simon sing a duet acknowledging their physical closeness and emotional distance: “When we’re dancing in the same room / but you’re an ocean away.” The song also makes use of the couple’s previous fight and seemingly irreconcilable views on bearing children. Both Simon and Daphne sing: “Forget the ache of

yesterday / And why don't we go dancing in the rain? / I know you think that I should change /
But nothing in the world could sway my way."

IV. DEFENDANTS DO NOT HAVE A LICENSE TO EXPLOIT *BRIDGERTON* INTELLECTUAL PROPERTY

31. Barlow & Bear's "The Unofficial Bridgerton Musical" is not authorized by Netflix, Shondaland, or Julia Quinn. And Netflix has never given Barlow & Bear permission to create or perform "The Unofficial Bridgerton Musical" live, let alone at the Kennedy Center or Royal Albert Hall, or to create new derivative works based on the *Bridgerton* intellectual property.

32. Barlow & Bear have admitted this publicly—that [they] "don't own the I.P."¹³ Yet in attempting to defend their clients' blatant infringement, Barlow & Bear's attorneys have now taken the position that they somehow *do not need* a license because Netflix did not file this lawsuit sooner. That is not how copyright law works. Netflix is not required to sue every infringer. Rather, it can make its rights known—which it unambiguously, and repeatedly, did here. Here is the history:

33. It is no secret that in early 2021, Netflix did not stop what Barlow & Bear represented as their personal TikTok fan tribute to *Bridgerton*. Numerous individuals involved in the creation of *Bridgerton*, including actors, producers, and Netflix, applauded Barlow & Bear, including with the tweet: "Absolutely blown away by the Bridgerton musical playing out on TikTok." Barlow & Bear benefited from the attention: They went viral.

¹³ Julia Jacobs, TikTok to the Grammys: How a 'Bridgerton' Musical Beat Broadway, *New York Times*, (Apr. 4, 2022), <https://www.nytimes.com/2022/04/04/theater/bridgerton-musical-grammy.html>.

34. In March 2021, Barlow & Bear’s counsel asked expressly for Netflix’s blessing of a recorded album and a *single* specific U.K. charity promotion to occur in or around July or August of 2021, for which they would engage West End performers who had been furloughed because of the pandemic. Netflix responded in June that it was “not approving or authorising” the album’s release or any charity performances, but in the spirit of supporting what Barlow & Bear represented as two *Bridgerton* fans’ expression of their appreciation for the series, it stated that it was “not standing in the way.” Barlow & Bear did not ask for, and Netflix never granted, ongoing authorization or any license. Ultimately, the requested performances did not happen.

35. In August, after learning that Barlow & Bear were due to release an album to Spotify the following month, Netflix sought to advise them of a clear line: Netflix representatives stressed to Barlow & Bear’s representative that Netflix would not authorize and did not want them to engage in any live performances (e.g., performances of “The Unofficial Bridgerton Musical”) or other derivative works that might compete with Netflix’s own planned live events (i.e., the Bridgerton Experience). At the time, Barlow & Bear’s representative stated *no* such events or other works based on “The Unofficial Bridgerton Musical” were planned. Barlow & Bear’s representative also made clear that they wanted to focus on their other work to avoid becoming known as the “*Bridgerton* girls.”

36. In November 2021, Barlow & Bear’s representative informed Netflix that their canceled U.K. charity performance had been rescheduled for later that month, and that proceeds from the event would be donated to a local foundation. Barlow & Bear’s representative stated that they planned to do this live concert focused on Barlow & Bear’s broader repertoire—i.e., *not* as “The Unofficial Bridgerton Musical”—and that it would include only a few of the songs. Netflix again reiterated that live performances of “The Unofficial Bridgerton Musical” were not

authorized and that the U.K. event should be only a one-time occurrence. Barlow & Bear's representative confirmed that they fully understood. They also promised that they did not have any additional plans for more *Bridgerton*-inspired works or live shows that would include songs from "The Unofficial Bridgerton Musical." Given Netflix's clear statement to Barlow & Bear that this would be the last such event, Barlow & Bear's assurances that it would be, and their express statement that they planned to focus on other projects to avoid becoming known as the "*Bridgerton* girls," Netflix did not seek to halt the rescheduled charity event in the U.K.

37. In March 2022, following Barlow & Bear's Grammy nomination, Netflix reached out—again—to reiterate the lines. Barlow & Bear's representative assured Netflix that they did not have any *Bridgerton*-related plans other than the Grammy nomination and any follow-up interviews if they were to win. Barlow & Bear's representative reiterated that Netflix should not worry because Barlow & Bear did not want to be known only for their work derivative of *Bridgerton*, so they would be focusing on other activities in the future.

38. In addition to their assurances to Netflix, Barlow & Bear's own conduct confirms they knew they needed Netflix's permission for live performances of "The Unofficial Bridgerton Musical"—and that Netflix never gave them that permission. Barlow & Bear kept coming back to Netflix with updates on the U.K. charity event and went out of their way to make clear that they did not have any other performances planned. Netflix relied on these representations in deciding not to pursue any additional enforcement activity.

V. DEFENDANTS' INFRINGING KENNEDY CENTER PERFORMANCE

39. Despite their prior assurances, on June 7, 2022, Barlow & Bear's representative informed Netflix for the first time that they would be performing "The Unofficial Bridgerton Musical" at the Kennedy Center on July 26. Netflix then sought to understand from Barlow &

Bear's representative what type of performance was planned, how it would be marketed, and whether it would be for charity. Rather than engaging with Netflix on its questions, Barlow & Bear's representative stated that they were not asking for Netflix's permission and would not further delay the announcement of the performance to afford the parties time to discuss. They publicly announced the Kennedy Center show within days.¹⁴

40. Multiple times, in June and July 2022, Netflix informed counsel for Barlow & Bear that the July 26 performance and any subsequent live performances were not authorized and that such exploitation would constitute willful copyright and trademark infringement unless they negotiated a license—which Netflix was willing to do. Netflix offered Barlow & Bear a license that would allow them to proceed with their scheduled live performances at the Kennedy Center and Royal Albert Hall, continue distributing their album, and perform their *Bridgerton*-inspired songs live as part of larger programs going forward. Barlow & Bear refused.

41. Barlow & Bear then doubled down on their infringement and resulting harm to Netflix. Netflix found out from the press that the performance would include Broadway actors. Barlow & Bear announced via TikTok that their Kennedy Center performance would include “some brand new songs, one that you’ve never heard before,” and “some, you know, little tasteful extensions to some of the [existing] Bridgerton songs.” Barlow & Bear also teasingly hinted: “You guys have been asking us to turn ‘Fool for You’ into a full song since the very beginning and we may or may not have done that. There may or may not be an overture. Uh oh!

¹⁴ The online marketing for the event changed multiple times during this dispute—evidencing Barlow & Bear's realization that they had no rights to exploit Netflix's trademarks. At some point after June 21, 2022 and after Netflix told Barlow & Bear they were not authorized, they added a reference to Netflix Studios' ownership of the registered trademark. Later, they took that down at Netflix's request. Then, as of July 20, after Netflix had sent a settlement demand, they changed it to say the mark was being “used with Permission” of Netflix, when the parties had *not* reached an agreement and Netflix continued to object.

There may or may not even be more material that we’re not saying, who knows?” Barlow & Bear concluded their post by saying, “Come show up at the Kennedy Center. It’s going to be a Ball!”—drawing on the same market for the Bridgerton Experience without authorization.

42. The Kennedy Center performance went forward over Netflix’s objections on July 26, 2022, in front of a sold-out audience, with seats available for \$29 to \$149 per ticket (in an 1,100 seat venue), and the option to purchase a “VIP package.” Barlow & Bear performed 14 of the 15 songs from “The Unofficial Bridgerton Musical Album,” including a new, full-length version of the song “Fool for You.” The performance also included a new song entitled “Secrets, Secrets,” which Barlow & Bear described as having a theme that is “constant throughout the entirety of the *Bridgerton* world and its characters, which is secrets.” The event also involved sixteen “special guests,” including Tony Award winner Kelli O’Hara, Tony Award nominee Ephraim Sykes, and Tony Award nominee Denée Benton, who performed dramatized versions of the songs in the roles of various *Bridgerton* characters. For example, special guest Micaela Diamond imitated Eloise Bridgerton’s signature mannerisms and demeanor while performing the song “If I Were a Man” in the character of Eloise. Before each song, Barlow & Bear discussed the song’s origins, regularly invoking the *Bridgerton* plot themes and storylines on which each song was based.

43. The Kennedy Center performance materials—including the performance program book, posters displayed at the venue, and the on-stage performance backdrop—were all prominently branded with the BRIDGERTON mark. All of the materials also wrongly assured audience members that the mark was being “used with Permission,” even though Netflix had made clear to Barlow & Bear that they had no such permission.

44. Barlow & Bear further sold merchandise featuring the BRIDGERTON marks,

both at the Kennedy Center and prior to that performance online, including clothing, songbooks, and vinyl albums promoting “The Unofficial Bridgerton Musical,” complete with a keychain of a vinyl record bearing the words “BRIDGERTON MUSICAL.”¹⁵

45. Barlow & Bear’s Kennedy Center performance interfered with Netflix’s long-announced offering of the Bridgerton Experience in Washington, D.C.: It attracted *Bridgerton* fans who would have otherwise attended the Bridgerton Experience and created confusion as to whether Netflix had approved of Barlow & Bear’s unauthorized derivative works. Barlow & Bear benefited from the confusion and false association with the BRIDGERTON brand.

46. Barlow & Bear lacked any license, approval, or authorization to exploit *Bridgerton* intellectual property in connection with the Kennedy Center performance. And to the extent Barlow & Bear ever claimed to believe they had such license, approval, or authorization—despite Netflix’s clear statements to the contrary—it has now been unequivocally revoked.

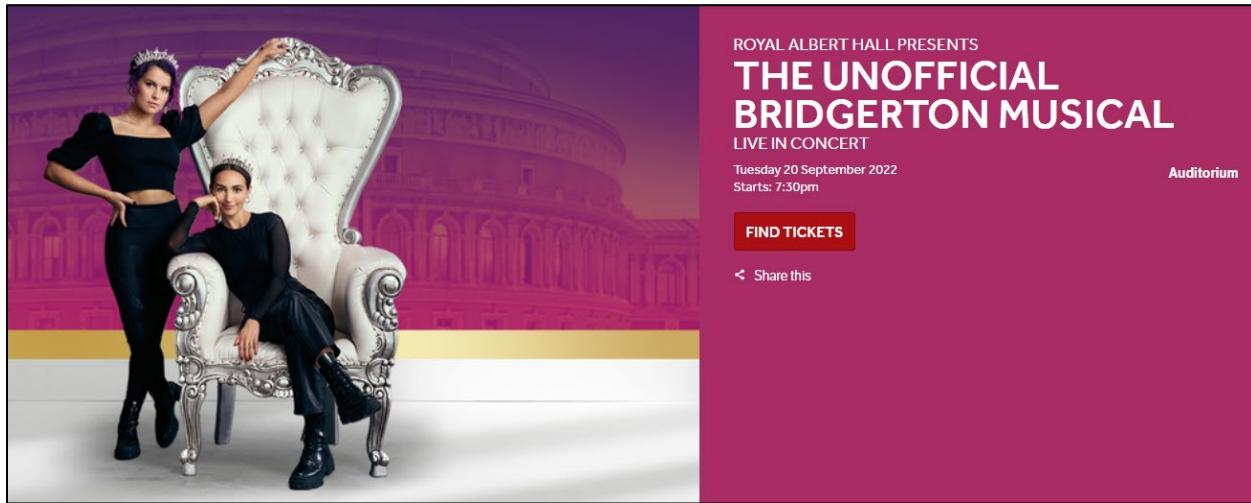
VI. NETFLIX FACES IRREPARABLE HARM TO THE *BRIDGERTON* BRAND

47. Barlow & Bear’s decision to usurp the *Bridgerton* series and brand for itself threatens Netflix—and everyone engaged in the *Bridgerton* franchise—with irreparable harm.

48. Beyond their Kennedy Center performance, Barlow & Bear have also announced a September performance of “all your favorite tunes from The Unofficial Bridgerton Musical alongside the BBC Orchestra at Royal Albert Hall!” They posted the announcement to their official Facebook page nearly a month after Netflix had made clear that Barlow & Bear did not

¹⁵ Prior to this lawsuit being filed, Barlow & Bear sold apparel featuring *Bridgerton* marks at <https://stores.inksoft.com/BarlowAndBear/shop/home>. They sold a vinyl record and keychain at <https://www.barlowandbear.com/vinyl>. The songbook was available at <https://www.halleonard.com/product/366478/barlow-bear-the-unofficial-bridgerton-musical>.

have permission to exploit the work of everyone involved in creating the *Bridgerton* series. The current marketing for the show features the word mark BRIDGERTON in large font:



The show, which Royal Albert Hall has said will involve “a host of special guests,” threatens Netflix’s plans for the Bridgerton Experience in the United Kingdom.

49. Barlow & Bear have also stated that they are planning *further* live performances of “The Unofficial Bridgerton Musical.” Indeed, the description to the newly-released songbook states that Barlow & Bear are “performing at concerts and music events around the world.”

50. Barlow & Bear’s actions have undermined and will continue to undermine the rightsholders’ ability to offer legitimate, authorized derivative works of *Bridgerton*, including live stage productions such as musical theater performances and the ongoing Bridgerton Experience offered by Netflix in Washington D.C. and other cities, not to mention their own branded merchandise, soundtracks, and other consumer products.

51. Barlow & Bear’s actions will also lead to irreparable consumer confusion about whether their performances and merchandise are in fact authorized by the rightsholders. Although Barlow & Bear have titled their derivative work “Unofficial” and disclosed that BRIDGERTON is a registered trademark of Netflix Studios, Barlow & Bear also falsely

represented that they had Netflix's permission, when they did not. Such statements cause, and certainly do not negate, consumer confusion.

52. In addition to harming Netflix and everyone involved in creating the series, Barlow & Bear's infringing use of Netflix's copyrights and trademark may also encourage other third parties to develop derivative works based on *Bridgerton* without Netflix's authorization. This would dilute the value of Netflix's copyright in *Bridgerton* and cause Netflix to incur substantial additional expense in enforcing its copyrights.

COUNT I
COPYRIGHT INFRINGEMENT

53. Netflix realleges and incorporates herein by reference Paragraphs 1 through 52 of the Complaint as if fully set forth herein.

54. Netflix Worldwide Entertainment owns the registered copyrights for Season 1 of *Bridgerton*, which are listed in **Exhibit A** hereto.

55. Netflix Worldwide Entertainment's copyrighted works contain original expression under the Copyright Act.

56. Defendants admit that "The Unofficial Bridgerton Musical" is a derivative work of *Bridgerton*. A review of the works establishes that "The Unofficial Bridgerton Musical" copies liberally from *Bridgerton* across numerous elements of creative expression. *See* 17 U.S.C. § 101 ("A 'derivative work' is a work based upon one or more preexisting works, such as a ... musical arrangement, dramatization, ... or any other form in which a work may be recast, transformed, or adapted.").

57. Defendants do not have a license. At a minimum, as of June 17, 2022, Netflix made clear that to the extent Defendants claimed to be under the misimpression that they had a license, that license had been revoked.

58. Defendants' reproduction, public performances, distribution and/or creation of new derivative works based on *Bridgerton* infringes Netflix Worldwide Entertainment's copyrights.

59. Defendants' conduct is willful.

60. Defendants' copyright infringement has injured Netflix Worldwide Entertainment in an amount to be determined at trial and threatens to cause irreparable harm to Netflix Worldwide Entertainment, for which there is no adequate remedy at law. As such, Netflix Worldwide Entertainment is entitled to and seeks injunctive relief as a result thereof pursuant to 17 U.S.C. § 502, as well as actual damages and any additional profits of Defendants pursuant to 17 U.S.C. § 504, and its costs, including attorneys' fees, in prosecuting this action pursuant to 17 U.S.C. § 505. Further, because Defendants' infringing conduct has been and continues to be willful, Netflix Worldwide Entertainment, at its election, as an alternative to an award of actual damages and Defendants' profits, is entitled to recover the maximum amount of statutory damages available under 17 U.S.C. § 504(c)(2), for each infringed work.

COUNT II
DECLARATORY RELIEF

61. Netflix realleges and incorporates herein by reference Paragraphs 1 through 60 of the Complaint as if fully set forth herein.

62. Defendants contend that they have a license or other authorization to exploit Netflix Worldwide Entertainment's copyright in *Bridgerton* via "The Unofficial Bridgerton Musical."

63. Netflix Worldwide Entertainment has made clear to Defendants that they do not have and never have had any such license and, to the extent they ever claimed to believe they did, such license has now been revoked.

64. Accordingly, Netflix Worldwide Entertainment is entitled to a declaratory judgment that Defendants lack any right or license to exploit the elements of “The Unofficial Bridgerton Musical” that they derived from *Bridgerton*.

COUNT III
INFRINGEMENT OF REGISTERED TRADEMARKS UNDER 15 U.S.C. § 1114

65. Netflix realleges and incorporates herein by reference Paragraphs 1 through 64 of the Complaint as if fully set forth herein.

66. Netflix Studios owns all rights, title, and interest in the U.S. trademark BRIDGERTON, with U.S. federal registration no. 6,296,166. A true and correct copy of the registration certificate is attached as **Exhibit E**, which was issued by the United States Patent and Trademark Office on March 16, 2021.

67. Netflix Studios has continuously used the BRIDGERTON mark in commerce throughout the United States since December 25, 2020 in connection with the distribution, promotion, marketing, and advertising of the *Bridgerton* series, the “Bridgerton Experience,” and related merchandise.

68. The BRIDGERTON mark is distinctive and/or has acquired secondary meaning.

69. Netflix Studios has expended substantial time, money, and resources distributing, promoting, marketing, and advertising the *Bridgerton* series, the “Bridgerton Experience,” and related merchandise.

70. By creating, promoting, publishing, and selling merchandise featuring the “The Unofficial Bridgerton Musical,” Defendants have used in commerce a reproduction or copy of Netflix Studios’ registered BRIDGERTON mark in connection with the sale, offer for sale,

distribution, or advertising of goods or services without Netflix Studios' authorization or consent.

71. Defendants' use in commerce of "The Unofficial Bridgerton Musical" is confusingly similar to Netflix Studios' registered BRIDGERTON mark and is likely to cause confusion, to cause mistake, and/or to deceive consumers as to the source, sponsorship, or origin of "The Unofficial Bridgerton Musical."

72. The aforesaid acts of Defendants constitute trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

73. At this point, Defendants' conduct has been and continues to be intentional and willful within the meaning of 15 U.S.C. § 1114 and § 1117.

74. Netflix Studios has been and is likely to be damaged by Defendants' infringing and unlawful acts.

75. Defendants' conduct has injured Netflix Studios in an amount to be determined at trial, and has caused and, unless enjoined by this Court, is likely to cause Netflix Studios to suffer irreparable harm to its business, reputation, and goodwill, for which Netflix Studios has no adequate remedy at law. As such, Netflix Studios seeks injunctive relief pursuant to 15 U.S.C. § 1116, as well as actual damages and Defendants' profits or statutory damages pursuant to 15 U.S.C. § 1117, and its reasonable attorneys' fees in prosecuting this action pursuant to 15 U.S.C. § 1117(a). Further, because Defendants' infringing conduct has been and continues to be willful, Netflix Studios is entitled to an enhanced damages award pursuant to 15 U.S.C. § 1117(a).

COUNT IV
FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(A)(1)

76. Netflix realleges and incorporates herein by reference Paragraphs 1 through 75 of the Complaint as if fully set forth herein.

77. As alleged above, Netflix Studios owns all rights, title, and interest in the BRIDGERTON mark.

78. Defendants have used and continue to use Netflix Studios' mark on merchandise without Netflix Studios' license or authorization.

79. Defendants' use of "The Unofficial Bridgerton Musical" is likely to cause confusion, to cause mistake, and/or to deceive consumers as to the affiliation, connection, or association of Defendants with Netflix and/or as to the origin, sponsorship, or approval of Defendants' merchandise.

80. The aforesaid acts of Defendants constitute false designation of origin in violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

81. At this point, Defendants' conduct is willful.

82. Defendants' conduct has injured Netflix Studios in an amount to be determined at trial, and has caused and, unless enjoined by this Court, is likely to cause Netflix Studios to suffer irreparable harm to its business, reputation, and goodwill, for which Netflix Studios has no adequate remedy at law. As such, Netflix Studios seeks injunctive relief pursuant to 15 U.S.C. § 1116, as well as actual damages and Defendants' profits or statutory damages pursuant to 15 U.S.C. § 1117, and its reasonable attorneys' fees in prosecuting this action pursuant to 15 U.S.C. § 1117(a). Further, because Defendants' infringing conduct has been and continues to be willful, Netflix Studios is entitled to an enhanced damages award pursuant to 15 U.S.C. § 1117(a).

PRAYER FOR RELIEF

Wherefore, Netflix prays for judgment against Defendants as follows:

- a) Declaratory relief establishing Netflix's rights;
- b) Preliminary and permanent injunctive relief;

- c) Damages available under 17 U.S.C. § 504 and 15 U.S.C. § 1117;
- d) That Netflix be entitled to recover its reasonable attorneys' fees, costs of suit and interest; and
- e) That Netflix be awarded any and all such other and further relief as this Court shall deem just and proper.

Dated: July 29, 2022

Respectfully submitted,

/s/ Ginger D. Anders

GINGER D. ANDERS (DC Bar No. 494471)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue NW
Suite 500E
Washington, DC 20001
Tel: 202.220.1100
Fax: 202.220.2300
Email: ginger.anders@mto.com

ROSE LEDA EHLER (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
350 South Grand Ave., 50th Floor
Los Angeles, CA 90071-3426
Tel: 213.683.9100
Fax: 213.687.3702
Email: rose.ehler@mto.com

VIRGINIA GRACE DAVIS (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105
Tel: 415.512.4083
Fax: 415.512.4077
Email: grace.davisfisher@mto.com

EXHIBIT A

Netflix Worldwide Entertainment, LLC v. Abigail Barlow, et al.
Copyrighted Works

Title	Copyright Claimant(s)	Registration Number	Registration Date
Bridgerton, Diamond of the First Water (Season 1, Episode 1)	Netflix Worldwide Entertainment, LLC	PA 2-277-750	January 8, 2021
Bridgerton, Shock and Delight (Season 1, Episode 2)	Netflix Worldwide Entertainment, LLC	PA 2-277-759	January 8, 2021
Bridgerton, Art of the Swoon (Season 1, Episode 3)	Netflix Worldwide Entertainment, LLC	PA 2-277-752	January 8, 2021
Bridgerton, An Affair of Honor (Season 1, Episode 4)	Netflix Worldwide Entertainment, LLC	PA 2-277-739	January 8, 2021
Bridgerton, The Duke and I (Season 1, Episode 5)	Netflix Worldwide Entertainment, LLC	PA 2-277-737	January 8, 2021
Bridgerton, Swish (Season 1, Episode 6)	Netflix Worldwide Entertainment, LLC	PA 2-277-733	January 8, 2021
Bridgerton, Oceans Apart (Season 1, Episode 7)	Netflix Worldwide Entertainment, LLC	PA 2-277-731	January 8, 2021
Bridgerton, After the Rain (Season 1, Episode 8)	Netflix Worldwide Entertainment, LLC	PA 2-277-769	January 8, 2021



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number

PA 2-277-750

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "Diamond of the First Water" - (Episode 1)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC

5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA, 90028, United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions _____

Organization Name: Netflix
Name: Copyright Administrator
Email: copyrightadmin@netflix.com
Address: 5808 Sunset Blvd
Los Angeles, CA 90028 United States

Certification _____

Name: Lauren Simmonds
Date: January 08, 2021



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number

PA 2-277-759

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "Shock and Delight" - (Episode 2)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions

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Email: copyrightadmin@netflix.com
Address: 5808 Sunset Blvd
Los Angeles, CA 90028 United States

Certification

Name: Lauren Simmonds
Date: January 08, 2021

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United States Register of Copyrights and Director

Registration Number

PA 2-277-752

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "Art of the Swoon" - (Episode 3)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

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United States Register of Copyrights and Director

Registration Number

PA 2-277-739

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "An Affair of Honor" - (Episode 4)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions _____

Organization Name: Netflix
Name: Copyright Administrator
Email: copyrightadmin@netflix.com
Address: 5808 Sunset Blvd
Los Angeles, CA 90028 United States

Certification _____

Name: Lauren Simmonds
Date: January 08, 2021



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United States Register of Copyrights and Director

Registration Number

PA 2-277-737

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "The Duke and I" - (Episode 5)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC

5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions

Organization Name: Netflix
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Los Angeles, CA 90028 United States

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Date: January 08, 2021



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United States Register of Copyrights and Director

Registration Number

PA 2-277-733

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "Swish" - (Episode 6)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions

Organization Name: Netflix
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United States Register of Copyrights and Director

Registration Number

PA 2-277-731

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "Oceans Apart" - (Episode 7)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA 90028 United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions

Organization Name: Netflix
Name: Copyright Administrator
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Address: 5808 Sunset Blvd
Los Angeles, CA 90028 United States

Certification

Name: Lauren Simmonds
Date: January 08, 2021



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United States Register of Copyrights and Director

Registration Number

PA 2-277-769

Effective Date of Registration:

January 08, 2021

Registration Decision Date:

February 22, 2021

Title

Title of Work: "After the Rain" - (Episode 8)

Series Title: Bridgerton (Season 1)

Completion/Publication

Year of Completion: 2020

Date of 1st Publication: December 25, 2020

Nation of 1st Publication: United States

Author

- **Author:** Netflix Studios, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

- **Author:** Netflix Global, LLC
Author Created: entire motion picture
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Netflix Worldwide Entertainment, LLC
5808 W. Sunset Blvd, 12th Floor, Los Angeles, CA, 90028, United States

Transfer statement: By written agreement

Limitation of copyright claim

Material excluded from this claim: Based upon the "Bridgerton" series of novels written by Julia Quinn.

New material included in claim: all other cinematographic material

Rights and Permissions

Organization Name: Netflix
Name: Copyright Administrator
Email: copyrightadmin@netflix.com
Address: 5808 Sunset Blvd
Los Angeles, CA 90028 United States

Certification

Name: Lauren Simmonds
Date: January 08, 2021

EXHIBIT B

**Physical Copy of Exhibit
Submitted With Notice
of Lodging**

EXHIBIT C

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Track 1: Tis the Season

MOTHERS

Tis the season.

It's a season for elegant ladies!

Reputations dictated by the queen!

Must be perfectly perfect

Must meet every expectation

May God save all our souls!

LADY WHISTLEDOWN

Grosvenor Square, eighteen-thirteen.

Dearest reader

The time has come to place our bets

For the upcoming social season!

Consider the household of the Baron Featherington

Three misses foisted upon the marriage market

Like sorrowful sows, by their tasteless and tactless mama

PENELOPE

Is she to breathe, Mama?

LADY FEATHERINGTON

When I was your age I could fit my waist into an orange and a half, and so shall you!

Tighter

PRUDENCE

Tighter?!

LADY WHISTLEDOWN

Far better odds might exist

In the household of the widowed Viscountess Bridgerton

A shockingly prolific family

Known for its bounty of perfectly handsome sons,

And perfectly beautiful daughters

ELOISE

Ugh! I'm boiling in this dress already.

HYACINTH

Are you to complain the entire time, Eloise?

ELOISE

Well, what else am I good for?

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

HYACINTH

I feel like a princess.
Do I look like one?

ELOISE

Hyacinth, do you wish to know what I think you look like?
Benedict!

BENEDICT

And where's the lovely Daphne?

HYACINTH

She's only been getting ready all evening.

ELOISE

Only her whole life.

BENEDICT

Well, I'll go fetch for her.

COLIN

No, I'll go fetch for her.
She likes me better than you anyway.

BENEDICT

And who says that?

HYACINTH

Well, everyone says that.

ELOISE

Rrrr! DAPHNE! YOU MUST. MAKE. HASTE.
Oh, so, do you think she heard me?

LADY WHISTLEDOWN

How very perfect indeed.

DAPHNE

This is only the beginning
Of the life that I'll be living.
I'm dreaming of a match for love
Just like Mama and Pa had done.
So Father, if you're looking down from above,
I'm marrying for love.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

THE SOCIETY

‘Tis the season. It’s a season for elegant ladies.
Must be marvelous down to every seam.
Must be perfectly perfect, with impeccable reputations.
So may she save us all.

MRS. BRIDGERTON

Where is he?
If your brother is to be obeyed as Lord Bridgerton,
He must act like Lord Bridgerton.
Benedict, where is Anthony?

BENEDICT

I do not know.

ELOISE

Ugh.

SIENA

Just hold me closer now.
Our time is running out.

ANTHONY

Siena, you know it's half-past nine.

SIENA

My lord, discard the time.
Just put it in your pocket and lock it away.

ANTHONY

You know I cannot stay,
Siena. My duties, they await.

So I'll see you Saturday.

BRIDGERTON SISTERS

There's a reason, there's a reason for all of this crazy.
The only word that matters is the queen's.

LASY WHISTLEDOWN

Today is a most important day;
And for some, a terrifying one.
For today is the day
London's marriage-minded misses
Are presented to Her Majesty, the Queen.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

BRIDGERTON SISTERS

To the Queen!

HERALD

Presenting ladies Prudence, Philippa, and Penelope Featherington,
All presented by their mother,
The Right Honorable Lady Featherington.

FEATHERINGTON SISTERS

Your Majesty,
We're as perfect as we seem.
Not the cake, but we're the cream.
Think I forgot how to breathe!

LADY WHISTLEDOWN

A glimmer of displeasure,
And a young lady's value plummets to unthinkable depths.
Presented by her mother
The Right Honorable Viscountess Bridgerton,....
Miss Daphne Bridgerton.

DAPHNE

Don't trip. Don't falter.
Just make it to the altar.
Don't break. Don't crumble.
Make certain you're perfectly humble.
Show Her Majesty the Queen
That I'm more than worthy.
Don't let it show that you're more than nervous.
Finally, I'm living with a purpose
Must be calm and cool, collected at the surface.
Must be perfectly perfect.

CHORUS

She's perfectly perfect.

DAPHNE

Must be perfectly deserving.

CHORUS

Could she be the diamond of the season?
Father would be so proud.

DAPHNE

Don't trip. Don't falter.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Just make it to the altar.
Must be perfectly perfect.

CHORUS
'Tis the season, 'tis the season for elegant ladies.
'Tis the season, ah.

DAPHNE
Perfectly perfect.
Must be--

QUEEN CHARLOTTE
Flawless, my dear.

DAPHNE
Did that really just happen?

Track 2: Tis the Season

Nothing but a whisper is a shout,
It's a buzz about the Ton.
Nothing like a scandal, going 'round
When you read the works of Lady Whistledown.

It's appalling, what a shame.
They'll disgrace their family name.
You can bet the one to blame without a doubt
It's Lady Whistledown, down, down.

If you've got a secret, you should keep it.
Whistledown, down, down.

If you've got a secret just pray it's never found, found found.
Pray it's never found, found found.

Without a doubt it's Lady Whistledown.

Track 3: If I Were a Man

ELOISE
I guess I have to be a lady,
Smiling and waving,
Constantly obeying.
I guess I need a prince
To come and save me,
Even if I don't need saving.
I guess I must sit on a throne I don't own,
Raising the babies we made all alone.
I guess as a lady there's just some things I'll never know.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

But if I were a man
I'd go to Japan,
Maybe swim in the Seine
And learn to speak French.
I'd have the whole world in the palm of my hand,
I'd finally do what I could but I can't
If I were a man.

PENELOPE
Eloise, I must tell you something.

ELOISE
Tell me.

PENELOPE
"I've learned to know of a woman who's come to be with child.

ELOISE
Is it a lady or a maid?

PENELOPE
It's a maid.

ELOISE
Well, I didn't know any of your maids were married.

PENELOPE
She's not married.

ELOISE
She's not married?
How does a woman come to be with child if she's not married?

PENELOPE
I don't know how.

ELOISE
Well, you need to find out, so it doesn't happen to us!

I guess I have to go to banquets.
Banquets make me anxious,
Acting rather shameless.
I guess I need a gown
Down past my ankles,
Doing up my hair in tangles.
I guess I have to sit still and look pretty,

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Dance 'til I'm proper dizzy,
Throw away the life
That I've been missing.

But if I were a man,
I'd summer in Cannes,
Maybe play in the sand
And wear my own pants.
I'd have the whole world in the palm of my hand.
I'd finally fly far away from the nest
If I were a man.

There'd be no ladies and lords,
Just the world to explore.
And I don't care if it's all blood and gore.
No extravagant balls or gentlemen calls;
And I don't give a rat if he's handsome and tall.
I don't want to settle and squawk,
Or never leave the nest for a delicate walk.
Whoa, what if I, what if I want to fly?
'Cause if I were a man I'd go to Bhutan,
Maybe play in the sand and learn to speak French.

I'd have the whole world in the palm of my hand.
And finally do what I could which I can't.
If I were a man,
If I were a man
I'd have the whole world in the palm of my hand.
I'd finally do what I could but I can't
If I were a man.

Track 4: The Ruse

SIMON
Maybe there's another way,
Another role to play here,
To keep the press and the desperate mothers at bay.
We can change the story.
What do you say?

DAPHNE
What are you suggesting, Your Grace?
SIMON
We convince them there's a flame between us,

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

DAPHNE

Between us?

SIMON

And you will be the diamond of the season once again.

DAPHNE

And you'll have reinstated your freedom.

SIMON

We can convince them there's a flame,
That since we met our hearts were set ablaze.
And we will be exactly what they say we are:
Me, unavailable;
You, desirable.

SIMON

Look me in the eyes. If this is to work, we must appear madly in love. Dance with me, Miss Bridgerton.

SOCIETY

Ooh. Ah.

SIMON

Perfect!

DAPHNE

Not so bad yourself!

SOCIETY

Could there really be a flame?
Could she be the one to change his ways?
And they are sure to be the talk of all the town!
He's unavailable and she's desirable.

MALE ENSEMBLE

She must be mine!
She must be my bride!

FEMALE ENSEMBLE

Why her?
Why not me?
Why not I?
When he looks her in the eyes,
Could she have won the most coveted prize?

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

LADY DANBURY

It's clear as day that there's a flame,
A spark that must have caught them by surprise.
They seem to have enchanted one another's hearts.
He's unavailable; and she's desirable.

LADY BRIDGERTON

She's a diamond once more.

LADY DANBURY

Who would have known?
It must be fate.

Track 5: Penelope Featherington

PENELOPE

Never as thin,
Never as perfect.
Never for him.
Never deserving of the boy I love.

Never a star;

Always an asteroid.

Delicate heart.

Forever the last choice of the one I want.

So I keep it all in.

It's like I'm invisible in my own skin.

Give up on the fictional fairytale end.

You're not Cinderella;

You're just Penelope Featherington

Ah, ah, ah, ah.

Never as prim,

Never as proper.

Never a whim,

Never an offer from a Bridgerton.

Colin will never see

Behind the yellow that covers me,

Just an afterthought.

So I keep it all in.

It's like I'm invisible in my own skin.

Give up on the fictional fairytale end.

Forever in yellow,

You're just Penelope Featherington.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

He would hold my hand;
He'd be more than just a friend.
If only someone else would just understand.
He'd be like my prince
And steal me with a kiss,
But that's not real life;
Never dressed in white.
'Cuz I'm never as thin,
Never as perfect.
Never for him.
Never deserving of the boy I love.

Never the star;
Always an asteroid.
Delicate heart.
Forever the last choice of the one I want.

So I keep it all in.
It's like I'm invisible in my own skin.
Give up on the fictional fairytale end.
Forever in yellow,
You're just Penelope Featherington.

Track 6: Fool For You

SIENA

No, don't you try to hold me close.
That door is closed now.
Go, go find yourself a girl
Who smells just like a rose.
I'm on my own now.

I don't need you,
You don't need me,
I can fight my own battles.
And I won't be a fool for you.
I won't be a fool no more.
So walk on out that door.
Don't pretend you haven't done it before.
I don't need your touch,
So release me from your clutch.

Track 7: Alone Together

SIMON

Alone together.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

DAPHNE

Alone together.

SIMON

In the gallery,
And she's just out of reach.

DAPHNE

Alone together,
And just for a moment,
Feels like I'll never be alone again,
I'll never be alone again.

SIMON

Whenever she's close,
Wherever she goes,
I wanna be near.

DAPHNE

The deal was proposed,
But I didn't know just how I'd feel.

SIMON

Alone together.

BOTH

Something is different than it was before.
It was so innocent;
Now that it's intimate,
I want more.

DAPHNE

In the perfect version of us

SIMON

In the perfect version of us

DAPHNE

He'd be the artist and I'd be the brush.

SIMON

In the perfect version of us
I'd be the artist...

BOTH

We could escape

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Into the painting,
Colored in green,
Gilded in gold.
When we're alone together
I lose control
Whenever our feelings unfold
The stories we told.
When we're alone together,
When we're alone together
I wish you were mine.

DAPHNE
We should go.

SIMON
Right.

Track 8: Entertain Me

QUEEN CHARLOTTE
I have everything I need,
But nothing that I want.

That's not good enough!
Is that the best you've got?

Bring me mimes and fire-eaters
And trapezes from the ceiling.
And if you tell a joke
And I'm still not amused, you're through.

ENTERTAINERS
Your Majesty!
Look here!
Look here!
I can make a rabbit disappear!
I can balance on a sphere!
I can put my legs behind my head!

QUEEN CHARLOTTE¹
Do that again and you'll be dead!
All the rest of you,
Bite your tongue, hold your breath
'Cause I'm the most valuable guest!

¹ Although the songbook does not indicate a change in speaker, the album makes clear the singer is Queen Charlotte.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Entertain!
Entertain!
That was good,
Wasn't great.
Entertain!
Entertain!
Where's my snuff?
Where's my fluff?

COURTIER

Your Majesty, it's right there on the tray.

QUEEN CHARLOTTE

Oh.

You! Bring me my silver spoon,
And while you're at it, prepare a goose,
And tell the baker that the Queen wants pudding too.
Why do you look confused?
Chop-chop!

COURTIER

Your Majesty...

QUEEN CHARLOTTE

What?

COURTIER

It's the King.

QUEEN CHARLOTTE

Is he dead?

COURTIER

Lucid, ma'am.

QUEEN CHARLOTTE

Oh. Well... Bring me to him.

Your Majesty...

KING GEORGE

No need for the formalities, Lottie. Come, sit with me. How is little George?

QUEEN CHARLOTTE,

He's not so little anymore. Your people miss you, my dear. I miss you.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

KING GEORGE

I'm right here, Lottie.

QUEEN CHARLOTTE

I miss the blue bells...
They're in full bloom.
Walking hand in hand...

KING GEORGE

I remember when you said we're dancing on the clouds,
Strolling through the grounds,
Talk and talk for hours

QUEEN CHARLOTTE

We were dancing...

KING GEORGE

Through the flowers.
Oh, I forgot to ask: How is dear Amelia?

QUEEN CHARLOTTE,

George, Amelia was ill, several years ago.

KING GEORGE

She came to my room but a fortnight ago. Did you not see her?

QUEEN CHARLOTTE

George, Amelia is dead!

KING GEORGE

Have you, have you done something? What have you done? No, you come back here!
Someone get her! This woman killed my child!

QUEEN CHARLOTTE

Ooh!
Entertain!
Entertain!
Bring me all my vices,
Something that will take away the pain

Entertain!

I'm dismayed!

I'm not crazy, but my sanity is circling the drain.

Ooh, ooh, ooh! Ooh.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

CROWD

She's not living, just surviving
Unforgiving, her sanity is circling the drain

QUEEN CHARLOTTE

Not living, just surviving.
No one's listening,
Watching as I slowly go insane.
Entertain me!
Entertain me!

COURTIER

Your Majesty...

QUEEN CHARLOTTE

What?

COURTIER

The latest Whistledown.

QUEEN CHARLOTTE

Hmm... That will do!

Track 9: Friend Turned Foe

ANTHONY

The time has come.
My friend turned enemy.
No escaping darkness: you should have known.

SIMON

I know,
My friend turned foe.

At least I'll die a man.

At least I'll die with honor now.
It's guaranteed there'll never be an heir of my own,
So take your best shot, my foe.

DAPHNE

Colin, pray tell me where they are.

COLIN

Hastings did a great dishonor on our family name. Surely you want him to pay

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

DAPHNE

Not with his life!

COLIN

Leave this to the men. Women should not be engaged in such weighty affairs.

DAPHNE

All that's ever said,
Again and again:
“Leave it to the men!”
To descend into madness.
But what if that madness
Is all that I know till the end?
Tell me where they went, Colin.
Tell me where they went, brother.
The ending could be tragic.
My life hangs in the balance.
Tell me where they went!

COLIN

Follow me, then.

SIMON

For what it's worth, I'm sorry.

ANTHONY

Your apology means nothing to me anymore.

BOTH

This means war.
Say goodbye.
Say good—

Track 10: Burn For You

DAPHNE

If this is what you call a honeymoon,
Pacing 'round our separate rooms,
Running from our elaborate ruse,...
We're doomed!

SIMON

Daphne—

DAPHNE

Please forgive me, Your Grace.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

SIMON
You’re Grace!

DAPHNE
Can’t even look me in the face.
And now I must lie in the mess you made.

SIMON
The mess we made.

DAPHNE
It was your mistake;
You kissed me in the maze.

SIMON
I was prepared to take my life that day.

DAPHNE
I stole your fate.

SIMON
I stole your fate.

DAPHNE
I stole your fate.

SIMON
No, I stole your fate!

DAPHNE
I don’t understand.

SIMON
And now, you’re forced to love a man you hate.

DAPHNE
Simon—

SIMON
I know you don’t feel the same,
But I burn for you.

DAPHNE
You burn for me?

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

SIMON

I burn.

DAPHNE

I burn.

SIMON

I burn.

DAPHNE

I burn.

SIMON

I

BOTH

Burn for you

DAPHNE

I burn

I burn for you

SIMON

You burn for me.

How do you feel?

DAPHNE

I feel wonderful.

SIMON

From the mornings you ease,

To the evenings you quiet,

I'm always thinking of you.

DAPHNE

I'm always dreaming of you.

From the mornings to late in the night,

It is you I cannot sacrifice.

SIMON

Sacrifice.

DAPHNE

Look me in

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

BOTH
My eyes
I burn for you

DAPHNE
I burn for you

SIMON
I burn

DAPHNE
I burn

BOTH
I burn for you

SIMON
I burn
I burn

BOTH
Say my name,
Say I'm yours,
Promise we'll never be oceans apart,
'Cause I burn for you.

SIMON
I burn for you

DAPHNE
I burn

SIMON
I burn

DAPHNE
You burn

BOTH
For me

SIMON
I'm yours, Daphne. I've always been yours.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

DAPHNE

And I'm yours.

Track 11: Every Inch

SIMON

I'm taking you somewhere.

DAPHNE

Where are we going? Tell me!

SIMON

You worry too much! You'll see!

She is light, she is music.

She is mine.

I could lose myself in her eyes.

There's an ocean deep and wide,

And I'm being pulled by the tide.

She's a melody, she's a muse,

She's a remedy to the blues.

She's a feeling I never knew.

She is night; she is day.

She is sunrise; she is rain.

And I say, let it pour.

I have been waiting for someone like her,

Something like this.

I'm in love with you,

Every inch of you.

DAPHNE

He is grace, he is beauty.

What a face!

I could lose myself in his embrace.

He's an absolute work of art.

His heart is beating just for me.

I can hardly breathe.

Fall down, down the well,

Under his spell.

He's a feeling that I've never felt.

He's the sun; he's the moon.

He's the roses in full bloom,

And they'll bloom forever more.

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

I have been waiting for someone like him,
Something like this.
I'm in love with him,
Every inch of him.
Every inch, every inch
Every inch of you.

SIMON
Every inch, every inch
Every inch of you.

DAPHNE
I'm in love with you,
Every inch of you,
Every inch.

Track 12: Worker Bee

ELOISE
I guess I have to find a lady,
Whistledown to name.
I'll do it for the queen.
She doesn't think I'm Eloise.
I'm not just Eloise,
I'm an official worker bee.

And I'll do it for the queen.
I'll do it for the queen.
She doesn't think I'm Eloise.
I'm not just Eloise,
I'm an official worker bee.
And I'll do it for the queen.

Track 13: Burned Me Instead

DAPHNE
I trusted him.
I thought he was the one for me.
And now I know I was naïve,
He could tell.
He lied to my face as he poisoned the well.

And he burned me instead.
He burned, he burned me instead.

Wonder if he's got regrets.

Track 14: Balancing the Scales

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

VIOLET

Balancing the scales,
All my job entails,
Making sure that they’re prepared
To see the world.

Making sure they’re fine on their own
When they’re old and they’re grown
And all I see is shadows.
But that doesn’t make it easier to let them go.
Ooh.

I walk past the doors
And the corridors where they grew,
And all I feel is emptiness from this emptying nest.
Edmund, are you there?
I was unaware how difficult it’d be without you there.
I was unprepared.
Balancing the scales.

PORȚIA

Balancing the scales.

VIOLET & PORȚIA

I did the best I could, but still I have failed,

LADY DANBURY

Still I have failed.

VIOLET & PORȚIA

Still I have

VIOLET, PORȚIA & LADY DANBURY

Failed

Balancing the scales.
Want them to see the world,
But I’ll always care.

VIOLET

Balancing the scales.

PORȚIA & LADY DANBURY

All my job entails,

VIOLET

Making sure that they’re prepared

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

VIOLET, PORTIA & LADY DANBURY
To see the world.

VIOLET
Making sure they learn

PORTRIA
Making sure they're perfect

LADY DANBURY
Making sure their worth is always something that they know.

VIOLET, PORTIA & LADY DANBURY
But it doesn't make it easier to let them go.

Track 15: Ocean Away

DAPHNE
What a beautiful party!
I'm looking up at the ceiling a lot.
The chandelier is sparkly.
You never said “sorry”; guess you forgot.
Or, maybe you're not sorry at all.

But, a beautiful evening.
I want to know just what the hell are you thinking?
Oh-- so stoic, emotionless, over us all so, quickly.
What am I missing?
I can't even drink champagne, no
Without seeing your, face.
Am I the one to blame
When we're dancing in the same room but you're an ocean away?

SIMON
What a terrible soirée.
With terrible people pretending they're happy in this masquerade.
We go through the motions when all that we wish is escape
From the choices we make.
And I see her smiling.
How can she be smiling?
There's been no reconciling.
And when she's at my focus, she won't even notice my gaze.
How can she be okay

BOTH
When I can't even drink champagne, no

LYRICS FOR “THE UNOFFICIAL BRIDGERTON MUSICAL”

Without seeing your, face?
Am I the one to blame
When we’re dancing in the same room, but you’re an ocean away?

Forget the ache of yesterday, and why don’t we go dancing in the rain?
I know you think that I should change,
But nothing in the world could sway my way,
When I can’t even drink champagne.
Dancing in the same room, but you’re an ocean away.
You’re an ocean away.
I can’t even drink , I can’t even drink champagne,
No, without hearing your name.
Am I the one to blame
When we’re dancing in the same room,
But you’re an ocean away?

EXHIBIT D

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 1: “Tis the Season” (5:18)**

Barlow & Bear’s first musical track appropriates Episode 1’s opening scenes, including near identical introduction of *Bridgerton*’s main characters, use of its Grosvenor’s Square 1813 setting, and the incorporation of substantial dialogue verbatim. The title, “Tis the Season” is a reference to “the season” described in Episode 1 and throughout Season 1 of *Bridgerton* as the social season that forms the basis for the storyline.

Introduction of Setting (1813 Grosvenor Square) and Narrator Lady Whistledown Upbeat Pace and Mood¹

Season 1, Episode 1, Scene 1 includes the dialogue, spoken by Lady Whistledown: “Grosvenor Square, 1813. Dearest reader, the time has come to place our bets for the upcoming social season. Consider the household of the Baron Featherington. Three misses foisted upon the marriage market by their tasteless, tactless mama.”

Season 1, Episode 1, Scene 2 includes the dialogue: “Far better odds might exist in the household of the widowed Viscountess Bridgerton. A shockingly prolific family, noted for its bounty of perfectly handsome sons and perfectly beautiful daughters,” spoken by Lady Whistledown.

The musical replicates this verbatim in lyrics also spoken by Lady Whistledown: “Grosvenor Square, 1813 / Dearest reader / The time has come to place our bets / For the upcoming social season! / Consider the household of the Baron Featherington / 3 misses foisted upon the marriage market / Like sorrowful sows by their tasteless and tactless Mama.”

The musical appropriates this dialogue nearly exactly in its lyrics: “Far better odds might exist / In the household of the widowed Viscountess Bridgerton / A shockingly prolific family known for its bounty of perfectly handsome sons / And perfectly beautiful daughters,” also attributed to Lady Whistledown.

Introduction of Characters and Themes, Daphne, Eloise, Hyacinth, and Anthony Bridgerton

Season 1, Episode 1 introduces Daphne Bridgerton as a young woman who is making her debut into London society. In Scene 24, Daphne expresses to her sisters that she desires to make a marital match like that of her parents, noting in dialogue that: “We will all need to find love. One day. Indeed, a love

The musical appropriates the character expression of Daphne Bridgerton, namely the character’s desire to find love similar to that of her parents. Lyrics of “Tis the Season” include, sung from Daphne’s point-of-view, that she is “dreaming of a match for love/Just like Mama and Pa had done.”

¹ Throughout Exhibit D material from the *Bridgerton* series appears on the left and material from “The Unauthorized Bridgerton Musical” appears on the right. This list is representative and not exhaustive of the similarities between the works.

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

as pure as what dear mama and papa once shared, if we are so fortunate.”

Season 1, Episode 1, Scene 8 introduces Eloise Bridgerton, who chafes against the constraints of femininity, sometimes literally. The scene includes Eloise stating, “I am already roasting!,” in regards to her gown. Eloise also expresses her frustration with Daphne’s lengthy dressing routine prior to her societal debut. Dialogue in the scene has Eloise shouting “DAPHNE! YOU MUST MAKE HASTE!! Should you think she heard me?”

Season 1, Episode 1, Scene 8 introduces Hyacinth Bridgerton, a younger sister serving as a foil to Eloise, one who embraces the femininity and marital strivings of the social season. Hyacinth asks Eloise “I feel like a princess. Do I look like one?” Eloise replies, “Do you truly wish to know what I think you look like?”

Season 1, Episode 1 introduces Anthony Bridgerton and his tension with his mother, Lady Violet Bridgerton, as he steps into his late father’s role. Scene 10, includes the dialogue “Should your brother wish to be obeyed as Lord Bridgerton, he must act as Lord Bridgerton,” spoken by Violet regarding Anthony’s tardiness for Daphne’s presentation (because he is engaged in a romantic assignation with his mistress, opera singer Siena Rosso).

The musical expresses Eloise Bridgerton’s discomfort in her position and attire with the substantially similar lyric “Ugh, I’m boiling in this dress already!” Similarly, lyrics convey Eloise’s frustration with Daphne’s lengthy dressing routine prior to her societal debut in extremely similar lyrics: “DAPHNE! YOU MUST. MAKE. HASTE. Oh, so, do you think she heard me?”

The musical appropriates Hyacinth Bridgerton’s core character traits and the relationship between Hyacinth and Eloise through nearly identical lyrics spoken from the two characters’ points-of-view: “I feel like a princess / Do I look like one? / Hyacinth, do you wish to know what I think you look like?”

The musical appropriates this same character tension and theme, including lyrics that are substantially similar to Lady Bridgerton’s spoken dialogue, and convey the same meaning, namely that Anthony is running late (“Where is he? If your brother is to be obeyed as Lord Bridgerton/He must act like Lord Bridgerton.”) because of his ongoing affair with Siena, who is specifically named in the song (“Siena, you know it’s half-past nine!”).

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 2: “Lady Whistledown” (1:18)**

Barlow & Bear’s eponymous second musical track expresses the essence of Lady Whistledown’s character, an unseen narrator whose hidden identity forms the core intrigue of Season 1. Her scandal sheets uncover the skeletons in many characters’ closets.

Expression of Lady Whistledown’s Scandal Sheets, Use of Gossip, Whisper to Express Tone

Throughout Season 1, Lady Whistledown releases scandal sheets (the era’s version of tabloids) during the season to report on the scandals and intrigue that plague the show’s main characters. Discovering Lady Whistledown’s true identity is the core mystery of Season 1, and she is only revealed in the final scenes of the last episode, Episode 8.

Season 1, Episode 6, Scene 62 involves Lady Whistledown revealing the shocking truth about character Marina Thompson’s secret pregnancy, the secrecy of which is a major plot point of Season 1.

The musical expresses the plot device of Lady Whistledown’s scandal sheets and the gossip they provoke, through singing in a whisper tone with the refrain “Nothing but a whisper / Is a shout / It’s a buzz about the Ton.” It goes on to describe this device further: “Nothing like a scandal / Going ’round / When you read the works of Lady Whistledown.”

The musical lyrics include the discussion of Lady Whistledown’s propensity to reveal a shocking secret: “If you’ve got a secret / You should keep it . . . If you’ve got a secret / Just pray it’s never found . . . Without a doubt it’s Lady Whistledown.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 3: “If I Were a Man” (2:58)**

Barlow & Bear’s third musical track expresses the essence of Eloise Bridgerton’s character and her frustration with societal constraints on women, as well as lifting substantial dialogue verbatim.

Expression of Eloise Bridgerton Character, Theme of Patriarchal Constraint

Season 1, Episode 2, Scene 12 includes the dialogue “if I were a man,” spoken by Eloise Bridgerton.

The character of Eloise Bridgerton is a young woman who is frustrated by her society’s values of femininity over intellect and searching for how she pursue her own passions within that society. She expresses her frustration frequently, including to her friend Penelope Featherington and is not content to accept the traditional role of a young woman in her society or marriage, including by rejecting the idea that she must one day have children or wear feminine clothes.

In Episode 2, Scene 12, Eloise and Penelope Featherington discuss conception and the secret pregnancy of Marina Thompson, Penelope’s maid. Eloise professes her ignorance as to how unmarried women can become pregnant. Eloise states: “How can a woman come to be with child if she’s not married?” . . . “We need to find out so it doesn’t happen to us!”

The title of this track, “If I Were a Man” is taken verbatim from dialogue.

The musical appropriates the essential character of Eloise Bridgerton, enumerating all the ways she could pursue her passions and education if she were a man and the freedom she perceives men have. The song conveys Eloise’s discontent and unwillingness to accept the roles afforded to her, from motherhood to the decorative nature of female existence. The lyrics, “I’d finally do what I could, but I can’t,” convey Eloise’s frustration and predicament.

The lyrics include the same discussion between Eloise and Penelope of the mysteries of conception as well as the secret pregnancy of Penelope’s maid. The lyrics include the same verbatim lines, including: “How does a woman come to be with child if she’s not married?” and “you need to find out so it doesn’t happen to us!”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 4: “Penelope Featherington” (2:44)**

Barlow & Bear’s eponymous fourth musical track expresses the essence of Penelope Featherington’s character—an overlooked and socially undesirable wallflower with unrequited romantic feelings for Colin Bridgerton.

Expression of Penelope Featherington, Plot and Themes of Feeling Inferior, Unrequited Love

The character of Penelope Featherington in the series is a young woman overlooked by those around her, given less value in society because she is slightly overweight, and portrayed as less attractive. In Season 1, Episode 1, Scene 25, Penelope remarks she “shall gladly sit this season out.” Her sister Prudence observes, “What she is, is two stone heavier than she ought to be.”

In Episode 1, Scene 33, Penelope wears an unflattering yellow dress, one that Lady Whistledown, in voice over, describes as the color of “the most undesirable pieces of overripe citrus fruit.” Yellow remains a recurring color through season one for Penelope.

In Episode 6, Scene 47, Penelope tries to persuade Marina to end her engagement to Colin Bridgerton, who has no idea about Marina’s secret pregnancy. Marina guesses (correctly) that Penelope is in love with Colin, and in dialogue says Penelope’s “love is an unrequited fantasy.”

The musical appropriates the essential character of Penelope Featherington, listing the ways that she feels overlooked and not sufficiently attractive for Regency society. The lyrics, “Never as thin / Never as perfect . . . It’s like I’m invisible in my own skin” express Penelope’s view on her status.

The musical copies this expression, noting in lyrics that Penelope is “Behind the yellow that covers me” and “Forever in yellow.”

The musical appropriates Penelope’s unrequited romantic feelings for Colin Bridgerton, a key plot point for the character, with the lyrics “Never an offer from a Bridgerton / Colin will never see / Behind the yellow that covers me.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

Track 5: “The Ruse” (2:59)	
Barlow & Bear’s fifth musical track song expresses a major plot point in the first season of <i>Bridgerton</i> as well as the essential characters of Daphne Bridgerton and Simon Bassett.	
<i>Expression of “Ruse” Plot Device</i>	
Season 1, Episode 1, Scene 81 expresses a major plot point of the first season of the series when Simon Bassett (Duke of Hastings) proposes a ruse so both he and Daphne can achieve their goals—by tricking Lady Whistledown into thinking they are a couple. The term “ruse” is used throughout Season 1, e.g. Episode 2, Scene 9, Daphne says: “And we are yet to see if this ruse will succeed at attracting any callers for me at all”; Episode 3, Scene 4, Daphne says: “Our plan has worked thus far, but we must continue this ruse until I have found my match”; Episode 4, Scene 14, Daphne says: “—It was a lie. It was a ruse” and then in Scene 24 wonders if Simon is going to “reveal the big secret of their ruse to the queen”; Episode 5, Scene 2, Violet Bridgerton says in dialogue: “I knew there was something between the two of you. Ruse or not.”	The musical copies this plot device and scenes nearly exactly. The very title “Ruse” is taken from the series and the musical tells the story of the faux romance pact between Daphne Bridgerton and Simon Bassett. As just one example, the lyrics when the character of Simon sings, “We convince them there’s a flame between us.”
In Episode 1, Scene 82, Simon and Daphne enact their plan to appear as a courting couple in public at a ball. As they dance, Simon reminds Daphne to make their attachment look authentic. In dialogue Simon tells Daphne to “Stare into my eyes” and reminds her “If this is to work, we must appear madly in love.”	The lyrics copy this dialogue nearly verbatim. In lyrics, Simon sings, “look me in the eyes / If this is to work, we must appear madly in love.”
<i>Characters of Daphne Bridgerton & Simon Bassett</i>	
The character of Daphne Bridgerton is a young woman debuting in society who must secure a husband. While initially earning the moniker of the “incomparable” of the season, essentially the most prized debut, and dubbed a flawless “diamond” by Queen Charlotte,	The musical appropriates the development of Daphne Bridgerton: The pressure she feels to reclaim her “diamond” status and to be seen as desirable despite derision published in Lady Whistledown. The lyrics, “And you will be the diamond of the season once again .

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

Daphne has fallen out of favor. She has been maligned in Lady Whistledown's scandal sheets following her brother's refusal of all her suitors. Daphne must be seen as desirable again to fulfill her goals of a successful marriage in the eyes of society.

In Episode 1, Scene 81, Simon proposes a ruse so that he can also achieve his goals: He, as an extremely eligible bachelor, will get the freedom he seeks from mothers intent on marrying off their daughters. This eligibility has been highlighted in Lady Whistledown's publications. In dialogue spoken by Simon he offers to Daphne: "With you on my arm, the world will believe I have finally found my Duchess . . . I presume [Lady Whistledown] will deem us precisely what we are: Me, unavailable . . . You . . . Desirable."

. . . And we will be exactly what they say we are . . . You, desirable" convey Daphne's particular quandary and Simon's solution in the form of a disingenuous union.

The musical also appropriates the development of Simon Bassett's character. He is an extremely sought-after single Duke who wants nothing to do with matchmaking matriarchs or coverage by Lady Whistledown. In lyrics, the song shares Simon's explicit point-of-view: "Maybe there's another way / Another role to play here / To keep the press and the desperate mothers at bay."

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

Track 6: “Fool for You” (0:59)

Barlow & Bear’s short sixth musical track expresses the character of Siena Rosso as well as a her abandonment by Anthony Bridgerton.

Expression of Character of Sienna Rosso, Plot of Her Breakup with Anthony Bridgerton

Season 1, Episode 8, Scene 46 is the culmination of an affair between Viscount Anthony Bridgerton and opera singer Siena Rosso. Anthony had tried to end the relationship but continually returns to her, dangling the hope that they might be together despite classist barriers. Siena in this scene has finally had enough, and ends things between the couple on her own terms.

Siena Rosso is a young woman who is stymied by the class struggles of Regency England: she is in love with a Viscount (Anthony) and because they come from different classes, their love affair will never be accepted in the eyes of society.

Throughout Season 1, Anthony has shifted in his affection, stringing Siena along as he weights his duty versus his devotion to her. In Episode 8, Scene 46, Siena recognizes in dialogue that their relationship is hopeless and must end: “What am I doing? . . . I am looking out for myself. I am ensuring my own future. Because I know . . . that there is no one else who ever will.”

This musical, sung from the character Siena Rosso’s point-of-view, reflects her decision to finally take matters into her own hands and end the relationship on her terms. The lyrics reflect Siena’s desire to end things once and for all, particularly because of Anthony’s mercurial affections: “And I won’t be a fool for you / I won’t be a fool no more / So walk on out that door / Don’t pretend you haven’t done it before.²”

The musical expresses the essential character of Siena Rosso, a woman in a forbidden love affair who finally decides that she must end her relationship with a Viscount, taking care of herself and her future, as well as letting him go. In lyrics, the character of Siena acknowledges that Anthony must find a woman among his own class: “Go, go find yourself a girl / Who smells just like a rose.” The lyrics also recognize Siena’s understanding that no one will look out for her but herself as she sings: “I’m on my own now / I don’t need you, you don’t need me / I can fight my own battles / And I won’t be a fool for you.”

² Further, per the original TikTok channel (@bridgertonthemusical) where the song was posted, Barlow & Bear highlight that “Fool for You” is “Sienna’s Song.” The video can be found at: https://www.tiktok.com/@bridgertonmusical/video/6920044177535388934?is_copy_url=1&is_from_webapp=v1&lang=en.

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 7: “Alone Together” (2:12)**

Barlow & Bear’s seventh musical track expresses an essential, intimate scene between the characters of Daphne Bridgerton and Simon Bassett where their romance begins.

Expression of Daphne and Simon Falling in Love, Specific Party Scene, Mood

Season 1, Episode 3, Scene 23 finds Simon Bassett and Daphne Bridgerton at a party featuring an art exhibit, alone for the first time to discuss their feigned affair and its success. This is the first scene where the characters begin to have romantic attraction to each other.

In Episode 3, the setting for Scene 23 is the Somerset House side gallery, the side room of an art exhibition. Daphne and Simon stand in front of a landscape painting.

On view in Scene 23 is a painting lent by Simon to the exhibition, and Daphne discovers it was a favorite painting of his late mother’s. Daphne explains what she sees in the painting and her connection to it, a metaphor for her burgeoning attraction to Simon. In dialogue, Daphne, presumably describing the painting, says it makes her feel “As if I could be the only person left in the world, and yet somehow . . . I am not lonely. I am comforted. At peace.”

Also in Scene 23 of Episode 3, Daphne describes the painting in dialogue as “intimate,” and she and Simon then proceed to have their first intimate moment when their

The title of this track, “Alone Together,” reflects this scene in Episode 3, where the characters of Simon and Daphne are finally alone to discuss their arrangement and find there is real attraction.³

The lyrics include a specific reference to the unique setting of Daphne and Simon’s interaction in Scene 23: “Alone together / In the gallery.” The lyrics further describe the art and its composition: “We could escape / Into the painting / Colored in green / Gilded in gold.”

The musical appropriates this essential character expression, namely that Daphne, when alone with Simon, does not feel lonely and in fact feels the beginnings of attraction. The lyrics express this sense of singular togetherness reflected in the episode: “Alone together / And just for a moment / Feels like I’ll never be alone again.”

In lyrics, the song describes the moment of intimacy noted in the scene’s dialogue and its emotional resonance in the couple’s love story: “Alone together / Something is different than it was before / It was so

³ Per an interview on the Kelly Clarkson show, Bear and Barlow explicitly admit that Episode 2, Scene 23 is the scene that inspired “Alone Together.” At approximately one minute and eight seconds into the clip, Barlow cites the scene where Simon and Daphne are “in a gallery together” and “looking at all the art.” See <https://www.youtube.com/watch?v=cS88nXJiovC>.

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

hands almost touch. This is a crucial moment in the evolution of the characters' true love story, and the start of a story transition from feigned to real emotion.	innocent / Now that it's intimate, I want more."
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REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 8: “Entertain Me” (3:32)**

Barlow & Bear’s eighth track song expresses the essence of Queen Charlotte’s character, her relationship with King George, and copies dialogue verbatim.

Character of Queen Charlotte, Setting and Mood

Queen Charlotte is a seminal character in *Bridgerton* Season 1, forming the locus around which the other characters interact with one another. Her husband King George suffers from mental illness and their separation is a source of pain for Queen Charlotte. In Season 1, Episode 5, Scene 19, Lady Danbury acknowledges the mercurial and demanding nature of the meddling Queen, who has conspired to deny the marriage license for Daphne Bridgerton and Simon Basset. In dialogue, when asked why the Queen would insert herself, Lady Danbury says: “To distract herself? To entertain herself? . . . Or, perhaps, she was simply bored.”

In Episode 5, Scene 17, the Queen is given an update regarding King George’s health. In dialogue, the Royal Physician tells the queen: “It is the king, your majesty.” Queen Charlotte asks: “Dead?” And the Physician replies: “Lucid.”

In Episode 5, Scene 26, Queen Charlotte is finally able to have a conversation with a lucid King George. This is a poignant moment for Queen Charlotte and a small window into their former life, allowing the audience to discover a kinder side to this character and also reveal a reason for her current sharp nature. In dialogue, Queen Charlotte greets George: “My king.” George replies: “There is no need for formality, Lottie. Sit with me. . . . How is little George?” Queen Charlotte replies: “He is . . . well, he is not so little anymore.” A bit later in the conversation, Queen Charlotte confesses: “Your subjects miss you, my dear. I miss

The track’s title, “Entertain Me” references Queen Charlotte, appropriating the character’s essential expression as a bored and frustrated monarch facing a lonely rule thanks to her husband’s illness and thus, meddling in the lives of her subjects. Sung from Queen Charlotte’s point-of-view, the lyrics express this duality: “Entertain! Entertain! Bring me all my vices / Something that will take away the pain.”

The lyrics replicate Scene 17’s dialogue nearly verbatim: “Your majesty / What? / It’s the King / Is he dead? / Lucid, ma’am.”

The musical reproduces this conversation nearly verbatim, importing the dialogue from the episode. It also appropriates the relationship between the characters and the revelation of their former love juxtaposed against the difficulty of their present state given George’s illness. The lyrics, sung from the Queen and King’s perspectives are: “Your Majesty / No need for formalities, Lottie / Come! Sit with me! / How is little George? / He’s not so little anymore / Your people miss you, my dear / I miss you / I’m right here, Lottie.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT

you." King George replies: "I am right here, Lottie."	
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REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 9: “Friend Turned Foe” (2:29)**

Barlow & Bear’s ninth track narrates the duel between former friends Simon Bassett and Anthony Bridgerton—a critical plot development that drives Daphne and Simon’s relationship forward.

Characters of Simon and Anthony, Plot Development of Their Relationship Souring

Season 1 establishes Anthony Bridgerton and Simon Bassett as old friends. In Episode 1, Anthony acknowledges in dialogue that “Hastings and I know each other from our days at Oxford.” In Episode 3, Scene 26, Anthony catches Simon and Daphne Bridgerton together in an illicit kiss, and challenges Simon to a duel.

In Episode 4, Scene 37, Anthony acknowledges in dialogue “the duel at dawn” but denies that it is honorable: “If there is any honor to be had from killing my dearest friend.”

In Episode 4, Scene 44, Daphne confronts Colin Bridgerton about the location of the duel. In dialogue she asks Colin: “Where have they gone? ... --Tell me where this duel is to take place.” Colin deflects, reminding Daphne that: “Hastings has done you a grave dishonor. Surely you must wish to see him pay.” Daphne responds: “Not with his life.”

The title of this track, “Friend Turned Foe,” is a reference to the friendship between Anthony and Simon and subsequent duel fought between them, turning them into enemies. The song is sung from Anthony and Simon’s perspectives.

In lyrics, the song expresses the essential character of Anthony Bridgerton, who faces the quandary of either killing his good friend or losing his own life in the name of an ostensibly worthy cause, the defense of his sister’s honor: “The time has come / My friend turned enemy / No escaping darkness / You should have known ... At least I’ll die with honor now.”

The lyrics, sung from the perspective of Daphne, appropriate this dialogue almost verbatim: “Colin pray tell me where they are / Hastings did a great dishonor on our family name / Surely you want him to pay / Not with his life.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 10: “Burn for You” (2:53)**

Barlow & Bear’s tenth track expresses the budding romance between Simon Bassett and Daphne Bridgerton—the primary relationship in the series—who begin courting as a ruse but ultimately develop romantic feelings for one another.

Plot Development of Daphne/Simon Relationship

Season 1, Episode 5, Scene 53 includes the dialogue “I burn for you,” spoken by Daphne Bridgerton.

In Episode 4, Scene 26, Simon and Daphne share a forbidden kiss in a garden maze. They are caught by Daphne’s brother, Anthony Bridgerton, who demands that Simon either marry Daphne for the dishonor or meet Anthony at dawn for a duel to the death. Simon agrees to the duel, seemingly willing to sacrifice his life.

The characters of Daphne Bridgerton and Simon Bassett are the core romantic story arc of Season 1: while initially engaging in a faux romance and being forced to marry, they have separately developed true romantic feelings for one another. Episode 5, Scene 53 is the culmination of many episodes of near misses for the couple. The scene opens with Daphne pacing on the first night of her honeymoon, frustrated because she believes Simon has been avoiding her and does not share her feelings. In dialogue, Daphne assumes Simon “would prefer to stay in your separate room and endure a wordless dinner on our wedding night.”

Also in Episode 5, Scene 53, Simon finally confesses his love for Daphne, a huge turning point in the couple’s relationship and a major plot point in the series. In dialogue, Simon admits: “I cannot stop thinking of you. From the mornings you ease to the evenings you quiet to the dreams you inhabit.”

The title of this track, “Burn for you” is taken verbatim from dialogue.

The musical expresses the unique setting and circumstance of Simon and Daphne’s first kiss, with lyrics sung by Daphne, “It was your mistake / You kissed me in the maze.” To which the character of Simon sings back, “(I was prepared to take my life that day),” a clear appropriation of the initial romantic moment shared by the couple and Simon’s subsequent resignation to a duel in the series.

The musical exploits the plot reveal of the characters’ true feelings on the eve of their wedding despite much past confusion. Sung as a duet from Daphne and Simon’s perspective, the lyrics highlight Daphne’s initial misunderstanding: “If this is what you call a honeymoon / Pacing ’round our separate rooms / Running from our elaborate ruse / We’re doomed.”

In the song “Burn for You,” Simon, using largely the same phrases as the dialogue of Episode 5, sings about his love for Daphne: “From the mornings you ease / To the evenings you quiet / I’m always thinking of you .”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 11: “Every Inch” (2:45)**

Barlow & Bear’s twelfth musical track replicates the tone, mood, and setting of Daphne Bridgerton and Simon Bassett’s physical love scene in Episode 6.

Expression of Simon/Daphne Romantic Relationship and “Every Inch” Scene

Season 1, Episode 6, Scenes 18 and 19 chronicle moments of wedded bliss between the newlyweds Simon and Daphne. The scenes involve an extended romantic interlude where the couple has finally acknowledged their feelings and feel free to express their love.

In Scene 18, Simon pulls Daphne outside into the moonlit gardens for a rendezvous. Daphne asks, “Where are we going?”

The musical track chronicles Daphne and Simon’s new love, and is sung from the characters’ perspectives. The character of Daphne sings: “I’m in love with you / Every inch of you,” reflecting this sequence of passion in Episode 6, where Daphne and Simon have finally united in their romantic and physical attraction.

In the lyrics, as in Scene 18 from Episode 6 where Simon pulls Daphne outside, the character of Simon sings: “I’m taking you somewhere.” Daphne then asks: “Where are we going?”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 12: “Worker Bee” (0:51)**

Barlow & Bear’s short eleventh musical track narrates Eloise Bridgerton’s investigation into the identity of Lady Whistledown for Queen Charlotte, an important development for Eloise’s character. The song also appropriates the bumblebee, a recurring symbol in the series.

Expression of Investigation of Lady Whistledown’s Identity and Use of “Bee” Symbol

In Episode 5, Scene 43, Queen Charlotte overhears Eloise inquiring if Lady Danbury is secretly writing as Lady Whistledown. The Queen, who is eager to find out the identity of the person ridiculing her in print, orders Eloise to reveal the fruits of her investigation. In Episode 6, Scene 7, Eloise brags that “The queen herself has charged me with discovering Whistledown’s identity.”

Throughout *Bridgerton*, the symbol of a bumblebee, shot in close-up, is used to represent the “buzzing” associated with Lady Whistledown’s missives. The bee is used as a thematic bookend: it appears in the Season 1, Episode 1 opening sequence on the Bridgerton door knocker and closes out the first season as the camera captures a bumblebee landing in the final moments of Episode 8.

The musical track expresses Eloise Bridgerton’s work for the Queen to discover Lady Whistledown’s identity. The song, sung from Eloise’s point-of-view, appropriates this plot element directly in its lyrics: “I guess I have to find a lady / Whistledown to name / I’ll do it for the queen / She doesn’t think I’m Eloise / I’m not just Eloise / I’m an official worker bee” with the refrain “I’ll do it for the queen” excitedly repeated throughout.

The track’s use of “Worker Bee” as a title and refrain in the song itself is an appropriation of this symbol. Particularly because the song references Eloise Bridgerton’s search for Lady Whistledown, whose publications cause quite the “buzz” in the Regency society that is the focus of the series, the title appears to be a pointed and specific lift.

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 13: “Burned Me Instead” (1:01)**

Barlow & Bear’s thirteenth musical track expresses Daphne Bridgerton’s feeling of betrayal at Simon Bassett over their conflicting desires to have children. This conflict and their resulting division drives the series forward in later episodes.

Expression of Simon’s Betrayal and Daphne’s Emotional Reaction

From early in the season, Daphne reveals to Simon and the audience that she wants a family. The audience, but not Daphne, knows that Simon made a promise that he would not sire an heir as revenge for his father’s treatment of him. Later in the series, Simon tells Daphne he cannot have children, but Daphne assumes it is a physical issue he cannot control, and marries him anyway. In Episode 6, Scene 58, Daphne finally understands that it is merely Simon’s choice to avoid children and feels lied to and betrayed. In dialogue Daphne expresses her anger: “I TRUSTED YOU. . . . You CHOSE to lie to me.”

The musical track, from the perspective of Daphne Bridgerton, expresses the character’s anger and hurt as evidenced in Episode 6, Scene 58. Sung in a tone of sadness and anger, Barlow weeps and her voice shudders as she sings. The lyrics encapsulate Daphne’s betrayal, an important plot transition from the newlyweds’ previously blissful union, as well as Daphne’s frustration with her own naïveté because she was unaware of the physical act required for conception: “I trusted him / I thought he was the one for me / And now I know I was naïve / He could tell / He lied to my face as he poisoned the well.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 14: “Balancing the Scales” (2:22)**

Barlow & Bear’s fourteenth musical track expresses the essence of matriarch Lady Violet Bridgerton’s character, as well as the series overall theme of marrying for love in a society that prioritizes social status.

Character of Lady Violet Bridgerton and Theme of Marrying for Love, Not Status

The character of Lady Violet Bridgerton, a dowager Viscountess and widow, is that of a doting mother intent on securing her children’s futures. Despite her role in Regency London society, Violet is not content for her children to marry for status but desires them to have a happy marriage much like hers was to Edmund Bridgerton prior to his death.

The musical appropriates this essential character of Lady Bridgerton and the theme of a mother’s desire for her children to be happy. The lyrics, sung from Lady Bridgerton’s point-of-view, acknowledge her doting role as a mother: “All my job entails / Making sure that they’re prepared to see the world.” Further, the song specifically acknowledges her beloved husband, Edmund Bridgerton, and she sings: “Edmund, are you there? / I was unaware / How difficult it’d be without you there.”

REPRESENTATIVE EXAMPLES OF INFRINGEMENT**Track 15: “Ocean Away” (3:14)**

Barlow & Bear’s fifteenth musical track expresses the emotional rift between the characters of Simon Bassett and Daphne Bridgerton—the primary conflict in *Bridgerton*’s later episodes—as well as appropriating Episode 7’s title and dialogue.

Ocean Away, Mood and Plot of Simon and Daphne’s Rift

Season 1, Episode 7 of *Bridgerton* is entitled “Oceans Apart.”

In Episode 7, Scene 53, Sir Henry Granville explains his arrangement with Lord Wetherby. Both men are married to women but engaged in a relationship. In dialogue Granville shares with Benedict Bridgerton: “You have no idea what it is like to be in a room with someone you cannot live without and yet still feel as though you are oceans apart.” Though this dialogue is spoken by Granville, it is a metaphor for what Simon Bassett and Daphne Bridgerton are experiencing: in the previous Episode 6, they had a terrible fight about Simon’s unwillingness to have children and Daphne’s sense of betrayal. Currently, they are emotionally and thematically separated: they must pretend they are happy newlyweds despite the seemingly insurmountable strife in their union.

The song title “Ocean Away” is an appropriation of the episode title of substantially the same name.

The refrain of the song references the emotional rift that occurs between Daphne and Simon during Episode 7 as reflected in the dialogue of Sir Granville: in the same room at society parties despite their marital separation. In the song, the characters of Daphne and Simon sing a duet acknowledging their physical closeness and emotional distance: “When we’re dancing in the same room / but you’re an ocean away.” Further, the song makes use of the couple’s previous fight, and each’s seemingly irreconcilable views on having children. In the lyrics, both Simon and Daphne sing: “Forget the ache of yesterday / And why don’t we go dancing in the rain? / I know you think that I should change / But nothing in the world could sway my way.”

EXHIBIT E

United States of America
United States Patent and Trademark Office

BRIDGERTON

Reg. No. 6,296,166

Registered Mar. 16, 2021

Int. Cl.: 41

Service Mark

Principal Register

Netflix Studios, LLC (DELAWARE LIMITED LIABILITY COMPANY)

5808 W. Sunset Blvd.

Los Angeles, CALIFORNIA 90028

CLASS 41: Entertainment services in the nature of a dramatic television series; providing online non-downloadable video clips and other multimedia digital content containing audio, video, artwork, and text from or related to a dramatic television series

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Dawn H. Hulfield

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***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the United States Patent and Trademark Office (USPTO). The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

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		Citizen or Subject of a Foreign Country <input type="radio"/> 3 <input checked="" type="radio"/> 3	Incorporated and Principal Place of Business in Another State <input type="radio"/> 6 <input checked="" type="radio"/> 6
			Foreign Nation <input type="radio"/> 6 <input checked="" type="radio"/> 6
IV. CASE ASSIGNMENT AND NATURE OF SUIT (Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)			
<input type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input type="radio"/> B. Personal Injury/ Malpractice <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*
<input checked="" type="radio"/> E. General Civil (Other)		<input type="radio"/> F. Pro Se General Civil	
Real Property <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	Bankruptcy <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157	Federal Tax Suits <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	<input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)
Personal Property <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	Prisoner Petitions <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement	Forfeiture/Penalty <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other	
	Property Rights <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	Other Statutes <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application	

<input type="radio"/> G. <i>Habeas Corpus/2255</i>	<input type="radio"/> H. <i>Employment Discrimination</i>	<input type="radio"/> I. <i>FOIA/Privacy Act</i>	<input type="radio"/> J. <i>Student Loan</i>
<input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation)	<input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act)	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
(If pro se, select this deck)			
<input type="radio"/> K. <i>Labor/ERISA (non-employment)</i>	<input type="radio"/> L. <i>Other Civil Rights (non-employment)</i>	<input type="radio"/> M. <i>Contract</i>	<input type="radio"/> N. <i>Three-Judge Court</i>
<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)
V. ORIGIN <input checked="" type="radio"/> 1 Original Proceeding <input type="radio"/> 2 Removed from State Court <input type="radio"/> 3 Remanded from Appellate Court <input type="radio"/> 4 Reinstated or Reopened <input type="radio"/> 5 Transferred from another district (specify) <input type="radio"/> 6 Multi-district Litigation <input type="radio"/> 7 Appeal to District Judge from Mag. Judge <input type="radio"/> 8 Multi-district Litigation – Direct File			
VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.) Infringement of copyrights in Netflix's Bridgerton streaming series under 17 U.S.C. § 501.			
VII. REQUESTED IN COMPLAINT	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ JURY DEMAND:	Check YES only if demanded in complaint YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction) YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> If yes, please complete related case form		
DATE: July 29, 2022	SIGNATURE OF ATTORNEY OF RECORD _____ /s/ Ginger D. Anders		

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

ADDENDUM
Continuation of Section I. (c) Attorneys

GINGER D. ANDERS
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue NW
Suite 500E
Washington, DC 20001
202.220.1100

VIRGINIA GRACE DAVIS
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105
415.512.4083

UNITED STATES DISTRICT COURT
for the
District of Columbia

NETFLIX WORLDWIDE ENTERTAINMENT, LLC;)
NETFLIX STUDIOS, LLC)
)
)
)
<i>Plaintiff(s)</i>)
v.)
ABIGAIL BARLOW d/b/a ABIGAIL BARLOW)
PUBLISHING; EMILY BEAR d/b/a JORDAN KING)
MUSIC USA; PINK & PURPLE LADY, INC.; and)
BARLOW & BEAR, LLC)
<i>Defendant(s)</i>)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Abigail Barlow d/b/a Abigail Barlow Publishing
c/o Kenneth D. Freundlich
Freundlich Law
16133 Ventura Blvd., Ste. 645
Encino, California 91436

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Rose Leda Ehler
Munger, Tolles & Olson LLP
350 South Grand Ave., 50th Floor
Los Angeles, CA 90071

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
for the
District of Columbia

NETFLIX WORLDWIDE ENTERTAINMENT, LLC;)
NETFLIX STUDIOS, LLC)
)
)
)
<i>Plaintiff(s)</i>)
v.)
ABIGAIL BARLOW d/b/a ABIGAIL BARLOW)
PUBLISHING; EMILY BEAR d/b/a JORDAN KING)
MUSIC USA; PINK & PURPLE LADY, INC.; and)
BARLOW & BEAR, LLC)
<i>Defendant(s)</i>)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Barlow & Bear, LLC
c/o Kenneth D. Freundlich
Freundlich Law
16133 Ventura Blvd., Ste. 645
Encino, California 91436

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Rose Leda Ehler
Munger, Tolles & Olson LLP
350 South Grand Ave., 50th Floor
Los Angeles, CA 90071

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
for the
District of Columbia

NETFLIX WORLDWIDE ENTERTAINMENT, LLC;)
NETFLIX STUDIOS, LLC)
)
)
)
<i>Plaintiff(s)</i>)
v.)
ABIGAIL BARLOW d/b/a ABIGAIL BARLOW)
PUBLISHING; EMILY BEAR d/b/a JORDAN KING)
MUSIC USA; PINK & PURPLE LADY, INC.; and)
BARLOW & BEAR, LLC)
<i>Defendant(s)</i>)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Emily Bear d/b/a Jordan King Music USA
c/o Kenneth D. Freundlich
Freundlich Law
16133 Ventura Blvd., Ste. 645
Encino, California 91436

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Rose Leda Ehler
Munger, Tolles & Olson LLP
350 South Grand Ave., 50th Floor
Los Angeles, CA 90071

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

UNITED STATES DISTRICT COURT
 for the
 District of Columbia

NETFLIX WORLDWIDE ENTERTAINMENT, LLC;)
NETFLIX STUDIOS, LLC)
)
)
<hr/>)
<i>Plaintiff(s)</i>)
)
v.	Civil Action No.
)
ABIGAIL BARLOW d/b/a ABIGAIL BARLOW)
PUBLISHING; EMILY BEAR d/b/a JORDAN KING)
MUSIC USA; PINK & PURPLE LADY, INC.; and)
BARLOW & BEAR, LLC)
<hr/>)
<i>Defendant(s)</i>)

SUMMONS IN A CIVIL ACTION

To: (*Defendant's name and address*) Pink & Purple Lady, Inc.
 c/o Kenneth D. Freundlich
 Freundlich Law
 16133 Ventura Blvd., Ste. 645
 Encino, California 91436

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Rose Leda Ehler
 Munger, Tolles & Olson LLP
 350 South Grand Ave., 50th Floor
 Los Angeles, CA 90071

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

TO:

**Register of Copyrights
U.S. Copyright Office
101 Independence Ave. S.E.
Washington, D.C. 20559-6000**

**REPORT ON THE
FILING OR DETERMINATION OF AN
ACTION OR APPEAL
REGARDING A COPYRIGHT**

In compliance with the provisions of 17 U.S.C. 508, you are hereby advised that a court action or appeal has been filed on the following copyright(s):

<input checked="" type="checkbox"/> ACTION <input type="checkbox"/> APPEAL		COURT NAME AND LOCATION United States District Court for the District of Columbia	
DOCKET NO.	DATE FILED 7/29/2022		
PLAINTIFF NETFLIX WORLDWIDE ENTERTAINMENT, LLC; NETFLIX STUDIOS, LLC		DEFENDANT ABIGAIL BARLOW d/b/a ABIGAIL BARLOW PUBLISHING; EMILY BEAR d/b/a JORDAN KING MUSIC USA; PINK & PURPLE LADY, INC.; and BARLOW & BEAR, LLC	
COPYRIGHT REGISTRATION NO.	TITLE OF WORK		AUTHOR OR WORK
1 See attached	See attached		See attached
2			
3			
4			
5			

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

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

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

COPY ATTACHED <input type="checkbox"/> Order <input type="checkbox"/> Judgment	WRITTEN OPINION ATTACHED <input type="checkbox"/> Yes <input type="checkbox"/> No	DATE RENDERED
CLERK	(BY) DEPUTY CLERK	DATE

- 1) Upon initiation of action,
mail copy to Register of Copyrights 2) Upon filing of document adding copyright(s),
mail copy to Register of Copyrights 3) Upon termination of action,
mail copy to Register of Copyrights

DISTRIBUTION:

- 4) In the event of an appeal, forward copy to Appellate Court 5) Case File Copy

Netflix Worldwide Entertainment, LLC v. Abigail Barlow, et al.
Copyrighted Works

Title	Copyright Claimant(s)	Registration Number	Registration Date
Bridgerton, Diamond of the First Water (Season 1, Episode 1)	Netflix Worldwide Entertainment, LLC	PA 2-277-750	January 8, 2021
Bridgerton, Shock and Delight (Season 1, Episode 2)	Netflix Worldwide Entertainment, LLC	PA 2-277-759	January 8, 2021
Bridgerton, Art of the Swoon (Season 1, Episode 3)	Netflix Worldwide Entertainment, LLC	PA 2-277-752	January 8, 2021
Bridgerton, An Affair of Honor (Season 1, Episode 4)	Netflix Worldwide Entertainment, LLC	PA 2-277-739	January 8, 2021
Bridgerton, The Duke and I (Season 1, Episode 5)	Netflix Worldwide Entertainment, LLC	PA 2-277-737	January 8, 2021
Bridgerton, Swish (Season 1, Episode 6)	Netflix Worldwide Entertainment, LLC	PA 2-277-733	January 8, 2021
Bridgerton, Oceans Apart (Season 1, Episode 7)	Netflix Worldwide Entertainment, LLC	PA 2-277-731	January 8, 2021
Bridgerton, After the Rain (Season 1, Episode 8)	Netflix Worldwide Entertainment, LLC	PA 2-277-769	January 8, 2021