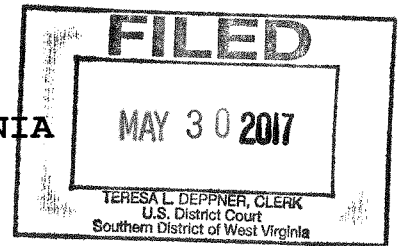


UNITED STATES DISTRICT COURT
SHOUTERN DISTRICT OF WEST VIRGINIA
CHARLESTON



SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: 2:17-cv-3079

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE

(DEFENDANTS)

**COMPLAINT FOR COPYRIGHT INFRINGEMENT AND
REQUEST FOR INJUNCTION**

I. PARTIES TO THE COMPLAINT

A. THE PLAINTIFF(S)

Provide the information for each plaintiff named in the complaint. Attach additional pages if needed.

Name Sherry A. Tulk
Street Address P.O. Box 3921
City and County Charleston, Kanawha
State and Zip Code WV 25339
Telephone Number 304.859.1596/681.205.9839
E-mail Address

B. The Defendant(s)

Provide the information for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Plaintiff, Sherry A. Tulk, filing Complaint against defendants additional defendants,

Defendant No. 1
Name West Virginia University
Job or Title (if known)
Street Address 1511 University Avenue
City and County Morgantown,
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.0111
E-mail Address (if known)

Defendant No. 2
Name Gordon Gee
Job or Title (if known) President
Street Address West Virginia University, 1511 University Avenue
City and County Morgantown,
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.5531
E-mail Address (if known) presidentsoffice@mail.wvu.edu

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Defendant No. 3

Name West Virginia Reed College of Media
Job or Title (if known)
Street Address WVU Reed College of Media, West Virginia
University, 1511 University Avenue
City and County Morgantown, Monongalia
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.3505
E-mail Address (if known)

Defendant No. 4

Name Chad Mezera
Job or Title (if known) Assistant Dean, Director of Online Programs,
including the Master of Integrated Marketing Communications (IMC)
Street Address WVU Reed College of Media, West Virginia
University, 1511 University Avenue
City and County Morgantown, Monongalia
State and Zip Code WV 26506-6010
Telephone Number 304.293.5903
E-mail Address (if known) chad.mezera@mail.wvu.edu

Defendant No. 5

Name Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication
Job or Title (if known)
Street Address Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication, Old Main 216, 1 Marshall Dr
City and County Huntington, Cabell
State and Zip Code WV 25755
Telephone Number 304.696.3977
E-mail Address (if known)

Defendant No. 6

Name Jerome Gilbert
Job or Title (if known) President
Street Address Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication, Old Main 216, 1 Marshall Dr
City and County Huntington, Cabell
State and Zip Code WV 25755
Telephone Number 304.696.3977
E-mail Address (if known) president@marshall.edu

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. Section 1331, a case arising under the United State Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. Section 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than

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\$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Article I, Section 8, Clause 8, of the U.S. Constitution and Title 17, U.S. Code Copyright Law, (patent pending reference to Title 35, U.S. Code, Patent Law - simply for the fact that a recently submitted patent document was access.)

B. If the Basis for Jurisdiction is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Sherry A. Tulk, is a citizen of the State of West Virginia

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. The defendant is an individual

The defendant (name) __, is a citizen of the State of (name) __ (foreign national) _.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

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3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

While a specific amount cannot be computed based on actual profits and revenue, due to the status of startup, for a number of reasons, including ongoing legal issues, such as this case. A range of costs for social media marketing, such as business board offers typically runs between a few hundred to \$20,000 per month, approximately, at an average just below \$10,000. Costs vary upon extent of online services utilized, from website promotion, social media use, and the number of social media promotions, and other services such as lead generation, and website traffic and analytics.

This summary provides very general information, the intent is to clarify potential losses for ongoing legal issues, in part. Further, the issue is more drastically felt as a damage to Ms. Tulk's startup business, and the market confusion created when institutions such as West Virginia University, West Virginia University Reed College of Media, and Marshal University, promote the protected strategy, as a non-protected writing, message and a written business methodology work with copyright protection, and anticipated patent protection.

The multiplier of such damage has enormous potential to impact service, business profits, primarily based on a market confusion and infiltration of industry leader use prior to even startup.

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

As temporary resident of a dvs, I printed in the office on the pc provided; recent completed documents for my business marketing strategy, a new business process. These documents were then forwarded via United Parcel Service, 2-day priority, to the USPTO, (United States Patent and Trademark

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Office) in Alexandria Virginia, customer care counter, to be added and included in the existing package, of a Nonprovisional patent.

It was within days, that I began seeing this most recent detailed written work in writing elsewhere. For example, positions for employment received via email job notifications, via indeed.com.

The INTEGRATED Marketing Conference was another I stumbled on. This conference even more devastating to Ms. Tulk's Copyright, is a compilation of my entire marketing strategy, and led me to discover my marketing strategy in use by WVU Reed College of Media and their student program. Further, this is not the first and only of my work promoted and programmed by WVU.

An addition to this recent event, access can be established prior, when I applied for the initial provisional patent application. In order to ensure as much protection as possible during the application process while I pursued patent protection of my created strategy, I travelled from Charlestown, WV to Morgantown, WV, to the USPTO PRC, Public Resource Center, to complete the Nonprovisional application. While there, the PRC pc provided somehow did not read my flashdrive, and I was offered a WVU laptop for use. The offered laptop by the PTRC staff, Marian Armour-Gemmen, did read my flashdrive, and Ms. Gemmen sat with me while I proceeded through the online process. When complete, I clicked submit, and was returned to the first page - a blank application page. There was never a confirmation or completed application received. This prompted me to check with the USPTO customer service number, who informed me an application was not received. I therefore quickly filled out another application and submitted the next day, which did complete, of which, I received a confirmation of completion.

B. What date and approximate time did the events give rise to your claim(s) occur?

The final document forwarded to the USPTO was printed _____, and forwarded to the USPTO via two-day, on _____, and confirmed received on _____, approximately 10:30am.

1. The promoted INTEGRATED Mass Communications & Marketing Conference, is scheduled for June 5, 2017.
2. The initial date of provisional application was _____, and the second application was submitted _____.

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3. (Plaintiff, Ms. Tulk, has withheld information regarding the copyright and patent application, as a matter of Claiming Privilege or Protecting Trial-Preparation Materials, as a reserved right under Fed R. Civ P 26(b)(5) and 26(c).)

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Ms. Tulk pursued protection of her newly developed business marketing strategy: copyright; and patent; _____. (Plaintiff, Ms. Tulk, has withheld information regarding the copyright and patent application, as a matter of Claiming Privilege or Protecting Trial-Preparation Materials, as a reserved right under Fed R. Civ P 26(b)(5) and 26(c).)

Despite seeking protection, and taking care to protect through the development stage as Ms. Tulk worked on her business plan, business start, funding and other forms of assistance, protection via copyright and, patent, and two crowdfunding campaigns, the plan was accessed and in use by WVU, WVU Reed College of Media, and now as a Conference, partnering with Marshall University.

The most recent documents Ms. Tulk completed and forwarded to the USPTO office for adding to her patent application, have also been accessed, and is now in use by WVU Reed College of Media and Marshall University as a conference in addition to the academia and student programming. The Conference is scheduled for June 5, 2017. Additionally, as Ms. Tulk continued work on her business, from pursuit of a crowdfunding campaign, to start of a blog, and learning relevant technology - each step Ms. Tulk has taken, appears to have been incorporated over time, as a pattern of monitoring for accessing Ms. Tulk's latest work continues; while this started in Ohio, continued through 7 moves, and is as prevalent here in West Virginia, as it was in Ohio. For example, the student organization associated with the WVU Reed College of Media now has a blog, and used keywords and ideas from Ms. Tulk's blog - Powerful and Culture, for example, and her personal references on several occasions of a foodie focus; diverse and healthy, diversity, and Appalacia/poverty.

Another noteworthy aspect regarding access, is my use of the flashdrive in a Cabell County public library, pc, briefly, to access another document on the same flash drive used to print my latest and recent patent document, on 3 occasions.

—

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Monetary damages at a later time, would not suffice to adequately compensate for injuries sustained, and are sustaining, and in the future will sustain as a result of these events and infringement, for the following reasons:

1. That defendants have, unbeknownst to plaintiff, not only been utilizing Ms. Tulk's new business marketing strategy, since the time of defendants access, but teaching said strategy, to many, as a revamped marketing program. Further, the more recent incorporation of the latest detail of the strategy acquired, in an illicit manner, reinforces the immediate, and ongoing damages into the future, as does having incorporated into the marketing academic program and degree. Adding to this, is the Conference based on Ms. Tulk's more recent detail of her invention, and two of West Virginia well-known institutions of higher learning partnering, expands this aspect of damages in a domino affect, as it ensures multiplying spreading a protected intellectual property, by copyright and patent, which Ms. Tulk pursued for her own use and business method.

2. The spreading from multiplying knowledge of the strategy, will have an ongoing, destructive impact to not only the business which the marketing strategy was started to utilize, but, to profits and the protection of a copyright and patent. The Constitution and Legislation provides protection for a determined period to encourage invention and economic benefit for individual inventor, and thus the U.S. economy. That protected time-period is and will further be, eliminated by the dissemination of the strategy through such education and conference programs. Ms. Tulk is determined to use her monopoly privilege period of protection, as an inventor. In addition, the past, present and future loss of such protection, and other aspects of this ongoing saga, is eroding the time period of protection without use, which although is indefinite for the life of an authored work of copyright, the established period is only twenty years for a patent -

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and the clock is ticking focused on legal battles such as this, prior, and other future.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim are entitled to actual or punitive money damages.

Estimated profit loss for each knowledge spread is approximately _____

Additional damages include beyond dissemination via the WVU and WVU Reed College of Media use of my marketing strategy, of not only the last 2.5 years, but also more recent of the more detailed portion of the protected work, from approximately April 2017.

Other damages include advertisement of the INTEGRATED Marketing Conference by WVU and Marshall.

Further damages include the loss of time, spent dealing with the acquisition and infringement of, a protected business process, via copyright and patent pending. This adds to the existing stress of a new startup business owner, as does the additional time-constraints of pro-se litigation for, and dealing with the the ongoing monitoring to determine if I'm taking legal recourse for the actions, and what my plans are. For these reasons, I also ask the court for reasonable attorney fees, and any other damages the court deems acceptable for such Goliath acts.

The acts resulting in this legal recourse, as are the initial acts through this court, questionable as to motive and intent beyond civil. Therefore, Ms. Tulk is respectfully requesting reasonable damages for such irreparable harm and damages to her protected property, most importantly for an injunction of the Scheduled Conference of June 5, 2017, removal of all from academic and student programming and any related activities, literature, website promotions, physical promotions, on-campus programming and promotions, etc. and for any and all damages deemed suitable for the entirety of the acts, of monetary damages equivalent to such extensive damages, and in addition to Injunction as previously referred.

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VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/26/2016

Signature of Plaintiff  _____

Printed Name of Plaintiff SHERRY A. TULK

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

Tulk, Sherry A.

05/26/2017

Defendant No. 1

Name West Virginia University
Job or Title (if known)
Street Address 1511 University Avenue
City and County Morgantown,
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.0111
E-mail Address (if known)

Defendant No. 2

Name Gordon Gee
Job or Title (if known) President
Street Address West Virginia University, 1511 University Avenue
City and County Morgantown,
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.5531
E-mail Address (if known) presidentsoffice@mail.wvu.edu

Defendant No. 3

Name West Virginia Reed College of Media
Job or Title (if known)
Street Address WVU Reed College of Media, West Virginia
University, 1511 University Avenue
City and County Morgantown, Monongalia
State and Zip Code West Virginia 26506-6010
Telephone Number 304.293.3505
E-mail Address (if known)

Defendant No. 4

Name Chad Mezera
Job or Title (if known) Assistant Dean, Director of Online Programs,
including the Master of Integrated Marketing Communications (IMC)
Street Address WVU Reed College of Media, West Virginia
University, 1511 University Avenue
City and County Morgantown, Monongalia
State and Zip Code WV 26506-6010
Telephone Number 304.293.5903
E-mail Address (if known) chad.mezera@mail.wvu.edu

Defendant No. 5

Name Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication
Job or Title (if known)
Street Address Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication, Old Main 216, 1 Marshall Dr
City and County Huntington, Cabell
State and Zip Code WV 25755
Telephone Number 304.696.3977
E-mail Address (if known)

Defendant No. 6

Name Jerome Gilbert
Job or Title (if known) President

Tulk, Sherry A.

05/26/2017

Street Address Marshall University, Marshall University W. Page
Pitt School of Journalism & Mass Communication, Old Main 216, 1 Marshall Dr
City and County Huntington, Cabell
State and Zip Code WV 25755
Telephone Number 304.696.3977
E-mail Address (if known) president@marshall.edu

UNITED STATES DISTRICT COURT
SHOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: _____

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE
(DEFENDANTS)

**COMPLAINT FOR COPYRIGHT INFRINGEMENT AND REQUEST FOR INJUNCTION
AND DEFENDANT ENJOINING SUBPOENA**

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

To: CHAD MEZERA

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place:

Courtroom No: _____

Date and Time: _____

You must also bring with you the following documents, electronically stored information or objects (*leave blank if not applicable*):

ANY & ALL RELEVANT TO THE LISTED PROGRAMS & EVENTS OF THE COMPLAINT

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT:

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) SHERRY A. TULK, who issues or requests this subpoena, are:

SHERRY A. TULK
P.O. BOX 3921
CHARLESTON, WV 25339
304.859.1596
681.205.9839

If this subpoena commands the production of documents, electronically stored information, or tangible things before it is served on the person trial, a notice and a copy of subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
SHOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: _____

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE
(DEFENDANTS)

**COMPLAINT FOR COPYRIGHT INFRINGEMENT AND REQUEST FOR INJUNCTION
AND DEFENDANT ENJOINING SUBPOENA**

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

To: JEROME GILBERT, AFFILIATES
(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: _____ Courtroom No: _____
Date and Time: _____

You must also bring with you the following documents, electronically stored information or objects (*leave blank if not applicable*):

ANY & ALL RELEVANT TO THE LISTED PROGRAMS & EVENTS OF THE COMPLAINT

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Date: _____

CLERK OF COURT:

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) SHERRY A. TULK, who issues or requests this subpoena, are:

SHERRY A. TULK
P.O. BOX 3921
CHARLESTON, WV 25339
304.859.1596
681.205.9839

If this subpoena commands the production of documents, electronically stored information, or tangible things before it is served on the person trial, a notice and a copy of subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**UNITED STATES DISTRICT COURT
SHOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON**

SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: _____

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE
(DEFENDANTS)

**COMPLAINT FOR COPYRIGHT INFRINGEMENT AND REQUEST FOR INJUNCTION
AND DEFENDANT ENJOINING SUBPOENA**

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

TO: GORDON GEE, AFFILIATES
(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: _____ Courtroom No: _____
Date and Time: _____

You must also bring with you the following documents, electronically stored information or objects (*leave blank if not applicable*):

ANY & ALL RELEVANT TO THE LISTED PROGRAMS & EVENTS OF THE COMPLAINT

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Date: _____

CLERK OF COURT:

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) SHERRY A. TULK, who issues or requests this subpoena, are:

SHERRY A. TULK
P.O. BOX 3921
CHARLESTON, WV 25339
304.859.1596
681.205.9839

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UNITED STATES DISTRICT COURT
SHOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON

SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: _____

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE
(DEFENDANTS)

**COMPLAINT FOR COPYRIGHT INFRINGEMENT AND REQUEST FOR INJUNCTION
AND DEFENDANT ENJOINING SUBPOENA**

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

TO: MARSHALL UNIVERSITY, AFFILIATES

(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

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Date: _____

CLERK OF COURT:

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) SHERRY A. TULK, who issues or requests this subpoena, are:

SHERRY A. TULK
P.O. BOX 3921
CHARLESTON, WV 25339
304.859.1596
681.205.9839

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UNITED STATES DISTRICT COURT
SHOUTHERN DISTRICT OF WEST VIRGINIA
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SHERRY A. TULK
(PLAINTIFF)

v.

CASE NUMBER: _____

MARSHALL UNIVERISTY, JEROME GILBERT, WEST VIRGINIA UNIVERSITY, (WVU), WEST VIRGINIA STATE UNIVERSITY REED COLLEGE OF MEDIA, CHAD MEZERA, GORDON GEE
(DEFENDANTS)

COMPLAINT FOR COPYRIGHT INFRINGEMENT AND REQUEST FOR INJUNCTION
AND DEFENDANT ENJOINING SUBPOENA

SUBPOENA TO APPEAR AND TESTIFY AT A HEARING OR TRIAL IN A CIVIL ACTION

TO: WEST VIRGINIA UNIVERSITY, AFFILIATES
(Name of person to whom this subpoena is directed)

YOU ARE COMMANDED to appear in the United States district court at the time, date, and place set forth below to testify at a hearing or trial in this civil action. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

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Date: _____

CLERK OF COURT:

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) SHERRY A. TULK, who issues or requests this subpoena, are:

SHERRY A. TULK
P.O. BOX 3921
CHARLESTON, WV 25339
304.859.1596
681.205.9839

If this subpoena commands the production of documents, electronically stored information, or tangible things before it is served on the person trial, a notice and a copy of subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

