

**PLAINTIFF’S INFRINGEMENT CLAIMS AGAINST DEFS WALT DISNET STUDIOS  
MOTION PICTURES, LUCASFILMS LTD, **BAD ROBOT PRODUCTIONS**, FOR  
INFRINGING THE PLAINTIFF’S SCRIPT *UBEROPOLIS: CITY OF LIGHT* (2003-2006),  
AND LATER VERSION *BUTTERFLY DRIVER* (2006-2007), VIA PUBLICATION OF  
THE “STAR WARS” SERIES FILM (AND ASSOCIATED MERCHANDISE) TITLED:  
“THE FORCE AWAKENS” (2015) ALSO CALLED “STAR WARS: EPISODE VII —  
THE FORCE AWAKENS” (2015)**

This section enumerates and describes the Plaintiff’s infringement claims against Defendants (**Defs**) Walt Disney Studios Motion Pictures, Lucasfilms Ltd, Bad Robot Productions, for producing, distributing, publishing the film *The Force Awakens* (AKA: *Star Wars Episode VII — The Force Awakens*), which infringes the Plaintiff’s screenplay *Uberopolis: City of Light* (**Uber**), written from 2003-2005 and 2006, attached as Exhibit B (**Ex B**), and/or the later version, *Butterfly Driver* (**BD**), 2006-2007, attached as Exhibit A (**Ex A**).

Many of the Plaintiff’s individual claims are independently copyrightable, and protected independently under common law, as they were UNPUBLISHED ideas and expression.

- ★ These independently copyrightable ideas are marked with a STAR symbol.
- Many of the story elements infringed by the Defs’ *The Force Awakens* marked a serious deviation for the Star Wars franchise. Thus, a bullet-pointed notation will note when the Defs’ infringement marks a serious deviation for the Star Wars franchise.

Each of the following 45 enumerated story structures/elements, and element groupings, appear in the Plaintiff’s script and the Defs’ film *The Force Awakens*. These similarities constitute deep infringement of the Plaintiff’s work. Further, several of the story structures are independently copyrightable. Several key aspects of the Plaintiff’s character *Benni*, AKA *Tina* (*Tina* from *Uber*, is renamed *Benni* in *BD*) are claimed, and the entire copyrightable character is claimed in item 45. Without infringing these aspects and the character *Benni/Tina*, the Defs’ film, *The Force Awakens*, could not exist. The Plaintiff’s claims begin on the following page.

**1. OVERARCHING PLOT.** The story involves a tyrannical government that oppresses the people it claims to rule, by indiscriminately killing them, via mass murder. The evil government’s power and corruption are embodied by a colossal man-made space station, which features seemingly natural (but man-made) planetary formations (such as lakes and hills). Against this back drop, a group of RESISTANCE fighters, who do not want to live under the government’s rule, fight back against the evil government. As the war grinds on, a poor hero, from an impoverished world where food is hard to obtain, arrives on the giant space station —pursued by another hero. Together, on the space station, the two heroes battle the villain, while explosions and fires rage and force the evacuation of the space station. In the climatic battle, one of the heroes is critically wounded by the villain, and appears to die near the moment that the space station explodes. But, in the story’s concluding moments, it is revealed that the wounded hero has survived.

- ★ This plot structure is independently copyrightable.
- This plot structure departs and deviates from all prior Star Wars films (which featured simplistic good vs evil fairytale structures, such as a primary female *princess*, and centuries old “award ceremony endings”; characters did not experience poverty or hunger, women wore feminine clothe -usually dresses- and were not starpilots.)

Plaintiff’s Work	Defs’ film, “The Force Awakens”
<p>In Butterfly Driver, the hero Arlo is pursued to the space station (Uberopolis) by the hero Jerry Matthiessen, who hopes to keep the villain’s forces from killing Arlo.</p>	<p>In The Force Awakens, the hero Rey is pursued to the space station (Starkiller base) by the hero Finn, who loves Rey and hopes to keep the villain from killing her.</p>

- All of the proceeding overarching plot facts violate Star Wars franchise history:
  - a. In the prior 6 Star Wars films (1977-2014) the government did not kill indiscriminately (Vader and the Emperor killed to instill fear, to expand power and impose “order”).
  - b. The exterior of all previous Star Wars space stations were entirely steel. The Death Stars did not feature natural geological features (lakes, mountains, hills).
  - c. No previous Death Star was ever evacuated.

- d. No Star Wars hero ever seemed to die, only to be seen alive, in body, a few minutes later.
- e. No Star Wars hero was ever depicted as poor and suffering from hunger or food scarcity.

**2. PLOT STRUCTURE: In an early scene, when a heroic character learns that the government has entered his town in search of the heroic character, he realizes that he must race and leave town immediately. THIS EVENT IS THE CATALYST OF THE ENTIRE STORY.**

Plaintiff's Work	Defs' film, "The Force Awakens"
<p>Page 10 of Butterfly Driver (Ex A) the hero Arlo learns State bounty hunters have come for him, so he must immediately rush to leave his impoverished city/town.</p>	<p>In the opening minutes, when the government storm-troopers arrive, Poe (a Resistance pilot) must escape, because he has a droid that the villain wants.</p>

**3. PLOT STRUCTURE: The hero(s) must find the RESISTANCE HEADQUARTERS to achieve their objective. Getting to the Resistance Headquarters takes up a substantial share of the film.**

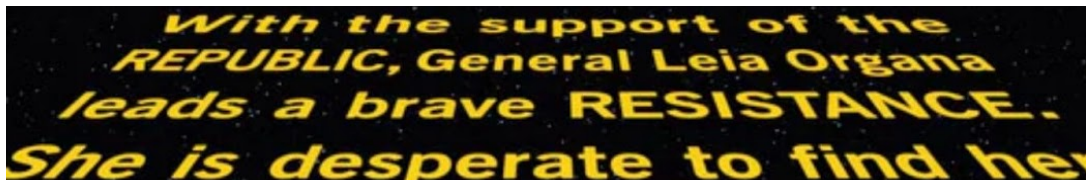
Plaintiff's Work	Defs' Infringing film, "The Force Awakens"
<p>On page 59 of Uberopolis (Ex B) and page 48 of Butterfly Driver (Ex A) the hero, Arlo, explains he must get to the AIR Center, or Z.R. center (the Resistance headquarters). In Butterfly Driver, getting to the Resistance headquarters takes about 15% of the story</p>	<p>Around 40:00 we learn that Rey is determined to help get her recently befriended robot to the Resistance headquarters. Getting to the headquarters takes about half the movie.</p>

**4. SIGNATURE STORY STRUCTURE & PLAINTIFF'S UNIQUE LANGUAGE: The heroes fight for the "Resistance." [The Plaintiff's hero fought for (and founded) the "AIR Resistance" —later called the "Zone Resistance" (Z.R.).**

- This language betrays all Star Wars history and continuity, as in the first SIX (6) Star

Wars films (1977 to 2005) the heroes fought for the “Rebellion” or “Rebel Alliance.” But suddenly, after the Plaintiff created his work, they were called the “Resistance.” Many sci-fi and fantasy films copied this language AFTER the Plaintiff’s work (**Hunger Games, Harry Potter...**). The Plaintiff has found no known such sci-fi and fantasy films using this language that pre-date his script. (Curiously, by 2011, even Occupy Wall Street would co-opt this language.)

Plaintiff’s Work	Def’s film, “The Force Awakens”
<p>In <i>Uber</i> (Ex B), Arlo fought for (and formed) the AIR Resistance (see pp 17, 59, etc).</p> <p>In BD (Ex A, pp 22, 46, 52...) the Resistance is called the <i>Zone Resistance</i> (“Z.R.”). <b>Also see early version of Butterfly Driver (Ex F).</b></p>	<p>The Def’s film infringes this, as the characters all speak of the “Resistance” and are searching for the “Resistance headquarters.”</p>



**Above:** The Defs so appreciated the Plaintiff’s terminology, that the term “Resistance” was capitalized in the film’s opening scroll.

- 5. Female hero who is poor, between 18-30years old, who struggles with hunger and food insecurity, who lives in an impoverished world, whose parents were killed years earlier, in a war that quietly goes on.**

Plaintiff’s Work	Def’s film, “The Force Awakens”
<p>Page 47-65 of BD (Ex A) the female hero “Benni” guards workers on their way to a factory (in exchange the workers sometimes</p>	<p>All of these conditions and characteristics apply to the Defs heroic female character “Rey,” in the Defs’ film The Force Awakens.</p>

buy Benni and her brother food.) As Benni and Arlo walk to Faith House they encounter children who have not eaten for two days.	
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- Prior to the Plaintiff’s work, in none of the Star Wars films, from 1977 to 2014, did a character ever struggle with hunger, food insecurity or poverty. Prior to the Plaintiff’s work, it appears that this collection of characteristics had NEVER been executed.

**6. The Female heroic character collects items that most people would consider junk as part of her daily life.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
<p>In the Uberopolis screenplay (Ex B, p 60), the heroic female Tina collects clothes from a dumpster to help the poor in her community.</p> <p><b>TINA: “We collect the sweat-shop's irregular clothes from their dumpster to give to the community...”.</b></p>	<p>The heroic female Rey, from Defs’ The Force Awakens, collects any items she can scavenge, to trade for food.</p>

- Never in any prior Star Wars film do we see a character searching for and collecting junk.



Above: Rey gathering her collected items, in The Force Awakens.

**7. The female hero lives in ruins caused by a war that occurred years earlier.**

Plaintiff's Work	Def's film, "The Force Awakens"
Page 47-50 of the Plaintiff's BD screenplay (Ex A) the heroic female character, Benni, has converted an abandoned bombed-out building into her home.	At 14:44 of the film (The Force Awakens) we learn that the female hero, "Rey", has converted a fallen At-At walker (large futuristic military tank) into her home.

- Never before in a prior Star Wars film did any character live in war ruins.



Above: The At-At ruins where Rey lives, in The Force Awakens.

**8. UNIQUE CONJOINED CHARACTER AND SETTING: Heroic character who struggles with food insecurity, who collects discarded items to survive, who lives in a poor, tough and war ravaged world, and who has converted war ruins into a home, in a sci-fi or action adventure film.**

- ★ This is an independently copyrightable expression, which had not been done prior to the Plaintiff's work.

Plaintiff's Work	Def's film, "The Force Awakens"
In the Plaintiff's script, the heroic character "Benni" struggles with food insecurity and	All of these conditions and characteristics apply to the Defs Heroic female character

scarcity, collects discarded items, lives in a poor, tough, war ravaged world, and has converted war ruins into a home.	“Rey,” in the Defs’ film <i>The Force Awakens</i> . Rey collects junk, is poor, struggles with food insecurity, lives in converted war ruins...
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**9. The female hero dresses in tattered, old, rugged clothing.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
Pages 47 and 52 of the Plaintiff’s script describe Benni’s tattered jacket and tank top.	Throughout the Defs’ “The Force Awakens” we see Rey wearing tattered clothing.

- Prior to the Plaintiff’s work (2003-07), NEVER in the prior Star Wars films (1977 to 2014) did a heroic female character wear tattered clothing.



**Above:** Rey eats, wearing her tattered clothing, in the Defs’ *The Force Awakens*.



**10. UNIQUE PLOT AND CHARACTER STRUCTURE: Hero who, long ago, was a great war hero, who now earns a living transporting goods between cities/planets.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
The hero, Arlo, was a war hero (many year earlier), and is very famous, but he earns a living transporting goods between cities.	The hero, Han Solo, was a war hero (many year earlier), and is very famous, but he earns a living transporting goods between cities.



- This betrays original Star Wars story (1977-1983), when Han Solo transported PEOPLE (not goods) between planets. This was clearly changed to exactly infringe the Plaintiff.

**11. SCENE AND UNIQUE STORY STRUCTURE AND PLOT ELEMENT: The hero must race his futuristic flying vehicle very low to ground, to avoid being detected by the evil government’s fighters—and shot down. The hero gets into a chase and firefight with evil government forces, he/she spins the vehicle to exchange fire, and out-runs them.**

Plaintiff’s Work	Def’s Infringing film, “The Force Awakens”
<p>Page 16 of Butterfly Driver (Ex A) the hero, Arlo, explains that he must ride his flying craft very low to avoid being shot down:</p> <p><b>ARLO (CONT'D) “We run supplies between the zones on the outland. Ride outside the lanes or more than 100 feet from the surface, you trip the radar, signal the Blue Guard, and get shot down.”</b></p> <p>In pages 7 and 8 (Ex A) describe Arlo racing his hover-jet low, chased by an evil police hover-jet; Arlo spins, returns fire and escapes.</p>	<p>The Defs infringe this aspect <u>twice</u>.</p> <p>(1) At 33:02, heroes Finn and Rey must fly low to avoid being detected by the Empire. A low chase ensues. After being fired upon, the heroes return fire, and, when the gun jams, they must SPIN the ship to return fire. The heroes out-run the evil police/army ships.</p> <p>(2) At 1:35:57, Han and Finn must fly extremely low to avoid being detected</p>
	



**Above:** Twice the heroes of “The Force Awakens” must race their spaceship low to the ground, to avoid detection.



**12. SETTING:** The story features a giant man-made space station, which uniquely features natural appearing geological and water features (lakes, mountains...), as well as clearly man-made elements such as housing and spacecraft landing ports.

★ No American (or international) science fiction film featured a giant space station with visible natural appearing geological and water features until AFTER the Plaintiff’s work.

Thus, the Plaintiff’s believe this concept is copyrightable (just as the Defs’ prior vision of an all steal space station—the Death Star—was copyrightable).<sup>1</sup>

Plaintiff’s Work	Defs’ film, “The Force Awakens”
<p>Page 25 and 26 of the Plaintiff’s Uberopolis: City of Light script (Ex B) describe the Plaintiff’s space station’s natural geological, planetary and water features (forest, harbor, golf courses, aquatic life...)</p>	<p>The Force Awakens’ Starkiller space station features mountains, snow and lakes.</p>
	

**Above:** Left, rough illustration of Plaintiff’s Uberopolis space station; Right, the Defs’ Starkiller base space station, from The Force Awakens.

<sup>1</sup> The Stanford Torus (1975) also featured natural appearing features (lakes). However the Torus was never featured in any sci-fi films until 2013, years after the Plaintiff’s concept captured the imagination of Hollywood and beyond.

**13. Hero whose name and/or face is recognized seemingly everywhere.**

Plaintiff's Work	Defs' film, "The Force Awakens"
The heroic male "Arlo" is recognized seemingly everywhere, and everyone knows his name, and speak of his past heroics.	The character Han Solo is recognized everywhere, by name and face, and characters speak of his past heroics. (41:27)

- This is a huge departure for Star Wars. After Han Solo and Luke Skywalker saved the galaxy and defeated the Empire in *Star Wars* (1977), and after they were honored at an award ceremony, in the next TWO Star Wars films (1980 and 1983), Han Solo was not recognized by name or face. This was clearly done to infringe the Plaintiff.

**14. The Resistance fighters wear jackets with triangles over the hearts.**

Plaintiff's Work	Defs' film, "The Force Awakens"
Page 5 of Butterfly Driver (Ex A) the hero's (Arlo's) jacket has a heart over the heart.	



**Above:** In *The Force Awakens*, many Resistance fighters' jackets have triangles on them.

- In prior Star Wars films, the Rebellion fighters did not have triangles over their hearts.

**15. The gritty, tough, young, heroic female refers to an older heroic male as a “myth.”**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
On page 48 of BD (Ex A), the gritty, tough, young, heroic female “Benni” refers to the heroic male, Arlo, as a “myth.”	At 29:40, the gritty, tough, young, heroic female “Rey” refers to the heroic older male, Luke Skywalker, as a “myth.”

- Never in prior Star Wars films was Luke Skywalker or Han ever referred to as a “myth” (even after they saved the galaxy); a clear infringement of the Plaintiff’s work.

**16. The Resistance headquarters is/are very substandard, and use recycled tech.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
The Plaintiff’s script (Ex A, p 63) describes the Resistance headquarter’s poor facilities, and recycled equipment.	The Resistance headquarters facilities are poor, dirty, with vines growing on the walls, and seeming substandard equipment.

- In all prior Star Wars films, the Rebel headquarters were clean and state of the art.



**Above:** The lo-fi Resistance HQ, in The Force Awakens, with cheap tech and dirty walls.

**17. PLOT STRUCTURE:** In a scene that occurs fairly early in the film, two heroic characters who have not known each other long, attempt to escape from the evil government on a stolen spacecraft (owned by the evil government), and get away from their dangerous predicament in space, to a safe place on the planet below. The evil government fires upon the escapees. Thus, the heroic pair **WORKS TOGETHER** to pilot the ship and evade and out-run multiple **GUIDED MISSILES**.

Plaintiff's Work	Defs' Infringing film, "The Force Awakens"
<p>When Arlo and David attempt to escape back to Earth in a shuttle train (spaceship), the evil State fires two guided missiles at them. (Ex A, p 32). The heroes cooperate to evade the missiles and get back to Earth.</p>	<p>When Poe and Finn escape the villainous First Order ship in a small TIE fighter (spaceship), the evil government fires 4 guided missiles at them. The heroes work together to evade the missiles, and escape to the planet Jakku.</p>



**Above:** The evil First Order fires four guided missiles at heroes Poe and Finn. Prior to the Plaintiff's work, only once did Star Wars fire ONE guided projectile.

**18. CLIMAX AND ENDING:** In the climax, in a battle with the villain, the a primary hero receives a life threatening wound from the villain, and the HERO appears to die. But in the closing scenes we learn that the wounded hero has survived.

Plaintiff's Work	Defs' Infringing film, "The Force Awakens"
<p>Arlo is shot in the neck and appears to die on page 115, BD (Ex A), but is seen alive, a few lines later. (Also see Uber, Ex B, pp 110-111.</p>	<p>Finn appears to die from his battle wounds (around 1:52:00 and 1:58:00), but is seen alive a few minutes later.</p>

**19. CLIMAX AND ENDING: When the villain inflicts a severe injury to one of the primary heroes, another hero intervenes and fights the villain (and gets the better of the villain) to save the wounded hero's life.**

Plaintiff's Work	Defs' film, "The Force Awakens"
In Butterfly Driver (Ex A), when villain Drexler shoots Arlo, the hero Jerry shocks the villain, then punches him, knocking him out.	When the villain (Kylo) defeats hero Finn, the hero Rey fights the villain and wins.

**20. In the ending climax, the hero(s) causes a fire that threatens the destruction of the entire space station.**

Plaintiff's Work	Defs' film, "The Force Awakens"
On page 102 (Ex A) Arlo causes a huge explosion and fire.	Chewbacca sets off explosives that cause a "fuel cell" to erupt, which eventually causes the space station to explode.

**21. The fire and chaos that the heroes create on the space station causes many people on the space station to panic and evacuate the space station.**

Plaintiff's Work	Defs' film, "The Force Awakens"
Page 104-107 of Butterfly Driver (Ex A) depicts a chaotic evacuation	At about 1:58:15 we see a chaotic evacuation among the villainous First Order forces.

- Never before in a Star Wars film was there an evacuation of the villain's space station.

**22. With the villain still alive, and with the space station failing and sure to explode or collapse any moment, the two primary surviving hero's (one severely wounded) escape the space station in a spaceship.**

Plaintiff's Work	Defs' film, "The Force Awakens"
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Arlo and Jerry escape the space station in a runaway shuttle train (spaceship).	Rey and Finn escape in the Millennium Falcon (spaceship), with the Wookiee's help.
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**23. During the fire and chaos on the space station, as people evacuate the space station, the/a villain argues with a subordinate officer about his decision to evacuate.**

Plaintiff's Work	Defs' film, "The Force Awakens"
Page 105 of Butterfly Driver (Ex A) and pages 83 and 84 of (Ex B) show the villain arguing with officers about evacuating.	At 1:58:14 two evil officers argue about evacuating.

**24. The primary VILLAIN appears to die on the space station, after he fails to evacuate —because he was fixated on killing the hero(s).**

Plaintiff's Work	Defs' film, "The Force Awakens"
Drexler dies in Uberopolis (space station) because he refused to evacuate, because he was fixated on killing Arlo.	The villain Kylo appears to die on the Starkiller (space station), because he was fixated on killing Rey and Finn.

**25. In the peak of the climax, the heroes narrowly escape from the space station, as the space station explodes behind them.**

**26. The government rounds up undesireables and kills them indiscriminately.**

Plaintiff's Work	Defs' film, "The Force Awakens"
BD (Ex A, p 83) and Uber (Ex B, p 90) show the government kills thousands of prisoners every week (without trials). Pp 48 and 53 (Ex A), Benni informs us that the government	At 08:31 the villain rounds up the people of a small village (who all appear brown-skinned), and order the storm troopers to "Kill all the villagers." The villagers were innocent, and

rounds innocent people up and kills them.	had done nothing.
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**Above:** Storm troopers round up innocent villagers and kill them, in the Force Awakens. The villagers appear to be brown (no prior Star Wars film featured a brown-skinned community.)

**27. SCENE: In a night scene, the evil government’s hovering/flying police/military vehicles loom over a poor town or city.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
In Uber (Ex B, p1), in a poor community, as people burn fires outside to keep warm, “ <u>futuristic police and military vehicles hover ominously above...</u> ” (And see Ex A, p 53.)	In the opening scene, a village is shown, where seemingly poor citizens burn outside fires. Soon police/military flying vehicle slowly descend upon the village.



**Above:** Slow moving police/military aircraft approach a poor village, in the opening of The Force Awakens.

**28. By showing (1) a large group of brown-skinned villager being rounded up, and by showing (2) hovering police vehicles over a poor village/town/city, the Defendants attempted to infringe the Plaintiff’s immigration theme.**



**29. The principal heroic female character collects a FLOWER. She appreciates nature, and makes a poignant commentary about plant life.**

Plaintiff's Work	Def's' film, "The Force Awakens"
Benni, who lives in a world lacking plant-life, collects a violet flower (in effort to save it and bring many flowers to her community), page 54 of BD (Ex A), where she also makes a poignant commentary about nature.	Rey, who lives in a planet lacking plant-life, has collected a flower, seen in her home, at 13:45. When Han Solo takes her to the planet Takodana, she is amazed by the plant-life and comments: "I didn't know there was this much green in the whole galaxy."



**Above:** The flower Rey has collected in The Force Awakens.

- There were no flowers in the first Star Wars trilogy (1977 to 1983). In the prequel trilogy (1999 to 2005), flowers are only a few brief scenes (such as a wedding and a funeral).
- No prior Star Wars character expressed any notice of a plant, flower or a blade of grass.

**30. The evil government uses a form of energy that kills billions.**

Plaintiff's Work	Def's' film, "The Force Awakens"
In BD (Ex A, pp 15, 16, 98) we learn the evil government's use of oil is killing billions.	The evil government consumption of stars for energy is killing billions

- There is no discussion of the Death Star's energy source in the previous Star Wars films.

**31. By combining the two previous elements** (namely: 1. The principal heroic female character collects a FLOWER. She appreciates nature, and makes a poignant commentary about plant life; 2. The evil government uses a form of energy that kills billions) **the Defs infringed the Plaintiff’s ENVIRONMENTAL theme.**

- No prior Star Wars work had an environmental theme.

**32. Theme: the horror of hunger and living without adequate food access.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
Food scarcity and hunger is a recurring theme issue in BD/Uber. Arlo, Louis, Drexler all discuss it, and Arlo and Benni/Tina encounter starving children.	Rey is repeatedly shown struggling to feed herself, and she licks her bowl clean.

- This deviates from all prior Star Wars films, where no character struggled with hunger.

**33. Although there is romantic tension/interest between two central heroic characters, because circumstances are so urgent, there is not so much as a romantic kiss.**

Plaintiff’s Work	Defs’ Infringing film, “The Force Awakens”
In BD (Ex A) there is romantic attraction between Arlo and Benni, but the circumstances are so urgent that there is never so much as a romantic kiss.	There is attraction between Rey and Finn, but there is never a romantic kiss.  (In the final minutes, with Finn unconscious in the hospital, Rey kisses his forehead.)

**34. The villain taunts an aging heroic character about the fact that he is getting old.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
In BD (Ex A, p 99), the villain (Drexler) tells	In the opening scene, at 6:34, the villain (Kylo

<p>the hero (Arlo): “You think I need a gun to kill you? Your body is aging, slowing down ...</p> <p>I'm immortal.”</p>	<p>Ren) taunts a heroic older character, saying:</p> <p>“Look how old you’ve become.”</p>
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- In none of the prior Star Wars films does a villain deride anyone’s age.

**35. Class-conflict theme.**

Plaintiff’s Work	Defs’ film, “The Force Awakens”
<p>Plaintiff’s BD &amp; Uber sceippts depicts most of the heroes and the oppressed people as poor, and depicts the villain as extremely rich and living comfortably.</p>	<p>The Def’s work depicts most of the heroes and the oppressed people as poor, and depicts the villains as living comfortably on the space station.</p>

- There is no class-conflict theme in any prior Star Wars film (there are ideological and/or political and sovereignty conflicts).

**36. UNIQUE CHARACTER SCENE AND DIALOGUE SIMILARITY: The story features two heroic parent characters, a man and woman, who had once been married, who still love each other, but who have irreconcilable differences, making a romantic relationship impossible. This is summed up in their final exchange, when the male character acknowledges something special he still sees in his ex-wife, and she comments about something that still frustrates her about him.**

Plaintiff’s Work	Defs’ Infringing film, “The Force Awakens”
<p>In BD (Ex A, p 118), in the final exchange between Arlo and his ex-wife (Rianna), Arlo tells her, “You’re still beautiful in the rain.”</p> <p>Rianna responds: “<b>You’re still impossible.</b>”</p>	<p>In the final exchange between Han and Leia (his ex), Han sees something special in Leia, and he says, “Somethings never change.”</p> <p>Leia reacts: “True. <b>You still drive me crazy.</b>”</p>

**37. CENTRAL STORY STRUCTURE: Heroic Parent(s) fight to save his/their child.**

Plaintiff's Work	Defs' film, "The Force Awakens"
The Plaintiff's story is about a parent who goes to impossible lengths to save his child.	To infringe this element, the Defs gave Han Solo and Leia (now in their 70s) an adult son, who is the villain, and Han was determined to bring him back from the dark side.

- This grossly deviates from Star Wars story history. Previously, the father (Darth Vader) sought to bring his son (Luke) **TO the Dark Side**. Suddenly, after the creation of the Plaintiff's work, the Defs sought to abandoned the anti-family tradition (of a father determined to corrupt his child), to show a father determined to save his child.

**38. Women fight in the Resistance army, and the story feature tough and gritty women soldiers, fighting for the Resistance.**


Plaintiff's Work	Defs' Infringing film, "The Force Awakens"
The Plaintiff's story features gritty women fighters, like Laney (Ex A, p 34, who fought in the war, where she received severe facial burns), Tamara (p 14, a brilliant scientist, willing to be the war's last soldier), and Benni (p 47, a gun toting resistance fighter, who dreams of a community with a few flowers on every street and a community college).	Features many tough women characters —which is counter to Star Wars history.

- In Star Wars films that pre-date the Plaintiff's work, there were no women starfighter pilots in the Rebellion (although, in 1999 or 2002 Star Wars depicted women Jedis.)

**39. Hero lives in a poor community where most transactions are done by barter.**

Plaintiff's Work	Def's' Infringing film, "The Force Awakens"
Arlo (the primary hero) is a line-rider, who transports supplies from his zone, to exchange for supplies from other zones.	Rey (the primary hero) trades objects she finds for food.

**40. In the final scene/shot of the film, two heroic characters (a man and a woman) are pictured with the ocean or a bay in the background.**

Plaintiff's Work	Def's' Infringing film, "The Force Awakens"
<p>In the final draft of the first version of Uberopolis: City Of Light, from May 25, 2005 (Ex C, p 99), the final shot/scene is a shot of Jerry and his wife, by the San Francisco Bay: "ANGLE ON: JERRY AND LAURA SITTING BY THE SAN FRANCISCO BAY -- LATER."</p>	<p>The final shot/scene of The Force Awakens features Rey and Luke overlooking an ocean or bay (below).</p> 

**41. Multi-racial inclusive cast.**

Plaintiff's Work	Def's' Infringing film, "The Force Awakens"
The Plaintiff script features a multi-racial cast (White, Black, Asian, Latino, straight, gay).	Features a multi-racial, balanced and inclusive cast.

- This departs from all prior Star Wars films, which featured a disproportionately White casts, few roles for Blacks and Latinos, and no meaningful roles for Asians.

**42. A-cell vs Fuel cell.**

Plaintiff's Work	Defendants' Infringing film, "The Force Awakens"
BD (Ex A) features a central A-cell technology. This runs from page 15 to the end (Ex A).	The Force Awakens features an unexplained "fuel-cell", which "erupts" near the end, causing the explosion of the Starkiller base.

There is no "fuel cell" mentioned in prior Star Wars films.

**43. The Story features a digital character (who may not actually exist in the story's continuum) WHO INTERACTS WITH REAL CHARACTERS.**

Plaintiff's Work	Defendants' Infringing film, "The Force Awakens"
BD (Ex A, pp 37, 38) features a digitized character (based on the biometric data of a real person, who is now dead) who is in a replicated universe and thinks he is still alive.	The Defendants' film features the digitized character, the Supreme Leader, who interacts with the villains.



Above: The Supreme Leader, in The Force Awaken, is a digitized character.

- This is a huge deviation from Star Wars, which had never featured a digitized character.

Perhaps no sci-fi film predating the Plaintiff's work featured a digitized character.

**44. SCENE: A heroic female (who lives in war ruins, collects discarded items and appreciates nature) SPEAKS OF NEVER GIVING UP HOPE.**

Plaintiff's Screenplay	Defs' Infringing film, "The Force Awakens"
<p>In a powerful exchange, the heroic female, Tamara Gwynn, speaks to the heroic male (Arlo) of never giving up hope (pp 14-16).</p>	<p>At 18:06 Rey tells her robot friend:  <b>"Don't Give up hope."</b>  This statement is punctuated by the editor.</p>

**45. COMPLETE CHARACTER INFRINGEMENT; The heroic character Rey infringes the Plaintiff's character BENNI (A.K.A. Tina).**

★ The Plaintiff's female heroic character "Benni" is independently copyrightable.

The Plaintiff's heroic female character is comprised of the 12 aspects listed below (and more). [The Defs' character "Rey" (from The Force Awakens) infringes each aspect below. This constitutes a total infringement of the Plaintiff's heroic female, *Benni*.] Benni is a hero who:

- A. is poor;
- B. is between 18-30years old;
- C. struggles with hunger and food insecurity;
- D. lives in an impoverished world;
- E. has a lean athletic body-type (from rugged living and inadequate nutrition);
- F. parents were killed years earlier, in a war that quietly goes on;
- G. collects items that many would consider junk as part of her daily life;
- H. lives in ruins caused by a war that occurred years earlier;
- I. despite her seemingly hopeless world, she expressly has hope;
- J. dresses in tattered, old, rugged clothing;
- K. refers to an older, central heroic male character as a "myth."
- L. inhabits a sci-fi, fantasy or action/adventure story-scape.