

INFRINGEMENT CLAIMS AGAINST DEFENDANTS WARNERMEDIA, WARNER BROTHERS & J.K. ROWLING, FOR INFRINGING THE PLAINTIFF'S ORIGINAL WORK (*13 GATES OF RANE*), BY PUBLISHING THEIR THREE INFRINGING BOOKS AND FILMS, TITLED:

“HARRY POTTER AND THE ORDER OF THE PHOENIX”

“HARRY POTTER AND THE HALF-BLOOD PRINCE”

“HARRY POTTER AND THE DEATHLY HALLOWS”

This section (beginning under the following bold and numbered headings) enumerates the Plaintiff's infringement claims against Defendants WarnerMedia, Warner Bros, and J.K.Rowling (referred to, in this section, as “the Defendants”) for publishing infringing derivative works “Harry Potter and the Deathly Hallows” (**HPDH**), a book purportedly written by JK Rowling, July 2007, and the Warner Bros film adaptations, “Harry Potter and the Deathly Hallows, Part 1” (**HPDHp1**), 2010, and “Harry Potter and the Deathly Hallows, Part 2” (**HPDHp2**), 2011. At times, in the following claims/comparison, “**HPDH**” may refer to the book or either film adaptation. HPDH infringes **43** structures of the Plaintiff's screenplay *13 gates of Rane* story outline (**Ex A**), in 2006. In its evaluation of these claims, the Court should contemplate:

1. Many of the following claims contain numerous creative elements, these complex items should be assessed in the larger collection, AND as separately protectable expressions.
2. Some of the following ideas are original ideas (or extremely rare ideas), and should be weighed accordingly; as two or more *original* ideas replicated in an allegedly infringing work is *prima facie* evidence of infringement.

The 43 story aspects that the Defendants' HPDH infringes from the Plaintiff's screenplay are enumerated under the following 43 **bold**, numbered headings. Some of the 41 infringement claims are prefaced with the words “Scene”, “Dialogue”, “Style”, or “Setting”, as certain items infringe both *central story structures* and signature scene, dialogue, setting and style elements.

The Plaintiff conceived and documented this “scavenger hunt” plot structure sometime between Summer 2001 and January 2002, in a bedtime story to his son (told over a period of 3 nights). Shortly thereafter, between fall 2001 and February 2002, the Plaintiff decided to actually write the story. It could not have been after spring 2002, for the reasons explained in the Plaintiff’s Original Works History and Access sections (namely, 13 Gates was written on Mac/Apple; the Plaintiff sold his Apple computer in mid 2002, and has remained on Windows from 2002 to the present).

JK Rowling released her first 4 books, one each consecutive year (1997, 1998, 1999, 2000). But after the Plaintiff recorded his story outline (and very rough sample sections/chapters) of his book series (in early 2002), suddenly Rowling next (fifth) book was delayed by two years, and was not released until June 2003 (UK), and June 2004 (US).

In 2003, after a 2 year delay, and about 1.5 years after the Plaintiff recorded his “scavenger hunt” story outline , JK Rowling and Warner Bros introduced a new Harry Potter “scavenger hunt” storyline in sixth book, Harry Potter and the Half-Blood Prince (**HPHBP**). This storyline would also continue and dominate the entire final book, Harry Potter and the Deathly Hallows (**HPDH**). To infringe this “scavenger hunt” plotline, Warner Bros and Rowling would entirely abandoned the previous Harry Potter formula. In HPHBP, the hero, Harry Potter, learns that before he can defeat Voldemort, he must destroy six “horcruxes” (items in which Voldemort stored and hid part of his soul). The horcruxes Harry must find are (1) **a ring** (which Dumbledore finds in HPHBP, **but continues to factor into HPDH**), (2) **a crown** (“diadem”, the Diadem of Ravenclaw), (3) a locket (**necklace**), (4) **a cup** (which holds liquid, like a **flask**), and (5) a snake. There is also a *diary* (Tom Riddle’s diary) which was featured in 1998’s Chamber of Secrets, which, in 2005, the writers suddenly claimed was a horcrux, which was conveniently

destroyed in the second book. [In 2005, Warner Bros and Rowling claimed the diary was a horcrux, in an unlawful effort to backdate their infringement the Plaintiff's concept of *enchanted items* which must be found to defeat the villain (these *enchanted items* copyright claim element that is explored later), by connecting the newly introduced (2005) concept of "horcruxes" to the previously introduced *Riddle diary* (1998).] Adding to this "scavenger hunt", in HPDH, we learn that Harry Potter must also find the **Resurrection Stone**, and may want to find the **Elder Wand**. Further, HPDH readers learn that to destroy the horcruxes, Harry ALSO need to find the **Sword of Gryffindor** (which is now conveniently missing since it last appeared in Chamber of Secrets, 1998). Thus, Harry must find 6 or 7 lost items before he can defeat the villain. AND, just like the Plaintiff's work, **time is running out**, as Voldemort will strike soon, and he will not be defeat-able until every horcrux is found and destroyed. All of this infringes the Plaintiff's work.

1. PLOT/CHARACTERS/SCENE: The Villain, From Miles Away*, Telepathically Speaks Into The Hero's Mind/Dreams, And Taunts The Hero That He (The Villain) Has Killed Or Harmed The Hero's Father (Father-Figure Or Loved One). But The Taunt Is A Lie. (*The Villain Can Also Invade Minds/Dreams At Close Range.)

- ★ The Plaintiff believes this is an original, **independently copyrightable** expression, as it is composed of several independent elements (1. A villain who telepathically speak into the hero's dreams/mind; 2. A villain who can do this from miles away; 3. a telepathic taunt; 4. A villain who taunts that he has killed/harmed the hero's father—or father-figure or family member; 5. the taunt is a lie. HPOP and HPDH infringe each of these aspects.
- ★ The Plaintiff believes that his villain who can invade and speak into the hero's mind and dreams from miles away is (or may be) also an original idea (or was in 2001-02).
- Some of the elements of this composite structure (listed above) are also listed, herein, in a smaller grouping, separately, because the Defendants infringed smaller grouping(s) of the Plaintiff's work/ideas.

Page 1 of the Plaintiff's *13 Gates of Rane* story outline explains: **“Gormatu actually talks to Joey in his dream —taunts him that he killed his father.”** Later, on page 30, the Plaintiff wrote: **“Joey Falls asleep on ride home—Gormatu comes to him in a dream.”**

Gormatu, the villain, is a “dream walker.” Page 11 of the Plaintiff's story notes explains that **“Dream walkers are able to leave their bodies in their dreams and enter into the minds of others through their dreams.”** The Plaintiff distinguished “mind” from “dream,” to make it clear that when Gormatu or other dream walkers enter a mind, the “host” knows the visiting entity is there, and knows the experience is real (not like a dream), and the experience is as vivid and memorable as real life. To reinforce this, pages 10 and 11 show that when dreamwalkers (Rane and Demjunuk) speaks into or enter another entities mind/dream, the host remembers every word, and understands that the visitor/invader is an actual and separate entity.

On pages 4, 5, 6, 17 and 24 of the Plaintiff's outline we see that Joey's father is still alive, and will remain alive—at least until the final battle: Page 4: “Joey finds and frees father”; Page 5: “Joey finds long lost father”; Page 6: “Joey battle alongside long lost father”; Page 6: “In the end Joey will go back to the Planet where his father last battled Gormatu. And wage war against Gormatu with his father along the coast.” Page 24: “Joey's dad found ring. Dark forces after Joey's dad,” and “Joey's Dad tell Joey about his discovery that...”; Page 17, 24: “Thirteenth door is the gate of time -Joey goes through in the end to meet his father”

Thus, Gormatu's cruel taunt, that Joey's father had been murdered, was a lie.

In the first 3 Harry Potter (**HP**) books Harry has no interesting dreams, and no telepathic connection to Voldemort. **In the 4th book** (HP & the Goblet of Fire), Harry has two dreams in which he sees Voldemort do evil deeds. Harry witnesses Voldemort murder Frank Bryce in chapter 2, and he witnesses Voldemort torture Peter Petigrew, in chapter 29. But when Harry observes Voldemort in these dreams he is an invisible observer, who flies into the Riddle House on the back of an owl. There was no telepathic link to Voldemort, or even a suggestion of a telepathic link. Harry was no more connected to Voldemort than he was to Petigrew or Bryce.

But roughly a year and a half after the Plaintiff recorded his 13 Gates outline, suddenly in the fifth HP book, *Harry Potter and the Order of the Phoenix* (**HPOP**; June 2003 UK, June 2004 US) and in seventh book, *Harry Potter and the Deathly Hallows* (**HPDH**; July 2007), Voldemort has the ability to invade Harry's dreams and mind, and speak to him from miles away—and he does so to taunt Harry. Voldemort's taunt involves 5 aspects: (1) Voldemort telepathically speaks into Harry's mind; (2) he does so from miles away; (3) he taunts Harry; (4) he taunts that he is about to torture and likely kill Harry's godfather, Sirius; (5) in truth, Voldemort had not harmed Sirius; thus, the taunt was a lie. All of this infringes the Plaintiff's work.

2. PLOT: The Hero Learns That Before The Hero Can Defeat The Villain, The Hero Must Find Various Items, Which Are Known To The Hero, And Which Happen To Be Enchanted. But Time Is Running Out. The Villain Will Attack Soon, And All Items Must Be Found Before The Villain Can Be Defeated. (The Plaintiff Calls This A “Scavenger Hunt”, Time-Countdown Plot, Which He May Have Conceived.)

★ The Plaintiff believes this plot structure, “a hero who [1] needs to find numerous/multiple enchanted items, which [2] are known to the hero from the outset, [3] before the hero can defeat the villain, [4] but time is running out, and [5] the villain will attack soon,” is original, and independently copyrightable, as it contains numerous creative elements. There are video games that require players to find various items along the way, but the items are revealed as the player progresses (the detective model: one clue leads to another). But in the Plaintiff’s plot, the required or sought after items are known from the outset; finding them *in time* is the challenge. ¹

- Many other *plot* elements are collectively claimed under item #37, in this section.

In *13 Gates of Rane*, the young hero, Joey Raymond (later named Danny Zander) must find the 13 items of the *Enchanted Armory*. These 13 items include: a crown (**Seran’s Crown**), a seemingly unbreakable sword (**Dire’s Blade**), a bag that seems to have an unlimited capacity (the **Harvester’s Bag**), an item that can hold liquid (the **Flask of Derjentaydo**), a ring (**Ring of All**), and a necklace (**Necklace of Dreams**). But time is running out for Joey. The villain will arrive and attack soon, and the hero(s) must collect these items before the villain attacks.

In 2003, 1.5 years after the Plaintiff recorded his 13 gates “scavenger hunt” story outline, the Defendants introduced a new and infringing Harry Potter “scavenger hunt” storyline in sixth book, Harry Potter and the Half-Blood Prince (**HPHBP**). This storyline would also

¹ In 2003, the same year HPOP was released (and roughly 1.5 years after the Plaintiff introduced his *scavenger hunt* plot, in which a hero seeks 13 ancient items), Dan Brown released his book *The Da Vinci Code*, in which the hero finds a few ancient items to solve a mystery. However, although there is similarity, *The Da Vinci Code* adheres to the traditional “sequential” detective model (one clue leads to another) structure.

dominate the entire final book, HPDH. To infringe this “scavenger hunt” plotline, the Defendants would entirely abandoned the previous HP formula. In HPHBP, the hero, Harry, learns that before he can defeat Voldemort, he must find and destroy six “horcruxes” (items Voldemort stored or hid part of his soul in). The horcruxes that must be found and destroyed are (1) **a ring** (which Dumbledore finds in HPHBP), (2) **a crown** (“diadem”, the Diadem of Ravenclaw)², (3) a locket (**necklace**), (4) **a cup** (a container that holds liquid—like a **flask**), and (5) a snake. There is also a *diary* (Tom Riddle’s diary) which was featured in 1998’s HPCS, which, in 2005, the writers suddenly claimed was a horcrux, conveniently destroyed in HPCS.³ Adding to the Defendants’ *scavenger hunt* plot, in HPDH, we learn (1) that Harry Potter must also find the Resurrection Stone, and may want to find the **Elder Wand**, (2) to destroy the horcruxes; Harry ALSO needs to find the **Sword of Gryffindor** (conveniently missing since it last appeared in HPCS). Thus, Harry must find 6 or 7 lost items before he can defeat the villain. AND, just like the Plaintiff’s work, **time is running out**, as Voldemort will strike soon, and he will not be defeat-able until all of the horcruxes are found and destroyed. In creating this *scavenger hunt* plotline, the Defendants infringed the Plaintiff’s work.

3. The Villain Speaks Into, Or Enters Into, The Hero’s Mind Or Dreams. The Villain Can Use This Ability Even If He Is Many Miles Away From The Hero/Host.

- ★ The Plaintiff believes this expression may be an original idea. It is possible this idea was executed before the Plaintiff (2001, 2002); however, the Plaintiff is **not** aware of any prior work featuring this concept. [NOTE: This concept differs from, say, *Nightmare on*

² The Diadem of Ravenclaw is the only horcrux which was not known to Harry Potter by the end of HPHBP; thus, Harry had to “solve” what this final horcrux was in the end of HPDH; this nuanced alteration is immaterial under the concept of *insignificant difference* (or *changes*).

³ In 2005, the Defendants retroactively claimed the Riddle diary was a *horcrux*, to unlawfully backdate their infringement of the Plaintiff’s work to before the Plaintiff conceived the ideas, by connecting the new (2005) concept of *horcruxes* to the prior *Riddle diary* (1998); besides this being false and unlawful, the problems with the horcrux story are addressed in the **introduction**.

Elm Street, where *Freddy* enters his victim's dreams, because *Freddy* has no physical body (he is a ghost, killed in the real world years earlier), thus, he did not speak into his victim's mind, **miles away** from his body (as he had no body).]

- The Plaintiff believes this structure may be an independently copyrightable expression.

On page 1 of the Plaintiff's 13 Gates outline, the Plaintiff wrote: "Gormatu actually talks to Joey in his dream -taunts him that he killed his father." Later, on page 30 of the *13 Gates* outline, the Plaintiff wrote: "Joey Falls asleep on ride home -Gormatu comes to him in a dream." The 13 Gates outline also explains that Gormatu is doing this from a planet thousands of light years away. Further, the 13 Gates outline explains that the hero and villain have the ability to "dream walk," and they are "dream walkers." Page 11 of the 13 Gates outline explains: "Dream walkers are able to leave their bodies in their dreams and enter into the minds of others through their dreams." The Outline also make it clear that dreamwalkers can enter into the minds and dreams of others and communicate with the host. On page 10 of the 13 Gates outline, the Plaintiff wrote: "...Demjunuk dream walked into Rane's mind and introduced himself as the Great Wizard, Demjunuk. Demjunuk explained that..." And on page 21 of the Outline, he wrote: "Soon, Rane would dream walk to the greatest master magicians on each planet and warn them of Gormatu and his growing army of evil. The great magicians of each world, took Ranes's warning seriously. Soon, together, under Ranes leadership..." [sic]

The preceding shows the Plaintiff's villain and hero are "dream walkers," who can speak into or enter into a host's mind or dreams, sleeping or awake, from miles away, or close range.

HPOP and HPDH infringes the Plaintiff's concept, as the villain, Voldemort, can and does suddenly speak into, and enters into Harry's mind and dreams (and those of the other characters).

- Voldemort was not able to access, or speak into, Harry's mind in the first 4 HP books.

4. The Linear Primary Story Contains A Central Fairytale-Like Myth Story, Within-The-Larger-Story. This Myth Is Separate From The Primary/Outer Story, But Is Vital To, And Integrally Related To The Primary/Outer Story.

The Plaintiff's *13 Gates of Rane* outline uniquely featured several *fairytale-like myths within-the-larger-story*. These "fairytale-like myth stories" are unusual because they are presented within the larger linear story, but they are separate and distinct from the larger linear story (because the events in these mythic backstories occurred long ago, and all of the characters have long since died), yet these myths are related to the larger linear story. One of these myths can be seen on page 26 (Ex C), under the heading "Myths of the Good," another can be found on page 27 (Ex C), under the heading "Rane: Fleece of Dreams (Joey's Dad)." Yet another of these myths is the origin story of the 13 Gate of Rane, as told to Joey by Verdan, page 10 of the 13 Gates of Rane story outline (Ex C), mid-page, the section reads:

"But it was in waking from the nightmarish vision of Gormatu enslaving the nations of the Universe, Therion realized that his sight into the future was not a curse but a gift. For in waking from that dream he realized then that the fate of the universe might be avoided-if he acted against it. And so did.

"Therion understood magic was acquired with limits. And for all of Therion's great light magic, he could do nothing to stop the events he'd seen from occurring on distant other worlds. Such were the limits of his power. But Therion was only limited alone. But with the right help anything was possible. But who?

"The only other advanced magician Therion had ever encountered was Demjunuk, The Enchanter. Demjunuk was a magician from somewhere in a region of Earth now called Africa. Demjunuk had three great magic abilities:...

The Defendants' HPDH's infringes the Plaintiff's concept of a *fairytale-like backstory myth included within the larger story*, as it contains *The Tale of the Three Brothers* (chapter 21, HPDH), a fairytale-like mythic backstory, presented within the larger linear story, but separate from the larger story, yet related to the larger story. And, like the Plaintiff's story, *The Tale of the Three Brothers* fairytale-like myth occurred long ago and the characters have long since died.

- None of the prior Harry Potter books and films contain such fairytale-like myth.



Above: A panel from the animated *fairytale*, “The Tale of the Three Brothers,” from HPDHp2.

- In the film, this fairytale-like myth within-a-larger-story was so important that **for the first time**, the visual story departs from HP’s usual live-action approach, and presents the myth **entirely in animation**.

5. The Fairytale-like Myth Stories Reveal The Special Powers Of Items That The Hero Must Find, AND/OR Reveal The Origin/History Of The Items. The Hero Must Utilize The Power Of At Least One Of These Items To Prevail Against The Villain.

The Plaintiff’s fairytale-like mythic backstories (concerning the 13 items of the Enchanted Armory) uniquely **reveal (1) the origin and the special powers of central items that the hero(s) must find on his/her/their quest, and (2) reveal what powers these special items have**; meanwhile, the primary linear story inevitably reveals that (3) the hero will have to use these items and their powers to defeat the villain.

HPDH infringes the Plaintiff’s fairytale-like backstories, as the fairytale-like mythic backstory of *The Tale of the Three Brothers* (chapter 21, HPDH) reveals (1) the origin story of the Deathly Hallows (the Elder Wand, the Cloak of Invisibility, and the Resurrection Stone), and (2) reveals these item’s unique powers; meanwhile, the primary linear story reveals (3) the hero will need the power of at least one of these items (the Resurrection Stone) to defeat the villain.

6. The Hero Must Accept That He/She Cannot Succeed Alone, And Needs The Help Of Other Heroic Characters. (This Is A Huge Departure For Harry Potter.)

The Plaintiff wanted to create an original young hero, who must learn to cooperate, learn that he cannot do everything alone, and learn that people can be even **better together** (a theme of the Plaintiff's work). Supporting this, page 10 of the Plaintiff's story notes explains:

"Therion understood magic was acquired with limits. And for all of Therion's great light magic, he could do nothing to stop the events he'd seen from occurring on distant other worlds. Such were the limits of his power. But Therion was only limited alone. But with the right help anything was possible. But who?"

Page 5 of the Plaintiff's story notes explain that after Joey fails to defeat the villain, Joey is saved from death by his girl-friend:

Gormatu wounds Joey badly. As he prepare to finish Joey, Joey creates an illusion to distract him. Joey's girl-friend recognizes the distraction and rushes in to save him save Joey. His girlfriend takes the ring and Jolaya's arm and swings Yuli's mace three times and hurls it and carry him back to the cave. Gormatu breaks through the illusion just in time to see the girl escape with Joey. But the gate of Disaster is left open. Joey and girl go back to Verdan's home. Joey and the girl agreed that now that they know her heart is pure enough that she too can wear the great armory, she must put on the Armory and try to fight Gormatu

Pages 5 and 6 of the Plaintiff's story outline shows Joey's girl-friend go back to the battle (where Joey was defeated and failed to obtain the *Hand of Time*) and win the hand of time. This "learning to accept help from your friends" and "better together" theme echoes Therion's lesson.

The Defendants' HPOP, HPHBP and HPDH infringe the Plaintiff's work, as suddenly, in HPOP (and all following books), Harry continues to learn to accept help. The scene that best captures this occurs in HPOP (film 44:44, approx), when Luna tells Harry that she and her father believe Harry (that Voldemort is back). Harry replies, "It seems that you're about the only ones that do." And Luna replies, "**If I were [Voldemort] I'd want you to feel cut off too; because if you're all alone, you're not as much of a threat.**" Thus, Harry begins to accept help.

After HPOP, Harry continues to learn to accept help from others. Thus, in HPHBP, Harry

must allow Dumbledore to drink poison, so Harry's life is not risked. And, at the end of HPHBP, when Harry, alone, resolves to find the horcruxes (setting up the next book/films), Hermione reminds Harry that he can't do it alone: **"You need us, Harry."** (HPHBP, film at 22:22.)

But Harry accepting help from others, and allowing others to help him fight Voldemort, goes against ALL prior Harry Potter books. In the first 4 Harry Potter books, Harry fought ALL final battles against the villains **alone**. The message was: Harry Potter is so great and so brave to face the villain alone. Consider the conclusions of the first 4 books:

- a. In HPSS, in the grand final battle, Harry, isolated and alone, **fighters to save his own life**.
- b. In HPCS, in the grand final battle, Harry, isolated and alone, **fighters to save his own life**.

[Note: Tom Riddle explains that Harry is the person he intends to murder (chap 17, pb, p 312, 316-321). Tom says he only used Ginny to lure Harry into the Chamber (chap 17, pb, pp 312, 313). Of Ginny who lies helpless at their feet, Tom is indifferent, and guesses: "There isn't much life left in her." With Harry present (whom Tom wants to kill), neither Tom nor his basilisk show further interest in Ginny. After the Basilisk is killed, Tom expresses his preferences for killing Harry himself (p 322: "I prefer it this way, Just you and me, Harry Potter...you and me...."). Tom raises Harry's wand to kill Harry, but Harry stabs the diary with a basilisk fang, killing the diary—**saving himself**.]

- c. In HPPA, in the final grand battle, Harry, isolated and alone, **fighters to save his own life**.
- d. In HPGF, in the cemetery, Cedric is murdered by Wormtail. Voldemort then transforms into his powerful, original body. Thus, in the final grand battle, Harry, isolated and alone, **fighters to save his own life**. (It is certain that Rowling had Cedric's ghost ask Harry to bring his body back only so Harry's actions would help someone other than himself.)

But a 1.5 years after the Plaintiff created his 13 Gates of Rane story outline, suddenly the

Defendants changed the formula, for ALL of the remaining Harry Potter books and films. Thus, **in the final three books and four films**, in the final battles Harry's friends and allies help him defeat the villain and his minions. AND never again is Harry isolated and alone in the books' final grand battles. All of this departs from the HP formula, and infringes the Plaintiff's work.

7. The Story Features A Special Room (Or "Chamber" Or "Hall") With 12 Or 13 Unusual Doors (Or "Gates" Or "Portals") Around The Perimeter Of The Room. The 12-13 Doors Lead To Various Unlikely And Far-Fetched Places.

- ★ The Plaintiff believes this may be an independently copyrightable expression, as it is comprised of several components and is reasonably creative.

Pages 21 and 22 of the Plaintiff's outline notes explain how Rane coordinated with Seran and other magicians to make the Gates of Rane and the Cave of Dire (a large room, with 13 very large doors on its periphery) in the center of large, ancient space station, called *Seran's Chamber* (mentioned on page 19, and referred to as "Seran's hall" [sic] on page 30; see **Ex C**). The Cave of Dire is mentioned on page 20. The bottom of page 21 to the top of page 22 (Ex C) read:

He then instructed the magicians to make two gates, made of the same material as the weapon == teleport power Jewels embedded in the gates, the tools and the ring
He asked Seran, The projector, to imbue the gates with the powers of teleprojection
He then built a great sealed Chamber he named after Seran- where he put one of each of the great magicians gates. Rane then asked Seran to use his magic to use his magic to teleport the Chamber to a certain place in space. This was Seran's....

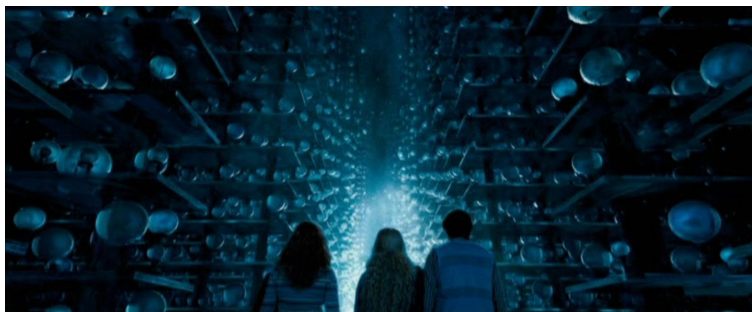
Each of 13 doors in Seran's Chamber led to one of 13 different planets, light years away.



Above: Harry and gang in the circular room with 12 doors. (Pic from HP Fandom.)

In Chapter 34 of **HPOP**, after Harry has a **dream/vision** that Voldemort was torturing Sirius Black behind a strange door at the Ministry of Magic headquarters, Harry and his friends race to the Ministry of Magic, where they find a circular room with **12 or 13 doors** (chapter 13 of HPOP, p 770, hb: “But there were **about a dozen doors** here.”) on the periphery of the room. Each door leads to a different and unlikely place. The first door leads to a large room with a giant aquarium full of brains, seemingly swimming in green fluid. The second door leads Harry and crew to a massive “amphitheatre”, with a rock floor, sunken 20 feet down, a stone archway (doorway) in the center, and a tattered curtain/veil covering the doorway (chap 34, p 770, hb). The third door leads to an enormous room (in the HPOP film the room is depicted as hundreds of feet long, hundreds of feet wide, and perhaps 60 feet high, dimly lit by countless glowing “prophecy orbs,” stacked on shelves, perhaps 50 feet high). Because the doors are close together but the rooms beyond them are extremely large, the doors defy reason and physics.

Thus, HPOP infringes the Plaintiff’s concept of *a strange room with 12 or 13 strange doors on the periphery, which lead to unlikely and far-fetched places*



Above: The room with hundreds of thousands of prophecy orbs (HPOP).

8. PLOT: The Heroes Who Are From A Sylvan (Wooded) Area Go To The Big City. The Story Includes A Central And Sustained Sequence In Which Young Heroes (From A Sylvan Community) Journey To The Big City. FISH OUT OF WATER.

The Plaintiff’s 13 Gates of Rane outline reveals that the hero lives in a small town in Colorado, with a hill behind his house—and a cave hidden in the hill. This sets up the “fish out

of water” structure, as small-town-Joey goes on an adventure to the big city, with his friend—the story’s secondary hero (referred to in the outline as “girl” and/or “Rebecca”). On page 1 of the 13 Gates outline (Ex C), the Plaintiff wrote:

Joey goes to bed and has a dream -about his dad and something coming to Earth and a light in shining on the hill behind his home.

On page 2 out the Plaintiff’s outline the Plaintiff wrote (Ex C):

*Joey hunts around with girl for Miguel Sierra -finds him 'on internet in NYC
Joey learns of whereabouts of Miguel Sierra (in New York City) He and Girl travel to NYC to get the arm of Jolaya.*

On page 3 of the Plaintiff’s outline, the Plaintiff wrote:

*Joey goes to see Miguel Sierra
Joey finds Miguel. Miguel tells Joey the story o the battle at Disaster. Then tells him the story of Jolaya's arm and gives him the arm.
Miguel Sierra explains that.....
...Miguel accompanies the kids back to Colorado with the arm of Jolaya.*

On page 30 of the Plaintiff’s story outline, the Plaintiff wrote:

*“Chapter 5
Joey goes to get the mace of Yuli -**Rebecca** comes along the two narrowly escape with their lives- Joey desperately flies them out of the unknown land almost out of control -almost dislocating his arm flying Rebecca , clinging to his feet out of harms way, back to Seran's hall.
Comes back and goes with Rebecca to the city to meet Miguel Sierra.
Miguel is now blind in one eye and missing an arm.
Miguel tells Joey about his dad and his past together. Joey shows Miguel the Harvester's bag. Miguel gives Joey the Arm of Jolaya.
Joey Falls asleep on ride home -Gormatu comes to him in a dream.
End Chapter 5”*

Page 18 of the Plaintiff’s 13 Gates outlines explains:

Introduce new neighbor girl -lives with her mom -hates life in the country.

The preceding passages outline the Plaintiff’s “fish out of water” story structure.

The Defendants’ HPDH infringes the Plaintiff’s fish-out-of-water structure. At about 36:09 into HPDHp1 (or HPDH, chapter 8 and 9), Voldemort’s Death Eaters attack a wedding that

Hermione, Ron and Harry are attending So Hermione teleports the gang to Shaftesbury Avenue, London, where the gang begins various adventures in the big city; infringing the Plaintiff's work.

- The Defendants may incorrectly suggest that Harry going to Hogwarts was a *fish out of water* element. Every story has a catalyst, which takes the protagonist out of their regular life and into the second act. Going to Hogwarts was a simple catalyst, not a *fish out of water* element.
- There is no *fish out of water* element in the first 5 Harry Potter books and films.

9. Villain's GOAL: Build An Army, Conquer The Earth/Universe, Enslave/Persecute.

Page 10 of the Plaintiff's 13 Gates of Rane story outline explains the villain Gormatu's 3-part goal: 1. Build an army; 2. Conquer the Earth and Universe; 3. Enslave and persecute (persecution is necessary because Gormatu feeds on suffering and misery).

For the first four HP books, **Voldemort's goal was attaining immortality** (Voldemort added the second goal of "killing Harry Potter" in HPGF). But 1.5 years after the Plaintiff composed his 13 Gates outline, **Voldemort's goal changed**, and he stopped speaking about immortality) and suddenly Voldemort had a **3-part goal**, almost exactly like Gormatu's goals:

1. Build an army; 2. Conquer the Earth; 3. Persecute Muggles.

We see Voldemort's first goal is to build his army, in HPOP, chapter five. Voldemort's plans to conquer Earth and persecute Muggles (regular humans) are seen in the following facts:

- a. In the final three HP books (HPOP, HPHBP, HPDH) Voldemort does not discuss immortality; rather, he speaks of creating new world of pure-blood wizards.
- b. In HPDH (chap 1) we learn Voldemort has recently killed many muggles (the UK Prime Minister and Fudge discuss Voldemort's recent killings; pp 10-12).
- c. In HPDH (chap 1) Voldemort murders Charity Burbage, for sympathizing with the muggles;

- d. In HPDH we learn Voldemort controls the Ministry of Magic and the wizard press—and promotes the mistreatment of muggles (HPDH, chap 13, we see the book *MUDBLOODS and the Dangers They Pose to a Peaceful Pure-Blood Society*).
- e. In HPDH, chap 18, Voldemort’s press publishes a story that Dumbledore believed (1) that wizard should dominate muggles “for the muggles own good,” and (2) that wizards “have been given power and yes, that power gives us the right to rule,” (p 357, pb).
- f. In HPDH, chap 36, Voldemort gives the surviving witches and wizards at Hogwarts a last chance to join him: “...kneel before me...and you will join me in the new world we shall build together.”
- g. Voldemort installs a statue in the Ministry of Magic, showing Muggles being crushed.
- h. In HPDH (chap 1, pp 5, 6, pb) Voldemort and Yaxley discuss their plan to topple the Ministry and “**subjugate the others.**”
- i. By chapter 22 of HPDH (pp 439, 440, pb) Voldemort’s Death Eater’s mass murders of humans (muggles) are so severe that an underground radio station appeals to wizards to protect muggles, to save “many lives.”
- j. In HPHBP (chap1) and HPDH (chap 4) the UK Prime Minister sends his best wizard bodyguard to protect Harry (who the World needs to defeat Voldemort).

In changing Voldemort’s goal, from *attaining immortality*, to a new 3-part goal (1. build an army, 2. conquer the Earth, 3. persecute muggles) the Defendants infringed the Plaintiff’s work.

10. A Strange Dream Leads The Hero To A Room With 12 Or 13 Doors—Which Lead To Unlikely And Far-Fetched Places, Which May Defy Reason And/Or Physics.

Page 18 of the Plaintiff’s 13 Gates story outline reads:

Joey wears the necklace to bed -**dream** leads him to mountains behind his House
 Finds cave -enters -meets ·Verdan

Page 19 of the Plaintiff's 13 Gates story outline reads:

Verdan ask Joey how he came there. He explain he had a **dream** and a guy that sounds like Rane told him to come there. [sic (should read: "Verdan asks...")]

Page 29 of the Plaintiff's 13 Gates story outline reads:

Chapter 2

Next day asks his mother about his dad

Has birthday, mom goes to bank gives Joey the stuff left by his father - wears the **fleece of dreams** to bed.

Has **dream** -sees cave, light on hill,

hand touching a rock wearing the ring and the door opens.

Goes to cave with the ring and opens the gate Meets Verdan.

Verdan Tells Joey about Rane

Page 21 to 22 of the Plaintiff's story outline explains that Rane, Seran and other magicians made 13 pairs of teleportation gates (doors, portals), placing one gate in each of the 13 great worlds, and placing one of the 13 partner gates/doors in the heart of a giant sealed structure, which also contained a sprawling garden, full of amazing plant-life, and a huge greenish-turquoise mansion, all covered by a huge glass dome canopy, and all called "Seran's Chamber", a giant space station, that Seran teleported into space, thousands of years earlier (page 20, *Id*). Pages 6-13, 18, 19 of the Plaintiff's story outline show Joey's dream leads him to the Earth-based teleportation "gate", near his house. Joey then enters the link gate, which leads to the Cave of Dire, where the 13 gates of Rane are found. This distills down to: *Joey had a strange dream which led him to the Cave of Dire, and the 13 Gates of Rane.*

The Defendants' HPOP infringes the Plaintiff's story structure, as Harry has a strange dream/vision of a door in the Department of Mysteries (chapters 24, 26). And in chapter 31 Harry has a dream/vision in which, beyond the strange door, he sees his godfather, Sirius Black, being tortured by Voldemort. Thus, Harry and his friends follow Harry's dream to the Department of Mysteries, where they find a strange, circular room with "**about a dozen doors,**"

which lead to strange and far-fetched places (examined under item 7). Because the doors are close together but the rooms beyond them are extremely large, the doors defy reason and physics.

11. The Story Features A Door (Or Many Doors) That Leads To Another World.

The Plaintiff's 13 Gates of Rane story outline shows 13 doors that lead to different worlds (the first door is entered on Earth, and teleports the enterer to a giant spacecraft, thousands of light years from Earth). Near the bottom of page 7 of the Plaintiff's story outline, Verdán explains: "Joseph, do you understand that you-are a thousand light years from your home?"

The Defendants' HPOP infringes the Plaintiff's concept, as in HPOP (chapters 34, 35, 36) there is a strange door (archway covered by a veil/curtain) which appears to lead to *the land of the dead*, as Sirius's body becomes ghost-like, and drifts through this door after he is killed.

12. The Story Features "Paired Teleportation Doors." A Door/Gate (Or Portal Or Cabinet) That Leads To A "Twin" Door/Gate, And Together, These Paired Doors Are Used To Transport People From One Door's Location To The Other Door's Location, Many Miles Away.

Page 21 to 22 of the Plaintiff's story outline explains that each of the 13 "gates" (very large "doors" or "portals") in the Cave of Dire, within Seran's Chamber, is part of a "pair"; meaning, each gates of the 13 gates has a mate. One of each of the 13 paired gates is found in the Cave of Dire, inside Seran's Chamber, and one of the other 13 "mate gates" were placed somewhere in each of 13 great worlds, millions of light years away. Page 21 to 22 (*Id.*, and elsewhere) explain that the paired gates are used to teleport whoever enters, either, from the link gates in the Cave of Dire (within Seran's Chamber) to one of the 13 corresponding great planets, or vice versa.

The Defendants' HPHBP (book and film) infringes the Plaintiff's concept, as Draco Malfoy repairs two paired teleportation cabinets, called "vanishing cabinets", capable of holding and teleporting one person at a time; one of which is in Hogwarts, while the other is hundreds of miles away, in Knockturn Alley, in London. These cabinets are inevitably used to transport Draco and

a few of Voldemort's minions from Knockturn Alley into Hogwarts, to kill Dumbledore.

13. The Features A Central Prophecy That The Villain & Hero Will Inevitably Engage In Mortal Combat, But The Prophecy Does Not Predict Who Will Prevail.

Pages 19-20 (and pp 20-21) of the Plaintiff's story outline contains the central prophecy:

“Long before I became The Keeper, Therion, the Seer of the future, foretold that one day the forces of evil throughout the galaxies would come together under the rule of a single master and wage the greatest war ever known against the forces of light -to claim control of the universe. Therion, The Seer, said that in the end a single great warrior would stand between the dark empire and their conquest of the Universe. Therion said the great warrior of good would lure the Master of darkness to Earth through the Lost Gate of Disaster, thereby unleashing the wrath of the dark empire on all of mankind. Why the great warrior would unleash the master of evil on the people of Earth, Therion was not able to see. Nor was he able to see whether or not the great warrior and the forces of good would prevail against the dark empire.”

The prequel to this mythic prophecy can be seen on pages 6 to 13, as Verdan explains to Joey that, initially, Therion only saw the evil growing and conquering, unopposed. But Therion takes action to try stop the coming evil. It is only after taking this action that Therion has a vision of a Great Warrior standing against the evil, but inexplicably luring the evil to Earth.

This prophecy is CENTRAL to the Plaintiff's story, because informs the reader of the tremendously important role that Joey may play in mankind's future, and it makes the story more compelling, as its warning of a tremendous, unavoidable war keeps the readers **interested**.

The Plaintiff's prophecy (above) contains 4 unique aspects:

1. The prophecy alludes to an entity that represents good (the hero).
 2. The prophecy alludes to an entity that represents evil (the villain).
 3. The prophecy suggests the two opposing entities will engage in mortal combat.
 4. **The prophecy does NOT predict who will prevail.**
- Prior to the Plaintiff's work, Harry Potter had NO prophecy for the preceding 4 books.

1.5 years after the Plaintiff, HPOP suddenly introduced a prophecy (see chap 37), reading:

"The one with the power to vanquish the Dark Lord approaches... born to those who have thrice defied him, born as the seventh month dies... and the Dark Lord will mark him as his equal, but he will have power the Dark Lord knows not... and either must die at the hand of the other for neither can live while the other survives... the one with the power to vanquish the Dark Lord will be born as the seventh month dies...."

The Defendants' HPOP prophecy infringes the Plaintiff's central prophecy, and it even, contains the same 4 central aspects as the Plaintiff's prophecy: (1) The prophecy alludes to an entity of good; (2) The prophecy alludes to an entity of evil; (3) The prophecy suggests the two opposing entities will engage in battle; (4) **The prophecy does NOT predict who will prevail.** This prophecy is centrally featured in HPOP (chap 21-38), HPHBP (chap 3, and others), HPDH (chap 34, 22 and others), thus all three of these works infringe the Plaintiff's work.

14. In The Story, The Hero's Consciousness/Soul Leaves His/Her Body (In A Dream, Or Awake), To Enter The Mind And Body Of Another Entity.

The Plaintiff's story outline and notes explain that by using the Necklace of Dreams or the Fleece of Tongues and Dreams, the central hero's consciousness/soul can leave his body and go to other places. The hero, Joey, uses this ability to go on important missions. This is explained on pages 1, 14, 23, 16, 17, 18, 19, 23 of the Plaintiff's 13 Gates of Rane outline and notes.

Page 11 of the Plaintiff's 13 Gates of Rane outline notes state:

Dream walkers are able to leave their bodies in their dreams and enter into the minds of others through their dreams.

Pages 16 to 17 of the Plaintiff's notes explain:

"Joey finds a seer on another planet and negotiates with him to trade places. so Joey has a body to operate in. The spirits who inhabit Joey's body behave peculiarly toward his friend-raising suspicions." [sic]

Pages 14, 15 and 26 explain the origin and power of the Fleece of Tongue and Dreams:

"Rane kept the Skin of the Lion, which contained his father's power of communicating with animals and Dreamwalking."

Page 29 of the Plaintiff's story outline, delineates the events of Chapter 2: after Joey wears the Fleece of Dreams to bed, and has an unusual dream—an out-of-body experience (this is perhaps more clearly explained on pages 6-13; see **Ex C**). Page 29 of the 13 Gates outline reads:

Chapter 2

Next day asks his mother about his dad

Has birthday, mom goes to bank gives Joey the stuff left by his father - wears the fleece of dreams to bed.

Has dream -sees cave, light on hill,

hand touching a rock wearing the ring and the door opens.

Goes to cave with the ring and opens the gate

Meets Verdán. Verdán Tells Joey about Rane

Verdán tells him to ask Miguel

End Chapter 2

The preceding passages of the Plaintiff's 13 Gates story outline (and other such passages) establish that the *Fleece of Tongue and Dreams* and the *Necklace of Dreams* enabled the consciousness or soul of the wearer, the hero Joey Raymond, to leave his body and journey about without a body, and/or the ability to enter into the minds or dreams of any other entity.

HPOP infringes the Plaintiff's concept, as Harry is suddenly able to enter the mind of Voldemort (seen in HPOP, chapters 21 & 24). [NOTE: In HPOP (book) Harry enters Voldemort's snake's (Nagini) mind in chapter 21, but we learn in chapter 24, p 532 (hb) that, at that time, Voldemort's consciousness was in the snake's mind; thus, Harry was in Voldemort's mind.]

15. The Story Features Numerous ENCHANTED ITEMS, Which Are Tightly And Deeply Connected To The Central Plot.

- **These items are not objects of passing curiosity; rather, they are deeply connected to the plot and the hero's goal.**

The Plaintiff's story outline features the unusual story elements of "*numerous enchanted items, which magic has been performed on, are tightly connected to the central plot,*" which the hero must locate to prevail. These enchanted items are the 13 items of the Enchanted Armory,

which include a **sword**, a **crown**, a **necklace**, a **ring**, and a **flask**. These items are NOT props or set dressings; rather, they are tightly connected to the plot and motivate the hero's action.

The Defendants infringed this concept, by introducing (in HPHBP) *7 enchanted items* (Voldemort used magic to make 7 horcruxes, containing part of his soul), which the hero must locate and destroy to defeat the villain. These items are: a **crown**, a **necklace** (locket), a **ring**, a **cup**, a **snake** and a **diary**. In the next book/films, HPDH, these items motivate the hero until the final climax; further, Harry learns there are 2 or 3 more enchanted items needed to defeat the villain: the Resurrection **Stone**, The **Sword** of Gryffindor (and maybe the Elder **Wand**).

16. The Plot Features An ENCHANTED CROWN.

- **This crown is NOT an object of passing curiosity; rather, it is woven into the plot and the hero's goal.**

The Plaintiff's story outline prominently features an enchanted crown (Seran's Crown), which the hero(s) must find, to defeat the villain. Seran's Crown can be seen on pages 14, 17, 23 and 28, of the Plaintiff's story outline.

HPDH infringes this aspect from the Plaintiff, as it too features an enchanted crown (the Diadem of Ravenclaw) which the hero(s) must find (and destroy) to defeat the villain.

- There were no items that Harry had to find, to defeat the villain, in the 5 prior HP books.



Above: The Diadem of Ravenclaw, from HPOP.

17. The Plot Features An ENCHANTED SWORD.

- **This sword is NOT an object of passing curiosity; rather, it is woven into the plot and the hero's goal.**

The Plaintiff's story outline prominently features an enchanted sword (Dire's Blade), which the hero(s) must find, to defeat the villain (see pp 14, 17, 23 and 28).

HPDH infringes this aspect from the Plaintiff, as it features an enchanted sword that Harry must find to defeat the villain. [**Note:** this sword was featured in the second HP book, HPCS, **but it had no name**, it was simply engraved with Godric Gryffindor's name. This sword is seen again, in the fourth book, HPGF (chap 30, p 583, pb), **but it still had no name**. But 5-6 years after the Plaintiff gave his enchanted items regal name, in HPDH, the Defendants re-imagined their sword, with regal name "the Sword of Gryffindor," to mimic the Plaintiff's "Dire's Blade".]

18. The Plot Features An ENCHANTED NECKLACE.

- **This necklace is NOT an object of passing curiosity; rather, it is woven into the plot and the hero's goal.**

The Plaintiff's story outline prominently features an enchanted necklace (the Necklace of Dreams), which the hero(s) must find, to defeat the villain. The Necklace of Dreams can be seen on pages 1, 17, 18, 19 and 23 of the Plaintiff's story outline.



Above: Salavar Slytherin's Locket, from HPDH.

The Defendants' HPHBP and HPDH infringes this aspect from the Plaintiff, as these

works also feature a necklace (Salazar Slytherin's Locket), which has unusual power. [NOTE: the book and film refer to this item as a "locket," but, as the films shows and as the story indicates, it is a **necklace** (with a locket attached). As such, the central characters, Harry, Ron and Hermione take turns wearing the necklace. But the necklace causes Ron to become jealous, and pushes Ron to desert Harry and Hermione for much of the book and film (HPDHp1).

19. The Plot Features An ENCHANTED RING.

- **This ring is NOT an object of passing curiosity; rather, it is woven into the plot and the hero's goal.**

The Plaintiff's story outline prominently features an enchanted ring (the Ring of All), which the hero(s) must find to defeat the villain. (See pp 14, 17, 19, 23, 24 of Plaintiff's story outline.)

HPHBP and HPDH infringe this aspect from Plaintiff, as these books and films also feature an enchanted ring (Marvolo Gaunt's Ring), which the hero(s) must find (and destroy) to defeat the villain. (Note: In HPHBP, chapter 10, we learn that destroying this ring has infected Dumbledore hand with a curse; later, we learn it is spreading and will kill him within a year.)

20. The Plot Features An Enchanted Item That Holds Liquids And/Or Beverages (Flask vs Cup).

- **This Item is NOT an object of passing curiosity; rather, it is woven into the plot and the hero's goal.**

The Plaintiff's story outline features an enchanted flask (Flask of Derjentydo), which the hero(s) must find, to defeat the villain (see pp 14, 17, 23 and 28). A flask is a handheld item, used to hold liquids and beverages.

The Defendant's HPDH infringes this aspect from the Plaintiff, as it too features an enchanted item designed to hold liquids and/or beverages (Helga Hufflepuff's Cup).

- Again, there were no items Harry had to find, to defeat the villain, in the first 5 HP books.

21. The Story Features A MAGICAL BOTTOMLESS BAG.

13 Gates of Rane features the “Harvester’s Bag” (a bottomless bag, which can hold seemingly any object that can fit into its wide opening) mentioned on pages 2, 3, 14, 15, 17, 23, 27, 28 of the 13 Gates outline (Ex C). On page 15 of the story outline, the Plaintiff wrote:

“Harvester: Bottomless weightless bag (Harvester's Bag)”

On page 3 of the 13 Gates Story outline, the Plaintiff wrote:

“Joey fight creature. [sic] Flies him into Harvester's bag exits and closes the bag until he agrees to give up Cryotenu's Skin. Which he does.

Infringing the Plaintiff’s bottomless bag, in the Defendants’ HPDH (chap 9), Hermione casts an “Undetectable Extension Charm” on her “small beaded handbag,” which makes her bag almost limitless. Hermione and Harry are shown reaching their entire arms into the small bag to retrieve changes of clothes, first aid supplies, a tent. (See HPDHp1 at (approx) 36:45, 1:04:15, and 1:05:40.)

22. The Villain Is Building An ARMY OF POWERFUL MINIONS.

- In the four HP books that predate 13 Gates of Rane, Voldemort had a small following. The fourth book, HPGF, names names all of Voldemort’s followers, past and present. Voldemort had 15 followers at his peak (circa HP’s birth), but 8 have since died or deserted Voldemort. In HPGF (book) Voldemort names 7 living followers. The HPGF film shows 8 followers in the Quidditch camp scene, and 8 in the cemetery scene—hardly an “army.”⁴ But, after the Defendants saw the Plaintiff’s armies of untold thousands—or millions, they increase Voldemort's few “followers” into an “**army**”.

The Plaintiff’s 13 Gates outline explains: (1) the Universe's most evil and powerful villain, Gormatu, is coming to Earth; (2) Joey’s father disappeared while trying to stop Gormatu’s forces; (3) Gormatu is building a massive army to conquer the 13 great worlds. Page 10 explains (Ex C):

⁴ In HPOP (released 1.5 years after the Plaintiff’s vision of a vast army) chapter 25, Harry says there were a dozen fighters at in the cemetery in HPGF.

In his dream he saw a monster of ultimate evil and destruction growing on a far off distant land. Therion saw the monster enslave the people of its own planet, then through the force of night magic it moved onto other planets, infecting the hearts of the weak, **transforming them into soldiers in his army of night** to wage war against all who stand against The night master. The monster fed on the suffering it inflicted upon the nations of each world, growing stronger in their misery. And the monster continued to assault the great civilizations of the universe until it finally reached planet Earth and began its destruction of your world, too. In Therion's night visions he would become the first to see the beast of wrath: Gormatu, The Destroyer.

Page 19 (Ex C) explains:

“...Therion, the Seer of the future, foretold that one day the forces of **evil throughout the galaxies would come together under the rule of a single master** and wage the greatest war ever known...”

Page 21 of the Plaintiff’s 13 Gates of Rane (Ex C) story outline explains:

“Soon, Rane would dream walk to the greatest master magicians on each planet and warn them of **Gormatu and his growing army of evil.**”

Pages 2 to 3 Joey learns that Gormatu is currently, actively trying to get to Earth to wage war.

All of this shows that the villain has been building a giant army, and will attack soon.

The Defendants infringe the Plaintiff’s concept of a villain who is building a massive army, as their subsequent works (HPOP, HPHBP, HPDH) discuss or show Voldemort's growing army.⁵

There is no mention of Voldemort growing an “**army**” until 1.5 years after the Plaintiff, in HPOP (chap 5, p 92, hb) when Sirius Black says, Well, firstly, we wants build up his **army** again.”



Above: Just some of Voldemort’s many powerful minions, in HPDHp2. (See approx 52:00)

⁵ To read more on Voldemort’s army, see HPOP chapter 5, HPHBP chapters 1, 3, and HPDH chapter 1 and throughout. In the film HPDHp2, we finally see Voldemort’s army of thousands.

23. In A Central Grand Battle, The Villain’s Countless Minions Race Down A Mountain/Hill To Attack The Hero And His Forces Of Good.

- **Impossible for the Harry Potter series, as Hogwarts was located a mountain top.**

Pages 31 to 34 of the Plaintiff’s story outline are a very rough “test” battle scene section, which features the Plaintiff’s description of a key battle from 13 Gates of Rane. These pages shows Joey’s tattered Army, outmatched by an army of thousands or millions of huge, seemingly indestructible fighters, who are charging **downhill**. Page 31 of the 13 Gates story outline reads:

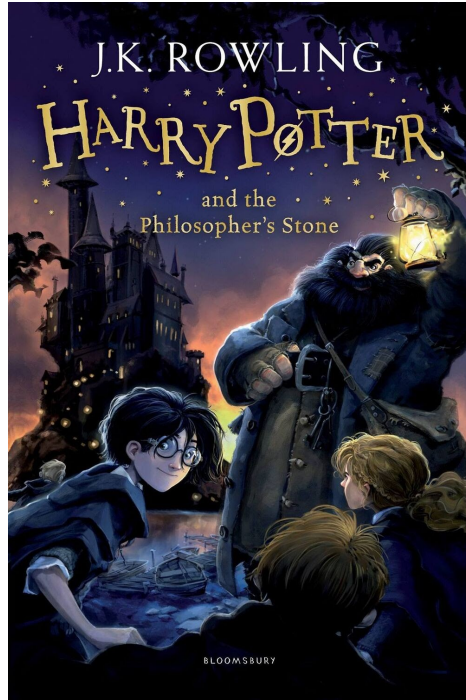
“The army of the Hedronul **descended** upon them. From upon his horse, Joey thought the army of Grollian fighters looked like a black ocean pouring **down the mountain side**, at least ten million strong. Each giant Grollian fighter protected, like giant beetles, by their thick, steel-like armored exoskeleton. Even in the heavier gravity of earth they would still be a hundred times stronger than the average earthman. Then, as the black, glistening Grollian fighters poured **down the mountain**, twice as fast as Joey's motley army of aliens, magians, and misfits, could run away, Joey noticed something even more horrible. Amid the sea of black armor rolling **down the mountain...**”

HPDHP2 (film) infringes the Plaintiff’s concept of the *villain’s countless minions charging downhill to attack*, as HPDHP2 shows (see 50:35 and 54:40) countless minions charging down a mountain to attack the hero’s forces, at Hogwarts, on two different sides! But this is impossible, because **Hogwarts is situated on a mountain top**, as described in, HPSS, chap 6, p 111, pb:

“The narrow path had opened suddenly onto the edge of a great black lake. Perched **atop a high mountain** on the other side, its windows sparkling in the starry sky, was a vast castle with many turrets and towers.”



Above: Hogwarts School, near the end of Chamber of Secrets film, showing no neighboring hills to charge down. Prior to the Plaintiff’s work (pre 2002) Hogwarts School was often depicted with lake water on two sides (as seen above).



Above: A Bloomsbury cover of HPSS (Philosopher's Stone, UK), properly showing Hogwarts atop a mountain (background).

Against common knowledge that Hogwarts is situated on the top of a mountain, to infringe the Plaintiff's idea, in HPDHp2, the Defendants situated Hogwarts between TWO mountains! HPDHp2 shows myriad fighters racing down a forested mountain, and down a treeless mountain.



Above: Voldemort's minions charge down on Hogwarts, from a forested side, in HPDHp2.

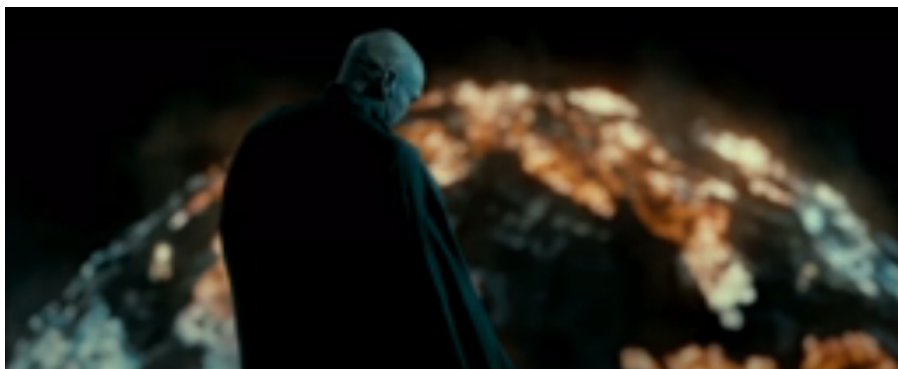


Above: Voldemort's minions charge down on Hogwarts, from an un-forested side; HPDHp2.

But not only did the Defendants have thousands of minions race down a mountain to attack, they had Voldemort, the villain, attack from the top of a mountain, with Hogwarts below.



Above: Voldemort fires a blast of magic down at Hogwarts, from a mountain top, in HPDHp2.



Above: Voldemort looks down from the mountaintop, as Hogwarts' shield burns; HPDHp2

All of this shows a willful, and seeming obsessive, effort to infringe the Plaintiff's work.

24. Reunited With His LONG-LOST FATHER (Or Long-Lost Father-figure, Or Lost Family Member), The Hero Battles The Villain (And/Or The Villain's Elite Minions) Alongside His Long-Lost Father (Or Father-Figure).

In the Plaintiff's 13 Gates story outline we see Joey (the hero) will fight the final battle (against Gormatu) with his long-lost father. The Plaintiff chose this unique arrangement because it would be so universally moving. On page 6 of the Plaintiff's outline, he wrote:

While Gormatu is distracted by a brief and petty dialogue with the girl he turns back to Joey with the girl in his hand and discovers Joey lying without any of the weapons on. Suddenly Gormatu's hand with the girl in it is severed. He turns to find Joey's **father** behind him-now possessing the power to bend time too.

In the end Joey will go back to the Planet where his father last battled Gormatu. And wage war against Gormatu with his father along the coast.

In HPOP, the Defendants infringed the Plaintiff's concept of a long-lost father and his son, together, fighting a terrible villain (or the villain's terrible minions).

The character Sirius Black was introduced in the third Harry Potter book, HPPA, as an escaped prisoner, and Harry's Godfather, who Harry doesn't know or accept until the book's end.

In the fourth book, HPGF, for the first 90% of the book, Sirius Black was not *physically* present, until he appeared, in the flesh, at the end of the book.

But suddenly, in the fifth book, HPOP, Sirius Black was primary character, early on, and he and Harry were portrayed as extremely close (as Sirius was Harry's father's best friend), and Sirius had become a surrogate father to Harry. Having established a father-like relationship, near the end of the book/film, Harry and Sirius fight Voldemort's most formidable minions, together, in a grand battle. The film "plays up" how close Harry and Sirius are. Hence, at 1:55:24 (approx) of HPOP, Sirius bursts into the final battle arena and tells Lucius Malfoy, "Get away from my godson!" And at 1:56:11, Sirius risks his life for Harry, as he absorbs a spell, fired at Harry. (Neither of these last two events occurred in the book.) In all of this, the Defendants' HPOP infringes the Plaintiff's idea of a father and son fighting together against an evil force.

25. Countless Of The Villain’s Minions’ Arrows Obscure The Sky.

The Plaintiff’s 13 Gates of Rane story outline describes the villains countless forces firing so many arrows that the sky is darkened. On page 32, the Plaintiff wrote:

Then a thousand arrows rose from the Grollian forces. And in another second the sky was dark with a million arrows.

The Plaintiff furthered showed the villain’s minions arrows darkening the sky, on page 33:

A second wave of arrows were launched into the air, simultaneously, as if controlled by a single mind, darkening the sky again.

HPDHP2 infringes the Plaintiff’s vision of arrows blocking the sky, as at about 51 minutes into the film the, Voldemort and thousands of “Death Eaters” launch a massive volley of hundreds or thousands of “wand arrows”, so numerous that the sky is almost blocked. Perhaps more peculiarly, these “wand arrows” fly like arrows, in a slow, circular, falling trajectory. (See image from the film [below](#).)

- The court should observe that this was the first time in the Harry Potter series when blasts flew from a wand, slow like an arrow, and in an arrow-like arched trajectory, and it was the first time that hundreds, or thousands of witches and wizards fired the same type of wand-arrow “blast,” at once.



Above: Wand “arrows” fired at the dome over Hogwarts, obscure the sky, in HPDHP2.

26. The Hero Assembles A Rag-Tag, Motley, Misfit Army, To Fight The Villain's Army.

As Joey and Rebecca journey to new worlds, in search of the 13 weapons of the Enchanted Amory, Joey simultaneously *assembles a rag-tag, motley, misfit army*. In the Plaintiff's 13 Gates story outline, a 3-page, rough-draft battle scene begins on page 31, (Ex C) where Joey's rag-tag, motley, misfit army is described. In the first four sentences of page 31, the Plaintiff wrote:

The army of the Hedronul descended upon them. From upon his horse, Joey thought the army of Grollian fighters looked like a black ocean pouring down the mountain side, at least ten million strong. Each giant Grollian fighter protected, like giant beetles, by their thick, steel-like armored exoskeleton. Even in the heavier gravity of earth they would still be a hundred times stronger than the average earthman. Then, as the black, glistening Grollian fighters poured down the mountain, twice as fast as Joey's motley army of aliens, magians, and misfits, could run away..." [sic]

A few sentences later, still in the first paragraph, page 31, the Plaintiff wrote:

"... It would take a well aimed missile to stop each Grollian and each Doxun. Joey's rag-tag army held only, arrows, bows, spears and staffs -ten or twenty million missiles short of what this job required."

The Defendants' HPOP and HPDH infringe the Plaintiff's concept of *the hero assembles a motley and rag-tag army of misfits*. HPOP spends considerable time showing (1) Hermione, Ron and Harry gather 25+ students who call themselves "**Dumbledore's Army**," who will fight Voldemort's forces, (2) showing the heroes efforts to find a place to train, and (3) showing Harry training his rag-tag motley army to defend themselves.



Above: The first meeting of Dumbledore's Army, in HPOP (clearly a rag-tag, motley bunch).

The Defendants' film HPDHp2 also infringes the Plaintiff's *rag-tag, motley, misfit army*,

for such reasons as:

1. In HPDH, the small 'army' that defends Hogwarts is made up, entirely, of students, faculty, parents, and a few Hogwarts alumni. (This, to mimic Plaintiff's: "aliens, magicians, and misfits"; page 33, paragraph 1, of the *13 Gates of Rane* outline, Ex C.)
 2. In the final two battles of HPDHp2, the forces of good (Harry's army) are filmed and attired to convey a "rag-tag, motley group of misfits" image.
 3. In HPDHp2, in the final battle, when Voldemort confronts the good forces at Hogwarts and asks those in Harry's army who wish to be spared to step forward and join Voldemort's ranks, Neville steps forward to speak, and Voldemort mistakenly assumes Neville intends to join his forces, and says, "I had hoped for better." This was done to imply that Neville appeared to be a rag-tag, motley misfit.
- Prior to the Plaintiff's work, in the first 4 HP books, Harry, Ron and Hermione never assembled any form of an "army,"



Above: A rag-tag, motley, misfit army greets Voldemort, in the final battle; HPDHp2.

27. The Hero's Body Is Possessed By A Foreign Entity—Who Causes The Hero To Behave Peculiarly. (“Possession” is very different from an entity “entering” the dreams/mind of another entity”, as it involves a foreign entity taking CONTROL of the body of another entity.) Oxford Languages defines *possession* as the state of being controlled by a demon or spirit.

The Plaintiff's *13 Gates* story outline includes one or more entities *possessing* the hero's body. At the bottom of page 16 and top of 17 of the Plaintiff's *13 Gates* outline (Ex C), the Plaintiff explains how Joey trades places with a being (a seer) from another planet, and Joey takes control of the seer's body, and, in turn, the seer takes possession of Joey's body—but the being that possesses Joey's body behaves peculiarly and arouses suspicion. This passage (bottom page 16, to top of page 17, of the *13 Gates* outline (Ex C) reads:

“Joey finds a seer on another planet and negotiates with him to trade places.so Joey ha a body to operate in. **The spirits who inhabit Joey's body behave peculiarly** toward his friend-raising suspicions.” [sic]

HPOP infringes this as Voldemort possesses the hero's (Harry's) body in chapter 36 of HPOP (p 816, hb); it is called a “possession” at the end of chapter 37 (Page 844, hb). This possession is depicted in the HPOP film, 2:01:00 (approx), when Voldemort enters Harry's body, and uses Harry's mouth (but Voldemort's voice) to tell Dumbledore, “You. You've lost old man.” (In the book Voldemort speaks several sentences, and dares Dumbledore to kill Harry.)

- In the HPOP book and film, this possession is presented as a new power or ability, and an escalation Voldemort's invasion into Harry, an escalation of evil.

A year or two before the Plaintiff created his *13 gates* outline, near the end of the fourth HP book, HPGF, chapter 33, Voldemort says he has the ability to possess bodies; **but this ability is never shown in ANY of the first four HP books.** It is not until roughly 1.5 years AFTER the Plaintiff produced his *13 Gates* outline that Voldemort is shown possessing Harry's body. This continues an expansive pattern of the Defendants infringing the Plaintiff's work.

28. A Secondary Central Hero Saves The Hero, Then Fights The Villain More Successfully Than The Primary Hero Fought The Villain.

The Plaintiff's 13 Gates of Rane story outline shows the secondary hero battle the hero more successfully than the primary hero. Consider the following 2 examples.

A. On page 5 of the 13 Gates outline, the Plaintiff wrote:

Joey and Gormatu battle relentlessly, but alas, due to Gormatu's incredible-time-bending speed, Joey falls.

Gormatu wounds Joey badly. As he prepare to finish Joey, Joey creates an illusion to distract him. Joey's girl-friend recognizes the distraction and rushes in to save him save Joey. His girlfriend takes the ring and Jolaya's arm and swings Yuli's mace three times and hurls it and carry him back to the cave. Gormatu breaks through the illusion just in time to see the girl escape with Joey.

B. On page 6 of the Plaintiff's 13 Gates outline, the Plaintiff wrote:

Reluctantly because Joey is weak and sore the girl enters the final gate alone. She faces tough battle. Doesn't know how to use stuff. But after silly but heroic battle she finds Elasofan and accepts the hand of time. She returns to Verdans place sore and certain she's not ready for further combat -yet.

These examples show the secondary hero ('the girl', later identified as *Rebecca*) saving the hero and defeating the villain after the primary hero was defeated by the villain.

The Defendants infringe the Plaintiff's story structure of a *secondary hero who saves the hero and fights the villain more successfully than the primary hero fought the villain*, as in chapter 36 of HPOP (pp 811-817, hb), in the final grand battle, for reasons that aren't made clear (perhaps distraught from the death of Sirius), Harry fails to defend himself from what is sure to be a killing blast from Voldemort. But Dumbledore intervenes and saves Harry, and holds Voldemort back until a group of Ministry of Magic aurors arrive, and Voldemort flees.

- Prior to the creation of the Plaintiff's 13 Gates of Rane story outline, in the previous four Harry Potter books, Harry Potter always defeated the villain by himself, and NEVER did a secondary hero save Harry or fight the villain more successfully than Harry.

29. On His Journey, A Principal Heroic Character Follows A Strange Light.

Page 1 of the Plaintiff's 13 Gates story outline, the Plaintiff describes how the young hero, Joey, has a recurring dream of a light, directing him to a place on a hill. Joey eventually goes to where the light in his dream directed him, and an incredible journey begins.

Joey goes to bed and has a dream -about his dad and something coming to Earth and a **light in shining on the hill** behind his home....

That night Joey dreams again about a **light** directing him to a place out on the **hill**.

The next day Joey goes and discovers a cave. In the cave he finds a necklace...

The Defendants' HPDH infringes the Plaintiff's idea of a strange light directing the hero. Approximately 1:44:00 into HPDHp1, after Ron gets lost from Harry and Hermione for weeks, he explains how he found his way back to them by using the strange deluminator that Dumbledore willed to him. Ron explains how a strange light emerged from the deluminator, then crashed into his chest, and Ron somehow knew to follow the light. So Ron Disappeared, and when he Apparated, he was near Harry and Hermione, again.

- No character's journey is guided by a strange light in the prior HP books.

30. The Villain Prevails Over The Hero In One Of The Series' Final Grand Battles.

- (This departs from the *Harry Potter* formula, in which Harry is always victorious.)

The Plaintiff's 13 Gates outline shows the villain prevail, repeatedly, in major battles. And the Plaintiff repeatedly states that at the end of the first book, in the final battle, the villain Gormatu will prevail, and Joey will retreat with his life. This approach is diametrically against all four of the Harry Potter books that predate the Plaintiff's 13 Gates outline, as Harry, alone, defeated Voldemort in the first 2 books, outsmarted the dementors in the third book, and out-dueled Voldemort in the cemetery (and got Cedric body back home) in the fourth book.

The fourth paragraph of page 4 of the Plaintiff's book outline and notes read:

Joey Fights Gormatu on Langorlay-loses and retreats before Gormatu can enter the the gate of Rane into Earth-only after freeing his father from Gormatu' s Dungeon.

End First Book.

The third paragraph of page 6 of the Plaintiff's book outline and notes read: "**A great battle ensues. Gormatu wins again.**"

Page 30 of the Plaintiff's 13 Gates outline, under the "Chapter 6" heading read:

"...Joey goes to Gormatu and **gets pounded**. Finds a human in Gormatu's Dungeon. Frees him. Gormatu's strength is enormous. **Joey retreats. Barely escapes.**
END BOOK ONE"

The Defendants' HPOP, HPHBP, and HPDH, all infringe the Plaintiff's approach. After insisting that Harry Potter formulaically get isolated, then defeat the villain, alone, in the final grand battles of the first four books; suddenly in HPOP, Harry Potter is unable to defeat Voldemort, alone. Thus, Dumbledore intervenes, and fights Voldemort valiantly, but Voldemort gets the upper hand. Voldemort's victory is proven by four events: (1) in HPOP, chap 36, page 816 (hb), as Dumbledore battles Voldemort, Rowling writes, "For the first time, Dumbledore looked frightened"; (2) moments later, in the HPOP film, Voldemort possesses Harry's body, and uses Harry's mouth to taunt Dumbledore, saying, "**You've lost old man**"; (3) Voldemort retreats only after a large group of aurors arrive; (4) because Sirius (a heroic character) was killed, and Voldemort out-dueled Harry and Dumbledore, this can only be seen as a defeat.

More disturbingly, the Defendants would re-infringe and re-use this new approach (of allowing the hero to lose) in **three** of the final four HP films: HPOP, HPHBP, HPDHp1.⁶

The Defendants sudden change of style (allowing the hero to be defeated in final, climatic, grand battle of a book) is a departure from the original Harry Potter formula, and a further infringement, by the Defendants, of the Plaintiff's work.

- Voldemort did not prevail in the final battles of any of the four prior HP works.

⁶ Voldemort's minions kill Dobby in the closing minutes of HPDHp1 film; thus, the film concludes as a victory for Voldemort.

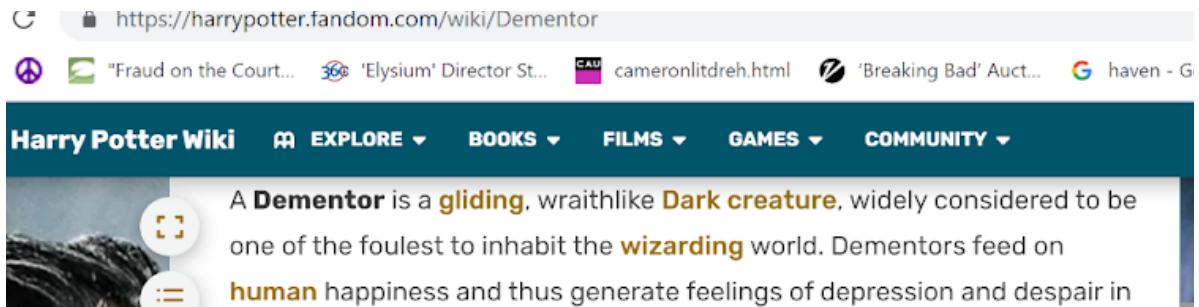
31. Plaintiff's Villain, Gormatu, Fed On Suffering & Misery (Despair).

Prior To The Plaintiff's Work, The Defendants Villains, THE DEMENTORS, Fed On "Happiness," In HPPA. But The Defendants Changed This In HPDH (To Copy The Plaintiff). Thus, In HPDH, Dementors "Feed Off Fear And Despair."

Page 10 of the *13 Gates* outline states the villain Gormatu feeds on suffering and misery:

The monster fed on the **suffering** it inflicted upon the nations of each world, growing stronger in their **misery**. And the monster continued to assault the great...
...In Therion's night visions he would become the first to see the beast of wrath: **Gormatu, The Destroyer**.

In the third HP potter book, *Harry Potter and the Prisoner of Azkaban* (HPPA, which was written before the Plaintiff composed his *13 Gates of Rane* outline), the villains were **the dementors**. In HPPA the dementors fed on **happiness**, peace and hope (HPPA, chapter 10). Harry Potter's Fandom website says dementors feed on **human happiness**.



But against this established history, in HPDH, the Defendants were so taken by, and so eager to steal the Plaintiff's ideas, that Harry Potter suddenly claims dementors "...feed off **fear and despair**" (HPDH, chap 3, p 35, pb). This is theft in plain sight. The Defendants abandon their own idea to infringe the Plaintiff's work.



Above: A dementor feeds on Dudley's happiness, in HPPA.

32. “The Chosen One” Infringes “The Expected Hero.” Harry Potter Became “THE CHOSEN ONE,” To Infringe The Plaintiff’s “EXPECTED HERO” —To Evoke The Power Of The Infringing PROPHECY.

The Plaintiff did not read any Harry Potter book until May to August 2021. But, circa Spring 2001, as the Plaintiff’s 4-year-old son prepared to enter kindergarten, his son’s mother told the Plaintiff a bit about Harry Potter books (which she enjoyed), primarily because the Plaintiff’s son was an excellent reader, and many young readers, in 2001, read HP books. Through these talks, and via the *pop-cultural din*, the Plaintiff knew a few details about Harry Potter: the villain kills Harry’s parents, Harry has **scar** (a mark). From these details the Plaintiff **wrongly assumed** HP was a “**chosen**” hero.⁷ But Harry Potter was NOT a “chosen” hero; not until the end of book #5. In the first four books, Harry was simply called “the boy who lived”.

Because the Plaintiff disliked the idea of *chosen* heroes, when he began to script *13 Gates of Rane*, late 2001, he decided to create a hero who was “**expected**”: *foretold of, prophecized of, seen in dreams* (events often associated with “chosen” heroes), but who was NOT “chosen.” Thus, young readers could dream that if they made virtuous choices, they might be able to wear the Enchanted Amory—and be the “expected warrior” (AKA “**the Great Warrior**”).

But the *expected hero* concept’s **greatest power** was that it tavitly invoked or **referred back to the prophecy**; thus, when “expected hero” is uttered, it conjures the prophecy’s value (reminding and warming of a tremendous coming war, thereby keeping readers engaged).

⁷ Because of the Plaintiff mistakenly assumed HP was a “chosen” hero, and because of his dislike of “chosen” heroes (as they go against tenets of **free will** and equality), in the Plaintiff’s *13 Gates of Rane Hand-Written Notes* (see **Exhibit D**) includes a fictitious literary character named “Perry Hauteur,” who was created to lampoon Harry Potter and the idea of being “chosen”. As explained in the “Access” section, the Plaintiff believes the reason the Defendants may have repeatedly destroyed his files (2001 to 2002) was initially to destroy evidence of his *13 Gates of Rane* outline, which, by mid 2002, included many more details than the original *13 Gates* printed outline (attached as Exhibit C) and it included this “Perry Hauteur” reference. Although this is conjecture, the Plaintiff believes the Defendants saw the Plaintiff mistakenly lampoon HP as “Chosen,” and they decided to embrace the “Chosen” archetype, because an “Expected Hero” and a “Chosen” hero both relied on similar supports, and both provided similar opportunities.

The Plaintiff's concept of an "expected" warrior/hero is developed throughout the 13 Gates outline, and is specifically named on pages 19 and 27, where the Plaintiff wrote:

Verdan drops Staff
Joey picks it up-Verdan learns that Joey must be The **expected warrior** as only the brave of heart and the true of spirit can pick up anything that Dire made.

1.5 years after the Plaintiff introduce his "expected" hero, the Defendants infringed the Plaintiff's "expected" hero, by doing TWO things:

1. in HPOP (book #5) the Defendants suddenly gave HP a prophecy (just as the Plaintiff gave his story a prophecy), which said that a child born when Harry was born would one day battle Voldemeort (the victor was not determined in the prophecy).
2. Once the prophecy was added, the Defendants repeatedly referred to Harry as "the Chosen One" in the next book, HPHBP (chapter 3, etc) and in the final HPDH book and films; such as, at 24:20 of HPDHp1, when Ron tells Harry, "You may be *the Chosen One*, but this is a whole lot bigger than that."

The Defendants infringed the Plaintiff's concept of an "*Expected Hero*," first, by adding a prophecy to the fifth Harry Potter book, HPOP, then by suddenly calling Harry "The Chosen One" in the sixth Harry Potter book, HPHBP, and the final Harry Potter book, HPDH.

33. A Primary Adult Character Explains The Spacial Limits Of Magic To The Young Hero.

The Plaintiff's 13 Gates outline twice explained that magic has **spacial** limits, exacting greater demands over greater distance. Page 21 of his 13 Gates outline, the Plaintiff wrote:

...He asked Seran, The projector, to imbue the gates with the powers of teleprojection He then built a great sealed Chamber he named after Seran- where he put one of each of the great magicians gates. Rane then asked Seran to use his magic to use his magic to teleport the Chamber to a certain place in **space**. This was Seran's greatest feat, transferring the giant chamber into **space**. But sadly teleporting the giant chamber required so much energy that Seran would die as a result. [sic]

The Plaintiff also had a primary adult character, Verdán, explain some of the limits of magic, in relation to space, to the hero, Joey. On Page 10, para 4, the Plaintiff wrote:

Therion understood magic was acquired with **limits**. And for all of Therion's great light magic, he could do nothing to stop the events he'd seen from occurring on **distant** other worlds. Such were the **limits** of his power. But Therion was only **limited** alone. But with the right help anything was possible. But who?

These are just two, of numerous occasions in the Plaintiff's 13 Gates of Rane story outline where the Plaintiff described various limits, types, rules and branches of magic.

The Defendants' HPOP infringes the Plaintiff's 13 Gates outline. In chapter 24, the central character *Snape*, an adult teacher at Hogwarts, informs Harry of certain limits of magic, saying:

"The Dark Lord is at considerable **distance** and the walls and grounds of Hogwarts are guarded by many ancient spells and charms to ensure the bodily and mental safety of those who dwell within them," said Snape. "Time and space matter in magic, Potter..."

In executing this contemplation of the spacial limits of magic, the Defendants' HPDH, infringed the Plaintiff's work.

34. The Villain's Minions Include A GREAT VARIETY OF DARK CREATURES.

The Plaintiff's 13 Gates of Rane outline (Ex C) shows the villain's army is made up of a "**great variety** of dark creatures." The following examples demonstrate this (see Ex C):

- a. Page 1 of the 13 Gates outline (Ex C) describes a strange beast riding on a flying red bull.
- b. Thousands of Gormatu's "ghouls" are mentioned on page 6 of the 13 Gates outline.
- c. Page 31 of the Outline describes the Grollian fighters, "Each giant Grollian fighter protected, like giant beetles, by their thick, steel-like armored exoskeleton."
- d. Also on page 31, the Doxun Night Beast is described: "...Joey remembered those horrifying shades of purple and red, unique to only one beast. The purple gums and red fangs of The Doxun night beasts."

e. Page 31 of the Plaintiff's 13 Gates outline describes the Hedronul (Ex C): "At least one hundred and fifty feet long, twenty feet wide, dark blue scales covered the rear of it's scorpion like tail..."

f. Page 10 of the Plaintiff's 13 Gates outline (Ex C) also explains that Gormatu transformed all beasts throughout the universe, into his minions:

"Therion saw the monster enslave the people of its own planet, then through the force of night magic it moved onto other planets, infecting the hearts of the weak, transforming them into soldiers in his army of night to wage war against all who stand against The night master."

The Defendants' HPOP infringes the Plaintiff's *villain's minions include of a variety of dark creatures* story structure. Roughly 1.5 years after the Plaintiff produced his 13 Gates outline, suddenly in HPOP, chapter 5, Sirius Black said that Voldemort's *army* has "**....a great variety of Dark creatures.**" But prior to the Plaintiff's work, the only mention of any non-human minions or helpers that the Defendants's villain, Voldemort, may have had were *dementors* and *giants* (HPGF, chap 36; pp 707, 708, pb). Two non-human types of minions are not a **great variety** of dark creatures. By the time the final war at Hogwarts occurred (HPDH) the only new creatures in Voldemorts army were spiders. This reflects a lack of imagination. However, the Defendants suggested Voldemort had a "great variety of dark creatures" to capture the essence and ambiance of the Plaintiff's work, to lure in more readers.

35. The Story Features A Door (Or Many Doors) That Leads To Another World.

The Plaintiff's 13 Gates of Rane story outline (Ex D) features 13 doors that lead to unlikely places, that defy logic and possibility.

The Defendants' HPOP, HPHBP and HPDH (books and films) infringes the Plaintiff's concept, as these works feature a magic door, in Hogwarts School, that leads to a room called the "Room of Requirement," which completely changes according to what the user needs or wishes.

- The Room of Requirement was not featured (or even mentioned) in the HP series, until the fifth HP book (2003), 1.5 years after the Plaintiff's work.⁸

36. The Transparent Dome Over Hogwarts, In HPDH, Infringes The Transparent Dome Over Verdan's Mansion And Garden, In The Space Station "Seran's Chamber."

The Plaintiff's 13 Gates of Rane story outline (Ex D) explains that Verdan lives in a space station called "Serean's Chamber," where Verdan is sworn to remain and defend the 13 Gates of Rane. Inside Seran's Chamber there is a giant mansion, where Verdan resides, and a large garden outside. The mansion and the garden are covered by a large, transparent (like glass) dome. As the Plaintiff wrote in the 13 Gates of Rane outline (Ex D):

It was like a giant house with a beautiful garden all inside a giant glass ball. Joey saw a million brilliant stars bursting through the giant rounded glass ceiling that covered the entire garden and house like a giant dome- or as Joey described it to himself "A giant upside-down bowl!"



Above: In HPDHp2, The Hogwarts Teachers Create A Protective Dome Over Hogwarts.

The Defendants' HPDH infringes the Plaintiff's transparent dome covering a large building, as, in the HP film adaptation, HPDHp1, for about 9 minutes of the film, there is a

⁸ The sudden introduction of the Room of Requirement, and its disappearing and re-appearing magic door, created one huge story problem for the Defendants: explain why the Room of Requirement did not appear on the Maurader's Map (introduced in HPPA, book #3). The Defendants (Rowling?) could not overcome this problem, and just explained for some reason the magic Room of Requirement does not appear on a magic map of a magic school. Hmm.

protective, translucent dome enclosure over Hogwarts School (the central setting of HP works), created by the Hogwarts faculty.

37. The Story Relies Creating *Ambient Tension Of A Coming War*.

- The aspect goes to the heart of mood of the final 3 HP books.

The Plaintiff's 13 Gates outline used (1) a prophecy of a coming war, and (2) **recurring conversational reminders of the coming war**, to create an pervading "ambient tension of coming war," to pull readers in. The Plaintiff created this *ambient tension*, in such passages as the following. On page 20 (para 2) of the Plaintiff's 13 Gates story outline, Verdan explains:

In recent years I have watched the forces of evil gathering and rising among the great nations of life throughout the galaxies. I believe that the master of darkness will make himself known soon, and gather his army of darkness for war.

On page 10 of the *13 Gates* outline, Verdan explains to Joey:

"Therion saw the monster enslave the people of its own planet, then through the force of night magic it moved onto other planets, infecting the hearts of the weak, transforming them into soldiers in his army of night....
"...The monster fed on the suffering it inflicted upon the nations of each world, growing stronger in their misery. And the monster continued to assault the great civilizations of the universe until it finally reached planet Earth and began its **destruction of your world, too.**

Page 3 of the 13 Gates outline, Miguel Sierra tells Joey how Gormatu captured his father:

"...When Disaster opened the gate Joey's dad shoved Disaster through the gate. As Gormatu stepped his claw into earth Joey's father cut it with Dire's blade." [sic]

This informs Joey that the war has already started—the tension is thick enough to cut.

The Defendants' HPOP, HPHBP and HPDH all infringe the Plaintiff's **ambient tension of a coming war**, and did so through the same methods as the Plaintiff: (1) by creating a prophecy of a coming war, and (2) through recurring conversational reminders of the coming war. Consider the following conversations about the coming war, and how they create tension in the HP series:

1. In HPOP (chapter 5, pp 92-93, hb) Sirius Black tells Harry that he fears Voldemort is

building up an army, then explains that long ago Voldemort had huge numbers of wizards, witches and Dark creatures at his command, and further explains that he and Order of the Phoenix hope to stop Voldemort from getting more followers.

2. 27:00 into the HPOP film, Harry Potter ask Sirius if he thinks there is going to be a war (the fearless Harry Potter suddenly asking this question, subtly confessing deep anxiety).
3. Hagrid somberly tells Harry, “There’s a storm coming, Harry. We’d all best be ready when she does.” (HPOP film, approx 1:19:40). This clearly creates ambient tension.

In addition to these examples, the Defendants’ **HPHBP** infringes the Plaintiff’s *ambient tension of coming war*, in such places as chapter 1, as the Minister for Magic tells the UK Prime Minister that the wizard world is at war, and this may impact the Muggle world. And HPHBP chapter 3 (p 42, hb) warns of the rising threat of Death Eaters. **HPDHP1** infringes the Plaintiff’s *ambient tension of war* in the opening shot, when the Minister says, “These are dark times, there is no denying...”, and moments later, as the Dursleys (Harry’s unkind family) are seen fleeing the UK. **HPDHP2** infringes this regularly, including at 10:00 (approx), when Mr Ollivander tells Harry that if Voldemort has the Elder Wand, Harry really doesn’t have a chance. All of this infringes the Plaintiff’s *ambient tension of coming war*.

- In the four HP books that pre-date the Plaintiff’s 13 Gates, the Plaintiff found no sentence that claimed Voldemort had ever engaged in war or creating an Army.

38. SETTING/SCENE: A Central & Meaningful Scenes (Which May Result In The Death Of One Or More Primary Characters) Unfolds On The OCEAN COAST

- Prior to the Plaintiff’s work, there was NOT a coastal scene in the first 4 HP books.
- AFTER the Plaintiff’s work, there were coastal scenes in the final three HP films.

The Plaintiff’s 13 Gates story outline specified that the final grand battle of the series would occur on the ocean coast. Page 6 of the 13 Gates outline (Ex C), the Plaintiff wrote :

In the end Joey will go back to the Planet where his father last battled Gormatu.
And wage war against Gormatu with his father along the coast.

After the Plaintiff's evocative vision of a father and son, standing on a shore, prepared to die together, the Defendants followed suit, and used this setting for two emotional moments (1. Dumbledore and Harry visited the coast, just before Dumbledore was killed, HPHBP, chap 26, p 555, hb; 2. When Dobby was killed and buried, in HPDH, chapters 23 and 24).

In locating these scenes on the coast (when the Defendants had never used the coast in any of their first 4 books/films) the Defendants' HPHBP and HPDH infringed the Plaintiff's work.

39. "FATE OF THE WORLD" STAKES: The Consequences Of The Hero Failing To Defeat The Villain Will Be Cataclysmic, And The ENTIRE WORLD Will Fall Under The Grip, Rule Or Threat Of The Evil Villain.

- For the first four HP books, Muggles (regular humans) were oblivious and indifferent to the wizard world. Voldemort's antics did not resound outside of the wizard world; thus, the consequences of Harry's and Voldemort's battles were meaningless. And when Harry returned to his *Muggle* family, each Summer, they had no idea about, or interest in the wizard world. But, to infringe the Plaintiff's "fate of the world" stakes, this needed to change: Regular humans (Muggles) would need to become aware of the wizard world. So the Harry Potter world would change.

The Plaintiff's *13 Gates of Rane* outline (Ex D) explains that if Gormatu is not defeated by the "Expected Hero" (Joey and Rebecca) he will **enslave the entire world** and feed on our suffering and misery (p10). These are the enormous, *fate of the world*, globally significant stakes.

The Defendants infringed the Plaintiff's *fate-of-the-world* global stakes, by making the consequences of Harry failing to stop Voldemort that Voldemort would persecute all Muggles (humans).⁹ (Prior to this, Muggles were unaware of, and indifferent to, wizards and Voldemort.)

⁹ To go from their previously meaningless stakes, to fate-of-the-world consequences, the Defendants needed (1) to change Voldemort's goal, from *seeking eternal life*, to ***growing an***

40. PLOT

Infringing the Plaintiff's work, the plots of both works share the following 25 aspects (which were not featured in the prior HP books and films), and more:

- a. PLOT: Before The Hero Can Defeat The Villain, The Hero Must Find Various Items, Which Are Known To The Hero, And Which Happen To Be Enchanted. But Time Is Running Out. The Villain Will Attack Soon, And All Items Must Be Found Before The Villain Can Be Defeated.
- b. The Villain, From Miles Away, Telepathically Speaks Into The Hero's Mind/Dreams, And Taunts The Hero (Telling The Hero That He —the Villain— Has Killed Or Harmed The Hero's Father, Father-figure Or Family), But The Villain's Taunt Is A Lie. (The Villain Can Also Use This Skill From Close Range.)
- c. The Villain Has The Power To Speak Into, Or Enter Into, The Hero's Mind Or Dreams —or Speak Into, Or Enter Into, Any Character's (Host's) Mind/Dreams. The Villain Has The Power To Do So Even If The Villain's Body Is Many Miles Away From The Host.
- d. Villain's Goal Is To Build An Army, Conquer, Enslave/Persecute.
- e. The Linear Primary Story Contains One Or More Central Fairytale-like Myth Stories

army to create a new world order where muggles are persecuted; and (2) the muggle world needed to seem *aware* of the wizard world; because it's impossible to convince readers that Voldemort threatens the world, if muggles are unaware and indifferent to Voldemort's activities. Toward this, in HPHBP, chapter 1, the Defendants had the UK Prime Minister (PM) and the Minister for Magic Fudge (president of wizards) discuss Voldemort and security issues. Then, in HPDH, chapter 3, we see the Dursleys are very concerned about the wizard world (as they are going into hiding from Voldemort) and Voldemort's actions are being covered on TV (HPDH, chap 3, p 34, pb). And the Defendants show Muggles are aware and fearful of Voldemort (and aware of Harry's importance) by having the PM sacrifice his chief wizard bodyguard (Kingsley) to protect Harry. But the problem with all of this was: for the first 4 or 5 books Muggles didn't know about or care about Wizards. So the Defendants used the first chapter of HPHBP to suggest that, secretly, Fudge told the PM, years earlier, about Voldemort committing "a thousand terrible crimes," and about Voldemort's disappearance (HPHBP, chap 1, p 11, hb), and about Harry Potter and the events of HPPA (HPHBP, chap 1, p 7, 8, hb), and about Voldemort's Death Eaters' perverse abuse of muggles at the "kwidditch" match in HPGF (HPHBP, chap 1, p 9, hb).

Within-the-larger-story —myth/Stories Which Are Independent And Separate From The Primary Story, But Related To The Primary Linear Story.

- f. The Fairytale-like Myth Stories Reveal The Special Powers Of Items That The Hero Must Find, And/Or The Origin/Background Of The Items. The Hero Must Utilize The Power Of At Least One Of These Items To Prevail Against The Villain.
- g. The Story Features A Special Room (Or “Chamber” Or “Hall”) With 12 Or 13 Unusual Doors (Or “Gates” Or “Portals”) Around The Perimeter Of The Room. The Doors Lead To Various Unlikely And Far-fetched Places.
- h. A Strange Dream Leads The Hero To A Room With 12 Or 13 Doors—Which Lead To Unlikely And Far-Fetched Places, Which May Defy Reason And/Or Physics.
- i. The Story Features A Door (Or Many Doors) That Leads To Another World.
- j. The Story Features “Paired Teleportation Doors.” A Door/Gate (Or Portal Or Cabinet) That Leads To A “Twin” Door/Gate. Together, These Paired Doors Are Used To Transport People From One Door/Cabinet Location To Another Door/Cabinet Location, Many Miles Away.
- k. The Story Features A Prophecy Of A Villain & Hero Who Will Inevitable Engage In Fierce Combat, But The Prophecy Does Not Predict Who Will Prevail.
- l. The Story Features Numerous Enchanted Items, Which Are Tightly And Deeply Connected To The Central Plot
- m. The Plot Features An Enchanted Crown.
- n. The Plot Features An Enchanted Sword.
- o. The Plot Features An Enchanted Necklace.
- p. The Plot Features An Enchanted Ring.

- q. The Story Features A Magical Bottomless Bag.
- r. In The Story The Villain Is Building An Army Of Powerful Minions.
- s. In A Grand Battle, The Villain's Countless Minions Race Down A Mountain/Hill To Attack The Hero And His Forces Of Good.
- t. In The Story, Alongside His Long-lost Father (Or Long-lost Father-figure Or Family Member), The Child Hero Fights The Villain (And/Or The Villain's Minions) In A Great Battle.
- u. The Hero Assembles A Rag-tag, Motley, Misfit Army, To Fight The Villain's Army.
- v. A Secondary Hero Saves The Hero, And Fights The Villain More Successfully Than The Primary Hero Fought The Villain.
- w. A Central Adult Character Explains The Spacial Limits Of Magic To The Young Hero.
- x. The Story Features A "Fish Out Of Water" Sequence (In Which The Young Heroes From The Country, Or "Exurbs", Venture Into The Big City.
- y. "Fate Of The World" Stakes: The Consequences Of The Hero Failing To Defeat The Villain Will Be Cataclysmic, And The Entire World Will Fall Under The Grip, Rule Or Threat Of The Evil Villain.

41. The HERO

Infringing the Plaintiff's work, the following 13 aspects (and more) are true of the heroes of both works (but were not true about Harry Potter in the prior HP works):

- a. The Villain, From Miles Away, Telepathically Speaks Into **The Hero's** Mind/Dreams, And Taunts The Hero (Telling The Hero That He —The Villain— Has Killed Or Harmed The Hero's Father, Father-figure Or Family), But The Villain's Taunt Is A Lie. (The Villain Can Also Use This Skill From Close Range.)

- b. The Fairytale-like Myth Stories Reveal The Special Powers Of Items That **The Hero** Must Find, AND/OR The Origin/Background Of The Items. **The Hero** Must Utilize The Power Of At Least One Of These Items To Prevail Against The Villain.
- c. Along His Journey, The Hero Must Accept That He/She Cannot Succeed Alone, And Needs The Help Of Other Heroic Characters.
- d. A Strange Dream Leads The Hero To A Room With 12 Or 13 Doors—which Lead To Unlikely And Far-fetched Places.
- e. The Story Features A Prophecy Of A Villain & Hero Who Will Inevitable Engage In Fierce Combat, But The Prophecy Does Not Predict Who Will Prevail.
- f. The Hero's Consciousness/Soul Can Leaves His/Her Body, In A Dream (Or Awake), To Enter The Mind And Body Of Another Entity.
- g. Alongside His LONG-LOST FATHER (Or Long-Lost Father-figure Or Family Member), The Child Hero Fights The Villain (And/Or The Villain's Elite Minions) In A Great Battle.
- h. The Hero Assembles A Rag-Tag, Motley, Misfit Army, To Fight The Villain's Army.
- i. The Hero's Body Is Possessed By A Foreign Entity—who Causes The Hero To Behave Peculiarly.
- j. A Secondary Hero Saves The Hero, And Fights The Villain More Successfully Than The Primary Hero Fought The Villain.
- k. A Central Adult Character Explains The Spacial Limits Of Magic To The Young Hero.
- l. "FISH OUT OF WATER" Sequence: The Story Includes A Central And Sustained Sequence In Which The Young Heroes (From The Country, Or "Exurbs") Venture Into The Big City.

- m. “FATE OF THE WORLD” STAKES: The Consequences Of The Hero Failing To Defeat The Villain Will Be Cataclysmic, And The ENTIRE WORLD Will Fall Under The Grip, Rule Or Threat Of The Evil Villain.

42. The VILLAIN

Infringing the Plaintiff’s work, the following 7 aspects (and more) are true of the heroes of both works (but were not true about the villain Voldemort in the prior HP works):

- a. A Prophecy Connects The Villain And The Hero.
- b. The Villain, From Miles Away, Telepathically Speaks Into The Hero’s Mind/Dreams, And Taunts The Hero (Telling The Hero That He —The Villain— Has Killed Or Harmed The Hero’s Father, Father-figure Or Family), But The Villain’s Taunt Is A Lie.
- c. The Villain Has The Power To Speak Into, Or Enter Into, The Hero’s Mind Or Dreams —Or Speak Into, Or Enter Into, Any Character’s (Host’s) Mind/Dreams, From Many Miles Away—Or From Close Range.
- d. The Villain Is Building An ARMY OF POWERFUL MINIONS.
- e. The Villain’s Countless Minions Race Down A Mountain/Hill To Attack The Hero And His Forces Of Good.
- f. The Villain’s Minions Include A GREAT VARIETY OF DARK CREATURES.
- g. The Villain Prevails In One Or More Of The Book/Film’s Final Grand Battle.
- h. Villain’s Goal is To Build An Army, Conquer, Enslave/Persecute.

43. OTHER CENTRAL STORY ELEMENTS: Themes, Mood, Pace, Genre.

The two works share over 35 **plot** and story similarities, previously described, herein. This includes sharing the Plaintiff’s unique and original “scavenger hunt” plot (see item #2), and many other aspects, described in the preceding 38 items, herein.

Plaintiff's 13 Gates of Rane and HPOP, HPHBP, HPDH share two major **themes**:

- a. **Stronger and better together** (this is expressed in how the hero receives help at every juncture, and how it is made clear that the hero cannot prevail alone).
- b. **Heroes never quit.**

13 Gates of Rane **genre** is *Fantasy* and *Sci-Fi*. In June 2021, Peacock direct streaming service (where HP films can be streamed) places Harry Potter films in the *Fantasy* and *Sci-Fi* genres. (NOTE: Peacock has since stopped displaying HP films' genre.)

Both stories have elements that also place them in the *action, adventure, drama* and *fiction genres*. The Plaintiff's work falls primarily into the *science fiction* genre. *Peacock* streaming places Harry Potter in both "science fiction" and "fantasy" genre.

The **mood** of the two works are similar; intend for younger readers, but dark. The HP works that predate 13 Gates of Rane (the first 4 HP books), are much lighter in mood than the final 3 books. So much so, that many book critics have commented that the later books are almost unrecognizable. This is observed in various Wikipedia *Harry Potter* entries (see below).

The Boston Globe correspondent LIZ ROSENBERG wrote, "The book bears the mark of genius on every page" and praised the imagery and darker tone of the book, considering that the series could be crossing over from fantasy to horror.^[28] The Associated Press writer Deepti Hajela praised the newfound emotional tones and ageing Harry to the point at which "younger fans may find [the series] has grown up too much."^[33] Emily Green, a staff writer for the *Los Angeles Times*, was generally positive about the book but was concerned whether young children could handle the material.^[35] Cultural critic Julia Keller of the *Chicago Tribune* called it the "most eloquent and substantial addition to the series thus far"

Above: A highlighted Wikipedia entry for HPHBP (book), showing critics commenting on the series' change of mood (and even change in genre).

There are pronounced similarities between key central **characters** (particularly between the heroes and the villains), as shown previously, herein. There are also **setting, pace, scene, dialogue, climax, and style** similarities between the Plaintiff's 13 Gates story notes and the Defendants' HPOP, HPHBP and HPDH books and films, as shown previously, herein.

Infringement Breakdown

To help the Court fully assess the nature and extent of the Defendants' infringement, the Plaintiff provides the following information, which names the elements of the Plaintiff's *13 Gates of Rane* story outline that are infringed by (1) Harry Potter and the Order of the Phoenix, (2) Harry Potter and the Half-Blood Prince, and (3) Harry Potter and the Deathly Hallows:

- a. HPOP infringes 23 story structures of the Plaintiff's 13 Gates of Rane.
- b. HPHBP Prince infringes 17 story structures of the Plaintiff's 13 Gates of Rane.
- c. HPDH infringes 27 story structures of the Plaintiff's 13 Gates of Rane.

The particular story structures infringed by the Defendants' Harry Potter series are named under the following, respective, Harry Potter book/film title headings.

“HARRY POTTER AND THE ORDER OF THE PHOENIX” Infringes 24 Of The Plaintiff's Unique Story Structures

HPOP infringes the following 24 story structures of the Plaintiff's 13 Gates of Rane:

1. **PLOT/CHARACTERS/SCENE: The Villain, From Miles Away*, Telepathically Speaks Into The Hero's Mind/Dreams, And Taunts The Hero That He (The Villain) Has Killed Or Harmed The Hero's Father (Father-Figure Or Loved One). But The Taunt Is A Lie.**
2. **The Villain Speaks Into, Or Enters Into, The Hero's Mind Or Dreams —Or Speaks Into, Or Enters Into, Any Character's (Host's) Mind/Dreams. (Doing So With or WITHOUT A TAUNT, And With Or WITHOUT A LIE). The Villain Has The Power To So Even If The Villain's Body Is Many Miles Away From The Host.**
3. **The Hero Must Accept That He/She Cannot Succeed Alone, And Needs The Help Of Other Heroic Characters. (This Is A Huge Departure For Harry Potter.)**
4. **The Story Features A Special Room (Or “Chamber” Or “Hall”) With 12 Or 13**

**Unusual Doors (Or “Gates” Or “Portals”) Around The Perimeter Of The Room.
The Doors Lead To Various Unlikely And Far-Fetched Places.**

5. **A Strange Dream Leads The Hero To A Room With 12 Or 13 Doors—Which Lead To Unlikely And Far-Fetched Places, Which May Defy Reason And/Or Physics.**
6. **The Story Features A Door (Or Many Doors) That Leads To Another World.**
7. The Story Features A Prophecy That The Villain & Hero Will Inevitably Engage In Mortal Combat, But The Prophecy Does Not Predict Who Will Prevail.
8. **In The Story The Hero’s Consciousness/Soul Can Leave His/Her Body (In A Dream, Or Awake), To Enter The Mind And Body Of Another Entity.**
9. The Villain Is Building An ARMY OF POWERFUL MINIONS.
10. **Reunited With His LONG-LOST FATHER (Or Long-Lost Father-figure, Or Lost Family Member), The Child Hero Battles The Villain (And/Or The Villain’s Elite Minions) Alongside His Long-Lost Father (Or Father-Figure).**
11. The Hero Assembles A Rag-Tag, Motley, Misfit Army, To Fight The Villain’s Army.
12. **The Hero’s Is Possessed By A Foreign Entity, Who Causes The Hero To Behave Oddly.**
13. A Secondary Hero Saves The Hero; Then Fights The Villain More Successfully Than The Primary Hero Fought The Villain.
14. One Or More Important & Meaningful Scenes Unfolds On The Ocean Coast.
15. The Villain Prevails In One Of The Book/Film’s Final Grand Battle.
16. **“The Chosen One” Infringes “The Expected Hero.” Harry Potter Became “THE CHOSEN ONE,” To Infringe The Plaintiff’s “EXPECTED HERO” —To Evoke The Power Of The Infringing PROPHECY.**

17. **A Central Adult Character Explains The Spacial Limits Of Magic To The Hero.**

18. PLOT: The Hero Who Is From the Exurbs Or Suburbs Goes To The Big City.

The Story Includes A Central And Sustained Sequence In Which Young Heroes (From The Exurbs Or Suburbs) Journey To The Big City.

This occurs in HPOP (chap 34-36), when Harry and other kids travel on thestral to London, without adult supervision.

19. A Central Story Component Is Developing The Ambient Tension Of A Coming War.

20. Villain's GOAL: Build An Army, Conquer The Earth/Universe, Enslave/Persecute.

21. The Villain's Minions Include A GREAT VARIETY OF DARK CREATURES.

22. PLOT (Many aspects; see above).

23. Hero (Many aspects; see previous "Hero" section).

24. Villain (Many aspects; see previous "Villain" section).

**"HARRY POTTER AND THE HALF-BLOOD PRINCE"
Infringes 17 Of The Plaintiff's Unique Story Structures**

The Plaintiff believes that although the 11 items in **bold** under the specific infringement claims against "Harry Potter And The Order of The Phoenix" are not named in these specific claims against HPHBP, the Court should view those items as infringed by HPHBP, because the HP series is a linear, on-going series, and the backstory of HPOP is alive and active in HPHBP.

HPHBP infringes the following 18 story structures of the Plaintiff's 13 Gates of Rane:

1. PLOT: Before The Hero Can Defeat The Villain, The Hero Must Find Various Items, Which Are Known To The Hero, And Which Happen To Be Enchanted. But Time Is Running Out. The Villain Will Attack Soon, And All Items Must Be Found Before The Villain Can Be Defeated.
2. The Hero Must Accept That He/She Cannot Succeed Alone, And Needs The Help Of

Other Heroic Characters. (This Is A Huge Departure For Harry Potter.)

3. The Story Features “Paired Teleportation Doors.” A Door/Gate (Or Portal Or Cabinet) That Leads To A “Twin” Doors. Together, These Paired Doors Are Used To Transport People From One Door’s Location To The Other Door’s Location, Many Miles Away.
4. The Story Features A Prophecy That The Villain & Hero Will Inevitably Engage In Mortal Combat, But The Prophecy Does Not Predict Who Will Prevail.
5. In The Story The Hero’s Consciousness/Soul Can Leave His/Her Body (In A Dream, Or Awake), To Enter The Mind And Body Of Another Entity.
6. The Story Features Numerous ENCHANTED ITEMS, Which Are Tightly And Deeply Connected To The Central Plot.
7. The Plot Features An ENCHANTED NECKLACE that has a substantial role in the plot.
8. The Plot Features An ENCHANTED RING that has a substantial role in the plot.
9. The Villain Is Building An ARMY OF POWERFUL MINIONS.
10. The Hero Assembles A Rag-Tag, Motley, Misfit Army, To Fight The Villain’s Army.
11. One Or More Important & Meaningful Scenes Unfolds On The Ocean Coast.
12. “The Chosen One” Infringes “The Expected Hero.” Harry Potter Became “THE CHOSEN ONE,” To Infringe The Plaintiff’s “EXPECTED HERO” —To Evoke The Power Of The Infringing PROPHECY.
13. A Central Story Component Is Developing The Ambient Tension Of A Coming War.
14. “FATE OF THE WORLD” STAKES: The Consequences Of The Hero Failing To Defeat The Villain Will Be Cataclysmic, And The ENTIRE WORLD Will Fall Under The Grip, Rule Or Threat Of The Evil Villain.
15. Villain’s GOAL: Build An Army, Conquer The Earth/Universe, Enslave/Persecute.

16. The Villain Prevails In One Of The Book/Film's Final Grand Battle.

Because Snape kills Dumbledore (which is what Voldemort wished) and Snape also defeated Harry, easily, in book/film's conclusion, this is a clear win for Voldemort.

17. PLOT (Many aspects; see previous detailed plot claims section).

18. Hero (Many aspects; see previous detailed hero claims section).

“HARRY POTTER AND THE DEATHLY HALLOWS”

Infringes 27 Of The Plaintiff's Unique Story Structures

Again, the Plaintiff believes that although the 11 items in **bold** under the specific infringement claims against “Harry Potter And The Order of The Phoenix” are not named in these specific claims against HPDH, the Court should view those items as infringed by HPDH, because the HP series is a linear series, and the backstory of HPOP is alive and active in HPHBP.

HPHBP infringes the following 27 story structures of the Plaintiff's 13 Gates of Rane:

1. PLOT: Before The Hero Can Defeat The Villain, The Hero Must Find Various Items, Which Are Known To The Hero, And Which Happen To Be Enchanted. But Time Is Running Out. The Villain Will Attack Soon, And All Items Must Be Found Before The Villain Can Be Defeated.
2. PLOT: The Hero Who Is From the Exurbs Or Suburbs Goes To The Big City. The Story Includes A Central And Sustained Sequence In Which Young Heroes (From The Exurbs Or Suburbs) Journey To The Big City. FISH OUT OF WATER.
3. The Villain Speaks Into, Or Enters Into, The Hero's Mind Or Dreams —Or Speaks Into, Or Enters Into, Any Character's (Host's) Mind/Dreams. The Villain Has The Power To So Even If The Villain Is Many Miles Away From The Host.
4. The Linear Primary Story Contains One Or More Central Fairytale-like Myth Stories,

Within-The-Larger-Story. These Myth/Stories, Are Separate From The Primary/Outer Story, But They Are Integrally Related To The Primary/Outer Story.

5. The Fairytale-like Myth Stories Reveal The Special Powers Of Items That The Hero Must Find, AND/OR Reveal The Origin/History Of The Items. The Hero Must Utilize The Power Of At Least One Of These Items To Prevail Against The Villain.
6. The Hero Must Accept That He/She Cannot Succeed Alone, And Needs The Help Of Other Heroic Characters. (This Is A Huge Departure For Harry Potter.)
7. The Story Features A Prophecy That The Villain & Hero Will Inevitably Engage In Mortal Combat, But The Prophecy Does Not Predict Who Will Prevail.
8. In The Story The Hero's Consciousness/Soul Can Leave His/Her Body (In A Dream, Or Awake), To Enter The Mind And Body Of Another Entity.
9. The Story Features Numerous ENCHANTED ITEMS, Which Are Tightly And Deeply Connected To The Central Plot.
10. The Plot Features An ENCHANTED CROWN that has a substantial role in the plot.
11. The Plot Features An ENCHANTED NECKLACE that has a substantial role in the plot.
12. The Plot Features An ENCHANTED SWORD that has a substantial role in the plot.
13. The Story Features A MAGICAL BOTTOMLESS BAG.
14. The Villain Is Building An ARMY OF POWERFUL MINIONS.
15. In A Central Grand Battle, The Villain's Countless Minions Race Down A Mountain/Hill To Attack The Hero And His Forces Of Good.
 - (Impossible for the Harry Potter series, because Hogwarts was located a mountain top)
16. Countless Of The Villain's Minions' Arrows Obscure (Block) The Sky.
17. The Hero Assembles A Rag-Tag, Motley, Misfit Army, To Fight The Villain's Army.

18. One Or More Important & Meaningful Scenes Unfolds On The Ocean Coast.
19. The Plaintiff's Villain, Gormatu, Fed On Suffering & Misery (Despair). Prior To The Plaintiff's Work, The Defendants Villains, THE DEMENTORS, Fed On "Happiness," In HPPA. But The Defendants Changed This In HPDH (To Copy The Plaintiff). Thus, In HPDH, Dementors Suddenly "Feed Off Fear And Despair."
20. "The Chosen One" Infringes "The Expected Hero." Harry Potter Became "THE CHOSEN ONE," To Infringe The Plaintiff's "EXPECTED HERO" —To Evoke The Power Of The Infringing PROPHECY.
21. A Central Story Component Is Developing The Ambient Tension Of A Coming War.
22. A Principal Heroic Character Follows A Strange Light.
23. "FATE OF THE WORLD" STAKES: The Consequences Of The Hero Failing To Defeat The Villain Will Be Cataclysmic, And The ENTIRE WORLD Will Fall Under The Grip, Rule Or Threat Of The Evil Villain.
24. Villain's GOAL: Build An Army, Conquer The Earth/Universe, Enslave/Persecute.
25. PLOT (Many aspects; see previous detailed plot claims section).
26. Hero (Many aspects; see previous detailed hero claims section).
27. Villain (Many aspects; see previous detailed villain claims section).

In Sum

Once the Plaintiff's ideas (including the Plaintiff's ideas named in the previous infringement section) are extracted from the Defendants' infringing works (HPOP, HPHBP, HPDH), there is nothing left to market but a boy and a villain who are magicians. Nothing.

EXPANDING INFRINGEMENT AND ONLINE FRAUD AND FALSIFICATION

The Plaintiff suspects that his terminology "dream walker" or "dreamwalker" is his

original concept. Used Google's modified search functions to investigate any use of either of those terms that predate the Plaintiff's work (the Plaintiff's search parameters were January 1990 to December 2000). All of the relevant search results had either never been crawled by the Internet Archive, or the Internet Archive had a fraudulent and unlawfully backdated crawl of the web page. These fake Internet Archive crawls were easily identifiable because rather than going to the proper calendar page, indicated by the prefix of the Internet Archive's URL, followed by the URL of the website that the user selected, the Internet Archive returned results that added four digits (which appear to indicate what year the fake page was created: 2016, 2020, etc) between these URLs; then, rather than properly presenting a "calendar view" of the current year, and allowing the user to select a previous year, if he/she so chooses, the Internet Archive improperly automatically redirects to a predetermined year. The Plaintiff suspects that the Defendants (Warner Brothers and WarnerMedia, and connected studios, via Motion Picture Association and MovieLabs, including Disney, Twentieth Century Fox, Paramount Pictures, Universal Pictures, Sony Pictures, Netflix, and Lionsgate) paid to produce these falsified Internet Archive crawls so they could improperly infringe (steal) the Plaintiff claim to the name/phrase "dream walker" or "dreamwalker" for their own works, such as the film "The Last Witch Hunter," which utilized the term dreamwalker.

Add prophecy claim

Room of requirement