

**INFRINGEMENT CLAIMS AGAINST “THE WALT DISNEY COMPANY,” FOR INFRINGING THE PLAINTIFF’S “13 GATES OF RANE” (OUTLINE, 2001-02; NOTES, 2001-09; SAMPLE CHAPTERS, 2013), BY PUBLISHING THE ANIMATED TV SERIES:**

**“GRAVITY FALLS”**

The Defendant(s)’s (The Walt Disney Company) 40 episode animated TV series, *Gravity Falls* (GF) is a largely a linear series (meaning, many/most of the episodes connect to tell a single, linear story). Every meaningful and integral element of that linear story infringes one of two of the Plaintiff’s work (*Butterfly Driver* or *13 Gates of Rane*). The following enumerated list form the Plaintiff’s **51** infringement claims against the Defendant(s), for publishing and profiting from their derivative work, GF, which infringes the Plaintiff’s **13 Gates of Rane book series outline notes** and his **13 Gates of Rane rough sample chapters**. To support these claims, the Plaintiff submits the following 3 original, connected writings, written by the Plaintiff, which form his **13 Gates of Rane** book series outline, sample chapters and notes (for consission 95% of the infringement claims are supported by just the first document, Exhibit D, described below):

- a. A copy of the original, computer typed and printed 13 Gates of Rane story outline notes, printed between November 2001 and February 2002. These outline notes describe events, and their sequence, to transpire in the Plaintiff’s *13 Gates of Rane* book series, with numerous rough passages; referred to, herein, as “**13 Gates of Rane story outline**,” or “**13 Gates outline**,” or “**13GoR outline**,” are attached as “**Exhibit D**” (Ex D).<sup>1</sup>
- b. 13 Gates of Rane, Book 1, Rough Sample Chapters and Notes, written in **2013** (time stamped and dated from Google Docs); attached as “**Exhibit E**” (Ex E).<sup>2</sup>
- c. Handwritten notes,<sup>3</sup> written between 2001/02 and 2009; attached as “**Exhibit F**,” (Ex F).

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<sup>1</sup> This primary document was produced in 2001-02, 10-12 years prior to Gravity Falls.

<sup>2</sup> GF’s season 1 (2012) predates these sample chapters, but season 2 (where the vast majority of infringement is found) was released 1 year to 2.5 years after these sample chapters were created. This document is only used to reinforce item #4 and #5.

<sup>3</sup> **These hand-written notes, provided for context, are NOT cited in the following claims.**

An enumerated list of **51** substantial examples of the Defendant(s)'s GF infringing the Plaintiff's work (*13 Gates of Rane*) follow this paragraph. **The numbered and bold headings describe substantial story structures common to both works**; confirming infringement. Beneath the headings the Plaintiff compares his work (presented first) to GF (subsequent). [NOTE: All of the following complex infringement claims pertain to the overarching, linear plot of GF (about a missing, long-lost family member, and the coming of a super-powerful villain). None of the claims pertain to any of the unrelated, stand-alone GF episodes.]

### **1. OVERARCHING PLOT**

Both works, the Plaintiff's 13 Gates of Rane story outline, and the Defendant(s)'s derivative TV series, Gravity Falls, share the following 24 story structures<sup>4</sup> (items "a" through "x," below)<sup>5</sup>, among many other similarities.

#### **Both works share the following 17major PLOT features (and more):**

- a. The story is about, or features, a villain who can enter people's dreams and minds, and speak into people's minds, from across the universe, who trying to find a way to Earth, from across the universe, and this villaon has tremendous powers.
- This (item "d") is an original concept, NEVER DONE before the Plaintiff.
- b. The story is about a boy (10 to 12 years old) who notices some strange things occurring in his small, sylvan (forested) community. When the boy sets out to investigate the strange occurances, he stumbles into mysteries and adventure. (Joey v Dipper)
- c. The boy/hero's investigation into the strange events leads him to find one (or more)

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<sup>4</sup> As the Court will see from the 49 subsequent, detailed infringement claims, the Plaintiff omitted many substantial instances of infringement from this list. This way done in respect for the Court's time, believing the 24 items presented in this list easily and sufficiently provide evidence of plot infringement.

<sup>5</sup> Many/most of the story structure identified in items "a" through "t" are independently listed, compared and analyzed, later herein (as is seemingly required in infringement suits).

teleportation gate (*door, portal or gateway*), which leads far across the Universe.

- d. The story is about the coming of a super powerful and immortal villain who feeds on the suffering he inflicts and who threatens to take over the Earth and the universe.
- e. The story is about a primary character who loses a close family member—who was pulled through a teleportation gate and transported far across the Universe.
- f. In the story, years before the story actually takes place, a FIGHT AT A TELEPORTATION GATE caused a family member to go MISSING ACROSS THE UNIVERSE. The audience learns of this event when a character who was there tells the young primary hero(s) about the incident.
- g. The story is about a primary character who needs to find several important items before time runs out, to bring back his lost family member, and possibly defeat the villain.
- h. In the Story, the missing family member (who was lost through a teleportation gate/door/portal/gateway) had an ASSISTANT who went through a/the teleportation gate. But the assistant was not lost through the teleportation gate, and he is still alive on Earth. The assistant has seen the terrible coming evil.
- i. In the Story, the missing family member's former ASSISTANT knows the evil villain is coming, and has seen the villain's horrors, and he helps the two young heroes on their quest.
- j. The story has a very important and substantial central arch about a war between the heroes (and their rag-tag army of good) and the villain (and the army of minions he assembles).
- k. The story involves a prophecy of a coming super powerful evil villain who threatens to takeover the world. This prophecy motivates the heroes into action, to prepare to defend themselves, and the world, against the evil villain.

- l. In the story, the hero assembles a rag-tag, motley, misfit army, to fight the villain's army.
- m. In the story, reunited with his long-lost father (or long-lost family member), the hero (or a central hero) battles the villain and his minions.
- n. The story involves **magical** objects/items, or objects/items with unusual and strong powers, and features numerous enchanted items, tied into the story's overarching plot.
- o. "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.
- p. The story features two heroes, a boy and a girl, who are between 10 and 12 years old. Although the boy hero may appear to be the primary hero, in one or more central battle, the young girl hero saves the boy hero.
- q. The story is compelled by a central mystery ("What happened to Joey's Dad?" vs "Who Wrote The Journal?").

**Both works also share the following 7 secondary PLOT features (and may more):**

- r. In the story a central character in the story has **six (6) fingers**. (Verdan v Ford)
- s. A time reversal, or time travel, aspect factors into the story's ending.
- t. A secondary central hero saves the hero, then fights the villain more successfully than the primary hero fought the villain.
- u. The hero's body is possessed by a foreign entity, that makes the hero behave peculiarly.
- v. The story plot/setting involve one of more caves, found near the hero's home.
- w. The hero(s)'s birthday, and birthday party, centrally factors into the story.
- x. The story involves the concept of a MULTIVERSE or POLYVERSE, and these terms (or variations of these terms) are used within the story/outline.

**2. From Across The Universe, The Villain Speaks Into The Hero's Mind, And Enter's Into The Hero's Dreams. The Villain Has The Power To Speak Into The Minds, Or Enters Into The Dreams, Of Any Character, And The Villain Does Enter The Minds And Dreams Of Other Characters (From Across The Universe).**

- This is an original concept/expression, and this may be independently copyrightable, as it is reasonably creative structure.

[NOTE: This concept differs from, say, *Nightmare on 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). It is also original, different and exceptional because the villain has this power **from across the Universe**. (\*Although it is not necessary for the villain to be across the Universe for this power/concept to be original and copyright protectable.)]

The Plaintiff's 13 Gates of Rane story outline features a villain (Gormatu) who had the power to enter dreams and minds, and speak into minds and dreams, in real time, from across the Universe, and the people who experience Gormatu "invade" their minds and dreams understand that whatever Gormatu says to the is an actual message from him, and not merely a dream. Demonstrative of this, 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 Rane's warning seriously. Soon, together, under Rane's 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.

**The Defendant(s)'s GF infringes this story structure** of the Plaintiff's *13 Gates of Rane* story outline, as we see in following episodes:

- a. In GF episode 19 (“Dreamscaperers”), at 5:51 the secondary villain Gideon asks the primary villain Bill to enter Stan's mind or dreams (Bill agrees).
- b. In GF episode 20 (“Gideon Rises”), the Journal says about the villain Bill: “Whatever you do, never let him into your mind.”
- c. In GF episode 24 (“Sock Opera”), Bill enters Dipper's dream. Dipper tells Mabel about the dream. (This event, Dipper telling Mabel about the dream, shows Dipper knew that the dream was more than a dream, and Bill's message was real and true.)
- d. In GF episode 35 (“The Last Mabelcorn”), at approximately 00:40, Bill enters Stanford's (Ford) dreams. When the dream is over, at approximately 1:31, Stanford wakes from and knows that the dream and Bill were real, and says: “I have to warn them, he's coming.”

**3. The Story Centrally Features A Teleportation “Gate” or Door (Or Numerous Gates/Doors), which can transport the user far across the Universe to other worlds. (Both works refer to these doors with the term “gate”).**

The Plaintiff's *13 Gates of Rane* outline shows 13 doors that lead **to different worlds, far across the Universe** (the first door is entered on Earth, and teleports the enterer to a giant

spacecraft, thousands of light years from Earth). The 13GoR outline explain how Joey Raymond, a 10-11 year old boy, follows images he saw in a dream, and other strange signs, to a cave behind his house. After entering the mouth of cave (which is a teleportation gate called “the Gate of Rane”) he is teleported to a place called “Seran’s Chamber,” thousands of light years from Earth. There, he meets an old man with six fingers, named Verdán. In Seran’s Chamber there are 13 teleportation gates that lead to different worlds, across the Universe. The notes also explain how the gates were created. Among the many passages in the 13 GoR outline (Ex D) that explain that the teleportation gates lead to different worlds around the universe are the following passages:

- a. Page one of the 13 Gate outline (Ex D) explains when Joey first saw one of the “gates”:

Joey goes to bed wearing the necklace and dreams about Gormatu entering earth through a lost gate (Disaster). Gormatu actually talks to Joey in his dream-taunts him that he killed his father. Gormatu's minion made the **gate** of disaster -the last gate Gormatu intended to use in his conquest of the Universe.

- b. Page 2 of the 13 Gates outline (Ex D) explains:

Next the next day Joey goes to cave and hunts around until he finds the **gate** portal. Joey tries to open the gate door with no luck, but dropping the necklace on the ground he learns when he picks up the necklace and touches the door the pathway is now open. Joey enters. Joey meets Verdán.

- c. After Joey enters the cave and meets Verdán, page 7 of the Plaintiff’s 13 Gates outline (Ex

D), Verdán (who lives in Seran’s Chamber, tells Joey: "**Joseph, do you understand that you are a thousand light years from your home?**")

- d. The 13GoR outline (Ex D) explains that the villains (particularly Gormatu and Disaster)

made their own teleportation gates between worlds; p 1 of 13GoR outline explains:

Joey goes to bed wearing the necklace and dreams about Gormatu entering earth through a lost **gate** (Disaster). Gormatu actually talks to Joey in his dream-taunts him that he killed his father. **Gormatu's minion made the gate of disaster -the last gate Gormatu intended to use in his conquest of the Universe.**

- e. Page 19 of the Plaintiff's 13 Gates outline (Ex D) explains:

I am Verdan the immortal, often called The Keeper. I am the writer of the truth, the teller of the tales of the legends and heroes that have fought and ageless battle against the Empire of Darkness -which has worked 10,000 years to take control the universe. I am The Keeper of the **thirteen great gates of Rane**. It is said that I live here in Seran's Chamber, in the outer edge of what your world knows as the Comistian constellation. 6,000 years ago I was entrusted to remain here in the Chamber and tend the **gates of Rane**. [sic]

- f. Page 3 to 4 of the 13 Gates outline explains:

When Trilogene is released he breaks free and escapes. Verdan and Joey deduce that he was sent with two mission -destroy Joey and find the **gate** of Disaster and remove the blade. Realizing this Joey has no choice but to go to Gormatu's home **planet**.

- g. Page 23 of the 13 gates outline explains: **“Thirteenth door is the gate of time -Joey goes through in the end to meet his father”**

- h. Pages 21 and 22 of the Plaintiff's 13 Gates outline notes (Ex D) explains how Rane coordinated with Seran and other magicians to make the 13 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 D). The Cave of Dire is mentioned on page 20.

The bottom of page 21 to the top of page 22 (Ex D) 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....

**The Defendant(s)'s GF infringes the Plaintiff's teleportation “gate” or door (or numerous gates/doors), which can transport the user far across the Universe to other worlds,**

as we see, repeatedly, in GF, such as:



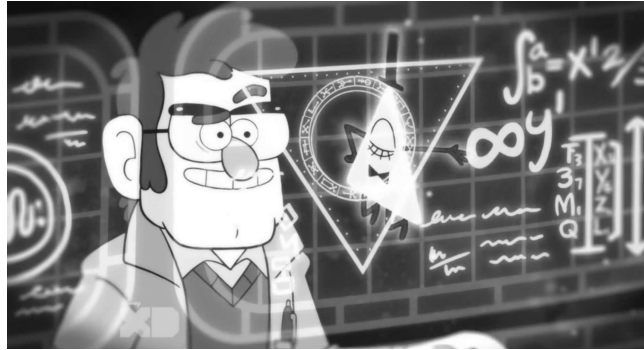
- a. in episode 32 (“A Tale Of Two Stans”), at 15:48, when the character Ford (AKA Stanford and Uncle Ford) theorizes that the source of Gravity Falls’ weirdness must originate “outside of our world” (Ford, E32, at15:40); Ford then explains that he set out to build a gateway across the Universe, as he explains (episode 32, at 15:50): “I realized the only way to understand Gravity Falls was to build a **gateway**, a **portal**, to the source of its weirdness.”
- b. And at 19:01 of episode 32, Ford reveals his teleportation gate, which he calls a “trans-Universal gateway.” “Trans-Universal” means “across the Universe”; thus, the gateway transports people across the Universe.



**Above:** At approximately 19:01 of GF episode 32, “A Tale of Two Stans,” Ford reveals his teleportation gate, and tells his brother Stan, “It’s a transuniversal gateway.”

- c. At approximately 16:09 of GF episode 32, the character Fiddleford McGucket calls the machine a “**trans-Universal**, polydimensional meta-vortex.”
- d. In GF episode 37 (“Dipper and Mabel vs The Future”), when Bill finally makes it to Earth, in physical form, he says (at approximately 20:54): “**At last! At long, long last. The gate between worlds is open!**”
- e. Perhaps the clearest evidence of infringement, regarding GF’s “trans-Universal gate” is

seen in GF episode 35, at approximately 19:19, when the villain, Bill, is shown teaching Ford how to make the “trans-Universal gate,” as Ford explains that the Gate was created as a gateway” between worlds; specifically, as Bill is shown teaching Ford how to build the gate, Ford explains: “When he told me I could complete my research by building a gateway to other worlds, I believed him.”



**Above:** In GF episode 35, “The Last Mabelcorn,” at approximately 19:19, Bill shows Ford how to make “a gateway between worlds.”

All of the foregoing shows that the Defendant(s)’s GF infringes the Plaintiff’s concept and application of a *teleportation “gate,” or “door,” or portal,” etc (or numerous such gates/doors), which can transport the user far across the Universe to other worlds.*

**4. A Primary Character Loses A Close Family Member—who Was Pulled Through A Teleportation Gate And Transported Far Across The Universe. This Event Happened During A Fight Near The Teleportation Gate.**

On line 4 of page 1 of the 13 Gates of Rane story outline (Ex D) the Plaintiff hints that the young hero Joey’s father is missing, as he wrote: “**Next day Joey ask mom about his dad.**” A few lines later, on page 1 of the 13 Gates outline, the Plaintiff revealed that something terrible must have happened to Joey’s father, as the villain, Gormatu, taunts Joey that he killed Joey’s father. The Plaintiff wrote:

Joey goes to bed wearing the necklace and dreams about Gormatu entering earth through a lost gate (Disaster). **Gormatu actually talks to Joey in his dream-taunts him that he killed his father.** Gormatu's minion made the gate of disaster -the last gate Gormatu intended to use in his conquest of the Universe.

And on page 3 of the 13 Gates of Rane outline, the Plaintiff revealed that Joey's father went missing through a teleportation gate, and his welfare is unknown:

.... 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. Wounding Gormatu just enough to cause him to retract his foot. Gormatu then grabbed Joey's dad in his giant claw. Joey's father's bestfriend (wearing the arm of Jolaya hurled a stone at the monster that sent Gormatu tumbling back into the door. Joey's father's friend picked up the fallen blade (at Joey's dad's insistence) and closed the; sealing it shut with Dire's blade. then shut the gate and sealed it locked by wedging Dire's blade in the lock.

Further, page 65 of the Plaintiff's "13 Gates of Rane, Book 1, rough sample chapters" (see Ex E)<sup>6</sup>, explains that Joey's father is missing:

"When Joey was six years old, his father left home to go to work –but never returned. No one knew if Mr. Raymond had been kidnapped, or met with foul play. But everyone knew that something bad must have happened."

Thus, because the story begins a few days before Joey's eleventh birthday, we know Joey's father went missing about **5 years earlier**. Further, pp 34 to 36 of the Plaintiff's "13 Gates of Rane, Book 1, rough sample chapters" show that Joey's father is missing and presumed dead.

The Defendant(s)'s GF infringes this story structure of *a primary character loses a close family member—who was pulled through a teleportation gate and transported far across the Universe* from the Plaintiff's *13 Gates of Rane* story outline, as we see learn in GF episode 31 and 32. GF episode 31 ("Not What He Seems") shows how Grunkle Stan brings his brother back (after being lost for 30 years), from across the universe, through a teleportation gate/door. And episode 32 ("A Tale Of Two Stans") explains how Stan's brother (called Ford, Stanford, and "Uncle Stanford") was lost through the teleportation gate 30 years earlier.

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<sup>6</sup> In the Plaintiff's "13 Gates of Rane, Book 1, rough sample chapters" (Exhibit E) the primary hero (previously named Joey Raymond, 2001 to 2013) has been re-named "Danny Zander", but this is the same character. However, in the passage cited in item #3, above, the hero is still named "Joey," because this passage was taken from the end of the "rough sample chapters" (Ex E), where the Plaintiff scripted book notes and ideas in early 2013, possibly 2012, before he re-named the hero "Danny Zander."

**5. The Missing Family Member Was Lost, Across The Universe, Because Of A FIGHT NEAR THE TELEPORTATION GATE, That Transpired Years Before The Story Takes Place. Thus, The Audience Learns How The Family Member Was Lost When A Character Who Was Present During The Incident Recounts The Event.**

As stated in item #4, page 65 of the “13 Gates of Rane, Book 1, rough sample chapters”

(Ex E)<sup>7</sup>, explains:

When Joey was six years old, his father left home to go to work –but never returned. No one knew if Mr. Raymond had been kidnapped, or met with foul play.

Further, pages 2 to 3 of the 13 Gates outline shows Joey set out to learn what happened to his long-lost father; Joey travels to find Miguel Sierra; Miguel tells Joey about the battle at the Gate of Disaster, where Joey’s father was lost. On pages 2 to 3, the Plaintiff wrote:

Verdan explains how Joey's father closed the gate of Disaster when Disaster opened the gate for Gormatu. Joey's father dreamed that Gormatu was coming. So, he went to the lost gate with only his bestfriend and assistant Miguel Sierra. Joey goes to see Miguel Sierra  
Joey finds Miguel. Miguel tells Joey the story o the battle at Disaster.

The actual details of Joey’s father’s battle at the Gate of Disaster are found on page 3 of the 13 Gates of Rane outline (Ex D), or see previous poage. Thus, the reader/viewers learn that Joey’s Father went missing, across the Universe, because of a fight near a teleportation gates, from a character (Miguel Sierra) who was present during the incident, years earlier.

The Defendant(s)’s GF infringes this story structure of *the missing family member was lost, across the universe, because of a fight near the teleportation gate, years before the story takes place; thus, a character who was present during the incident recounts the event*, as seen in GF episodes 31 and 32. GF episode 31 (“Not What He Seems”) shows how Grunkle Stan brings

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<sup>7</sup> In the Plaintiff’s “13 Gates of Rane, Book 1, rough sample chapters” (Exhibit E) the primary hero (previously named Joey Raymond, 2001 to 2013) has been re-named “Danny Zander”, but this is the same character. However, in the passage cited in item #3, above, the hero is still named “Joey,” because this passage was taken from the end of the “rough sample chapters” (Ex E), where the Plaintiff scripted book notes and ideas in early 2013, possibly 2012, before he re-named the hero “Danny Zander.”

his brother back, from across the universe, through a teleportation gate/door (after he was lost for 30 years). And episode 32 (“A Tale Of Two Stans”) explains how Stan’s brother (called Ford, Stanford, and “Uncle Stanford”) was lost through the teleportation gate 30 years earlier.



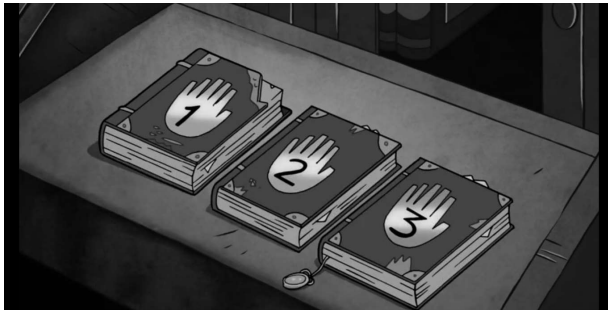
**Above:** In GF episode 32, Stan explains how Ford was lost through the teleportation gate, during a fight.

**6. In The Story, A Primary Character Needs To FIND SEVERAL IMPORTANT ITEMS, BEFORE TIME RUNS OUT, In Order To Bring Back His Lost Family Member, And Possibly Defeat The Villain.**

The Plaintiff’s 13 Gates of Rane outline (Ex D) explains that the young hero (Joey) must find and obtain the 13 items of the enchanted armory to unleash the power of the “The Great Warrior,” (also called “The Expected Warrior”). Thus, Joey must hurry to numerous different worlds to try to obtain these items before the villain Gormatu returns. The 13GoR outline also shows the hero is motivated to find his long lost father (and bring him home) and to defeat the villain. The Plaintiff’s 13GoR outline (Ex D) also makes it clear that there is a “time countdown” aspect in the plot, as the villain is trying hard to invade Earth, and may arrive at any moment.

The Defendant(s)’s GF infringes the Plaintiff’s story structure of *a primary character needs to find several important items before time runs out, in order to bring back his lost family member, and possibly defeat the villain*, as we see/learn in GF episode 20 (“Gideon Rises”) and episode 31 (“Not What He Seems”) Grunkle **Stan** (who had one journal earlier in the

series) has been looking for two lost journals (#2 and #3; unbeknownst to Stan, Dipper found Journal #3 in the first episode, and we learn in episode 11, “Little Dipper,” at 00:08, that Gideon has Journal #2). In GF episode 20 Stan finally obtains journal #3. We learn Stan has been looking for them for very long time, at 23:08 of GF episode 20, when Stan, talking to himself, says: **“After all these years, finally, I have them all.”** Stan then places all three journals on a work desk next to computer machinery. In episode 31 (“Not What He Seems”) we learn Stan has been looking for the Journals for **30 years**. And we see a clock ticking down toward zero, throughout episode 31. And at 17:31 of episode 31, Dipper, reading the journals, explains: **“If the clock ever gets down to zero, the Universe is doomed.”** [the Defendant(s) GF does not explain why the clock cannot reach zero. The Plaintiff believe the Defendant(s) just added the countdown to mimic/infringe the Plaintiff’s concept.] In the end of episode 31, Stan brings back his long-lost brother. Thus, the Defendants infringe all 3 aspects of the Plaintiff’s work: 1. must find items, 2. to bring back lost family member, 3. time countdown.



**Above:** (Top) Stan finds the lost journals in GF episode 20 (23:07); (Bottom L) Time countdown in GF E31; (Bottom R) Stan’s brother returns E31 (21:06).

**7. The Boy Hero Notices Strange Events, STRANGE CREATURES, And Strange People In His Small, Sylvan (Forested) Community. When The Boy Investigates These Strange Events And Creatures, He Stumbles Into Adventure And Mystery.**

Page 1 of the Plaintiff's 13 Gates of Rane outline (Ex D) shows the young hero, Joey, who lives in a small sylvan town, wakes from a bad dream (about a **terrifying monster**—the villain, Gormatu) and sees a **strange beasts** on the back of flying red bull. The next day, when Joey sets out to investigate the images in his dream and the beast on the back of the red bull, he meets **people with strange powers/abilities**, and wonders into an adventure. Page 1 of the Plaintiff's 13 Gates outline, the Plaintiff wrote:

Joey goes to bed wearing the necklace and dreams about Gormatu entering earth through a lost gate (Disaster). **Gormatu actually talks to Joey in his dream-taunts him that he killed his father.** Gormatu's minion made the gate of disaster -the last gate Gormatu intended to use in his conquest of the Universe.

Joey wakes up restlessly and looks out of his window and sees some sort of beast on a strange **winged red bull**.

On the bottom of page 1 of the 13 Gates of Rane outline we see, the next day, when Joey investigates the strange events, he meets a magic teacher who can speak to animals. This is explained more clearly and succinctly on page 29 of the 13GoR outline (Ex D): "Magic teacher talks to rebecca's dog who tells him about the Red Bull in the sky."

**The Defendant(s)'s GF infringes the Plaintiff's story structure** of *boy hero notices strange events, creatures, and people in his small community, and when the boy investigates, he stumble into adventure and mystery*, as we see in Gravity Falls, beginning in episode 1, when, after the hero, Dipper Pines, finds one of the journals (#3), he becomes motivated to learn who wrote the journal. Meanwhile, he begins to observe strange beasts, and meet strange people, and repeatedly, Dipper's curiosity about the journal leads him into new adventures and deeper into the mystery of the journal's author.

**8. The Story Involves A PROPHECY Of A Coming Super Powerful Evil Villain Who Threatens To Destroy The World.**

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.

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane* outline, as we see in GF episode 19, “Dreamscaperers,” at 20:55, after the heroes defeat Bill, Bill first reveals the prophecy of his existence, as he says: “But know this, a darkness approaches, a day will come when everything you care about will change.” Various iterations of the prophecy are stated in GF, most notably, in GF episode 37 (“Dipper and Mabel vs The Future”), as 20:54 Bill says: “At last! At long, long last. The gate between worlds is open! **An event one billion years prophecized has come to pass!**”

**9. The Central PROPHECY Is Iterated Numerous Times, At Semi-regular Intervals, To CREATE AN INTRIGUING AMBIENT TENSION OF A COMING WAR.**

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 Defendant(s)’s GF infringes this story structure** of *ireating the central prophecy at semi-regular intervals, to create an intriguing ambient tension of a coming war*, as we see in GF, after the villain Bill is introduced in episode 19, the prophecy is iterated semi-regularly, in that episode (19), and over the remaining 21 episodes, including in the following episodes:

- a. in GF episode 19, “Dreamscaperers,” at 20:55, Bill says: “But know this, a darkness approaches, a day will come when everything you care about will change.”
- b. in GF episode 21 (“Scary-Oke”), at approximately 04:24, Dipper says, “What was Bill talking about when he said everything was going to change.”
- c. In GF episode 24 (“Sock Opera”), after Bill is defeated he tells Mabel and Dipper: “This isn’t the last you’ll hear of me. **Big things are coming.** You can’t stop me.”
- d. In GF episode 32 (“A Tale of Two Stans”), after McGucket goes through the gateway, he says: “When Gravity Falls and Earth become sky, fear the beast with just one eye.”

- e. In GF episode 35, “The Last Mabelcorn,” at about 01:00, Bill tells Stanford: “You think shutting down that portal can stop what I have planned? I’ve been making deals, chatting with old friends, preparing for the big day.”
- f. And in GF episode 37, at about 20:54 Bill says: “At last! At long, long last. The gate between worlds is open! An event one billion years prophecized has come to pass!”

**10. A Substantial Central Story Arch Focuses On The War Between The Hero(s)’s Forces Versus The Villain And His Minions/Army.**

In the Plaintiff’s 13 Gates of Rane outline (Ex D), a major component of the story focuses on the great war between Gormatu and his minions and Joey and the army he assembles. The 13 Gates outline explains who will win or lose numerous battles, explains that Joey will meet his father before a certain battle, and they will fight together in a later battle. And the final four pages of the 13GoR outline describes one key battle in that war.

The Defendant(s)’s GF animated series infringes this aspect of the Plaintiff’s work as the episodes 19 to 40 focus, increasingly, on the coming of Bill. Once Bill arrives on Earth, in physical form, episode 37, the final three GF episodes (episodes 38, 39, 40) focus on the great war between Dipper, Mabel and the Gravity Falls heroes, and Bill and his minions.

**11. THE ASSISTANT (PART 1). In The Story, The Missing Family Member (Who Was Lost Through A Teleportation Gate/Door) Had An ASSISTANT Who Also Went Through The Teleportation Gate. BUT The Assistant Was NOT Lost Through The Teleportation Gate, And He Is Still Alive On Earth. In Addition To Assisting The Long-lost Family Member, The Assistant Was A Good FRIEND Of The Lost Family Member.**

The Plaintiff’s 13 Gates of Rane outline (Ex D), particularly pages 2, 3, 29 and 30, explains that Joey’s Father has an **assistant** named Miguel Sierra, who was Joey’s Father’s **best friend** (the first line of page 3 of the 13GoR outline, Ex D, explains that Miguel was Joey’s father’s “bestfriend and assistant”) [sic], who went on adventures with Joey’s father through the

teleportation gates, and was present when Joey's father was lost through the Gate of Disaster, preventing Gormatu from entering the Earth gate (see Ex D, page 3).

The Defendant(s)'s GF infringes this story structure from the Plaintiff's work, as we discover in learn in GF episode 27 ("Society of the Blind Eye"), at 18:57, that Fiddleford McGucket used to be the assistant of the author of the journal(s) (who Dipper is trying to find. And in episode and episode 32, "A tale of Two Stans," we learn that McGucket was Uncle Ford's good friend in college (15:55), and we further learn that McGucket became Uncle Ford's assistant in creating the transporter gates (GF episode 32, 16:15). And, finally, at 16:41 (GF episode 32), we see McGucket go through the teleportation gate. went through the features the character Old Man McGucket ep 2 (S1, E2 03:40). Thus, in both works, the missing family member had an assistant who was the missing family's member's friend, and who went through a teleportation gate, but was not lost through it (infringing the Plaintiff's work).

**12. THE ASSISTANT (PART 2). In The Story, The Missing Family Member's Former Assistant, Has Seen The Coming Evil, And He Helps The Hero(s) In Their Mission/Quest To Defeat The Coming Villain.**

In the Plaintiff's 13 Gates outline (Ex D, pp 2, 3, 29, 30) we see that Joey's father's assistant, Miguel Sierra, provides Joey and his girl friend (Rebecca) information (p 3), and drives them home, but he cannot help them fight Gormatu, because "Miguel is now **blind** in one eye and **missing an arm**," (p 30, Ex D). We also see on page 3, Ex D, that Miguel has already fought the evil Gormatu and his minion Disaster, at the Gate of Disaster, so he has seen the coming evil. But we see on page 30 of the 13 Gates of Rane story outline (Ex D), in the final chapter of the first book (13 Gates of Rane), under the heading "Chapter 6," Joey contemplates asking Miguel (injured or not) to assist in fighting Gormatu, as the Plaintiff wrote:

Joey Goes to Gormatu's Planet. To stop Gormatu from entering the gate of disaster -and coming to earth. He reasons that if using the Cape of

Herangon, maybe Miguel can follow Triglocene to disaster's gate and beat him up with the cape of Herangon and the Mace of Yuli....

The Defendant(s)'s GF infringes this story structure of the Plaintiff's work, as we see in GF episode 27, "Society of the Blind Eye," Old Man McGucket (Fiddleford McGucket) **helps Mabel and Dipper** learn more about the author of the journal, and he **fighters to protect** them. In GF episode 32, "A Tale of Two Stans," we see McGucket go through the teleportation gate, and when he returns he warns Ford about the coming horrors (at approx 17:07). And in the final GF episode, #40, "Weirdmageddon: Take Back The Falls," McGucket helps the heroes design a giant robot, which battles Bill. All of this infringes the Plaintiff's work.



**Above:** In GF episode 40, *Old Man McGucket* pilots the heroes' giant robot.

### **13. A Primary And Central Character In The Story Has Six (6) Fingers.**

On page 7 of the Plaintiff's 13 Gates of Rane outline (Ex D), the Plaintiff explains that the central character "Verdan" has six (6) finger on each hand, as he wrote: "**Verdan stroked his beard thoughtfully with all six fingers of his right hand.**" On page 12 of the 13GoR (Ex D) outline the Plaintiff playfully described Verdan as having "**many fingers.**"<sup>8</sup>

The Defendant(s)'s GF infringes this story structure from the Plaintiff's *13 Gates of Rane* story outline, as we see in GF falls episode 1, there is a hand with six fingers on the cover of journal #3; later we see the six-fingered hand on journal #2 and #3. And we finally learn in GF

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<sup>8</sup> On the last line of page 31 of the 13GoR outline there is another character/being, the Hedronul, who also has six fingers on each hand.

episode 31 that the writer of the journal is Stan's long lost brother, Ford, who has six fingers. Ford remains a central character until for remaining nine (9) episodes.



**Above:** The six-fingered hand on the cover of journal #2.

**14. The Boy-hero's Investigation Into The Strange Events Leads Him To Find One (Or More) Teleportation Gate (Door, Portal Or Gateway), Which Leads Far Across The Universe.**

On page 1 of the 13 Gates of Rane outline we see that Joey has a bad dream, in which the villain Gormatu "talks to Joey in his dream," and Joey wakes and observes two strange beast through his window:

**Joey wakes up restlessly and looks out of his window and sees some sort of beast on a strange winged red bull.**

Pages 1 to 13 of the 13 Gates outline (Ex D) show that Joey's investigation of these strange events leads him to find a teleportation gate, which transports Joey a thousand light years away, to a space station called "Seran's Chamber," where he meets a character named Verdan.

**The Defendant(s)'s GF infringes the Plaintiff's story structure of a boy-hero's investigation into the strange events leads him to find one (or more) teleportation gate (door, portal or gateway), which leads far across the Universe,** as we learn in GF episode 1, when GF hero, Dipper Pines, finds journal #3, he resolves to learn who wrote the journal. Dipper's investigation culminates in episode 31, at 17:26, when he and Mabel discover that Stan has all 3 journals, and moments later they discover that the journals explain how to create a teleportation gate that could tear the Universe apart.

**15. The Hero's Body Is Possessed By A Foreign Soul/Entity—Who Causes The Hero To Behave Peculiarly.**

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]

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane* story outline, as we see in GF episode 24, “The Sock Opera,” at approximately 11:18, the villain, Bill, removes Dipper's soul from Dipper's body, and Bill enters and possesses Dipper's body, and Bill immediately begins doing peculiar things, like deliberately falling down stairs. And at about 13:36, Bill, inside Dipper's body, puts his arms around Soos and Wendy (Dipper is usually reserved around Wendy, as she is older than he is, and he has a crush on her), then asks Soos, “Hey Soos, want to hear the exact time and date of your death?” This causes Wendy to look at Dipper (possessed by Bill) peculiarly or suspiciously (see image below).<sup>9</sup>



**Above:** (Left) Bill rips Dippers soul out; (Right) Bill, in Dipper, offers to tell Soos when he dies.

<sup>9</sup> Possession occurs repeatedly in GF. Possession occurs in GF episodes 5, 24, 34, 37.

## 16. The Story Is Compelled By A Central Mystery (“What Happened To Joey’s Dad?” vs “Who Wrote The Journal?”).

The Plaintiff’s 13 Gates of Rane outline (Ex D) is compelled by the young hero’s desire to learn what happened to his father.

The Defendant(s)’s GF infringes the Plaintiff’s “mystery” story structure, as GF features the compelling central mystery of “who wrote the journal(s),” which is first iterated, by Dipper, in the first episode. Dipper then periodically mentions his desire to know who wrote the journals, including in episode 21 (which is the first episode of season 2), at about 04:20. And in episode 27, “The Society of the Blind Eye,” Dipper is so consumed with the mystery of who the author is that he makes police “link analysis” chart, at 01:50 (**seen below**).



## 17. The Villain Builds An ARMY OF POWERFUL MINIONS.

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):

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 Defendant(s)’s GF infringes this story structure of the Plaintiff’s *13 Gates of Rane* story outline, as we see in numerous scenes and episode, including the following:

- a. GF episode 35, at 01:00, Bill indicates he’s gathering minions for his forthcoming war against humanity, as he says: “You think shutting down that portal can stop what I have planned? **I’ve been making deals, chatting with old friends,** preparing for the big day.”
- b. In GF episode 38, at 01:14, we see 14 of Bill’s new minions.
- c. In GF episode 38, at 02:33, we see Bill is many new minions.
- d. And in GF episode 38, at 04:12, a “weirdness wave” transforms countless new minions, perhaps thousands, for Bill.
- e. And, in GF episode 38, at 08:46, we see Bill making ever more minions.
- f. In GF episode 39, at 00:06, GF is overrun by Bill’s countless minions.



Above: GF episode 38, Bills minions taking over Gravity Falls.



## 18. The Hero Has An Outmatched, Rag-tag, Motley, Misfit Army.

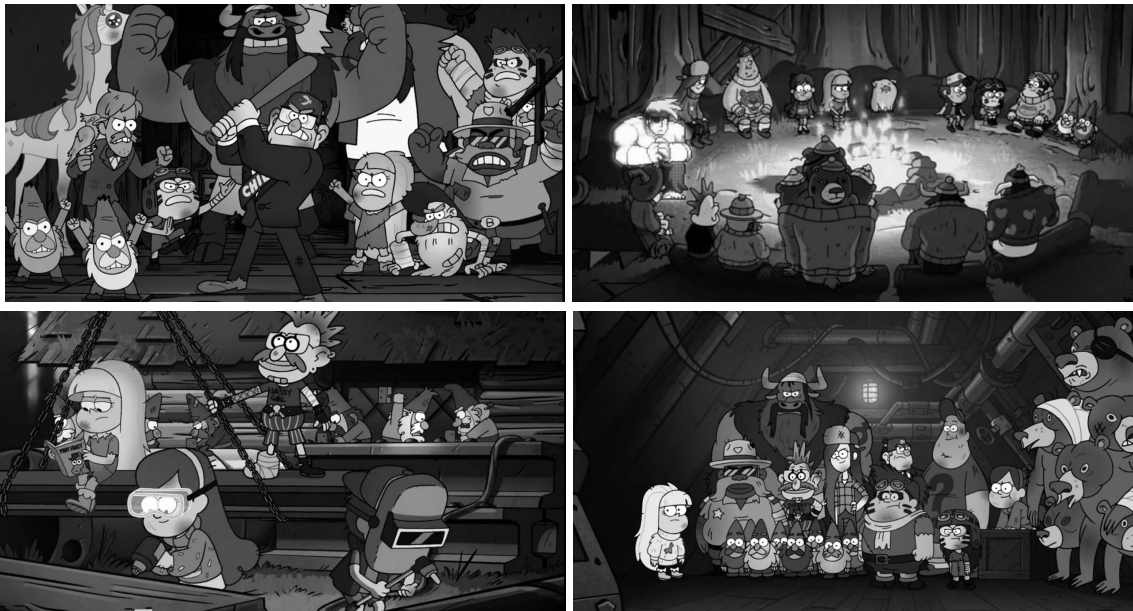
In the Plaintiff's 13 Gates of Rane story outline (Ex D), As Joey and Rebecca journey to new worlds, in search of the 13 weapons of the Enchanted Amory, Joey simultaneously *assembles a rag-tag, motley, misfit army*. On page 31 of the 13 Gates story outline is the first page of a 3-page, very rough-draft battle scene, in which we see Joey's outmatched rag-tag, motley, misfit army. Toward the top of page 31 (Ex D), first paragraph, the Plaintiff wrote:

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 Defendant(s)'s GF infringes the Plaintiff's story structure, as we see in GF episode 40, "Weirdmageddon 3: Take Back The Falls," the **rag-tag, motley, misfit** characters of Gravity Falls band together, and make weapons, and formulate plans fight Bill and his minions.



**Above:** In GF episode 40, we see Dipper and Mabel's rag-tag, motley, misfit army.

### **19. The Long Lost Family Member Is Inevitably Found, And Returns, Alive.**

In the Plaintiff's 13 Gates of Rane story outline (Ex D), Joey eventually finds his long-lost father.

The Defendant(s)'s GF infringes this aspect of the Plaintiff's work, in episode 31, "Not What He Seems," Grunkle Stan finds the his long-lost brother (who had been missing for 30 years), alive.

### **20. Reunited With His Long-lost Father (Or Lost Family Member), The Hero Battles The Villain (And/Or The Villain's Elite Minions) Alongside His Long-Lost Family Member.**

In the Plaintiff's 13 Gates of Rane outline (Ex D) we see that Joey (the hero) will fight the final battle (against Gormatu) with his long-lost father. The Plaintiff chose this arrangement because it would be 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.

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane* story outline, observable from the fact that immediately after Dipper's long-lost uncle Ford (Stanford) returns from across the Universe (in episodes 31 and 32), by GF episode 33, "Dungeons, Dungeons, and More Dungeons," Ford and Dipper are going on adventures together. And in GF episode 37, "Dipper and Mabel vs The Future," at 3:00, Ford asks Dipper to join him in trying to stop Bill from taking over the Earth. And finally, in GF episode 40, "Weirdmageddon 3: Take Back The Falls," at 23:50, Stan and his long-lost brother Ford fight the villain, Bill, together; and at 26:36 the Dipper, Mabel and Stan all fight the villain, Bill, alongside their long-lost family member, Ford.

## 21. The Villain Feeds On Suffering & Misery.

Page 10 of the Plaintiff's *13 Gates of Rane* outline (Ex D) 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. The villain feed on the suffering of his victims. [sic]

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane* story outline, as we see Bill's "Throne of Human Agony" in episode 39, *Weirdmageddon 2: Escape From Reality*," at about 00:44, as Bill explains: "**It's been fun turning Gravity Falls inside out, rounding up all of its terrified citizens, and stacking them into a massive throne of frozen human agony.**" The Defendants were so pleased with their infringement of this idea that in GF episode 40, "*Weirdmageddon 3: Take Back The Falls*," at 03:55, we see the throne again, as a reporter explains the concept, again. This a figurative and semi-literal infringement.



Above: (Left) The throne of Human Agony, in E39; (Right) The throne in episode 40.

## 22. The Story Features Numerous ENCHANTED ITEMS, Which Are Tightly Connected To The Central Plot, And Factor Into The Story's Ending.

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 items are NOT props or set dressings; rather, they are tightly connected to the plot and motivate the hero's action, and he will need them and use them

to defeat the villain, in the end.

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane* story outline, as we see GF there are numerous enchanted items that factor into the storyline.

Three such examples of central enchanted items are:

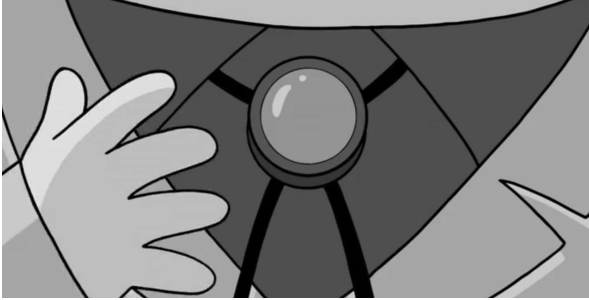
- a. GF episode 4, "The Hand That Rocks The Mabel," features an **enchanted necklace** with an **enchanted rock pendant**, which allows Gideon to pick up seemingly anything, with his will alone
- b. GF episode 11, features an **enchanted crystal**, which, when connected to a flashlight, makes objects much larger or much smaller.
- c. And GF episode 35, "The Last Mabelcorn," features unicorns and **enchanted unicorn hair**.

The enchanted crystal, attached to the flashlight, factors into the final episode of Gravity Falls. Likewise the enchanted unicorn hair factors into the final episode, as it is used to create an unbreakable protective barrier around the "Mystery Shack" (the name of Stan's house/novelty shop). Thus, the Defendant(s) further infringed the Plaintiff's work.

### **23. The Plot Features An ENCHANTED NECKLACE.**

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.

The Defendant(s)'s GF infringes this aspect of the Plaintiff's work, as we see in GF episode 4, "The Hand That Rocks The Mabel," which concerns an enchanted necklace, that give Gideon (GF's secondary villain) super-power. At the end of the episode, at 21:49, we see in Dipper's journal that the enchanted necklace is called the "Mystic Amulet."



**Above:** The enchanted necklace, in GF episode 4.

**24. The Villain’s GOAL: Build An Army, Conquer The Earth/Universe, Persecute Mankind.**

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 mankind (persecution is necessary because Gormatu feeds on suffering and misery).

The Defendant(s)’s GF infringes this story structure of the Plaintiff’s *13 Gates* outline, as we see in such GF story events as: (1) In episodes 35 to 40, the villain, Bill, creates an army of minions (see item 17); (2) In episode 37, at 21:01, moments after Bill finally gets an Earth body, he says, “The World is finally mine!”; (3) In GF episode 38, at 00:55, Bill tells the people of Gravity Falls: “...you can call me your new lord and master, for all of eternity.”

**25. The Villain’s Minions Include A Variety Of Dark And Bizarre Creatures.**

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

- a. Page 1 of the 13 Gates outline (Ex D) 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.” [sic]

- e. The 13GoR outline (Ex D), p 31, describes the Hedronul: “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 D) 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 Defendant(s)’s GF infringes this aspect of the Plaintiff’s work, as seen in GF episodes 35 to 40, the villain, Bill, assembles a variety bizarre, dark creatures as his minions (see below).



## 26. The Story Features A “Secret Society.”

On page 21 of the Plaintiff’s 13 Gates of Rane outline (Ex D), the Plaintiff explained that on each of the 13 major world where a weapon of the *Enchanted Armory* was created there is a *secret society* of magicians. On page 21 the Plaintiff wrote:

As Rane dream walked these new world's, searching for a way to stop the terrible future he had seen in his dreams, in time, Rane would learn that each of these new worlds had more in common than intelligent life and an evil beast intent on controlling their world -Rane learned that each planet also had their own **secret society** of magicians.

The Defendant(s)’s GF infringes the Plaintiff’s work, as seen in GF episode 27, “The

Society of the Blind Eye,” an episode in which Dipper, Mabel and the gang discover there is a secret society in Gravity Falls that uses a magical ray gun to erase citizens’ troubling memories.



Above: The secret society in GF episode 27, “The Society of the Blind Eye.”

### **27. The Placement Of The Town Of Gravity Falls Under A Giant Transparent Dome Enclosure Infringes The Giant Dome Enclosure Covering Verdan’s Mansion And His Large Garden.**

On page 6 and 7 of the 13 Gates of Rane story outline (Ex D), the Plaintiff described Verdan mansion and large garden INSIDE the transparent, glass-like dome of his space-station (called Seran’s Chamber). The Plaintiff wrote:

Joey walked around the great garden slowly looking with awe at the garden. 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:** (Left) Gravity Falls under a dome, GF episode 39, at 01:30.

The Defendant(s)’s GF infringes the Plaintiff’s work, as seen in episode 39, at 01:30, when the Defendant(s) enclosed the town of Gravity Falls in a giant transparent dome enclosure.

## 28. The Placement Of The “Mystery Shack” Under A Giant Transparent Dome Enclosure Infringes The Giant Dome Enclosure Covering Verdan’s Mansion And His Large Garden.

As explained in the previous item (#27), on page 6 and 7 of the 13 Gates of Rane story outline (Ex D), the Plaintiff described Verdan’s mansion and garden INSIDE the transparent, glass-like dome of his space-station (Seran’s Chamber). (See item #27 for dome description.)



**Above:** The “Mystery shack under a translucent dome in GF episode 40.

Like the prior example (item #27), the Defendant(s)’s GF infringes this aspect of the Plaintiff’s work, again, in GF episode 40, when the Defendant(s) enclosed the “Mystery Shack” (Stan’s house and novelty shop) in a translucent dome enclosure.

## 29. The Hero(s)’s Birthday Is A Central Part Of The Story.

Page 1, 18 and 29 of the Plaintiff’s 13 Gates outline (Ex D) show that Joey’s birthday is an important aspect of the Plaintiff’s story. On page 1 on the 13GoR outline, the Plaintiff wrote:

On his eleventh birthday mother gives him a few items she had in a bank security box. A ring (the ring of All -Demjunuk)

On page 18 of the 13GoR outline (Ex D), the Plaintiff simply wrote: “**Joe has Birthday,**” and on page 29 of the 13 GoR outline, the Plaintiff wrote: “**Has birthday, mom goes to bank gives Joey the stuff left by his father - wears the fleece of dreams to bed.**”

The Defendant(s)’s GF infringes this aspect of the Plaintiff’s work as Dipper and Mabel have their centrally placed birthday in the final episode, 40, after the heroes defeat the villain.



**30. “FATE OF THE WORLD” Stakes: The Consequences Of Not Defeating The Villain Will Be Cataclysmic; THE WORLD Will End Or Fall Into The Villain’s Grip.**

The Plaintiff’s 13 Gates of Rane outline explains that if Gormatu is not defeated, he will **enslave the entire world** and feed on our suffering and misery (p10). And on page 19 of 13GoR outline (Ex D) the Plaintiff described Gormatu’s goal of conquering the Universe: “... **in the end a single great warrior would stand between the dark empire and their conquest of the Universe.**” These are the enormous, *fate of the world*, and *fate of the Universe*, stakes.

The Defendants infringed the Plaintiff’s enormous, *fate of the world*, and *fate of the Universe*, stakes, first, by making the consequences of the teleportation gate “crash” that “the machine could tear the **Universe** apart,” and “total **global** destruction” (GF episode 31 at 17:14). Later, in episode 37, at 21:01, Bill says, “The **World** is finally mine!” Also in episode 37, at 3:47, Ford warns Dipper about Bill: “Did I mention that the fate of the **Universe** is at stake?”

**31. DIALOGUE INFRINGEMENT: “Fate of the Universe.”**

The Plaintiff’s 13 Gates of Rane story outline (Ex D) uses the expression “fate of the universe.” On page 10 of the Plaintiff’s 13GoR outline, the character Verdán says:

“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.”

On page 13 of the 13GoR outline (Ex D), Joey and Verdán have the following exchange:

"What the heck is a cataclysm?"

"The Cataclysm is the great war for the **fate of the universe.**"

Again, even here, the Defendant(s)’s GF infringes the Plaintiff’s work. Although this is not a huge detail, it is telling of subconscious infringement; demonstrable because, in GF, although Bill threatens Earth, he never threatens the Universe. Yet, in GF episode 37, at 03:47, Ford warns Dipper (about the coming of Bill): “Did I mention that the **fate of the Universe** is at stake?” The Plaintiff believes the Defendant(s) subconsciously echoed this refrain from the Plaintiff’s work.

### **32. The villain is immortal and comes from far across the Universe.**

The Plaintiff's villain, Gormatu, comes from across the Universe and is immortal (the character "Verdan" comes from the same planet as Gormatu, *Langorlay*, and is also immortal, as Verdan explains on page 19: "**I am Verdan the immortal**, often called The Keeper"). The 13GoR outline (Ex D) shows that Gormatu is between, at least, 1000 years old and 6000 years old; although he could be much older; his exact age is not given. (See Ex D, pp 9, 10, 19, 20, 21.)

The Defendant(s)'s GF villain, Bill, infringes the Plaintiff's villain's immortality, as Bill is also immortal. In GF, episode 35, "The Last Mabelcorn," at 08:57, Ford says Bill is "older than the Universe," and in GF episode 38, "Weirdmageddon, Part 1," at 00:44, Bill says, "For one **trillion** years, I've been trapped in my own decaying dimension."

### **33. The Story Has A Shape-shifting Element.**

In the Plaintiff's 13 Gates of Rane outline, the Flask of Derjentaydo is one of the 13 items of the *Enchanted Armory* that Joey must find, to defeat Gormatu. Pages 14 and 23 of the 13GoR outline (Ex D) explains that the Flask of Derjentaydo gives the user the power to shape-shift (change into any animal or form he chooses). Page 14 and 23 of the 13GoR outlines states:

**-Flask of Derjentaydo's -Drinking from the flask enables Shape shifting [sic]**

Page 18 and 23 of the Plaintiff's 13 Gates of Rane story outline (Ex D) also explain that Gormatu, the villain, intends to **shape shift**, to defeat the forces of good:

**Gormatu wants to shape shift and get the key of time and go back in time to stop the forces of light.**

The Defendant(s)'s GF infringes this element of the Plaintiff's work, as seen in GF episode 22, "Into The Bunker," which features an unnamed shape-shifting villain. In GF episode 32, "A Tale of Two Stans," at 15:20, we learn Ford found the shape-shift villain when it was an egg.

**34. Although The Story Takes Place In A Sylvan/Forested Community, A Central & Meaningful Scene Involving The Long-Lost (Estranged) Family Members Unfolds On The COAST.**

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.**

Although GF is set in a sylvan setting, with no prior depiction of the coast or ocean, the Defendant(s)'s GF infringed the Plaintiff's evocative vision of two long-lost family members, standing on a shore, twice:

- a. In episode 31, at 21:36, immediately after Grunkle Stan brings his brother Ford (Stanford) back from across the universe, we see Stan and Ford, as children, swinging on swings, overlooking the coast.
- b. In GF episode 32, after uncle Ford is brought back from across the Universe, he and Stan's childhoods are depicted on a coastal community, and the two boys share dreams about sailing the world.

**35. The story starts with one or two heroes, but the cast of heroes grows larger, and some of the new heroes save the primary hero, and some of the new heroes fight the villain more successfully than the primary hero does.**

- Prior to the Plaintiff's work (2001-2002) this was very uncommon (perhaps even an original arrangement), as almost always, the principle hero(s) saved themselves, and, by definition, fought the villain more successfully than any subordinate hero.

The Plaintiff's 13 Gates of Rane story outline (Ex D) begins with one central hero (Joey), but the cast of heroes quickly grows to include **Rebecca** (initially referred to as "the girl," or Joey's "girl-friend," etc), and Joey's **father**, and **Miguel Sierra**. **Verdan** is also a hero. Further, on page 3 of the 13GoR outline we see that Joey's father and Miguel Sierra have already

successfully prevented the villain, Gormatu, from entering Earth, and on pages 5 and 6 of the Plaintiff's 13GoR outline (Ex D) we see Rebecca ("the girl," "girl," "girl-friend," girlfriend," "she," "She," "her," "best friend") saves the primary hero, Joey, from the villain, Gormatu, and we see she fights Gormatu more successfully than the primary hero, Joey. Further, page 6 of the 13GoR outline shows that after Joey is saved by Rebecca, Joey and Rebecca are then, both, saved by Joey's father; the Plaintiff wrote (Ex D, p 6):

Near death his best friend rushes to save him. Gormatu laughs then decides to let Joey watch her die before killing him. After all she snatched Joey away last time. 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.

The Defendant(s)'s GF infringes the Plaintiff's story structure of *an expanding cast of heroes, some of whom save the primary hero, some of whom fight the villain more successfully than the primary hero does*, as we see in GF, the series begins with one or two heroes (Dipper and Mabel), but the cast of heroes grows (Grunkle Stan, Soos, Wendy, Ford). And all of the new cast of heroes save the primary heroes (Grunkle Stan and Ford repeatedly save the younger hero; Soos saves Dipper and Mabel in episode 31; Wendy saves Dipper from Gideon's gang of bandits in episode 38), and, after Dipper fails to beat the villain, Bill, in episode 38, Grunkle Stan and Uncle Ford save the entire cast from Bill in the final episode, 40.

### **36. A Time Reversal/Travel Aspect Factors Into The Story's Ending**

Pages 17 and 23 of the Plaintiff's 13 Gates of Rane story outline (Ex D) explain that in the end Joey will try to go back in time to meet his father; as the Plaintiff wrote:

**Thirteenth door is the gate of time -Joey goes through in the end to meet his father**

The Defendant(s)'s GF infringes this story structure of the Plaintiff's *13 Gates of Rane*

story outline, as we see in in GF episode 40, at 16:00 (approx) Ford explains that once the villain (Bill) is defeated all of his weirdness would be **reversed**.

**37. The story's plot and setting involve one of more caves that are found near the hero(s)'s residence.**

The Plaintiff's 13 Gates of Rane story outline (Ex D) explains that behind Joey's house there is a hill(s) or mountain(s), and on that hill or mountain, Joey find a cave, which leads to great adventure. This is most succinctly explained on page 18 of the 13 Gates outline (Ex D):

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

The Defendant(s)'s GF infringes this story structure from the Plaintiff's work, *13 Gates of Rane* story outline, as seen in GF episodes 6 ("Dipper v Manliness"), 18 ("Land Before Swine"), and 22 ("Into The Bunker"), there are hills and mountains near the "Mystery Shack," and in these hills and mountains are caves; there are also underground caves (not in the mountains) in episode 18 and 22. And all of these various caves lead to, and/or they are part of, new adventure.

**38. The story involves the concept of a POLYVERSE or MULTIVERSE.**

On page 34 of the Plaintiff's 13 Gates of Rane story outline (Ex D), referred to "**the polyverse,**" indicating his story may take place in a polyverse. ("Polyverse" and "multiverse" both terms referring to the concept of multiple of many universes).

The Defendant(s)'s GF infringes this aspect, as seen in GF episode 33, at 06:40, Ford says, "It's my favorite game in the whole **multiverse.**"

**39. The Defendant(s)'s Gravity Falls Further Infringes The Plaintiff's 13 Teleportation Gates By Featuring "Curse Door #13" (Mimicking The Plaintiff's "13 Gates").**

The Plaintiff's 13 Gates of Rane features 13 "gates." or large doorways, that lead to the 13 great planets, across the Universe.

The Defendant(s)'s GF infringes the Plaintiff's 13 Gates, by featuring a "cursed door" page in journal #3, seen in the first episode of Gravity Falls. And in the Gravity Falls video game "Rumbles Revenge" there is a cursed door with the number "13" on it. This, of course, is not direct infringement, but the Plaintiff believes it is the Defendant(s)'s perverted way to both laugh about their infringement and theft, and pay homage to the source.



Above: Door 13, from "Rumble's Revenge."

#### CHARACTERS & STORY ELEMENTS INFRINGEMENT

The Defendant(s)'s series Gravity Falls infringes the following four characters: 1. THE VILLAIN, 2. The Missing Family Member, 3. The missing family member's assistant, 4. THE HERO. The Defendant(s)'s Gravity Falls (GF) also infringes numerous of the plaintiff remaining, and yet unclaimed. Story elements, such as themes, mood, pace and genre.

#### **40. The Assistant**

Infringing the Plaintiff's work, the following 7 aspects (and more) are true of the "Assistants" of both works:

- a. THE ASSISTANT (PART 1). In The Story, The Missing Family Member (Who Was Lost Through A Teleportation Gate/Door) Had An ASSISTANT Who Also Went Through The Teleportation Gate. BUT The Assistant Was NOT Lost Through The Teleportation Gate,

And He Is Still Alive On Earth. In Addition To Assisting The Long-lost Family Member, The Assistant Was A Good FRIEND Of The Lost Family Member.

- b. THE ASSISTANT (PART 2). In The Story, The Missing Family Member's Former Assistant, Has Seen The Coming Evil, And He Helps The Hero(S) In Their Mission/Quest To Defeat The Coming Villain.

#### **41. The Long Lost Family Member**

Infringing the Plaintiff's work, the following aspects are true about the "Long-Lost Family Members" of both works:

- a. A Primary Character Loses A Close Family Member—who Was Pulled Through A Teleportation Gate And Transported Far Across The Universe. This Event Happened During A Fight Near The Teleportation Gate.
- b. The Missing Family Member Was Lost, Across The Universe, Because Of A FIGHT NEAR THE TELEPORTATION GATE, That Transpired Years Before The Story Takes Place. Thus, The Audience Learns How The Family Member Was Lost When A Character Who Was Present During The Incident Recounts The Event.
- c. The Long Lost Family Member Is Inevitably Found, And Returns, Alive.
- d. Reunited With His Long-lost Father (Or Lost Family Member), The Hero Battles The Villain (And/Or The Villain's Elite Minions) Alongside His Long-Lost Family Member.

#### **42. The HERO**

Infringing the Plaintiff's work, the following 10 aspects (and more) are true of the heroes of both works:

- a. The Primary Hero is A pre-teen boy (Joey is Eleven vs Dipper and Mabel are 12).
- b. A Villain From Across The Universe Enters Into The Hero's Dreams and Mind.

- c. The Boy Hero Notices Strange Events, STRANGE CREATURES, And Strange People In His Small, Sylvan (Forested) Community. When The Boy Investigates These Strange Events And Creatures, He Stumbles Into Adventure And Mystery.
- d. The Boy-hero's Investigation Into The Strange Events Leads Him To Find One (Or More) Teleportation Gate (*Door*, or *Portal*), Which Leads Far Across The Universe.
- e. The Hero's Body Is Possessed By A Foreign Soul/Entity—Who Causes The Hero To Behave Peculiarly.
- f. The Hero(s)'s Goal Is To Stop A Powerful Villain, From Across The Universe, From Taking Over The Earth/Universe.
- g. The Hero Has An Outmatched, Rag-tag, Motley, Misfit Army.
- h. Alongside His LONG-LOST Family Member, The Child Hero Fights The Villain (An/Or His Minions), In A Great Battle.
- i. A Secondary Hero Saves The Hero, And Fights The Villain More Successfully Than The Primary Hero Fought The Villain.
- j. “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.

### **43. The VILLAIN**

Infringing the Plaintiff's work, the following 7 aspects (and more) are true of the villains of both works:

- a. A Villain From Across The Universe Speaks Into The Hero's Mind, And Enter's Into The Hero's Dreams.
- b. The Villain Feeds On Suffering & Misery.



- c. The villain is immortal and comes from far across the Universe.
- d. The Villain Builds An ARMY OF POWERFUL MINIONS.
- e. The Villain's Minions Include A VARIETY OF DARK CREATURES.
- f. The Villain's GOAL: Build An Army, Conquer The Earth/Universe, Persecute Mankind.
- g. The Story Involves A PROPHECY Of A Coming Super Powerful Evil Villain Who Threatens To Destroy The World.

#### **44. 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.<sup>[28]</sup> 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."<sup>[33]</sup> 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.<sup>[35]</sup> 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.

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