

JENNER & BLOCK LLP

David R. Singer (SBN 204699)

dsinger@jenner.com

Julie A. Shepard (SBN 175538)

jshepard@jenner.com

Lauren M. Greene (SBN 271397)

lgreene@jenner.com

515 South Flower Street, Suite 3300

Los Angeles, CA 90071-2246

Telephone: (213) 239-5100

Facsimile: (213) 239-5199

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DISNEY ENTERPRISES, INC., a Delaware corporation; UNIVERSAL CITY STUDIOS PRODUCTIONS LLLP, a Delaware limited liability limited partnership; WARNER BROS. ENTERTAINMENT INC., a Delaware corporation; MARVEL CHARACTERS, INC., a Delaware corporation; MVL FILM FINANCE LLC, a Delaware limited liability company; LUCASFILM LTD. LLC, a California limited liability company; TWENTIETH CENTURY FOX FILM CORPORATION, a Delaware corporation; DC COMICS, a New York general partnership; THE CARTOON NETWORK, INC., a Delaware corporation; TURNER ENTERTAINMENT CO., a Delaware corporation; HANNA-BARBERA PRODUCTIONS, INC., a Delaware corporation; and DREAMWORKS ANIMATION L.L.C., a Delaware limited liability company,

Plaintiffs.

Case No. 25-8768

**COMPLAINT FOR DIRECT
COPYRIGHT INFRINGEMENT
AND SECONDARY COPYRIGHT
INFRINGEMENT; DEMAND FOR
JURY TRIAL**

1 v.

2 MINIMAX, a Chinese company;
3 SHANGHAI XIYU JIZHI TECHNOLOGY
4 CO. LTD., a Chinese limited company;
5 NANONOBLE PTE. LTD., a Singaporean
6 private limited company and DOES 1
through 20, inclusive,

7 Defendants.

1 Plaintiffs Disney Enterprises, Inc., Marvel Characters, Inc., MVL Film Finance
2 LLC, Lucasfilm Ltd. LLC, and Twentieth Century Fox Film Corporation, (collectively,
3 “Disney”), Universal City Studios Productions LLLP and DreamWorks Animation L.L.C.
4 (collectively “Universal”), and Warner Bros. Entertainment Inc., DC Comics, The Cartoon
5 Network, Inc., Turner Entertainment Co., Hanna-Barbera Productions, Inc. (collectively
6 “Warner Bros. Discovery”) (Disney, Universal, and Warner Bros. Discovery are referred
7 to collectively as “Plaintiffs”) bring this lawsuit for direct and secondary copyright
8 infringement under the Copyright Act (17 U.S.C. § 101 *et seq.*) against defendant
9 MiniMax, defendant Shanghai Xiyu Jizhi Technology Co. Ltd., of which MiniMax is a
10 division or subsidiary, along with their affiliate and/or agent, and defendant Nanonoble
11 Pte. Ltd. which operates at the direction and under the control of MiniMax (together,
12 “MiniMax”). This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331,
13 1338(a), and 17 U.S.C. § 501(b). Plaintiffs allege, on personal knowledge as to themselves
14 and information and belief as to others, as follows:

15 **INTRODUCTION**

16 1. MiniMax operates Hailuo AI, a Chinese artificial intelligence (“AI”) image
17 and video generating service that pirates and plunders Plaintiffs’ copyrighted works on a
18 massive scale. MiniMax markets Hailuo AI as a “Hollywood studio in your pocket” – an
19 audacious self-anointed nickname given that MiniMax built its business from intellectual
20 property stolen from Hollywood studios like Plaintiffs. The Hailuo service offers its
21 subscribers an endless supply of infringing images and videos featuring Plaintiffs’ famous
22 copyrighted characters. MiniMax completely disregards U.S. copyright law and treats
23 Plaintiffs’ valuable copyrighted characters like its own. Not only has it failed to act on
24 Plaintiffs’ requests to adopt the reasonable measures taken by several AI services to avoid
25 infringement, MiniMax has actively engaged in and encouraged infringement. MiniMax
26
27
28

1 even uses Plaintiffs' famous copyrighted characters to advertise and promote its infringing
2 Hailuo service. MiniMax's copyright infringement is willful and brazen.

3 2. Plaintiffs are the largest movie studios in the world and have been fueling the
4 American engine of creativity for more than a century. Many of Plaintiffs' most successful
5 and critically-acclaimed movies are exceptional – and valuable – because of the larger-
6 than-life characters featured in those works. They include heroes like Spider-Man and
7 Superman; villains like Darth Vader and the Joker; popular animated characters like Shrek
8 and the Minions from *Despicable Me*; astronaut toys like *Toy Story*'s Buzz Lightyear; and
9 classic cartoon characters like Bugs Bunny and Tom and Jerry. The mere presence of these
10 iconic characters on a screen tells a story that was created and developed over many years
11 by teams of dedicated artists and storytellers.

12 3. MiniMax's bootlegging business model and defiance of U.S. copyright law
13 are not only an attack on Plaintiffs and the hard-working creative community that brings
14 the magic of movies to life, but are also a broader threat to the American motion picture
15 industry, which has created millions of jobs and contributed more than \$260 billion to the
16 nation's economy.

17 4. Plaintiffs' successful monetization of their copyrighted works and characters
18 across so many different channels and markets is not only a testament to their investment
19 in human creativity, but also to Plaintiffs' constant innovation. Few American
20 entertainment companies have embraced creativity and technology like Plaintiffs, from the
21 earliest days of synchronizing sound and film, to creating virtual and immersive
22 experiences at world class theme parks, to pushing the boundaries of animation through
23 groundbreaking rendering software, to using advanced technologies to enhance the magic
24 of filmmaking. These investments of creativity, time, and money are only made possible
25 by the incentives embodied in U.S. copyright law, which grants copyright owners the
26 exclusive right to control and commercialize their own creative works.

27 5. Whether it is a video game based on the *Star Wars* movies, a theme park
28 attraction featuring Shrek and Donkey, merchandise branded with DC Universe

1 superheroes, or a subscription service that distributes videos with Plaintiffs' copyrighted
2 characters, *only Plaintiffs* are allowed to build a business around those characters.

3 6. MiniMax's Hailuo AI service was developed using innumerable unauthorized
4 copies of Plaintiffs' copyrighted works, and it operates by reproducing, publicly displaying
5 and performing, making available, and distributing infringing copies and derivatives of
6 those works. If a MiniMax subscriber submits a simple text prompt requesting the
7 character Darth Vader in a particular setting or doing a particular action, MiniMax
8 generates and displays high quality, downloadable images and videos featuring Disney's
9 copyrighted Darth Vader (along with MiniMax Hailuo branding no less):



20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

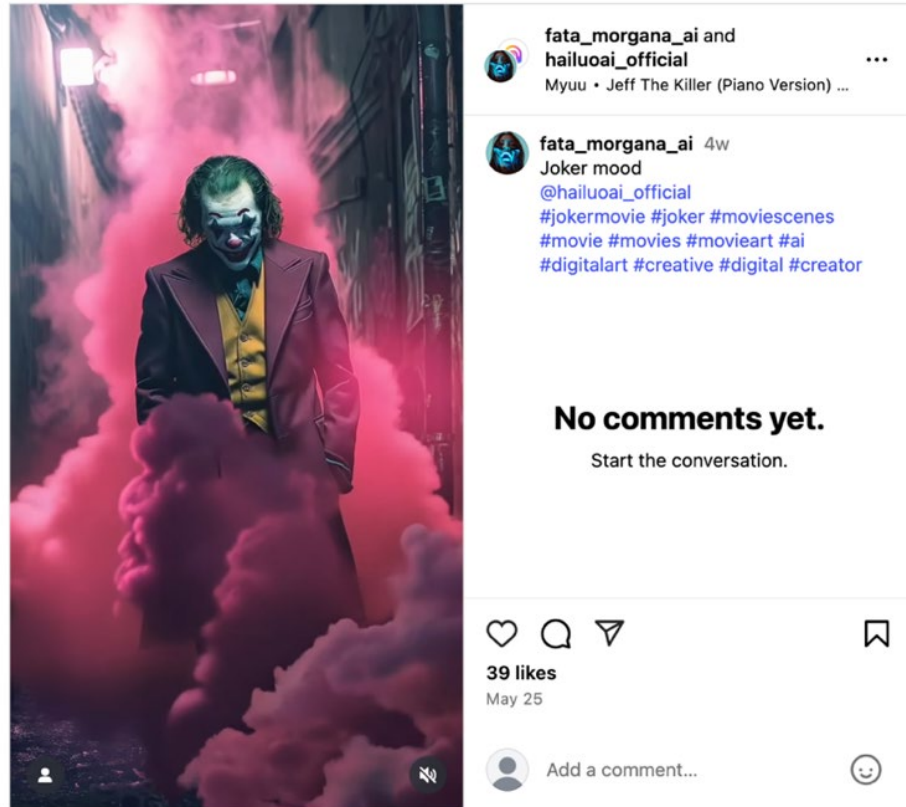
1 7. Similarly, if a Hailuo AI subscriber submits a simple text prompt requesting
2 Wonder Woman in a particular setting or doing a particular action, MiniMax generates and
3 displays high quality, downloadable images and videos featuring Wonder Woman:



14 8. Likewise, if a Hailuo AI subscriber submits a simple text prompt requesting
15 the Minions characters in a particular setting or doing a particular action, MiniMax
16 generates and displays high quality, downloadable images and videos featuring Universal's
17 Minions:



9. To further commercialize its rampant copyright infringement, without authorization, MiniMax copies and uses *Plaintiffs' copyrighted characters to advertise and promote* its Hailuo AI video service to U.S. consumers (falsely implying Plaintiffs' endorsement), as seen in this advertisement on Hailuo AI's official Instagram account displaying an infringing image of Warner Bros. Discovery's the Joker.



///

///

///

///

///

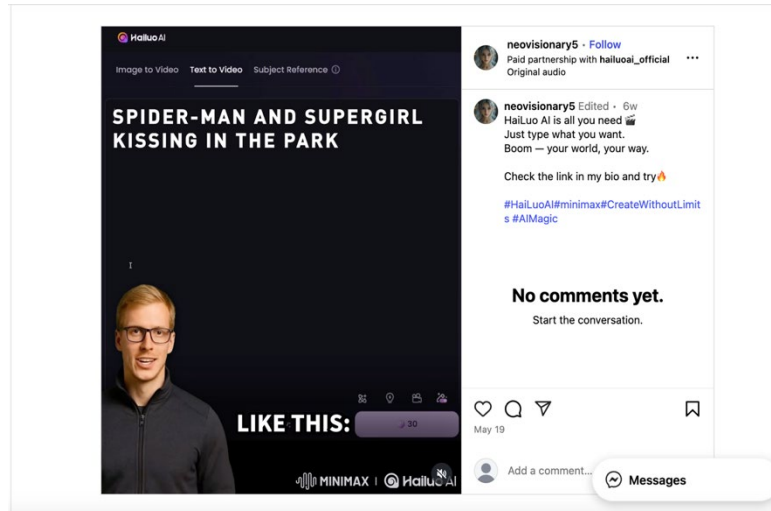
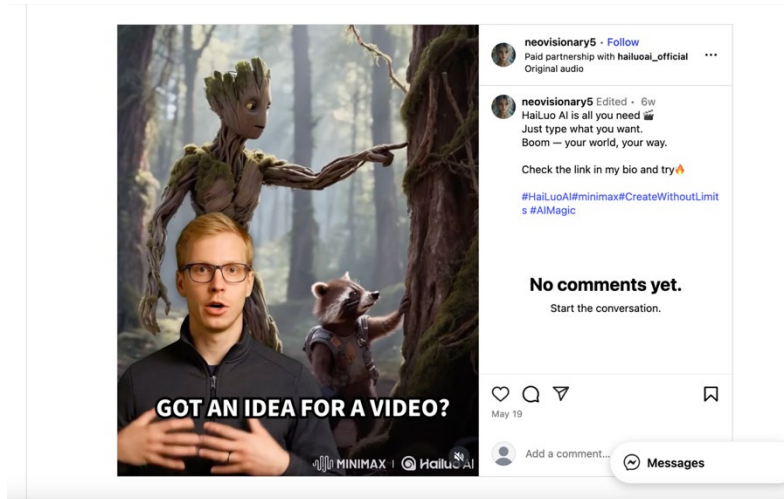
///

///

///

///

10. Without any regard for U.S. copyright laws, MiniMax encourages consumers to download its Hailuo AI app for the express purpose of distributing infringing content featuring Plaintiffs' copyrighted characters. One recent advertisement coaxes consumers to subscribe to Hailuo AI by enticing them with infringing videos featuring Disney's Groot, Rocket Raccoon, and Spider-Man, and Warner Bros. Discovery's Supergirl:



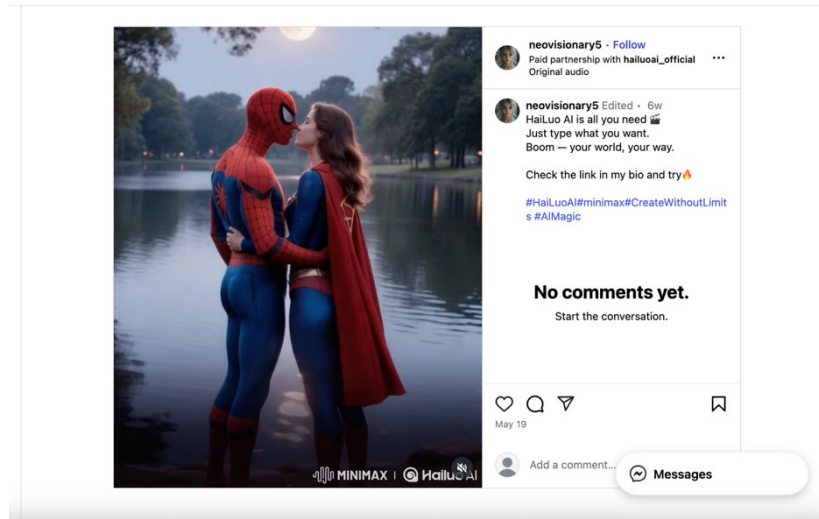
///

///

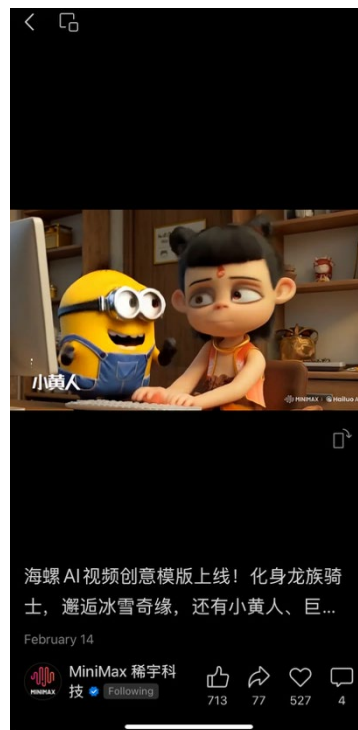
///

///

///



11. Another advertisement posted to MiniMax's official WeChat page entices consumers to subscribe to Hailuo AI by showing an infringing image of one of Universal's Minions.



12. MiniMax could easily stop its theft and exploitation of Plaintiffs' intellectual property. MiniMax controls what copyrighted content it selects, copies, and includes in Hailuo AI, and it has the means to implement protection measures to prevent the ongoing copying, public display, public performance, and distribution of Plaintiffs' works. MiniMax already has in place technological measures to prevent its distribution and public display and performance of certain images and video such as violence or nudity. And other AI image- and video-generating services have instituted copyright protection measures that recognize and protect the rights of content creators like Plaintiffs. These readily available measures could easily be implemented by MiniMax.

13. Plaintiffs asked MiniMax to stop infringing their copyrighted works. But MiniMax, which has attracted millions of subscribers and is now reportedly worth \$4 billion, blatantly continues to infringe Plaintiffs' copyrights in favor of its own bottom line.

14. MiniMax's large-scale infringement is systematic, ongoing, and willful, and Plaintiffs have been, and continue to be, substantially and irreparably harmed by it. Plaintiffs bring this action to stop MiniMax's intellectual property theft and to uphold U.S. copyright law and the crucial incentives that reward those who create, not those who take.

THE PARTIES

15. Plaintiff Disney Enterprises, Inc. is a corporation duly incorporated under the laws of the State of Delaware with its principal place of business in Burbank, California. Disney Enterprises, Inc. owns or controls copyrights or exclusive rights in content that it or its affiliates produce or distribute, including those copyrighted works specified in Exhibit A.

16. Plaintiff Marvel Characters, Inc. is a corporation duly incorporated under the laws of the State of Delaware with its principal place of business in Burbank, California. Marvel Characters, Inc. owns or controls copyrights or exclusive rights in content that it or

1 its affiliates produce or distribute, including those copyrighted works specified in
2 Exhibit A.

3 17. Plaintiff MVL Film Finance LLC is a limited liability company organized
4 under the laws of the State of Delaware with its principal place of business in Burbank,
5 California. MVL Film Finance LLC owns or controls copyrights or exclusive rights in
6 content that it or its affiliates produce or distribute, including those copyrighted works
7 specified in Exhibit A.

8 18. Plaintiffs Marvel Character, Inc. and MVL Film Finance LLC are referred to
9 collectively as “Marvel.”

10 19. Plaintiff Lucasfilm Ltd. LLC is a limited liability company organized under
11 the laws of the State of California with its principal place of business in San Francisco,
12 California. Lucasfilm Ltd. LLC owns or controls copyrights or exclusive rights in content
13 that it or its affiliates produce or distribute, including those copyrighted works specified in
14 Exhibit A.

15 20. Plaintiff Twentieth Century Fox Film Corporation (also known as “20th
16 Century Studios”) is a corporation duly incorporated under the laws of the State of
17 Delaware with its principal place of business in Burbank, California. 20th Century Studios
18 owns or controls copyrights or exclusive rights in content that it or its affiliates produce or
19 distribute, including those copyrighted works specified in Exhibit A.

20 21. As noted above, Disney Enterprises, Inc., Marvel Characters, Inc., MVL Film
21 Finance LLC, Lucasfilm Ltd. LLC, and 20th Century Studios are collectively referred to
22 in this Complaint as “Disney.” Exhibit A contains a non-exhaustive, representative list of
23 Disney’s works, along with their registration numbers, which MiniMax has directly or
24 secondarily infringed and continues to infringe (“Disney’s Copyrighted Works”). All of
25 Disney’s Copyrighted Works in Exhibit A constitute original works and copyrightable
26 subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, et seq., and they have been
27 duly registered with the U.S. Copyright Office. The copyrights set forth in Exhibit A
28 remain valid and subsisting and have been owned and/or controlled by Disney at all times

1 relevant to the allegations in this Complaint. The registered copyrights for Disney's
2 Copyrighted Works encompass the identified characters appearing therein. Moreover, the
3 visual depictions of the characters constitute copyright protected artwork and audiovisual
4 works.

5 22. Plaintiff Warner Bros. Entertainment Inc. ("Warner Bros. Entertainment") is
6 a corporation duly incorporated under the laws of the State of Delaware with its principal
7 place of business in Burbank, California. Warner Bros. Entertainment owns or controls
8 copyrights or exclusive rights in content that it or its affiliates produce or distribute,
9 including those copyrighted works specified in Exhibit B.

10 23. Plaintiff DC Comics ("DC Comics") is a New York general partnership with
11 its principal place of business in Burbank, California. DC Comics owns or controls
12 copyrights or exclusive rights in content that it or its affiliates produce or distribute,
13 including those copyrighted works specified in Exhibit B. DC Comics as defined herein
14 includes its predecessor entities.

15 24. The Cartoon Network, Inc. ("The Cartoon Network") is a corporation duly
16 incorporated under the laws of the State of Delaware with its principal place of business in
17 Atlanta, Georgia. The Cartoon Network owns or controls copyrights or exclusive rights in
18 content that it or its affiliates produce or distribute, including those copyrighted works
19 specified in Exhibit B.

20 25. Turner Entertainment Co. is a corporation duly organized under the laws of
21 the State of Delaware with its principal place of business in Burbank, California. Turner
22 Entertainment Co. owns or controls copyrights or exclusive rights in content that it or its
23 affiliates produce or distribute, including those copyrighted works specified in Exhibit B.

24 26. Hanna-Barbera Productions, Inc. is a corporation duly organized under the
25 laws of the State of Delaware with its principal place of business in Burbank, California.
26 Hanna-Barbera Productions, Inc. owns or controls copyrights or exclusive rights in content
27 that it or its affiliates produce or distribute, including those copyrighted works specified in
28 Exhibit B.

27. As noted above, Warner Bros. Entertainment Inc., DC Comics, The Cartoon Network, Turner Entertainment Co., and Hanna-Barbera Productions, Inc. are referred to collectively in this Complaint as “Warner Bros. Discovery” Exhibit B contains a non-exhaustive, representative list of Warner Bros. Discovery’s works, along with their registration numbers, which MiniMax has directly or secondarily infringed and continues to infringe (“Warner Bros. Discovery’s Copyrighted Works”). All of Warner Bros. Discovery’s Copyrighted Works in Exhibit B constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, et seq., and they have been duly registered with the U.S. Copyright Office. The copyrights set forth in Exhibit B remain valid and subsisting and have been owned and/or controlled by Warner Bros. Discovery at all times relevant to the allegations in this Complaint. The registered copyrights for Warner Bros. Discovery’s Copyrighted Works encompass the identified characters appearing therein. Moreover, the visual depictions of the characters constitute copyright protected artwork and audiovisual works.

28. Plaintiff Universal City Studios Productions LLLP (“Universal Pictures”) is a limited liability limited partnership organized under the laws of the State of Delaware with its principal place of business in Universal City, California. Universal Pictures owns or controls copyrights or exclusive rights in content that it or its affiliates produce or distribute, including those copyrighted works specified in Exhibit C.

29. Plaintiff DreamWorks Animation L.L.C. (“DreamWorks”) is a limited liability company organized under the laws of the State of Delaware with its principal place of business in Glendale, California. DreamWorks Animation L.L.C. owns or controls copyrights or exclusive rights in content that it or its affiliates produce or distribute, including those copyrighted works specified in Exhibit C.

30. As noted above, Universal Pictures and DreamWorks are referred to collectively in this Complaint as “Universal.” Exhibit C contains a non-exhaustive, representative list of Universal’s works, along with their registration numbers, which MiniMax has directly or secondarily infringed and continues to infringe (“Universal’s

1 Copyrighted Works”). All of Universal’s Copyrighted Works in Exhibit C constitute
2 original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C.
3 § 101, et seq., and they have been duly registered with the U.S. Copyright Office. The
4 copyrights set forth in Exhibit C remain valid and subsisting and have been owned and/or
5 controlled by Universal at all times relevant to the allegations in this Complaint. The
6 registered copyrights for Universal’s Copyrighted Works encompass the identified
7 characters appearing therein. Moreover, the visual depictions of the characters constitute
8 copyright protected artwork and audiovisual works.

9 31. Disney’s Copyrighted Works, Warner Bros. Discovery’s Copyrighted Works,
10 and Universal’s Copyrighted Works are referred to collectively in this Complaint as the
11 “Copyrighted Works” or “Plaintiffs’ Copyrighted Works.”

12 32. On information and belief, defendant MiniMax is a privately held Chinese
13 company with its headquarters in Shanghai, China. MiniMax identifies itself as the
14 developer of Hailuo AI (see minimax.io/about, attached as Exhibit D) and it has been
15 publicly reported that MiniMax owns Hailuo AI. Alternatively, on information and belief,
16 Plaintiffs allege that MiniMax is a subsidiary, division, or d/b/a of defendant Shanghai
17 Xiyu Jizhi Technology Co. Ltd.

18 33. Defendant Shanghai Xiyu Jizhi Technology Co. Ltd. (“SXJT”) is a Chinese
19 limited company with its headquarters in Shanghai, China. Plaintiffs are informed and
20 believe that, in connection with the conduct alleged in this Complaint, MiniMax is a
21 division or subsidiary of SXJT. SXJT controls, in whole or in part, MiniMax and
22 participates in its operations and/or the conduct alleged herein. For example, SXJT filed
23 the U.S. trademark applications for the mark “MiniMax,” attached as Exhibit E.

24 34. Defendant Nanonoble Pte. Ltd. (“Nanonoble”) is a Singaporean private
25 limited company with its headquarters in Singapore. Plaintiffs are informed and believe,
26 and on that basis allege that, in connection with the conduct alleged in this Complaint,
27 Nanonoble acts as the agent of MiniMax and/or an affiliate of MiniMax and operates at the
28 direction of and/or under the control of MiniMax. For example, on the Apple App Store,

1 Nanonoble is identified as the “Developer” of the MiniMax Hailuo AI app. Also, the
2 payment page for subscription purchases from the Hailuo AI website indicates that that
3 payment is going to Nanonoble. In addition, Nanonoble filed the U.S. trademark
4 applications for the mark “Hailuo,” attached as Exhibit F.

5 **JURISDICTION AND VENUE**

6 35. This Court has subject matter jurisdiction over this Complaint pursuant to
7 28 U.S.C. §§ 1331, 1332, 1338(a), and 17 U.S.C. § 501(b).

8 36. This Court has personal jurisdiction over MiniMax, SXJT, and Nanonoble
9 Pte. Ltd pursuant to Federal Rule of Civil Procedure 4(k)(2) because they each have
10 purposefully directed their activities at the United States, California, and this District, and
11 have purposefully availed themselves of the benefits of doing business in the United States,
12 California, and this District as detailed below. Plaintiffs are informed and believe, and on
13 that basis allege, that:

14 a. MiniMax distributes its infringing Hailuo AI service in the United
15 States, California, and this District as an app through the Apple App Store and Google Play
16 Store, both operated from California. By distributing Hailuo AI through the Apple App
17 Store and Google Play Store, MiniMax has agreed to be subject to personal jurisdiction in
18 California and to the application of the laws of the United States and the State of California
19 in connection with those distribution relationships.

20 b. MiniMax conducts extensive and ongoing business with customers in
21 the United States, California, and this District including through the sale of its Hailuo AI
22 service and in-app purchases made by customers in the United States, California, and this
23 District. MiniMax promotes and advertises those in-app purchases on the Hailuo AI app
24 in U.S. Dollars.

25 c. In addition, MiniMax conducts business with customers in the United
26 States by providing and selling the Hailuo AI service through its English-language website,
27 <https://hailuoai.video>, to consumers in the United States. MiniMax’s website domain is
28

1 registered using services of GoDaddy.com, LLC and Domains By Proxy, LLC both
2 Delaware limited liability companies with offices in the United States.

3 d. MiniMax has consented to jurisdiction in the United States as Hailuo
4 AI's Terms of Service expressly provide that, "[a]ny legal suit, action, or proceeding
5 arising out of, or related to, these Terms of Use or the Website shall be instituted
6 exclusively in the federal courts of the United States or the courts of the Singapore..."

7 e. MiniMax also uses Cloudflare, Inc, a Delaware corporation
8 headquartered in San Francisco, California, for content delivery network ("CDN") services
9 in the United States and, on information and belief, in this District. In general, a CDN is a
10 group of servers distributed across various geographic areas that are utilized to enhance a
11 website user's experience with the website. A CDN caches, *i.e.*, temporarily stores, assets
12 needed to load a website such as video and image files. On information and belief, when
13 a Hailuo AI subscriber in the United States asks Hailuo AI to generate a video or image
14 (including images and videos that infringe Plaintiffs' Copyrighted Works), a copy of that
15 file is cached on Cloudflare servers geographically located near that subscriber.
16 Additionally, when someone visiting Hailuo AI's Explore page views a video displayed
17 there (including videos that infringe Plaintiffs' Copyrighted Works), a copy of that video
18 file is cached on a Cloudflare server geographically located near the requesting visitor. In
19 other words, MiniMax is using Cloudflare servers in the United States, and on information
20 and belief, in this District to store copies of and publicly display and publicly perform the
21 infringing images and videos from its Hailuo AI.

22 f. In order to use Hailuo AI on its website, subscribers need to sign up for
23 the service using an existing Google or Apple account. Subscribers in the United States
24 pay for their subscriptions and/or for credits to generate videos and images in Hailuo AI in
25 U.S. dollars. MiniMax uses Stripe, Inc., a Delaware corporation headquartered in San
26
27
28

1 Francisco, California, as the payment processor for purchases made by MiniMax's
2 customers in the United States.

3 g. MiniMax has availed itself of United States' intellectual property laws
4 and protection by filing several trademark applications in the United States Patent and
5 Trademark Office for Hailuo AI. In trademark applications for the mark "Hailuo,"
6 MiniMax confirms that it intends to use its Hailuo mark in commerce in the United States
7 for "software for creating and editing music and video by artificial intelligences."¹ Its
8 applications also provide that MiniMax intends to use the Hailuo mark in connection with
9 the sale of goods and services in the United States including, but not limited to, computer
10 software, software for mobile phones, and producing film, radio, television, music, and
11 podcasts. In trademark applications for the mark "MiniMax," MiniMax confirms that it
12 intends to use the MiniMax mark in commerce in the United States in connection with
13 providing artificial intelligence services, streaming audio, visual, and audiovisual material,
14 and producing film, radio, television, music, and podcasts.

15 h. MiniMax has further availed itself of the laws of the United States by
16 expressly stating on Hailuo AI's Terms of Service that Hailuo AI is "protected by United
17 States and international copyright, trademark, patent, trade secret, and other intellectual
18 property or proprietary rights laws."

19 i. MiniMax has targeted consumers in the United States, California, and
20 this District through its social media platforms and advertisements to U.S. consumers
21 touting Hailuo AI's ability to infringe Plaintiffs' Copyrighted Works.

22 j. MiniMax has further targeted consumers in the United States,
23 California, and this District by hosting a generative AI "meetup" in conjunction with the
24 California-based company fal.ai.

25
26
27
28 ¹ See U.S. Trademark Application Serial No. 98/825,674 (filed
Oct. 29, 2024), <https://tsdr.uspto.gov/#caseNumber=98825674>.

1 k. MiniMax has targeted and seeks to compete with Plaintiffs who reside
2 in this District by promoting and advertising itself as “a Hollywood Studio in your pocket.”

3 l. As recently as September 2025, MiniMax has distributed infringing
4 copies, reproductions, and derivatives of Plaintiffs’ Copyrighted Works to MiniMax’s
5 subscribers in the United States, California, and this District. On information and belief,
6 during the entire relevant period, MiniMax has distributed infringing copies, reproductions,
7 and derivatives of Plaintiffs’ Copyrighted Works to subscribers in the United States,
8 California, and this District.

9 m. Finally, MiniMax’s unauthorized exploitation of the Copyrighted
10 Works has caused harm to Plaintiffs in California and this District. MiniMax reasonably
11 expected or should have reasonably expected its acts to cause harm in California and this
12 District because Plaintiffs maintain either headquarters or offices in California, and it is the
13 location of a significant portion of Plaintiffs’ production and distribution operations.

14 37. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and 1391(c)
15 because a substantial part of the events giving rise to the claims have occurred in this
16 District and under 28 U.S.C. § 1400(a) because this District has personal jurisdiction over
17 MiniMax, as alleged above.

18 **FACTUAL BACKGROUND**

19 **A. Plaintiffs Have Created and Own Some of the Most Popular Movies and** 20 **Television Shows of All Time.**

21 38. Disney, Warner Bros. Discovery, and Universal have a long and storied
22 history of entertaining and inspiring audiences worldwide. Plaintiffs have created,
23 developed, and produced some of the most enduring, valuable, and famous copyrighted
24 entertainment properties in film, television, books, consumer products, theme parks, and
25 other experiences.

26 39. A driving force behind the success of Plaintiffs’ entertainment properties are
27 the imaginative and beloved copyrighted characters that appear in those Copyrighted
28

1 Works. Many of Plaintiffs' memorable characters have become pillars of pop culture with
2 a lasting impact on generations of audiences and consumers.

3 40. Plaintiffs' characters span across the numerous entertainment properties that
4 they own and exploit from Superman to Princess Elsa to Boss Baby. These original
5 characters are central to the entertainment properties in which they appear. Plaintiffs'
6 copyright registrations for those properties encompass those characters.

7 **1. The *Star Wars* Characters**

8 41. The *Star Wars* franchise began in 1977 with the release of the film *Episode*
9 *IV: A New Hope*. The franchise is an epic space odyssey that spans multiple eras across
10 three sets of film trilogies, multiple standalone motion pictures and specials, numerous
11 live-action and animated television series, live theatrical productions, interactive video
12 games, novels, theme park attractions, and comic books. Disney owns the copyrights to
13 the *Star Wars* entertainment properties.

14 42. The *Star Wars* franchise is one of the most commercially successful franchises
15 in entertainment history. As of 2020, five of the *Star Wars* movies have each earned
16 over \$1 billion at the global box office. *Star Wars: The Rise of Skywalker*, the most recent
17 film in the franchise, reached this mark in only 28 days.

18 43. The *Star Wars* franchise is built upon numerous key characters that have
19 expressive conceptual and physical qualities that make them distinctive and immediately
20 recognizable. For example, Darth Vader is the iconic villain from the original *Star Wars*
21 trilogy. Darth Vader is known for his black robes, dark powers, and signature black mask
22 and helmet. Yoda, is the small, green, humanoid alien and Jedi Master in the *Star Wars*
23 franchise. He is old, wise, has distinctive ears, and wears a robe. The Stormtroopers are
24 the iconic military soldiers for the Galactic Empire and its leaders, including Darth Vader.
25 The Stormtrooper's distinguishable uniform consists of white armor on top of a black
26 underlayer and a striking white helmet. The Clone Troopers are soldiers that served as the
27 military for the Galactic Republic. The Clone Trooper's distinguishable uniform typically
28 consists of white plates of armor over a soft black layer and features a unique T-shaped

visor. In some portrayals, different ranks and units of Clone Troopers are denoted using different colors of markings on their armor.

44. The *Star Wars* franchise includes several other iconic central characters like the droids R2-D2 and C-3PO, the Wookiee Chewbacca, and many more.

45. Disney's copyright registrations for the entertainment properties in its *Star Wars* franchise encompass the central characters therein.

2. The Marvel Characters

46. The Marvel works and characters are part of one of the largest collections of entertainment properties that exist in the same shared universe. The origins of the Marvel works and characters are the superheroes from comic books published by Marvel Comics. The Marvel characters and storylines have grown considerably over time and are featured in numerous blockbuster feature films, television series, specials, short films, books, video games, art exhibits, theme park attractions, and, of course, comic books. Disney owns the copyrights to these Marvel entertainment properties.

47. Disney's Marvel Cinematic Universe, which includes films based on the Marvel characters, is the highest-grossing film franchise of all time. All thirty-six films in the franchise have opened number one at the domestic weekend box office.

48. There are numerous superheroes and other characters in the Marvel works. These characters have expressive conceptual and physical qualities that make them distinctive and immediately recognizable. The superhero Iron Man first appeared in Marvel Comics in 1963, and in 2008 was featured in the blockbuster motion picture *Iron Man*. Iron Man is the alter ego of eccentric billionaire businessman and engineer Tony Stark. To transform into Iron Man, Stark dons his Iron Man suit made of distinguishable red and gold armor that glows white over his heart and includes a red and gold mask.

49. The Incredible Hulk (sometimes called "The Hulk") first appeared in Marvel Comics in 1962. The Hulk originated when Dr. Robert Bruce Banner was accidentally exposed to gamma rays after an experimental bomb exploded. As a result of the gamma

1 ray exposure, when Banner experiences emotional stress, he transforms into The Hulk, a
2 large, green, super muscular humanoid with extreme physical strength and anger.

3 50. Spider-Man first appeared in Marvel Comics in 1962. In the comics, high-
4 schooler Peter Parker became Spider-Man after he developed superhuman spider powers
5 from being bitten by a radioactive spider. Spider-Man wears a distinctive red and blue suit
6 with spider web markings and spider-based eyes.

7 51. The Marvel works include numerous other iconic central characters like
8 Deadpool, Groot from Guardians of the Galaxy, the X-Man Wolverine, and Captain
9 America. Disney's copyright registrations for the Marvel works encompass the central
10 characters therein.

11 **3. *The Simpsons* Characters**

12 52. The television series *The Simpsons* debuted in 1989 and has become the
13 longest-running scripted primetime television series in American history. The series is
14 produced by 20th Century Studios, which was acquired by Disney approximately five years
15 ago. *The Simpsons* follows a family of five through their hijinks in the fictional town of
16 Springfield. In addition to the television series, *The Simpsons* franchise includes a movie,
17 comic books, video games, and books. Disney's 20th Century Studios owns the copyrights
18 to the works in *The Simpsons* franchise.

19 53. *The Simpsons* franchise is built upon several key main characters. These
20 characters have expressive conceptual and physical qualities that make them distinctive
21 and immediately recognizable. Visually, characters in *The Simpsons* franchise are distinct
22 due to the animation style featured on the show. The namesake family of five consists of
23 Homer and Marge and their three children Bart, Lisa, and Maggie. Bart Simpson, for
24 example, is a mischievous troublemaker who wears blue shorts and an orange-red shirt and
25 has signature spiked hair. The father, Homer Simpson, is a loveable goof with a penchant
26 for donuts, wears blue pants with a white top, and has two signature strands of hair.

27 54. Disney's copyright registrations for the entertainment properties in *The*
28 *Simpsons* franchise encompass the central characters therein.

4. The Pixar Works and Characters

55. Pixar is an animation studio that has produced dozens of critically acclaimed and commercially successful computer-animated films. In 1995, Pixar released *Toy Story*, which became an overnight sensation and box office success, grossing over \$350 million worldwide. Since then, the Pixar works have expanded to include several highly successful motion picture franchises and standalone films including *Monsters, Inc.*, *Cars*, and *The Incredibles*. Additionally, the characters from the Pixar works appear in several theme park attractions, experiences, and consumer products. Disney owns the copyrights to the Pixar entertainment properties.

56. The Pixar entertainment properties have achieved both commercial and critical success. Eight of Pixar's films have surpassed the \$1 billion mark at the worldwide box office, something only eleven animated films have ever done. In addition, Pixar's films have won eighteen Academy Awards and received forty-nine nominations.

57. The Pixar works feature numerous, highly expressive copyrighted characters adored by fans. Buzz Lightyear, for example, is a central character in the *Toy Story* franchise. He is a superhero action figure that wears a green and white spacesuit with a clear dome-shaped helmet and expandable wings. Lightning McQueen is an anthropomorphic stock car and the main character in the *Cars* franchise. He is a red race car with a yellow lightning bolt on his sides along with the number 95.

58. Disney's copyright registrations for the Pixar entertainment properties encompass the central characters therein.

5. Disney Classic Animation Characters

59. Animated cartoons have been a bedrock in Disney's intellectual property portfolio since the 1920s. Classic animation has delighted and entertained generations of audiences.

60. In 1937, Disney released its first animated feature film, *Snow White and the Seven Dwarfs*. The movie was the highest-grossing film for over five decades and ushered in a golden age of animation. Since the release of *Snow White*, Disney has released

1 numerous successful animated feature films such as *Peter Pan*, *The Little Mermaid*, *The*
2 *Lion King*, *Frozen*, and *Mulan*. Disney holds the copyrights to each of these feature films
3 along with several sequels, television series, short films, books, and other works in these
4 franchises and Disney's classic animation universe.

5 61. Disney's classic animation properties feature some of the world's most
6 beloved characters including Princess Elsa and Olaf from *Frozen*, Ariel from *The Little*
7 *Mermaid*, Jasmine and Aladdin from *Aladdin*, Mulan from *Mulan*, Lilo and Stitch from
8 *Lilo & Stitch*, and Snow White from *Snow White*.

9 62. The iconic central characters in Disney's classic animation properties have
10 expressive conceptual and physical qualities that make them distinctive and immediately
11 recognizable. Elsa, for one, is a princess with the ability to control ice and snow, who
12 wears a glittering blue dress and has flowing, light blond hair. Stitch, for another, is a
13 mischievous blue extraterrestrial with large floppy ears, a round black nose, and black eyes.

14 63. Disney's copyright registrations for its classic animation entertainment
15 properties encompass the central characters therein.

16 **6. The DC Comics Characters**

17 64. The DC Comics works and characters are part of one of the largest collections
18 of entertainment properties that exist in the same shared universe. The origins of the DC
19 Comics works and characters are superheroes from comic books originally published by
20 DC Comics (including predecessors) starting in 1936. The DC Comics characters and
21 storylines have grown considerably over time and are featured in numerous blockbuster
22 feature films, television series, short films, video games, theme park attractions, and, of
23 course, comic books. Warner Bros. Discovery owns the copyrights to these DC Comics
24 entertainment properties.

25 65. Warner Bros. Discovery's DC Comics universes, which include films based
26 on the DC Comics characters, have achieved enormous commercial success. The DC
27 Extended Universe, which encompasses films from 2018 through 2023, grossed over \$7.14
28

1 billion in total at the global box office, with each film earning an average gross of \$479
2 million.

3 66. There are numerous superheroes and other characters in the DC Comics
4 works. These characters have expressive conceptual and physical qualities that make them
5 distinctive and immediately recognizable.

6 67. Superman is the quintessential superhero, and one of the most enduring
7 superheroes in popular culture. Superman was first introduced in DC Comics in 1938 and
8 has most recently been featured in the film *Superman*, which was released domestically on
9 July 11, 2025 and is still in theatres. *Superman* grossed \$125 million domestically in its
10 opening weekend, making it the third-most-successful opening of the year so far.
11 Superman's alter ego is Clark Kent, who resides in the city of Metropolis. When Clark
12 Kent transforms into Superman to fight crime, he typically dons a blue bodysuit that
13 emphasizes his muscular physique, red trunks, red boots, a yellow belt, and a long red cape.
14 Most importantly, Superman's suit features his unmistakable logo emblazoned on his
15 chest, which features a red "S" inside a red and yellow shield. Superman has superhuman
16 speed and reflexes. Throughout the DC Comics universes, Superman has been portrayed
17 both as a live-action and animated superhero, and has appeared across various films,
18 television series, comic books, and video games.

19 68. The superhero Batman is an iconic fictional character who first appeared in
20 the DC Comics anthology series *Detective Comics* in 1939 and was more recently featured
21 in the 2022 film *The Batman*, the seventh highest-grossing film of the year. By day,
22 Batman's alter ego Bruce Wayne is a playboy billionaire, but by night, he fights crime in
23 his distinctive Batsuit, which features a bat-inspired mask, yellow utility belt, and Batman
24 emblem on the chest. Throughout the DC Comics universes, Batman has been portrayed
25 both as a live-action and animated superhero, and has appeared across various films,
26 television series, comic books, and video games.

27 69. The supervillain the Joker is Batman's archenemy. The Joker typically wears
28 a purple suit and has stark white skin, green hair, and a wide, dramatic smile often with

1 bright red lips. The Joker was introduced by DC Comics in a 1940 and was recently
2 featured in the 2024 film *Joker: Folie à Deux*. Throughout the DC Comics universes, the
3 Joker has been portrayed both as a live-action and animated character.

4 70. Flash is a distinctive and popular superhero character known for his
5 superhuman speed, which he can use to generate lightning. Flash wears a red suit and mask
6 with gold lightning bolt-shaped ear and a lightning bolt emblem on the chest. Flash first
7 appeared in a comic book published by DC Comics in a 1940 and more recently in the
8 2023 film *The Flash*. Throughout the DC Comics universes, Flash has been portrayed both
9 as a live-action and animated character.

10 71. Wonder Woman is another central superhero in the DC Comics works who
11 debuted in 1941. She is an Amazonian warrior from the fictional Themyscira who wears
12 a distinctive blue and red outfit with a tiara, bracelets and her Lasso of Truth. Wonder
13 Woman has starred in numerous television and film projects over the decades including the
14 1970s television show *Wonder Woman* and more recently in the 2020 film, *Wonder Woman*
15 *1984*. Throughout the DC Comics universes, Wonder Woman has been portrayed both as
16 a live-action and animated character.

17 72. Warner Bros' *Teens Titans Go!* is a comedic animated series that first
18 broadcast in 2013 that follows teenage versions of superheroes from the DC Comics
19 universe. The team includes teenaged Beast Boy, Robin, Cyborg, Raven, and Starfire.
20 *Teen Titans Go!* and the characters therein, have a distinctive animation style, outfits, and
21 visual appearance.

22 73. Warner Bros. Discovery's copyright registrations for the DC Comics works
23 encompass the central characters therein.

24 7. ***Looney Tunes Characters***

25 74. The animated franchise *Looney Tunes* was first released as a series of
26 animated theatrical short films beginning in 1930. The franchise has spawned numerous
27 television series that are still broadcast today. The franchise also includes televisions
28 specials, films, comic books, theme park attractions, and video games.

1 75. Many of the *Looney Tunes* characters are ubiquitous household names, and
2 these characters have expressive conceptual and physical qualities that make them
3 distinctive and immediately recognizable. Bugs Bunny, for example, is a playfully
4 irreverent anthropomorphic gray and white rabbit, who has a star on the Hollywood Walk
5 of Fame. Bugs Bunny has an overbite that showcases his two long front teeth, oversized
6 feet with white fur, and is often depicted eating a carrot.

7 76. Other major *Looney Tunes* characters include Daffy Duck, a black duck with
8 an orange beak and orange feet, and a white ring around his neck; Sylvester the Cat, an
9 anthropomorphic tuxedo cat with a bulbous red nose and hairy white cheeks; and Tweety,
10 a yellow canary bird with baby blue eyes, long eyelashes, chubby cheeks, and oversized
11 orange feet. Sylvester the Cat is often portrayed chasing Tweety.

12 77. Warner Bros. Discovery's copyright registrations for the entertainment
13 properties in the *Looney Tunes* franchise encompass the central characters therein. Warner
14 Bros. Discovery owns the copyrights to the *Looney Tunes* properties.

15 **8. Tom and Jerry**

16 78. *Tom and Jerry* is a classic animated short film franchise originally created in
17 1940. Since then, numerous spinoffs have been released in the form of television shows,
18 feature films, comic books, comic strips, video games, and a staged musical. Seven *Tom*
19 *and Jerry* short films have won the Academy Award for Best Animated Short Film. In
20 2021, *Tom and Jerry* was released as a hybrid live-action and animated film in theatres and
21 via HBO Max.

22 79. The characters in *Tom and Jerry* have expressive conceptual and physical
23 qualities that make them distinctive and immediately recognizable. Tom is a gray,
24 anthropomorphic tuxedo cat, and Jerry is a small brown anthropomorphic mouse. Tom
25 and Jerry's creators characterized the duo as "the best of enemies," in a nod to their
26 antagonistic yet caring relationship. Tom is often depicted chasing Jerry and ultimately
27 failing to capture him.

1 80. Warner Bros. Discovery's copyright registrations for *Tom and Jerry*
2 encompass the central characters therein. Warner Bros. Discovery owns the copyrights to
3 the *Tom and Jerry* properties.

4 **9. *Scooby-Doo***

5 81. *Scooby-Doo* is a media franchise that features four teenagers and their
6 cowardly but loveable Great Dane, Scooby-Doo, who travel around in their distinctive van,
7 the Mystery Machine, and solve spooky mysteries. *Scooby-Doo* was first released as an
8 animated television series in 1969, and the franchise has been refreshed in various
9 television series, including as recently as 2021. A live-action series is currently in
10 development for release on Netflix. The *Scooby-Doo* characters have also been featured
11 in films, comic books, theme park attractions, and tabletop games.

12 82. The characters in the *Scooby-Doo* media franchise have expressive conceptual
13 and physical qualities that make them distinctive and immediately recognizable.

14 83. Scooby-Doo is an animated Great Dane who is brown with black spots on his
15 back and shoulders. Scooby-Doo wears a teal collar with a gold-trimmed teal tag that bears
16 his initials, "SD." He has a large, black, triangular nose, thick eyebrows, rounded upright
17 ears, and small spots on his cheeks.

18 84. Warner Bros. Discovery's copyright registrations for *Scooby-Doo* encompass
19 the central characters therein. Warner Bros. Discovery owns the copyrights to the *Scooby-*
20 *Doo* properties.

21 **10. The Cartoon Network Characters**

22 85. The Cartoon Network is a cable television network that broadcasts animated
23 television series ranging from action to comedy for both children and adults. The Cartoon
24 Network owns the copyrights to many popular American cartoons including *The Powerpuff*
25 *Girls* and *Rick and Morty*.

26 86. *The Powerpuff Girls* is an animated television series that features three
27 kindergarten-aged girls, Blossom, Bubbles, and Buttercup, who fight crime in the fictional
28 city of Townsville. The franchise originated in 1992 with the introduction of the three

1 characters in a cartoon short and became a full television series in 1998. The series
2 received a reboot in 2016. The franchise also includes television specials, films, anime
3 adaptations, comic books, video games, and consumer products.

4 87. The Powerpuff Girls have expressive conceptual and physical qualities that
5 make them distinctive and immediately recognizable. The Powerpuff Girls are small,
6 animated girls with oversized heads, large round eyes, and small, rounded features. They
7 have small, simple mouths, and no noses or necks. The Powerpuff Girls have superpowers
8 including the ability to fly.

9 88. All three characters wear a color blocked dress with a black stripe, white
10 stockings, and black Mary Jane shoes, and have eyes the same color as their
11 outfits. Blossom has orange hair and wears pink. Bubbles is blond and wears blue.
12 Buttercup has black hair and wears green.

13 89. The Cartoon Network's copyright registrations for *The Powerpuff Girls*
14 encompass the central characters therein. The Cartoon Network owns the copyrights to
15 *The Powerpuff Girls* properties.

16 90. *Rick and Morty* is an adult animated television series released under Cartoon
17 Network's "Adult Swim" brand. *Rick and Morty* features two titular characters: mad
18 scientist Rick Sanchez, and his gullible and anxious grandson Morty Smith. *Rick and*
19 *Morty* was initially released in 2013 and has consistently received high viewer ratings and
20 critical acclaim. The series has been nominated for many awards, and has won multiple
21 Emmy and Annie Awards, among others. *Rick and Morty* characters have been featured
22 in short spinoff series and comic books and have made cameo appearances in other films
23 and television series, including *The Simpsons*.

24 91. The characters in *Rick and Morty* have expressive conceptual and physical
25 qualities that make them distinctive and immediately recognizable. Rick Sanchez is an
26 animated eccentric mad scientist with spiky, baby-blue hair, and a unibrow of the same
27 color. He has grayish skin and large eyes, and typically wears a blue shirt and a long, white
28 lab coat. He also wears brown trousers over his pencil-thin legs. Morty Smith is an

1 animated 14-year-old boy with brown hair and bulbous eyes. He typically wears a plain
2 yellow t-shirt and blue trousers. The duo is often pictured traveling in their Space Cruiser
3 or traveling through the universe using glowing, bright green portals.

4 92. The Cartoon Network's copyright registrations for *Rick and Morty* encompass
5 the central characters therein. The Cartoon Network owns the copyrights to the *Rick and*
6 *Morty* properties.

7 **11. Universal Pictures' Minions Characters**

8 93. The *Despicable Me* franchise began in 2010 with Universal Pictures' release
9 of the original *Despicable Me* film. The *Despicable Me* franchise is not only the highest-
10 grossing animated film franchise of all time, but it is also among the highest-grossing of
11 any film franchises of all time, having grossed over \$5 billion since 2010. The *Despicable*
12 *Me* franchise has spawned four main feature films, a *Minions* three-film prequel series, 20
13 short films, a holiday television special, a *Saturday Morning Minions* digital series
14 consisting of forty episodes, several video games, and theme park attractions in Universal
15 Studios Hollywood, located in this District, as well as theme parks in Florida and
16 throughout Asia.

17 94. The *Despicable Me* franchise is built upon numerous key characters that have
18 expressive conceptual and physical qualities that make them distinctive and immediately
19 recognizable. One of the most ubiquitous and recognizable characters from the franchise
20 is the Minion. Minions were first introduced in *Despicable Me* as members of the army of
21 the film's antagonist, Felonious Gru, but quickly achieved fame on their own, and
22 eventually became the main characters in the *Minions* spin-off film series.

23 95. Minions are instantly recognizable due to their distinctive capsule shape and
24 yellow color. Minions have one or two brown eyes, sparse black or no hair, and lack visible
25 noses and ears. Minions wear black gloves and metal goggles, and often wear denim
26 overalls that sometimes feature Gru's logo on the pocket.

27 96. Universal Pictures' copyright registrations for the *Despicable Me* franchise
28 encompass the central characters therein, including the Minions.

12. DreamWorks Characters

97. Universal's DreamWorks animation studio has released 50 films and over 50 television series in its 30 years, making it one of the largest animation production companies in the world. Dream Works films and television shows are critically acclaimed, and have received Academy Awards, Emmy Awards, and Golden Globe Awards. DreamWorks has also received awards for being an industry leader in technological innovations.

98. The *Shrek* franchise is among DreamWorks' most successful ventures. DreamWorks has released four *Shrek* feature films, with *Shrek 5* slated for release next year. The *Shrek* franchise also consists of short films, theme park attractions, television specials, video games, comic books, spin-off films based on the Puss in Boots character, and a Broadway musical. *Shrek* is the second highest-grossing animated film franchise of all time, after Universal's *Despicable Me*.

99. *Shrek*'s namesake character is a large, bald, dull-green ogre with a broad, round face, brown eyes, and highly distinctive trumpet-shaped ears. Shrek typically wears crude clothing consisting of a canvas-like shirt, a leather vest, and brown leggings.

100. Puss in Boots is a small, charismatic orange tabby cat with a penchant for drama, who originally appeared in the *Shrek* franchise before receiving his own film series. Puss in Boots is a swashbuckling swordsman who is usually pictured carrying his rapier and wearing a black wide-brimmed hat with an oversized feather, knee-high boots, and a belt. He is known for his large, expressive green eyes.

101. The *How to Train Your Dragon* franchise began with the release of the first of three animated films, *How to Train Your Dragon*, in 2010. Since 2010, the franchise has grossed over \$1.6 billion worldwide, and has received overwhelmingly positive critical reviews. The *How to Train Your Dragon* franchise has won Golden Globe Awards and been nominated for Academy Awards. In addition to the three original animated films, Universal released a live-action remake of *How to Train Your Dragon* on June 16, 2025, with a *How to Train Your Dragon 2* remake expected in 2027. The franchise also consists

1 of the *DreamWorks Dragons* television series, short films, video games, comic books and
2 graphic novels, live performance adaptations, and theme park attractions.

3 102. The *How to Train Your Dragon* franchise is built upon several key main
4 characters. These characters have expressive conceptual and physical qualities that make
5 them distinctive and immediately recognizable. The protagonist of the franchise, Hiccup
6 Horrendous Haddock III, or “Hiccup,” is a scrawny, teenage Viking boy, with medium-
7 length tousled hair and green eyes. Hiccup often wears armor made of dark brown leather.
8 Toothless is the dragon who belongs to Hiccup in the franchise. Toothless has a sleek body
9 covered in matte, jet-black scales, with bat-like wings and a long tail. He is a medium-
10 sized, aerodynamic dragon, with pointy black ears that are pointed backwards. Toothless
11 has a short, rounded muzzle, with large, cat-like green eyes.

12 103. The *Kung Fu Panda* franchise began with DreamWorks’ release of the 2008
13 animated film of the same name. The original *Kung Fu Panda* had the highest-grossing
14 opening for any DreamWorks non-sequel film; other than *Shrek*, its domestic box office
15 revenue was also the highest of all non-sequel DreamWorks films until *How to Train Your*
16 *Dragon* was released in 2010. Today, the *Kung Fu Panda* franchise extends to video
17 games, an interactive theme park experience, a live show, short films, and television series.

18 104. The franchise follows a giant animated panda, Po Ping, or “Po,” as he is
19 chosen to be the legendary Dragon Warrior and seeks to become a Kung Fu master. Po is
20 depicted as a rotund, animated panda, who initially struggles to become proficient in Kung
21 Fu but ultimately grows into his own unique fighting style motivated by his love of food,
22 and leans into his bulky physique to become a skilled martial artist.

23 105. Po is portrayed as a chubby, anthropomorphic panda with a white face, black
24 ears, and black fur around his eyes. Po’s upper body and arms are covered with black fur,
25 while his torso is covered with white fur. Po wears brown burlap pants that have a
26 waistband of vertical dark red and yellow stripes. Po also wears shoes that are intended to
27 look like panda toes.

1 106. The *Trolls* franchise began in 2016 with the release of the namesake film
2 *Trolls*. The franchise is built off of two central troll characters, Poppy and Branch, who
3 live in a village of pop-singing trolls. The franchise includes three feature films, two
4 holiday televisions specials, and two animated series. The trolls are colorful and happy
5 animated characters who enjoy singing and dancing. Poppy is a small, pink troll with bright
6 pink hair who typically wears a blue floral dress and a flower crown. Branch is a blue troll
7 with spiky blue hair, who typically wears a vest made of leaves and shorts, and is often
8 shown as more skeptical or concerned than Poppy.

9 107. *The Boss Baby* film franchise began with the 2017 animated film of the same
10 name. The franchise also includes two television series, two short films, and an interactive
11 special. The franchise has been praised for its adult humor despite being in an animation
12 format and was nominated for Academy and Golden Globe Awards. *The Boss Baby* earned
13 over \$500 million at the box office worldwide.

14 108. *The Boss Baby*'s titular character, "Boss Baby," also known as "Theodore
15 Templeton Jr." or simply "Ted," is an infant who speaks and carries himself like an adult
16 when parents and adults are not around. Ted is visually distinct and deliberately designed
17 to contrast the cuteness of a baby with the seriousness of a corporate executive. Ted has
18 an oversized, round baby head with a high forehead, green eyes and blonde hair that forms
19 a widow's peak. Ted is usually portrayed wearing a full suit, or just a diaper.

20 109. Universal's copyright registrations for its DreamWorks entertainment
21 properties encompass the central characters therein.

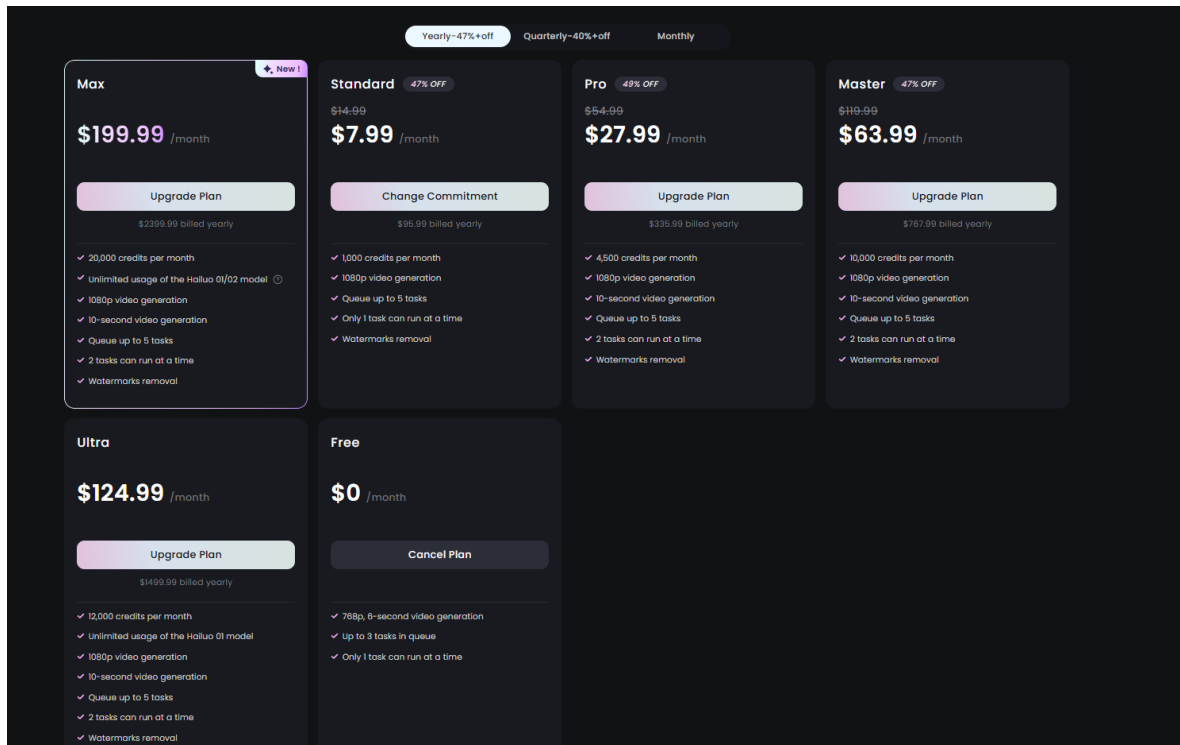
22 **B. MiniMax Infringes Plaintiffs' Intellectual Property.**

23 **1. MiniMax's Business of Providing AI Services.**

24 110. Unbeknownst to Plaintiffs, MiniMax was founded in 2021 and received
25 backing from Chinese companies and investors. MiniMax develops, operates, and sells its
26 generative AI services, including Hailuo AI. MiniMax is a successful enterprise that, in
27
28

January 2025, was reported to have raised \$850 million in venture capital² and is now reportedly valued at \$4 billion for its initial public offering.³

111. MiniMax's Hailuo AI is a commercial service. Currently, subscribers can access Hailuo AI by signing up for a subscription on MiniMax's website.⁴ MiniMax offers six different subscription levels, as shown below:



² See Kyle Wiggers, *Chinese AI Company Minimax Releases New Models It Claims Are Competitive With The Industry's Best*, TECHCRUNCH (Jan. 15, 2025), <https://techcrunch.com/2025/01/15/chinese-ai-company-minimax-releases-new-models-it-claims-are-competitive-with-the-industrys-best/>; Pei Li, Julia Fioretti, and Luz Ding, *Alibaba-Backed 'AI Dragon' MiniMax Plans Hong Kong IPO*, BLOOMBERG (June 18, 2025), <https://www.bloomberg.com/news/articles/2025-06-18/alibaba-backed-ai-dragon-minimax-is-said-to-plan-hong-kong-ipo>.

³ Tracy Qu and Raffaele Huang, *Alibaba-Backed Chinese Startup Files for Hong Kong IPO*, THE WALL STREET JOURNAL (July 16, 2025), https://www.wsj.com/finance/chinese-ai-startup-minimax-files-for-hong-kong-ipo-sources-say-bbc88c91?reflink=desktopwebshare_permalink.

⁴ See Subscription Plans, Hailuo AI, <https://hailuoai.video/subscribe>.

1 112. MiniMax’s five levels of paid subscriptions range from \$9.99 per month to
2 \$199.99 per month. Subscribers can receive a discount of 40–43% on monthly pricing by
3 paying for quarterly subscription and a discount of 47–49% by paying for an annual
4 subscription.

5 113. While the introductory level subscription is free, subscribers must still register
6 an account, and a free subscriber’s use of Hailuo AI is limited, which encourages the user
7 to become a paid subscriber. For example, a subscriber with a free account receives 500
8 credits upon signing up (which expire if not used within three days). According to
9 MiniMax, each image generation costs one credit (with a default of four images generated
10 per prompt) and each six second video generation costs 25 credits. Therefore, once a free
11 account holder uses or loses their 500 sign-up credits, the subscriber must upgrade their
12 membership to a paid plan if they wish to generate additional images or videos. MiniMax
13 also applies a watermark of its logo to many videos and images generated by its Hailuo AI
14 service, allowing it to further advertise and promote its commercial service. Users with
15 paid subscriptions have the option to remove watermarks from Hailuo AI outputs, but users
16 with free subscriptions do not. MiniMax recently introduced its top-tier “Max” plan which,
17 for \$199.99 per month, allots users 20,000 credits per month, and “[u]nlimited usage of the
18 Hailuo 01/02 model” to generate videos in slow mode, regardless of available credits.

19 114. Subscribers with paid accounts get (a) more credits, (b) the ability to process
20 multiple generations at once (what MiniMax calls “Fast-track generation”), and (c) the
21 ability to remove MiniMax’s watermark logo from their videos and images. By providing
22 additional benefits to paid subscribers (in addition to limiting use for free subscriptions as
23 noted above), MiniMax further encourages its subscribers to become paid subscribers.

24 115. Copies of the videos generated by MiniMax for its subscribers are also
25 publicly displayed and performed on the “Explore” page on MiniMax’s website.
26 MiniMax’s Explore page is a prominent feature of its website that advertises the videos
27
28

1 and images that Hailuo AI has generated. The Explore page is one of many ways MiniMax
2 promotes its Hailuo AI and attracts subscribers to the service.

3 **2. MiniMax Reproduces, Generates, Publicly Displays, Publicly**
4 **Performs, and Distributes Reproductions and Derivative Works of**
5 **Plaintiffs' Copyrighted Works.**

6 116. Through its own affirmative conduct, including the selection of which
7 Copyrighted Works will be stored by and made available through Hailuo AI, MiniMax
8 directly reproduces, publicly displays, publicly performs, and distributes reproductions and
9 derivative works of Plaintiffs' content.

10 117. The examples below confirm that MiniMax directly produces video and
11 image outputs that infringe on Plaintiffs' copyrighted characters.

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

118. MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of characters from Disney's *Star Wars* franchise to its subscribers. In response to the simple request (often referred to as a "prompt") asking to see a "Storm Trooper running into battle," MiniMax used the data about Disney's Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Disney's Stormtroopers, as shown in these screenshots:



///

///

///

///

///

///

119. In response to the simple request asking to see “Clone Troopers walking around a spaceship,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Clone Troopers, as shown in this screenshot:



///

///

///

///

///

///

///

///

///

120. In response to the prompt “Yoda with lightsaber, IMAX,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Yoda, as shown in this screenshot:



///

///

///

///

///

///

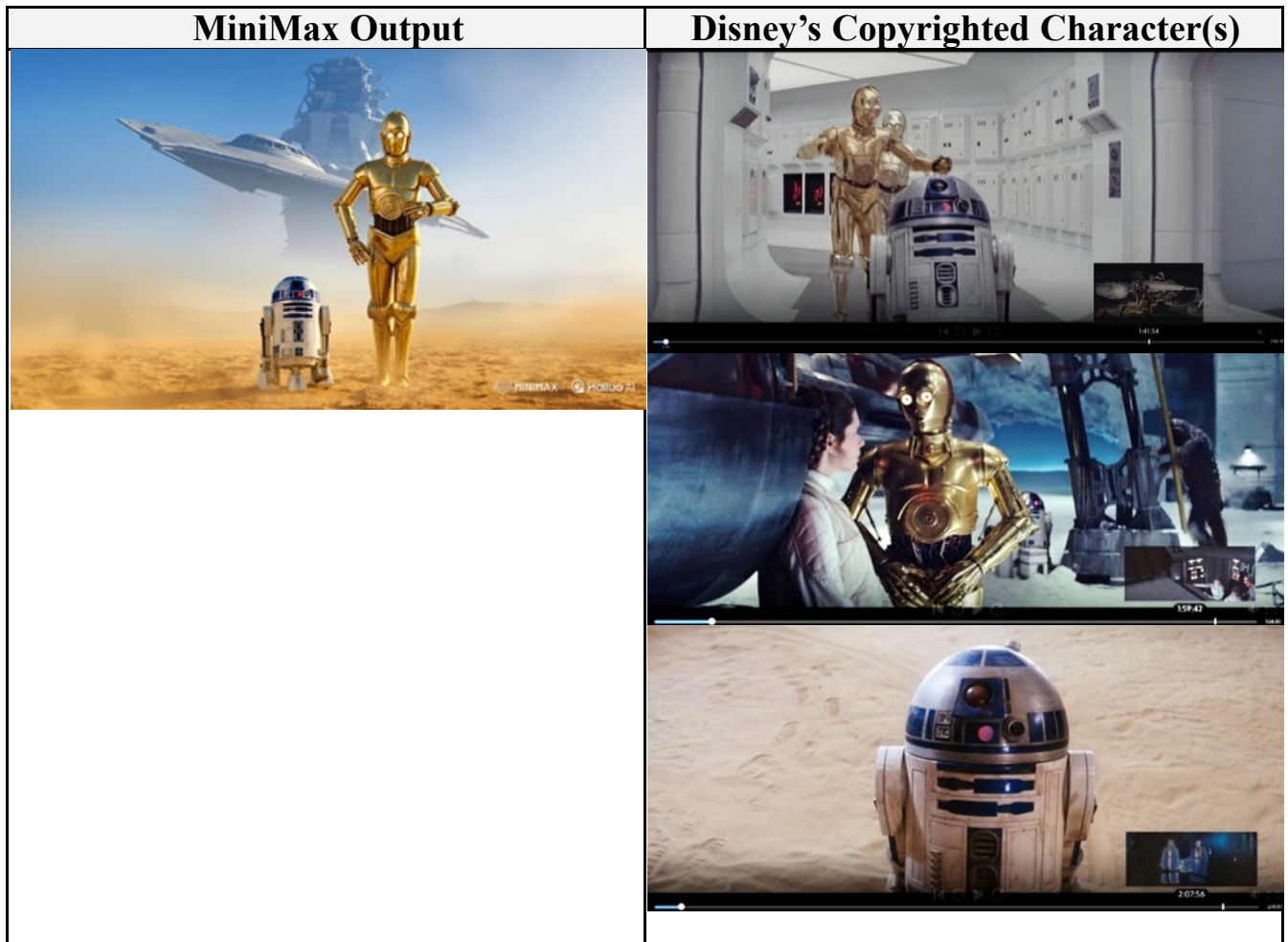
///

///

///

///

121. In response to the prompt “R2-D2 and C-3PO walking near a spaceship, movie scene,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, and made available for download an image output that reproduces Disney’s R2-D2 and C-3PO characters, as shown below:



///

///

///

///

///

122. In response to the prompt, “Darth Vader walking around the Death Star with a red lightsaber,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Darth Vader, as shown in this screenshot:



///

///

///

///

///

123. In response to the prompt, “Darth Vader and Yoda sitting at a table having a drink together,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Darth Vader and Yoda, as shown in this screenshot:



///

///

///

///

///

///

///

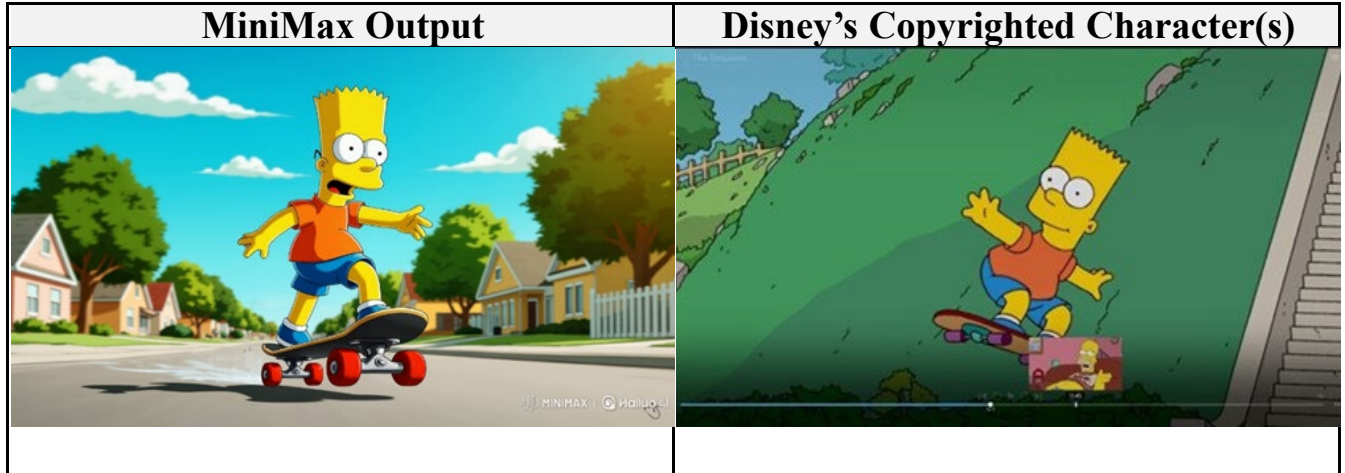
///

///

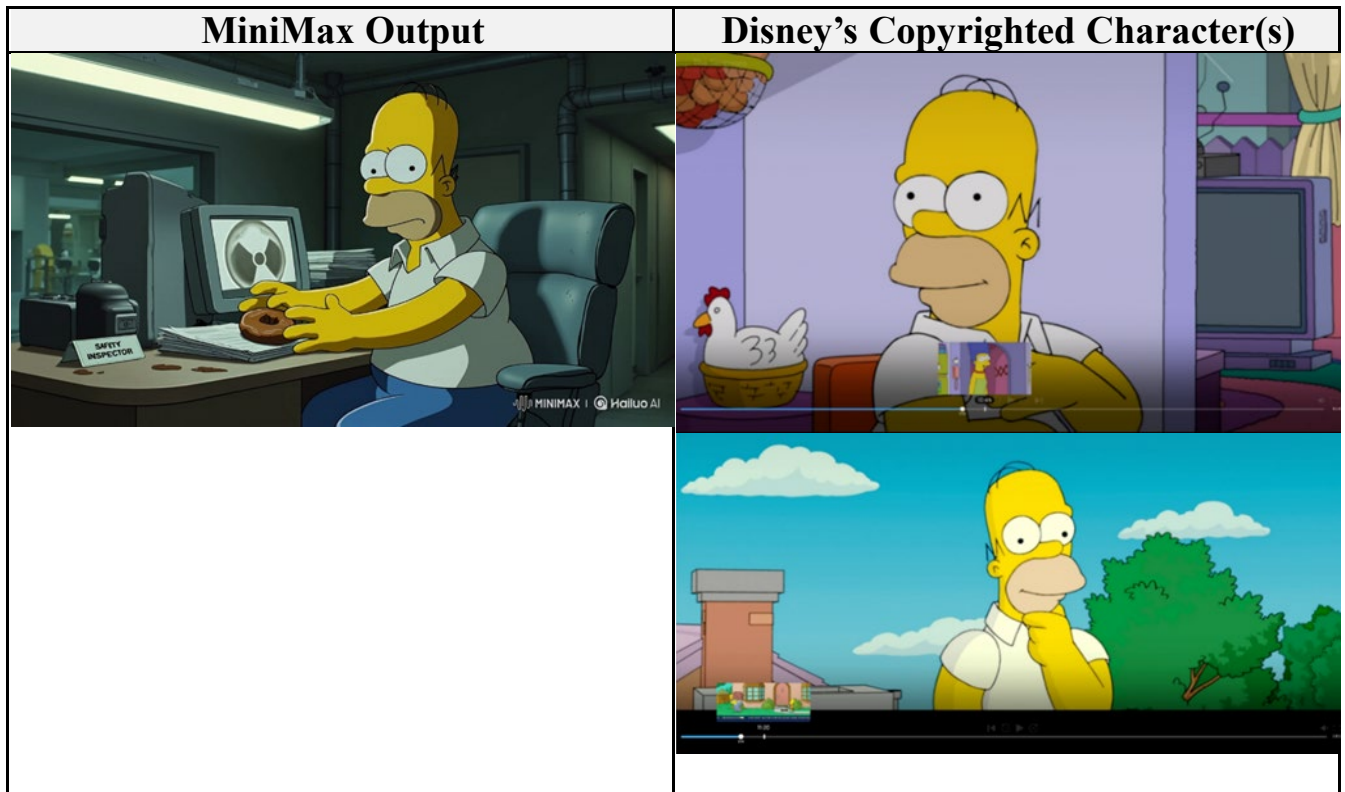
124. In response to the prompt, “Mandalorian carrying Baby Yoda,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s The Mandalorian and Grogu (sometimes referred to as Baby Yoda), as shown in this screenshot:





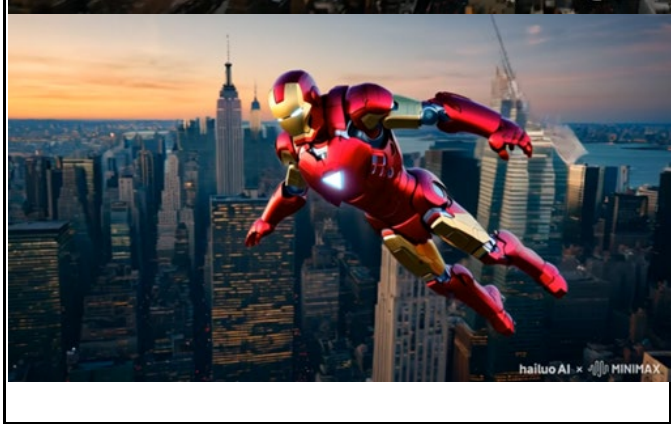
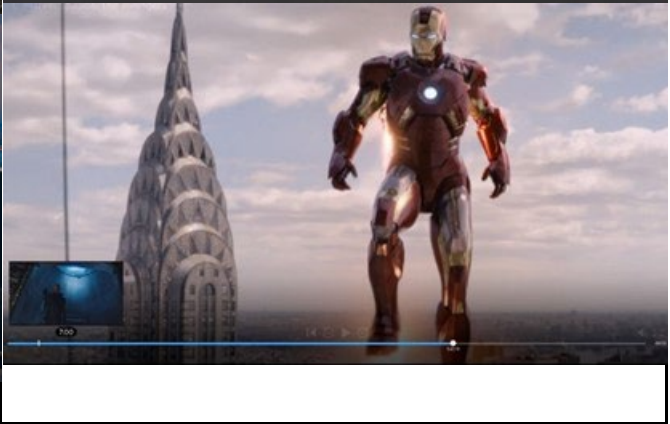
125. MiniMax consistently reproduces, publicly displays, and distributes copies and derivatives of characters from *The Simpsons* to its subscribers. In response to the prompt, “Bart Simpson riding a skateboard down the street,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, and made available for download an image output that reproduces Disney’s Bart Simpson, as shown below:



126. In response to the prompt, “homer simpson cartoon character at work,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, and made available for download an image output that reproduces Disney’s Homer Simpson, as shown below:



1 127. MiniMax consistently and accurately reproduces, publicly displays, publicly
2 performs and makes available for download copies and derivatives of Disney’s Marvel
3 characters to its subscribers. In response to the prompt, “Iron Man flying over New York
4 City,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within
5 the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and
6 made available for download video outputs that reproduce Disney’s Iron Man character, as
7 shown in these screenshots:

MiniMax Output	Disney’s Copyrighted Character(s)
	
	

23 ///

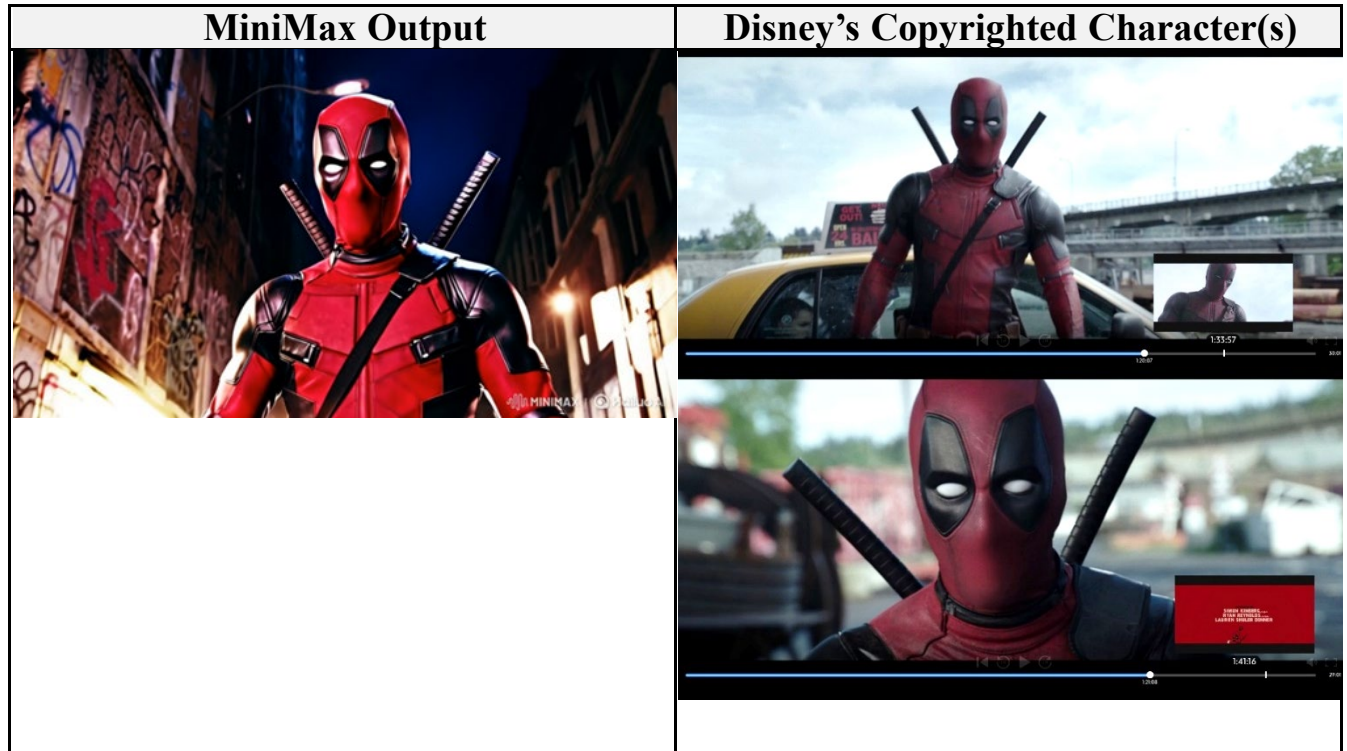
24 ///

25 ///

26 ///

27 ///

128. In response to the prompt, “Deadpool raising his swords,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Deadpool character, as shown in this screenshot:



///

///

///

///

///

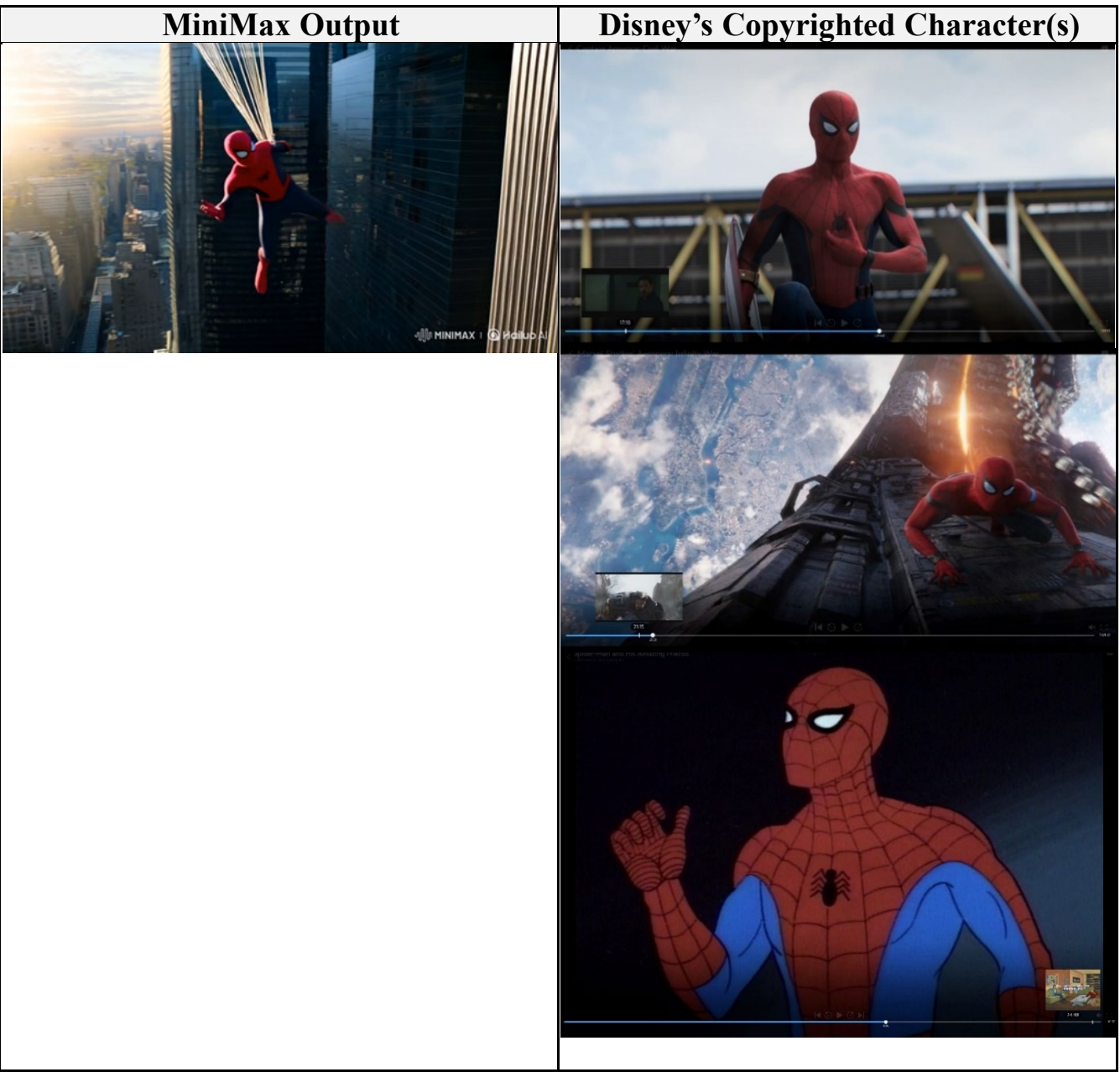
///

///

///

///

129. In response to the prompt, “Spider Man swinging between buildings with his web,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Spider-Man character, as shown in this screenshot:



130. In response to the prompt, “Baby Groot walking around the forest,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, and made available for download an image output that reproduces Disney’s Baby Groot character, as shown below:



///

///

///

///

///

///

///

///

///

///

///

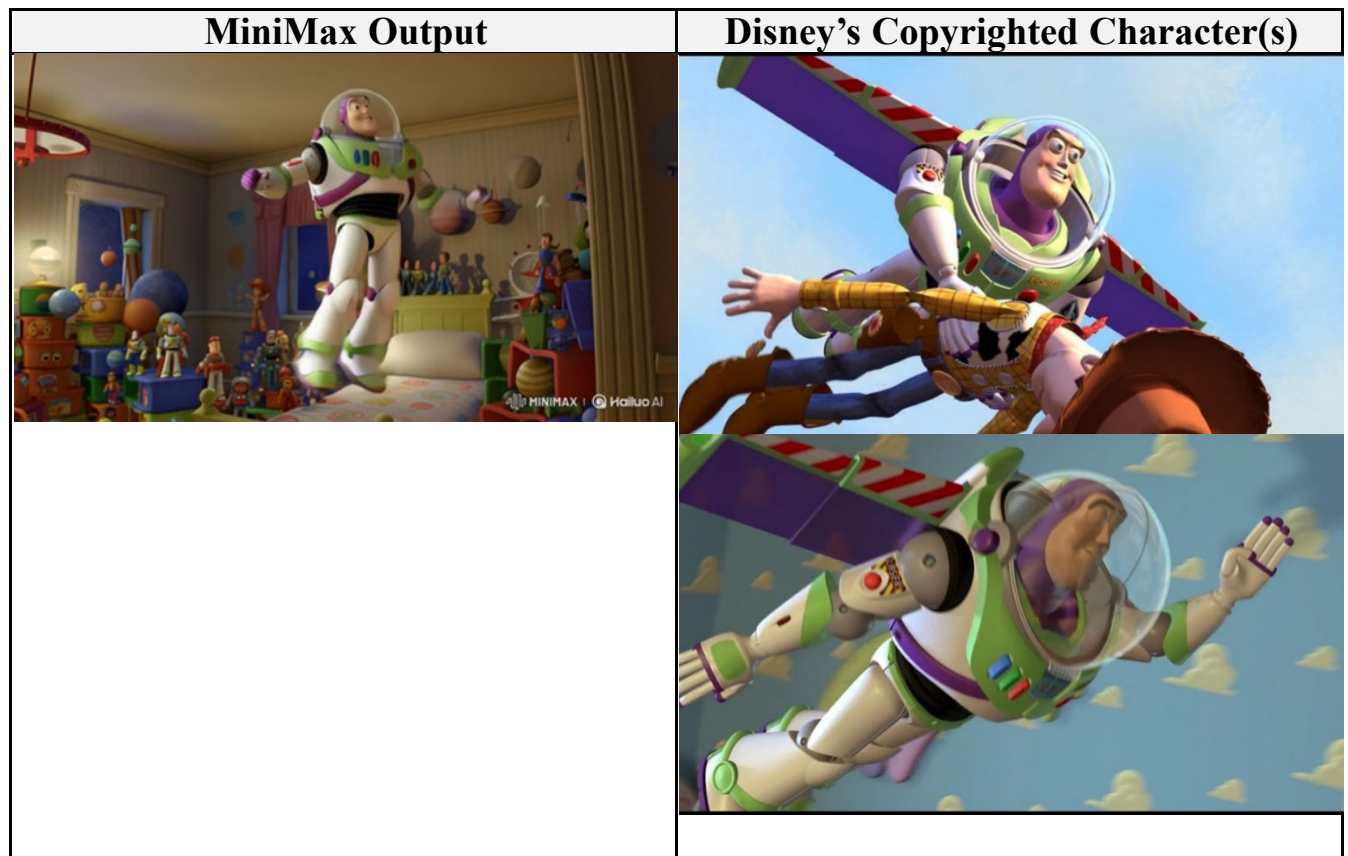
///

///

///

///

131. MiniMax consistently and accurately reproduces, publicly displays, and makes available for download copies and derivatives of characters from Disney's Pixar entertainment properties to its subscribers. In response to the prompt, "Buzz Lightyear flying around bedroom, Toy Story, animated movie scene," MiniMax used the data about Disney's Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney's Buzz Lightyear, as shown in this screenshot:



///

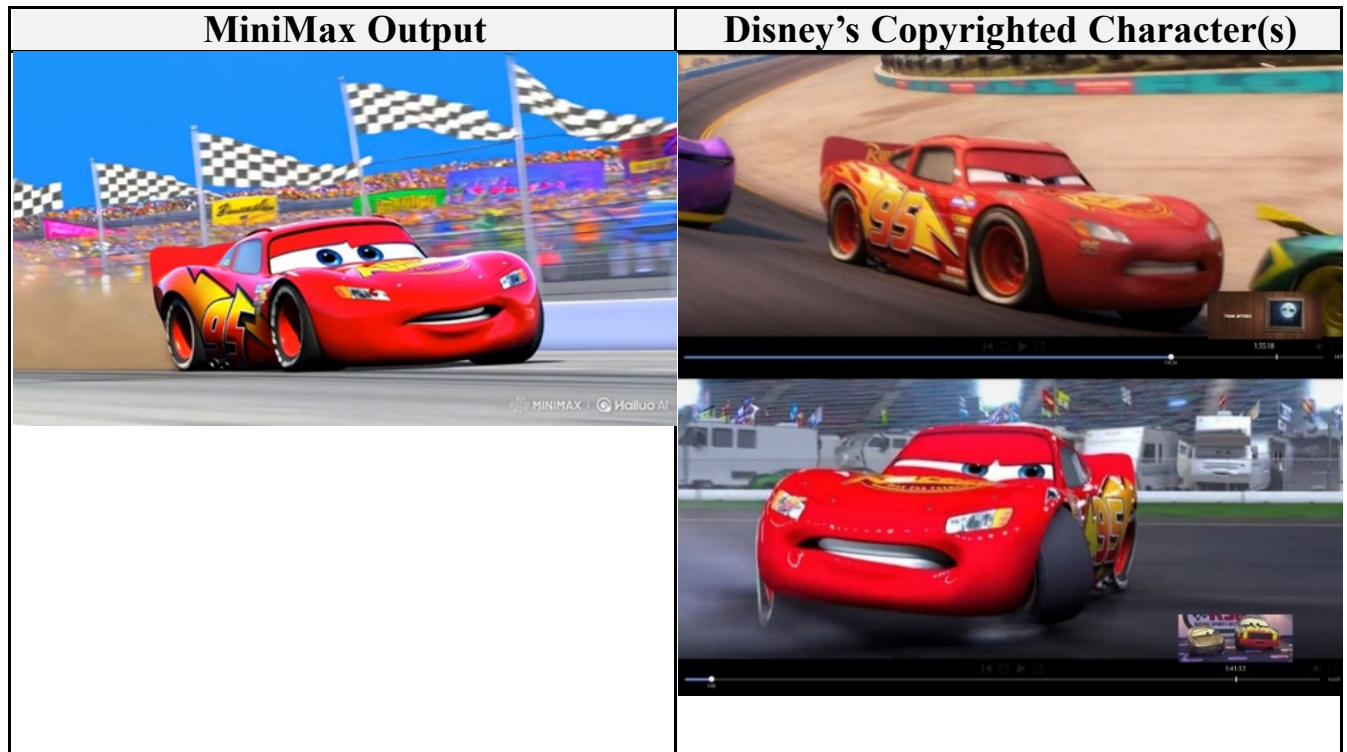
///

///

///

///

132. In response to the prompt, “Lightening McQueen crossing the finish line,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Lightening McQueen character, as shown in this screenshot:



///

///

///

///

///

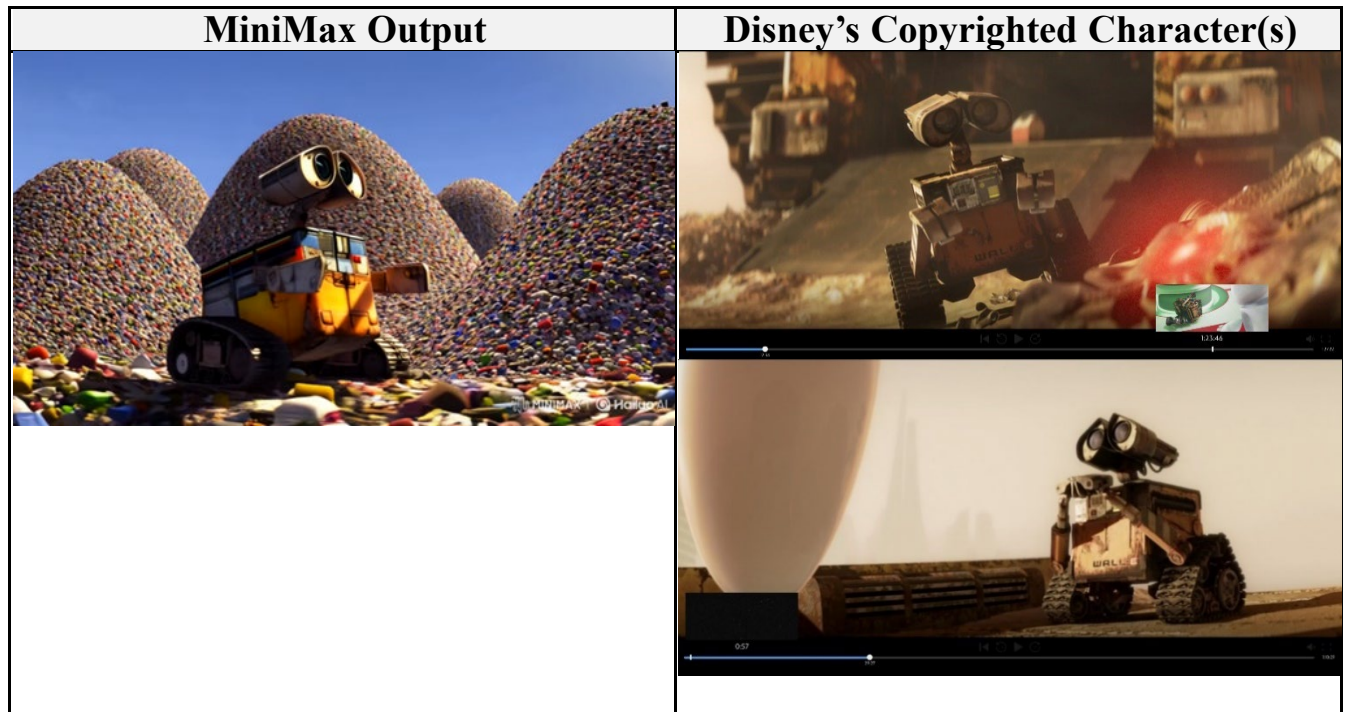
///

///

///

///

133. In response to the prompt, “Wall-E rolling around a pile of trash, animated movie scene,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Wall-E character, as shown in this screenshot:



///

///

///

///

///

///

///

///

///

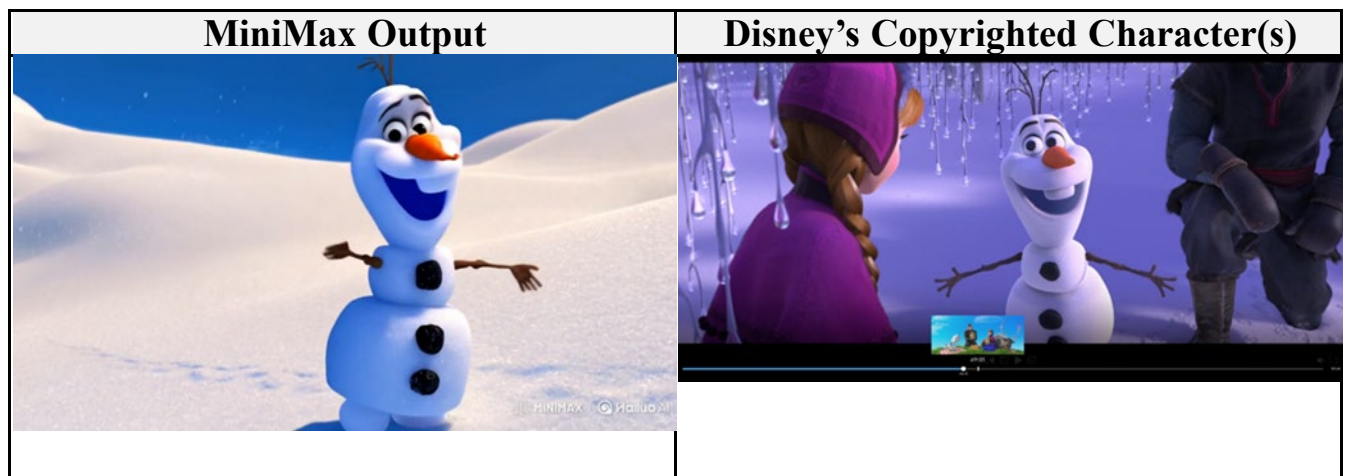
134. In response to the prompt, “Mike Wazowski and Sully in a child’s bedroom, Monsters, Inc.,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Sulley and Mike Wazowski characters, as shown in this screenshot:



135. MiniMax consistently and accurately reproduces, publicly displays, and makes available for download copies and derivatives of characters from Disney’s classic animation entertainment properties to its subscribers. In response to the prompt, “Princess Elsa singing in front of an ice castle, Frozen animated movie,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Princess Elsa character, as shown in this screenshot:



136. In response to the prompt, “Olaf from Frozen dancing in the snow,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Olaf character from *Frozen*, as shown in this screenshot:



137. In response to the prompt, “Ariel and Flounder under the sea, cartoon,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Disney’s Ariel and Flounder, as shown in this screenshot:



///

///

///

///

///

///

///

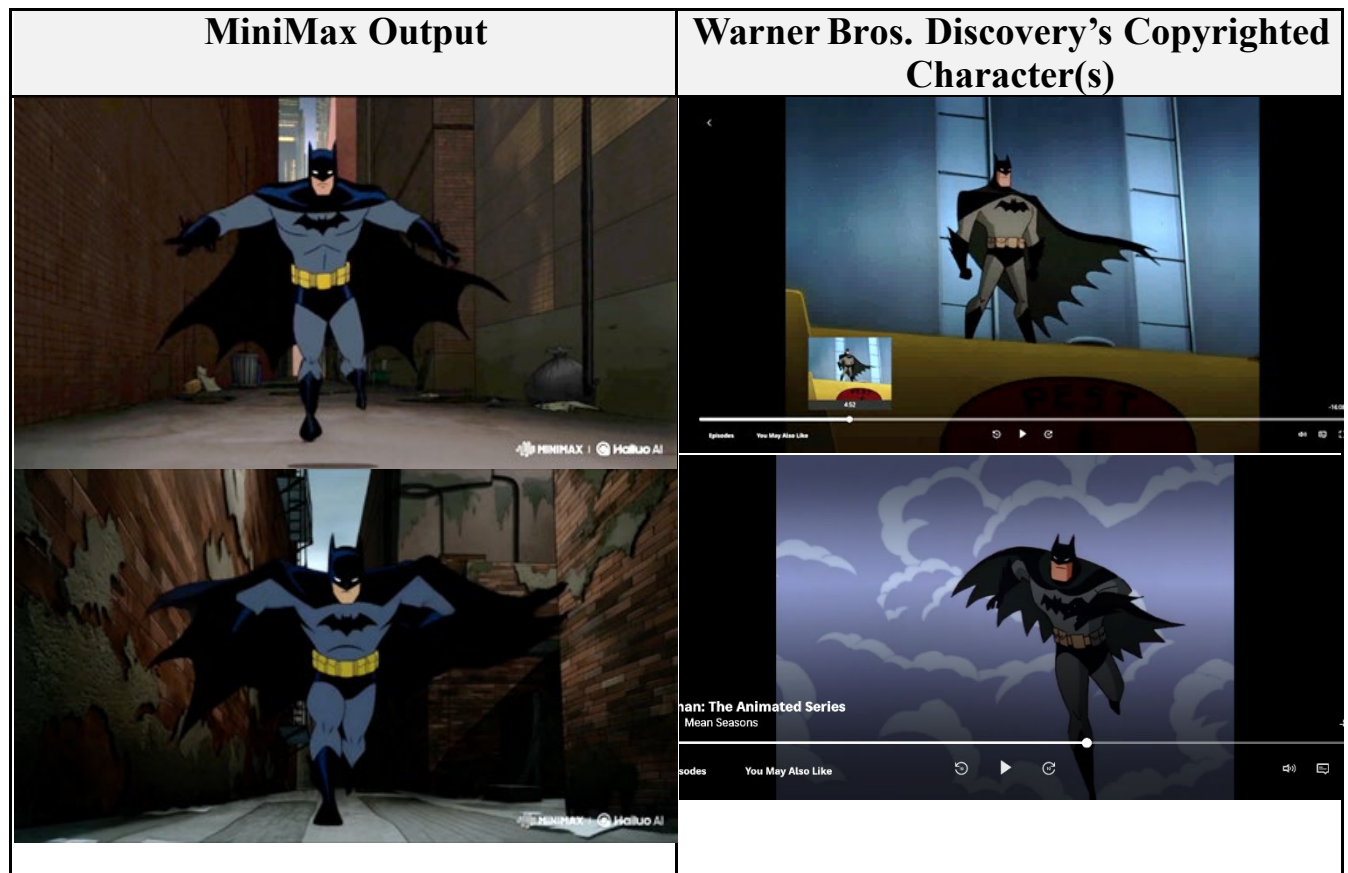
138. In response to the prompt, “Simba and Nala standing on Pride Rock, Lion King,” MiniMax used the data about Disney’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, and made available for download an image output that reproduces Disney’s Simba and Nala, as shown below:

MiniMax Output	Disney’s Copyrighted Character(s)
	
	

139. In addition to the characters above, MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of other Disney characters, including the titular characters from Disney’s *Mulan* and *Moana* franchises.

///
///
///
///

140. MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of characters from Warner Bros. Discovery's DC Comics properties to its subscribers. In response to a prompt asking to see "Batman running down an alley in Gotham City, animated 2d cartoon," MiniMax used the data about Warner Bros. Discovery's Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Warner Bros. Discovery's Batman, as shown in these screenshots:



///

///

///

///


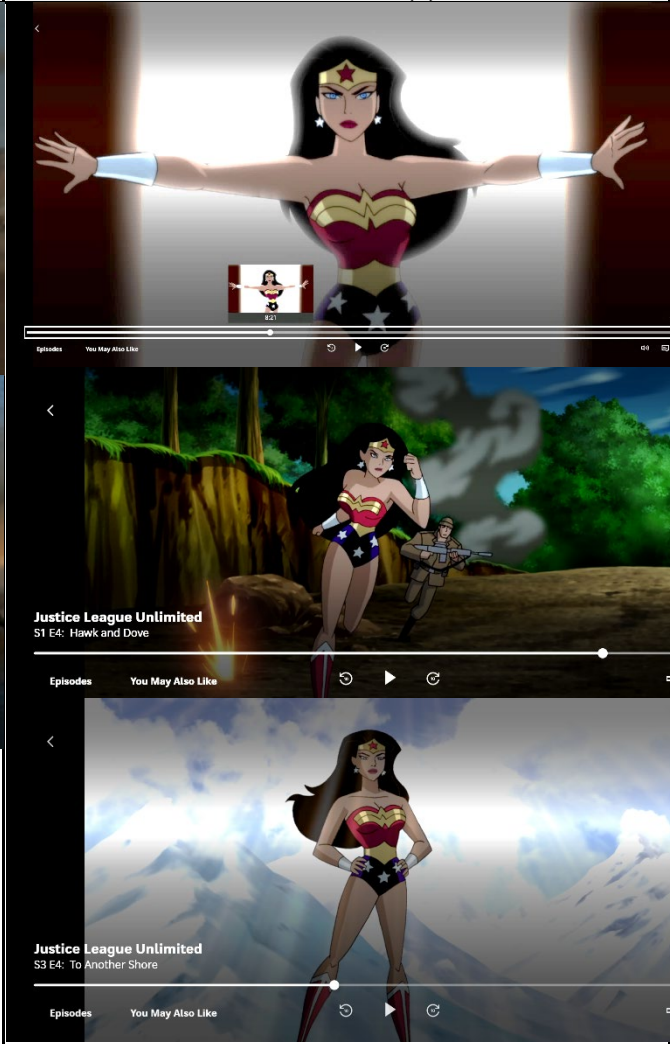
141. In response to a prompt asking to see “The Joker holding up a Joker playing card and laughing, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery’s The Joker, as shown in this screenshot:



142. In response to prompts asking to see “The Flash running through Central City” and “The Flash running through Central City, animated 2d cartoon” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download image and video outputs that reproduce Warner Bros. Discovery’s Flash, as shown in these screenshots:

MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

143. In response to prompts asking to see “Wonder Woman running through a battlefield” and “Wonder Woman running through a battlefield, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Warner Bros. Discovery’s Wonder Woman, as shown in these screenshots:

MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

144. In response to a prompt asking to see “Superman flying over Metropolis with his arms outstretched, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download image and video outputs that reproduce Warner Bros. Discovery’s Superman, as shown in this screenshot:



///

///

///

///

///

///

///

///

///

///

///

145. In response to prompts asking to see “The Teen Titans Go! Hanging out in Titans Tower” and “The Teen Titans Go! Hanging out in Titans Tower, animated 2d cartoon” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Warner Bros. Discovery’s Teen Titans Go! characters, as shown in these screenshots:



///

///

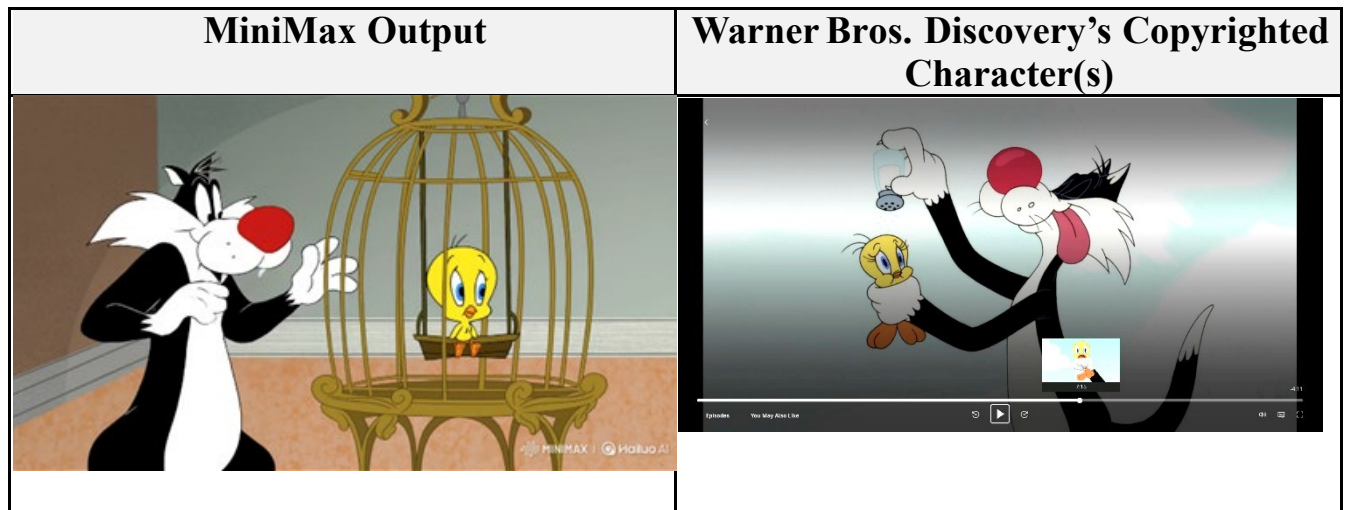
146. MiniMax consistently and accurately reproduces, publicly displays, and distributes copies and derivatives of characters from Warner Bros. Discovery's *Looney Tunes* properties to its subscribers. In response to a prompt asking to see "Bugs Bunny eating a carrot in a grove of trees, animated 2d cartoon," MiniMax used the data about Warner Bros. Discovery's Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery's Bugs Bunny, as shown in this screenshot:

MiniMax Output	Warner Bros. Discovery's Copyrighted Character(s)
	

147. In response to a prompt asking to see “Daffy Duck running through a forest, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery’s Daffy Duck, as shown in this screenshot:

MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

148. In response to a prompt asking to see “Sylvester trying to eat Tweety through his bird cage, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery’s Sylvester and Tweety characters, as shown in this screenshot:



///

///

///

///

///

///

///


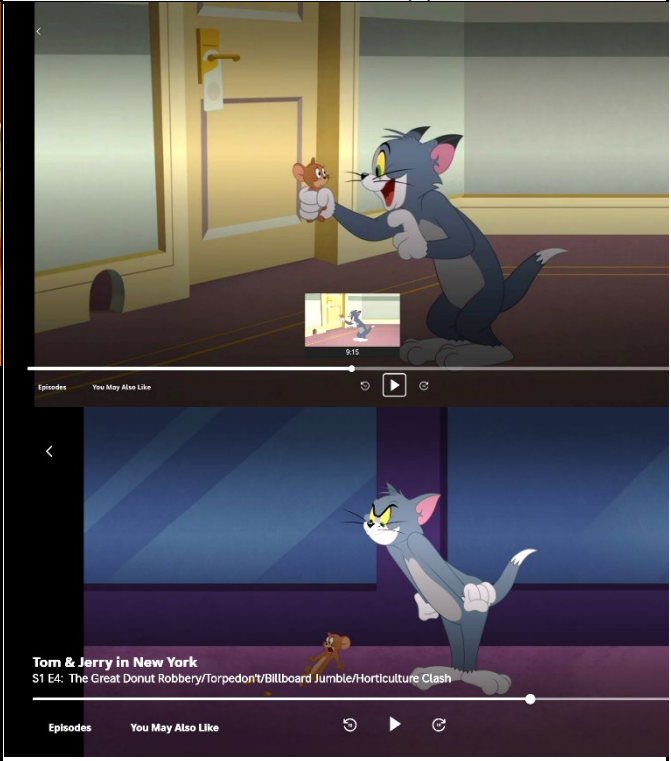
///

///

///

///

149. MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of characters from Warner Bros. Discovery’s other animated properties to its subscribers. In response to a prompt asking to see “Jerry Mouse running away from Tom Cat in a living room, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery’s Tom and Jerry characters, as shown in this screenshot:


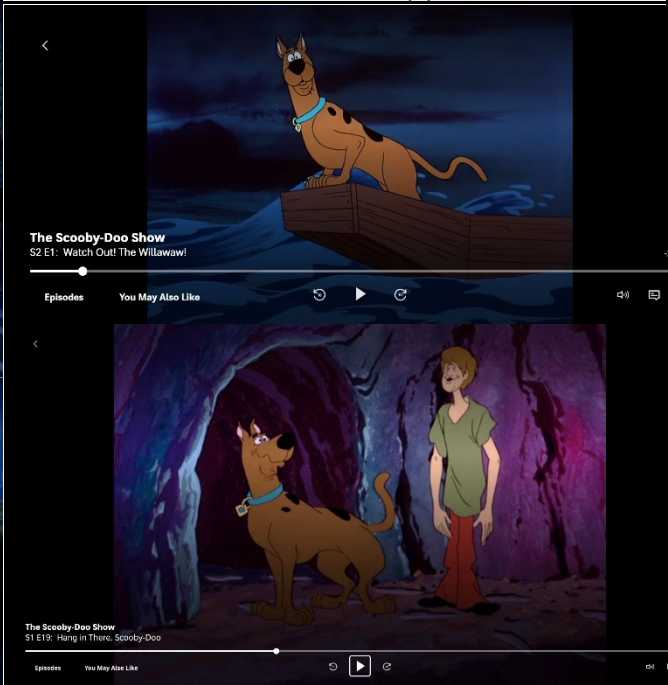
MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

///

///

///

150. In response to a prompt asking to see “Scooby-Doo sneaking around a dark warehouse, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Warner Bros. Discovery’s Scooby-Doo character, as shown in these screenshots:

MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

///


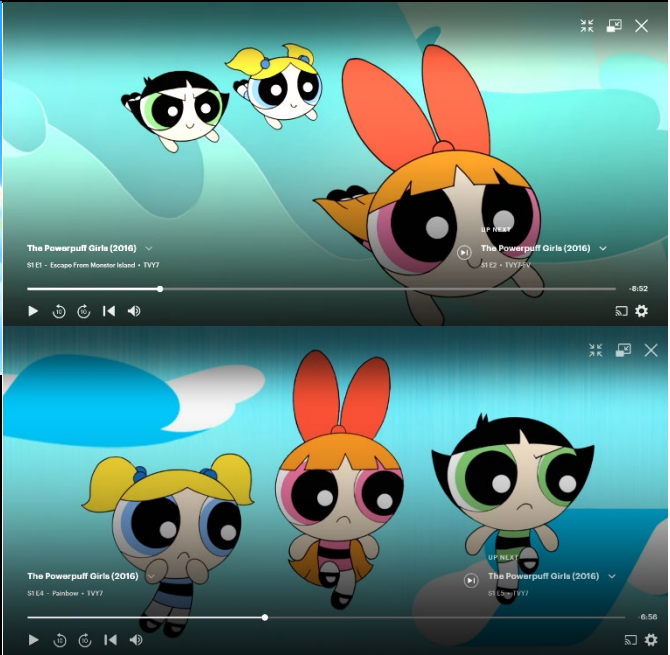
///

///

///

///

151. MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of characters from Warner Bros. Discovery’s Cartoon Network properties to its subscribers. In response to a prompt asking to see “Powerpuff girls flying through the clouds,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Warner Bros. Discovery’s Blossom, Buttercup, and Bubbles characters from *The Powerpuff Girls*, as shown in this screenshot:

MiniMax Output	Warner Bros. Discovery’s Copyrighted Character(s)
	

///

///


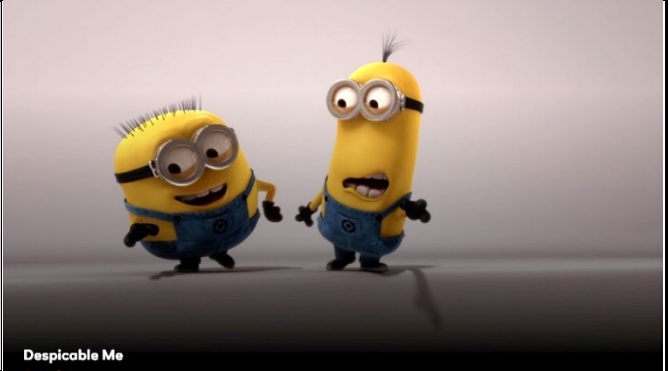
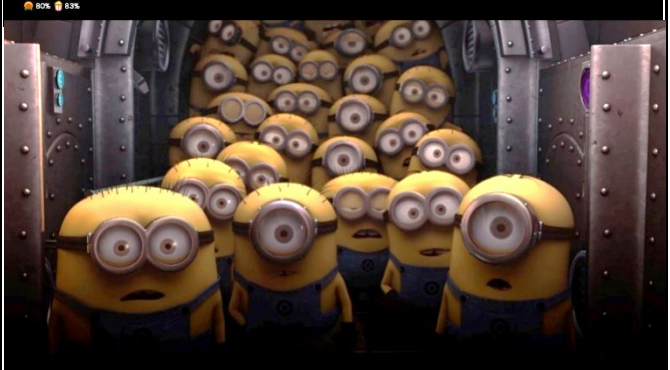
///

///

152. In response to prompts asking to see “Rick and Morty flying in their spaceship” and “Rick and Morty emerging from a wormhole, animated 2d cartoon,” MiniMax used the data about Warner Bros. Discovery’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Warner Bros. Discovery’s Rick Sanchez and Morty Smith characters from *Rick and Morty*, as shown in these screenshots:



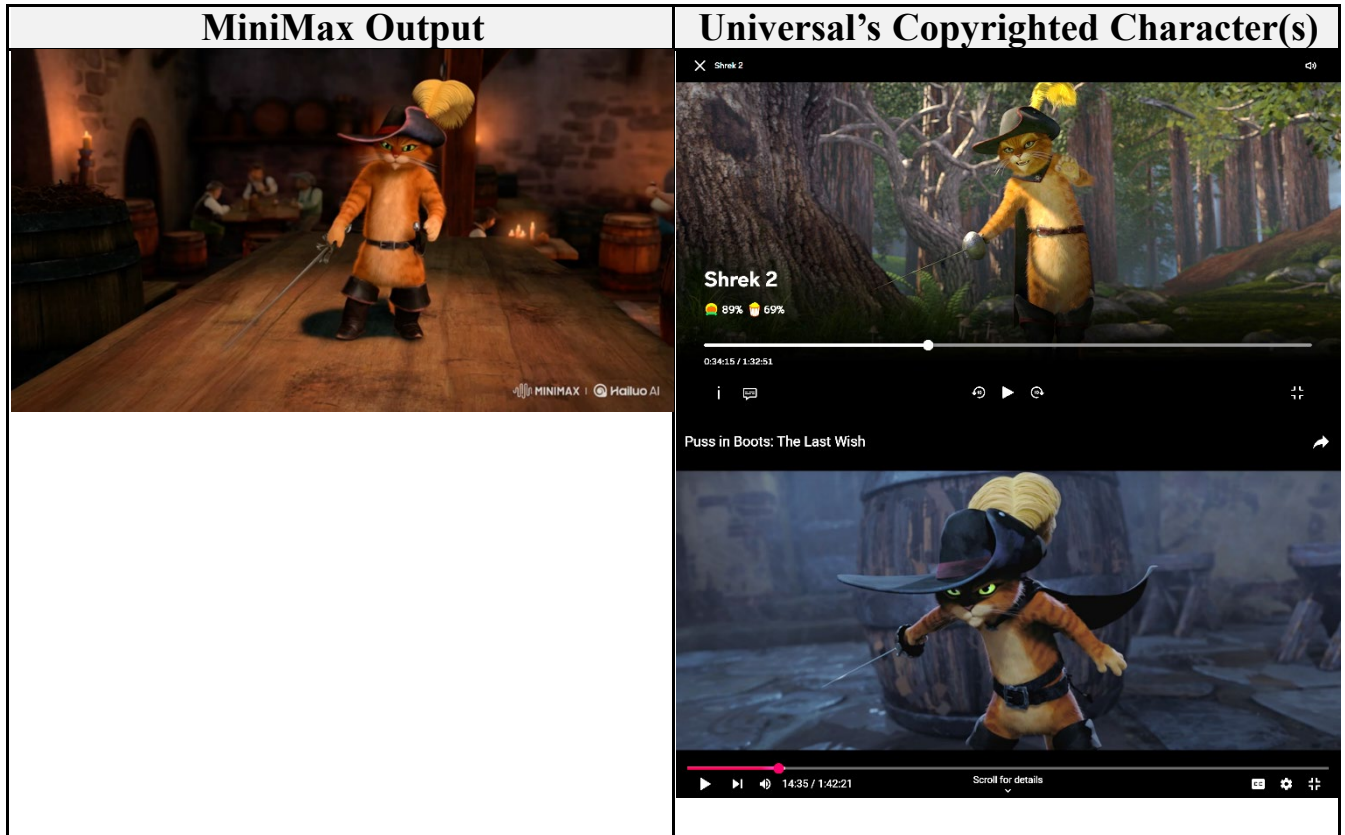
1 153. MiniMax consistently and accurately reproduces, publicly displays, publicly
2 performs, and distributes copies and derivatives of Universal Pictures’ Minions characters
3 from its *Despicable Me* properties to its subscribers. In response to prompts asking to see
4 “Minions” and “Minions from Despicable Me,” MiniMax used the data about Universal’s
5 Copyrighted Works that is embodied within the Hailuo AI model and then reproduced,
6 publicly displayed, publicly performed, and made available for download video outputs
7 that reproduce Universal Pictures’ Minions, as shown in these screenshots:

MiniMax Output	Universal’s Copyrighted Character(s)
	
	
	

154. MiniMax consistently and accurately reproduces, publicly displays, publicly performs, and distributes copies and derivatives of characters from its DreamWorks properties to its subscribers. For example, in response to prompts asking to see “Shrek and Donkey talking to each other,” “Shrek DreamWorks,” and “Shrek and Donkey crossing a rickety bridge over lava,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Universal’s Shrek and Donkey, as shown in these screenshots:



155. In response to a prompt asking to see “Puss in Boots fencing dramatically on a tavern table,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Universal’s Puss in Boots character, as shown in this screenshot:



///

///

///

///

///

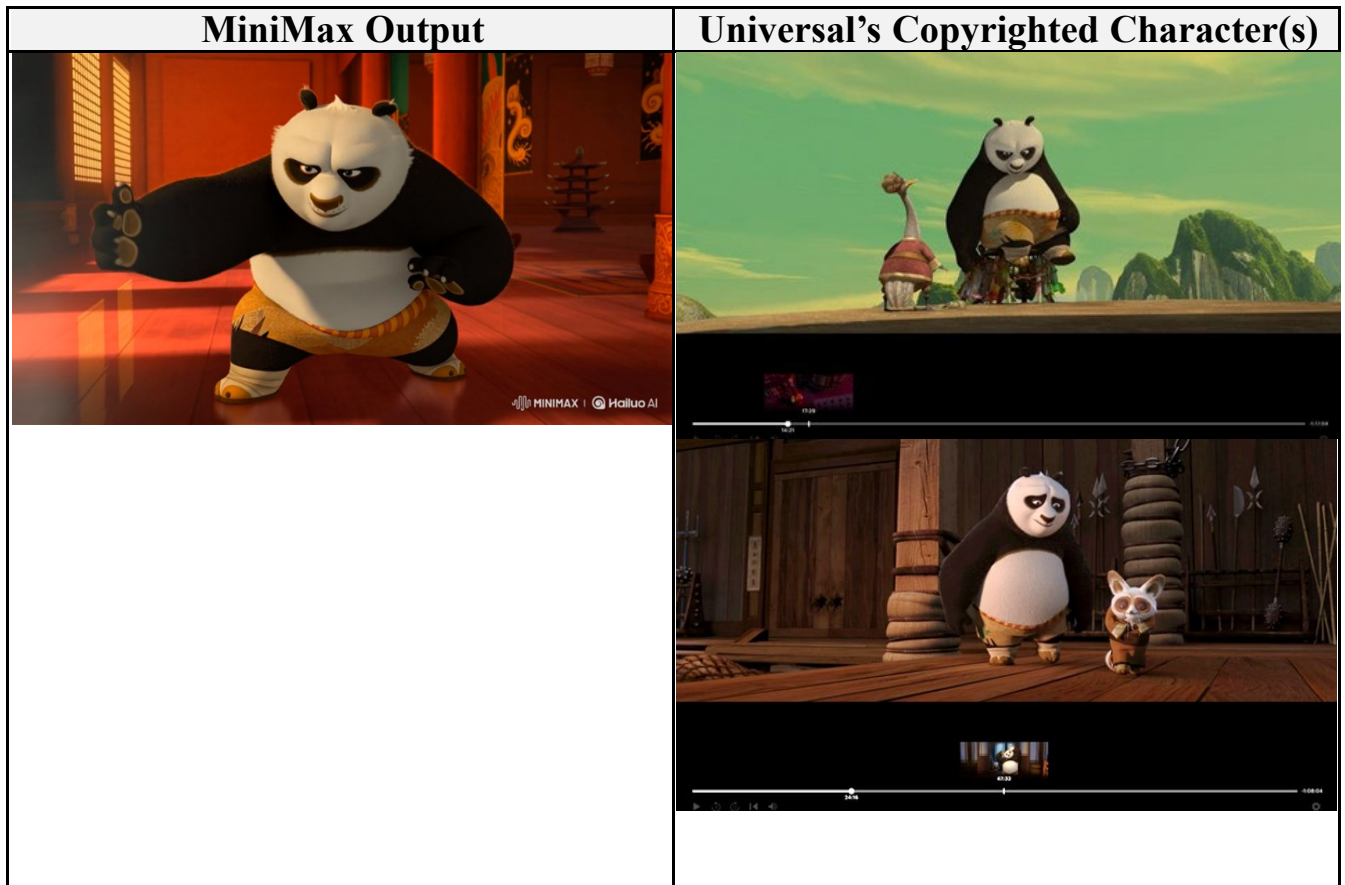
///

///

///

///

156. In response to a prompt asking to see “Kung Fu Panda,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Universal’s Po character from *Kung Fu Panda*, as shown in this screenshot:



///

///

///

///

///

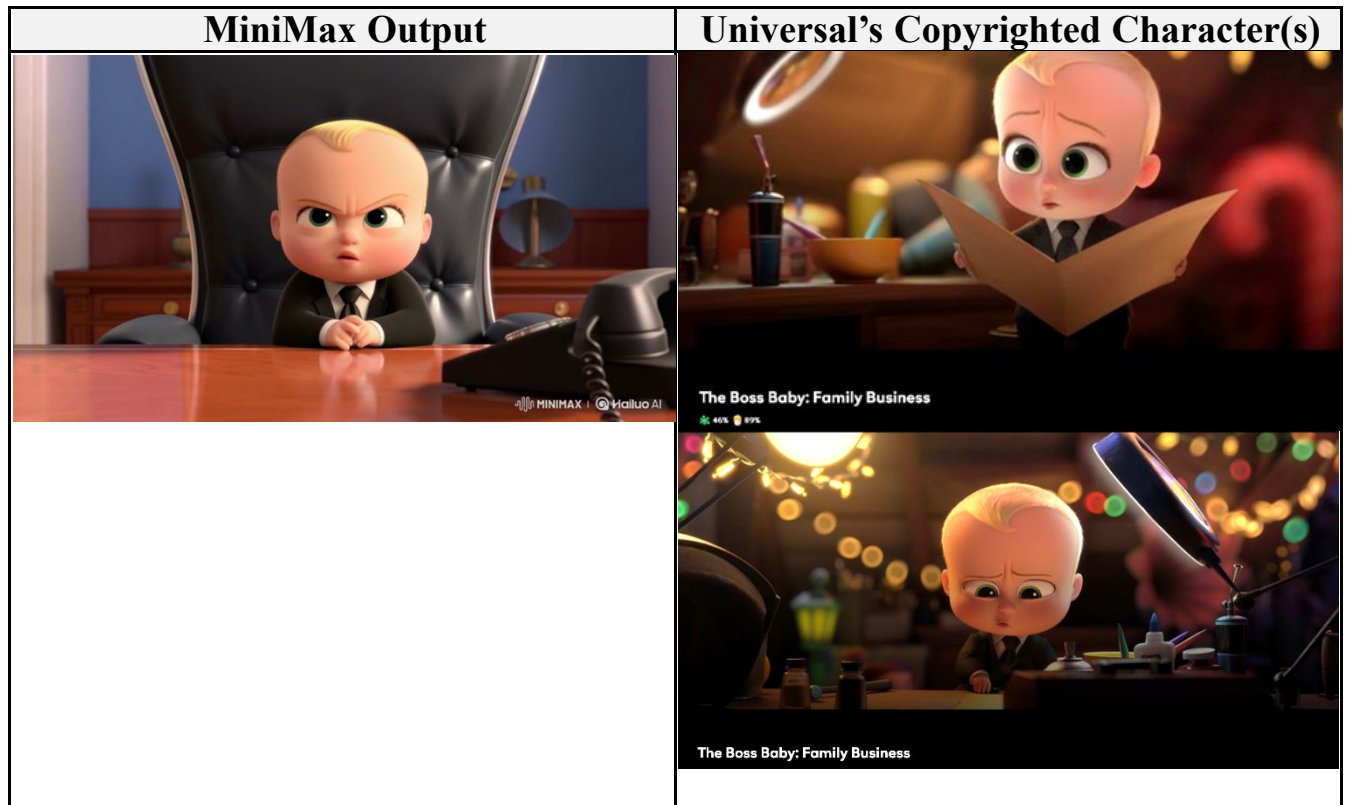
///

///




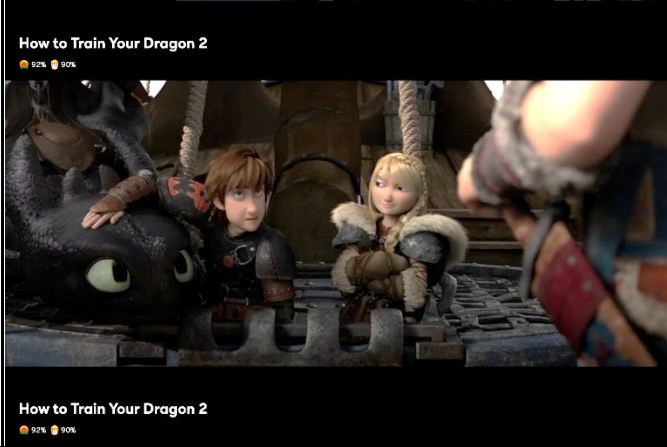
157. In response to prompts asking to see “Poppy and Branch from Trolls,” “Poppy from Trolls animated character,” and “Branch singing solo on a mossy cliff in the Trolls world,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download video outputs that reproduce Universal’s Poppy and Branch characters from *Trolls*, as shown in these screenshots:

MiniMax Output	Universal’s Copyrighted Character(s)
	
	
	

158. In response to a prompt asking to see “The Boss Baby,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Universal’s Boss Baby character as shown in this screenshot:



159. In response to a prompt asking to see “Hiccup and Toothless the Dragon soaring over cliffs at sunset,” MiniMax used the data about Universal’s Copyrighted Works that is embodied within the Hailuo AI model and then reproduced, publicly displayed, publicly performed, and made available for download a video output that reproduces Universal’s Hiccup and Toothless characters from *How to Train Your Dragon*, as shown in this screenshot:

MiniMax Output	Universal's Copyrighted Character(s)
	
	
	

160. As shown above, the outputs created by MiniMax are substantially similar reproductions and derivative works of Disney's, Warner Bros.' Discovery, and Universal's valuable copyrighted characters. The outputs often contain extensive nuance and detail, background elements, costumes, and accessories beyond what was specified in the prompt. As explained below, MiniMax is able to reproduce, publicly display, publicly perform, and distribute these copies because MiniMax selected and copied Plaintiffs' Copyrighted Works as part of the training process for Hailuo AI.

3. MiniMax Was Trained to Output Infringing Content.

161. The fact that MiniMax reliably generates copies and derivatives of Plaintiffs' Copyrighted Works demonstrates that MiniMax, without Plaintiffs' knowledge or

1 permission, copied Plaintiffs' Copyrighted Works to train and develop Hailuo AI. It also
2 shows that Hailuo AI, through software programming and computer storage devices,
3 embodies "copies" of those works, as that term is defined in Section 101 of the Copyright
4 Act, in the AI software that powers Hailuo AI. On information and belief, MiniMax,
5 without Plaintiffs' knowledge, developed and trained Hailuo AI on copyrighted works,
6 including Plaintiffs' Copyrighted Works, to help ensure that it is able to reproduce, publicly
7 display, publicly perform, and distribute faithful, high-quality copies and derivative works
8 of the works it trained on, including Plaintiffs' Copyrighted Works.

9 162. Based on the facts and circumstantial evidence alleged in this Complaint and
10 common knowledge about the process for creating a generative AI image and video
11 services like MiniMax, Plaintiffs are informed and believe that MiniMax engaged in the
12 following conduct to train Hailuo AI:

- 13 a. *First*, MiniMax acquired the underlying works to be used to train the
14 service. To do so, MiniMax downloaded from the internet, and other
15 sources, content using tools variously described as bots, scrapers,
16 streamrippers, video downloaders, and web crawlers. That content may
17 have been obtained from pirate sources or repositories. The data
18 acquired and copied by MiniMax to use in training Hailuo AI includes
19 Plaintiffs' Copyrighted Works.
- 20 b. *Second*, to prepare the data for ingestion, MiniMax "cleaned" the copies
21 of the underlying works that were collected in the previous step through
22 a filtering process and reformatted (e.g., converted them to a common
23 technical format) the copies that were not filtered out in the cleaning
24 process to train Hailuo AI. This step necessarily included creating more
25 copies of the materials obtained in the gathering phase, such as a new
26 copy of each reformatted item (including Plaintiffs' Copyrighted
27 Works).

1 c. *Third*, MiniMax then used the collected and cleaned data and
2 Copyrighted Works to “train” Hailuo AI. Although the specifics of this
3 training phase have not been disclosed by MiniMax, and will be the
4 subject of discovery in this action, MiniMax’s ability to repeatedly use
5 the data embodied within the Hailuo AI model to reproduce, publicly
6 display, publicly perform, and distribute further copies of Plaintiffs’
7 Copyrighted Works for its subscribers demonstrates that MiniMax’s
8 training of its generative AI model involved the fixation of copies of
9 Plaintiffs’ Copyrighted Works in a tangible medium from which the
10 work can be perceived, reproduced, or otherwise communicated with
11 the aid of a machine or device. On information and belief, and based
12 on Hailuo AI’s terms of use, MiniMax also trains on Hailuo AI outputs
13 it has generated for subscribers. MiniMax’s process of training and
14 making multiple copies of Plaintiffs’ Copyrighted Works was done
15 without Plaintiffs’ approval or authorization.

16 163. In other words, MiniMax uses software, servers, and other technology to store
17 and fix data associated with Plaintiffs’ Copyrighted Works in such a manner that those
18 works are thereby embodied in the model, from which MiniMax is then able to generate,
19 reproduce, publicly display, publicly perform, and distribute unlimited “copies” of
20 Plaintiffs’ works as defined by the Copyright Act.

21 164. To be clear, MiniMax had to copy Plaintiffs’ Copyrighted Works in order for
22 it to be able to subsequently disseminate reproductions and derivatives of Plaintiffs’
23 Copyrighted Works as outputs. MiniMax’s copying of Plaintiffs’ Copyrighted Works was,
24 at all times, unauthorized.

25 ///

26 ///

27 ///

28 ///

1 **4. MiniMax’s Public Display, Public Performance, and Distribution**
2 **of Plaintiffs’ Copyrighted Works Is Pervasive and Draws**
3 **Consumers to the Hailuo AI Service.**

4 165. Once the training process is complete, due to MiniMax’s massive copying of
5 Plaintiffs’ Copyrighted Works, and as a direct and intentional result of Hailuo AI’s
6 development and training, Hailuo AI generates reproductions and derivatives of Plaintiffs’
7 Copyrighted Works. With its Hailuo AI service, MiniMax is able to further reproduce,
8 publicly display, publicly perform, and distribute image and video outputs that are identical
9 or virtually identical to Plaintiffs’ Copyrighted Works in response to simple text-based
10 prompts.

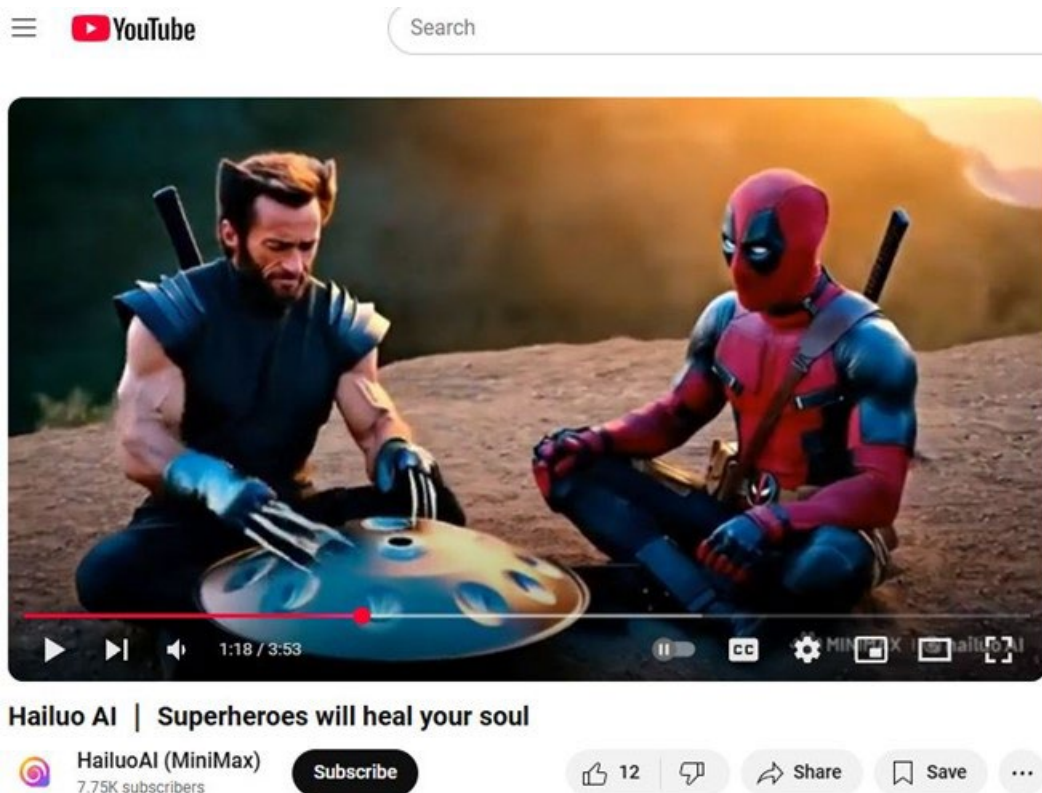
11 166. As repeatedly shown above, the outputs created by Hailuo AI are copies and
12 derivative works of Plaintiffs’ valuable copyrighted characters. In response to a prompt
13 for an image or video of Spider-Man, Minions, Rick and Morty, or any of Plaintiffs’
14 countless copyrighted characters, Hailuo AI creates yet another copy of that character
15 which it publicly displays, publicly performs, and distributes by making the copy available
16 for download. These so-called outputs are copies and/or derivatives of Plaintiffs’
17 copyrighted characters. Hailuo AI thus can generate an endless supply of copies and
18 derivative works that it can and does publicly display, publicly perform, and/or distribute
19 to subscribers on demand.

20 167. Indeed, like a virtual vending machine, MiniMax publicly performs,
21 distributes, and displays copy after copy after copy of Plaintiffs’ iconic copyrighted
22 characters to its subscribers and then advertises the availability of this infringing content
23 on its website as part of its promotional Explore feature. MiniMax also advertises its
24 infringing service and induces infringement of Plaintiffs’ copyrights through streaming
25 unauthorized videos with Plaintiffs’ copyrighted characters on MiniMax’s YouTube
26 channel and its other promotional outlets such as Instagram and TikTok as detailed below.

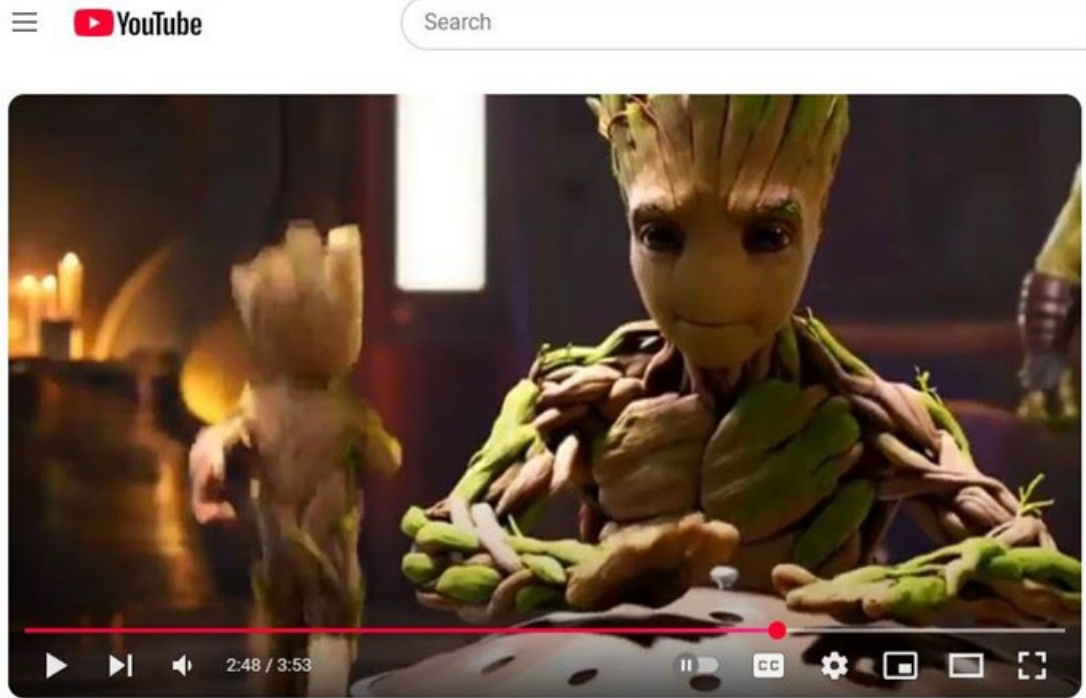
27 168. By publicly displaying, publicly performing, reproducing, distributing, and
28 creating derivative works of Plaintiffs’ Copyrighted Works, as described above and below,

MiniMax has directly infringed (and continues to directly infringe) Plaintiffs' exclusive rights as copyright holders, including the rights of reproduction, distribution, public display, public performance, and preparation of derivative works.

169. Undeterred by U.S. copyright law, MiniMax openly advertises Hailuo AI's ability to infringe Plaintiffs' Copyrighted Works to draw subscribers to its service. MiniMax consistently advertises and promotes videos that Hailuo AI generated which copy Plaintiffs' Copyrighted Works. For example, MiniMax's official YouTube channel promoted (and continues to promote) a video titled "Hailuo AI | Superheroes will heal your soul" which features many of Plaintiffs' characters including Deadpool, Batman, The Joker, Iron Man, Wonder Woman, Thanos, Superman, Groot, Black Panther, Spider-Man, Flash, Wolverine, and more as shown in the screenshots below.⁵



⁵ See HAILUOAI, *Hailuo AI | Superheroes will heal your soul* (YouTube Nov. 18, 2024), <https://youtu.be/9FZyRYDdgGY?si=UKp8XAaBP8HnbVQP>.



12 Hailuo AI | Superheroes will heal your soul



HailuoAI (MiniMax)
7.75K subscribers

Subscribe

15

16

17

18

19

20

21

22

23

24

25

26

27

28

12



Share

Save



YouTube

Search



Hailuo AI | Superheroes will heal your soul



HailuoAI (MiniMax)
7.75K subscribers

Subscribe

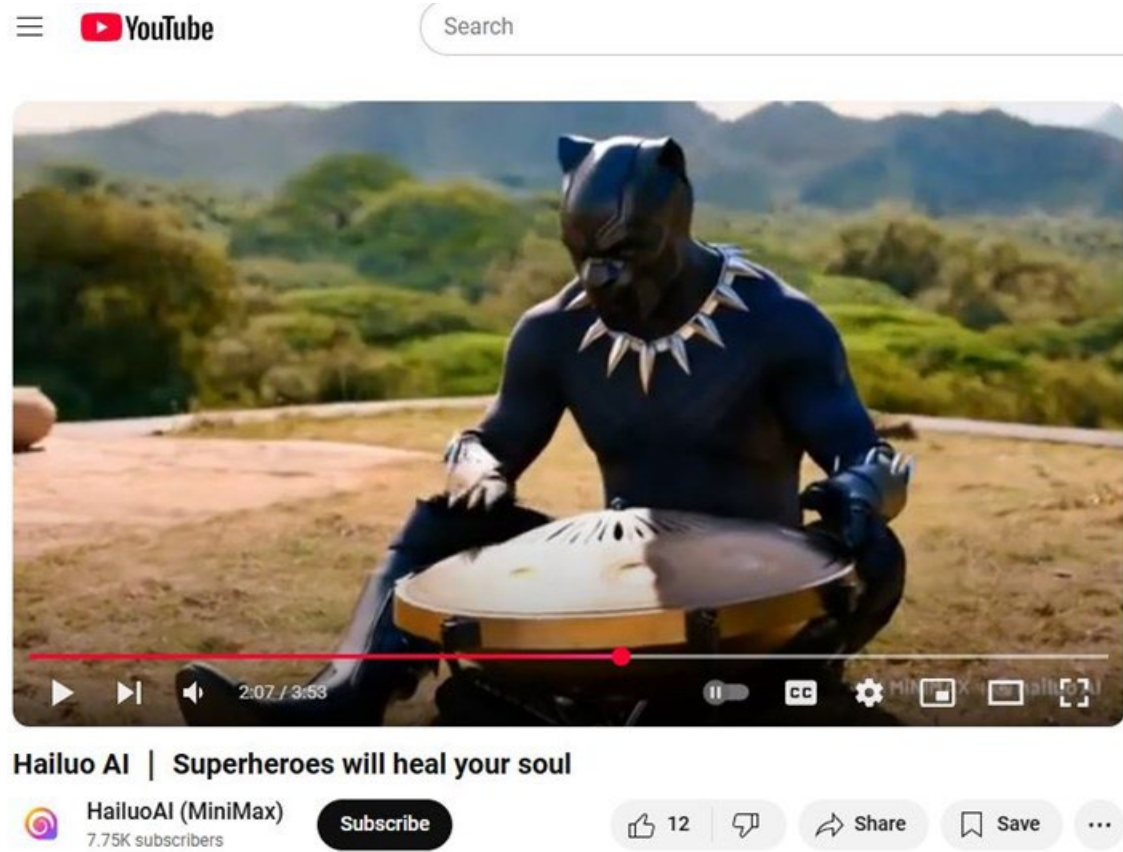
12

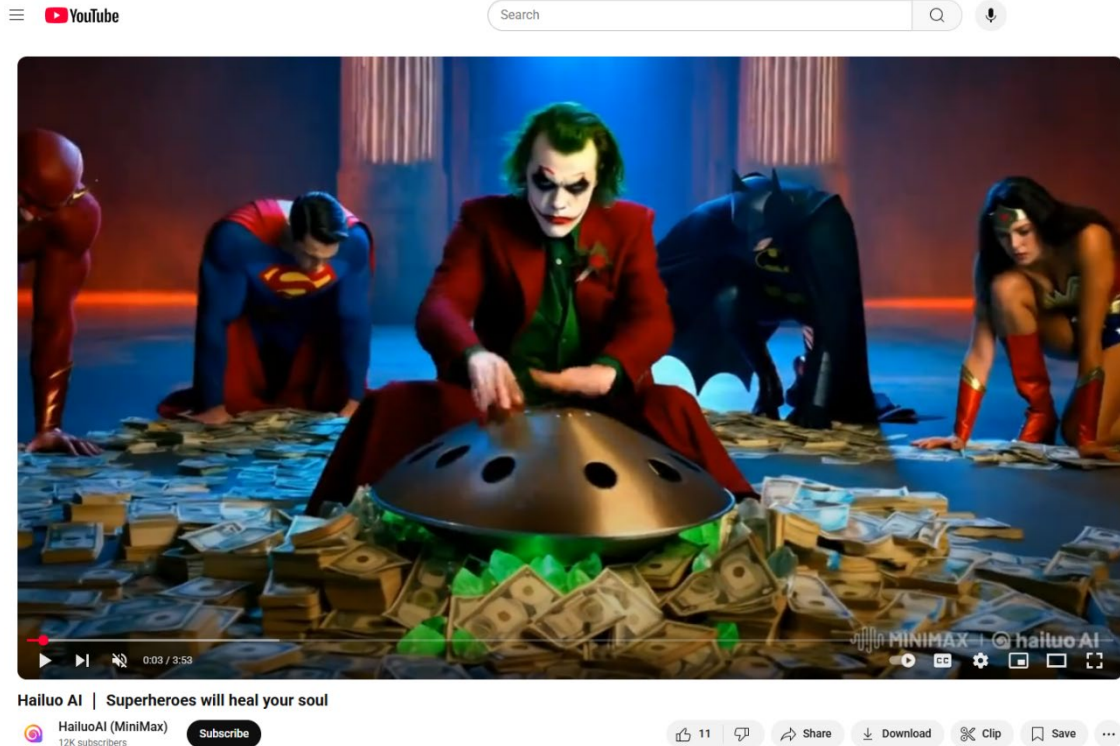


Share

Save







170. MiniMax also encourages and induces subscribers to request and download videos featuring Disney and Warner Bros. Discovery's Copyrighted Works by conducting "paid partnerships" with subscribers.⁶ As shown below and as noted above, an Instagram post, tagged as a "paid partnership" with Hailuo AI shows numerous video clips of Disney's Copyrighted Works, that include Iron Man, Deadpool, Groot and Rocket Raccoon.

///

///

///

///

///

⁶ Video posted by @neovisionary5, INSTAGRAM (May 19, 2025), <https://www.instagram.com/p/DJ0821VM5dj/>.



neovisionary5 · Follow

Paid partnership with hailuoai_official
Original audio



neovisionary5 Edited · 6w

Hailuo AI is all you need 🤖
Just type what you want.
Boom — your world, your way.

Check the link in my bio and try 🔥

[#HailuoAI#minimax#CreateWithoutLimits](#)
[#AIMagic](#)

No comments yet.

Start the conversation.



May 19



Add a comment...



Messages



neovisionary5 · Follow

Paid partnership with hailuoai_official
Original audio



neovisionary5 Edited · 6w

Hailuo AI is all you need 🤖
Just type what you want.
Boom — your world, your way.

Check the link in my bio and try 🔥

[#HailuoAI#minimax#CreateWithoutLimits](#)
[#AIMagic](#)

No comments yet.

Start the conversation.



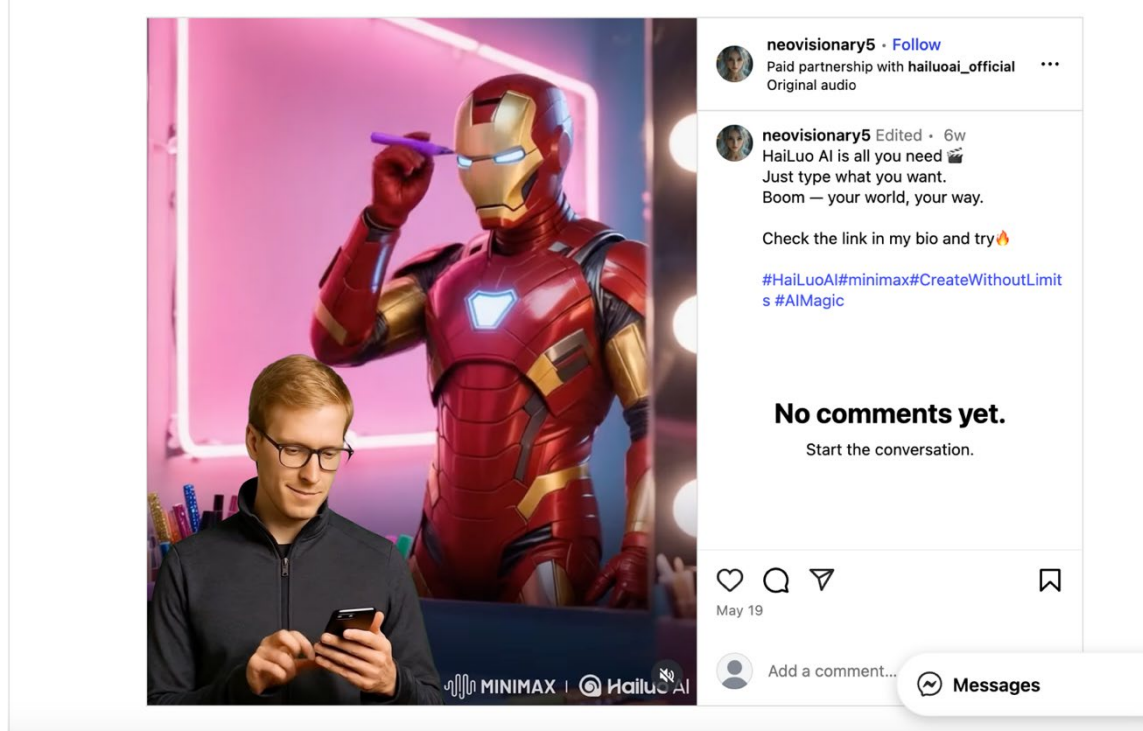
May 19



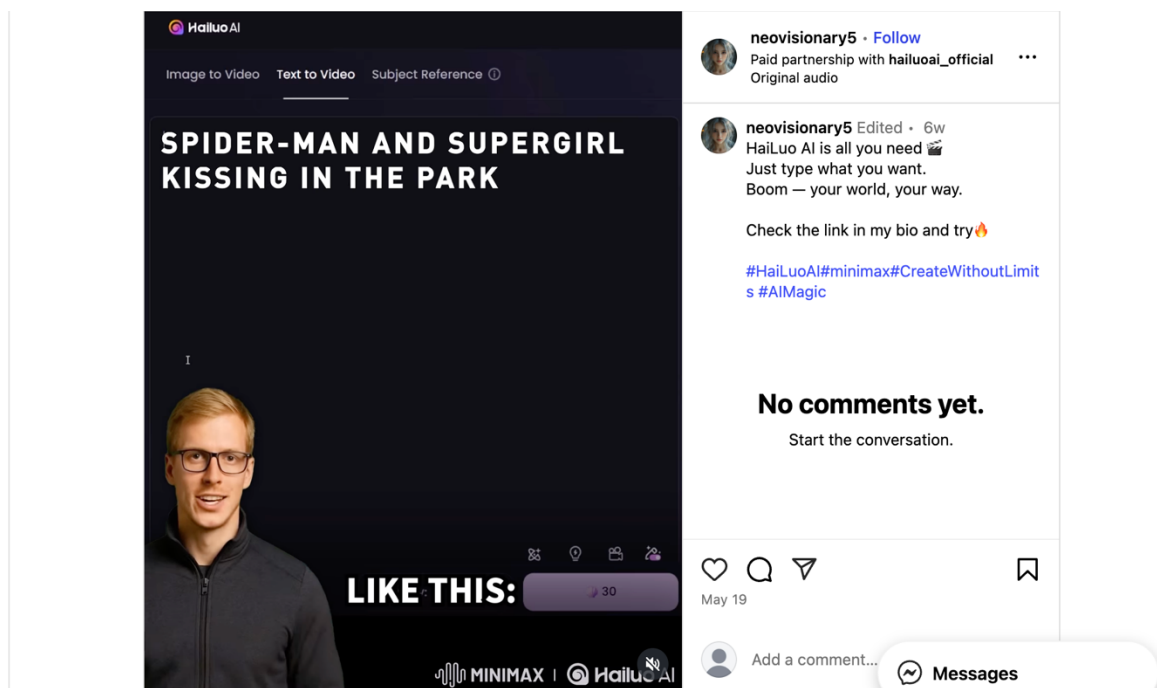
Add a comment...



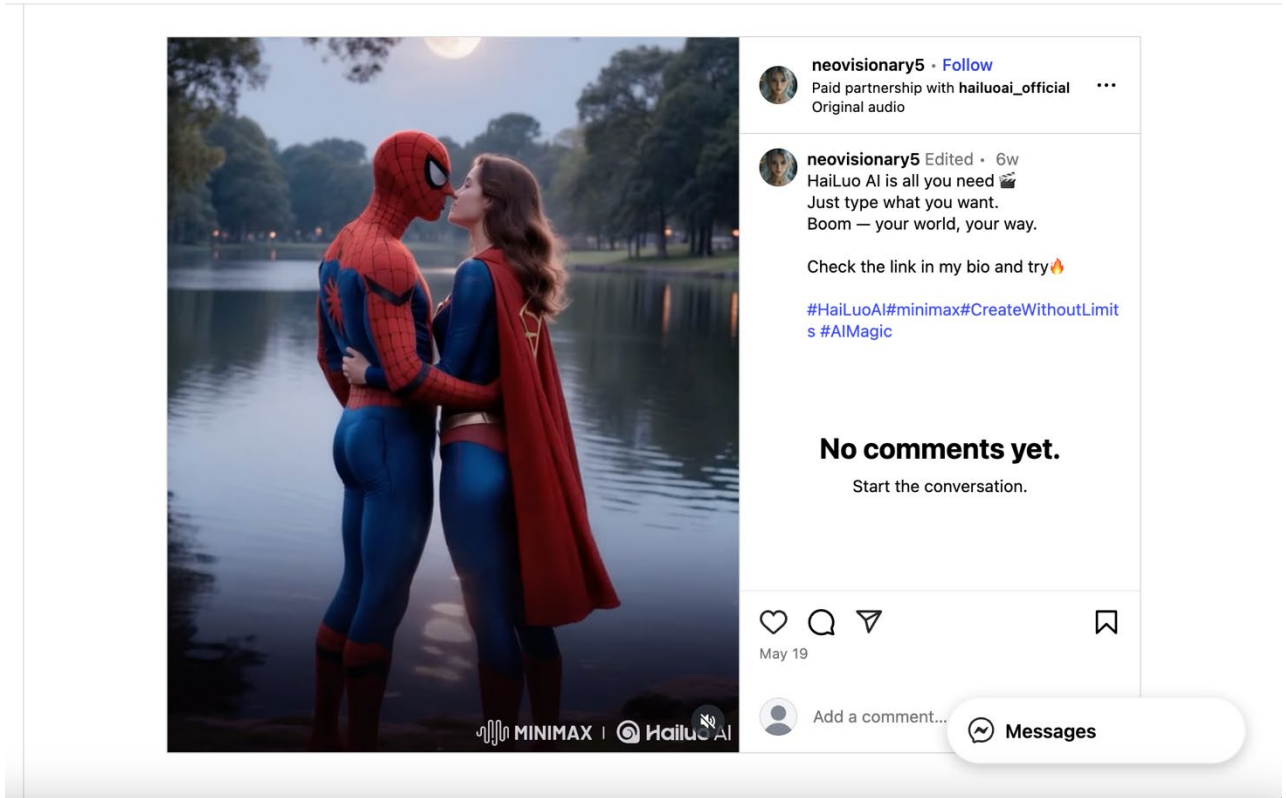
Messages



171. The advertisement informs subscribers and potential subscribers that they can “open Hailuo AI” and then “just type what you want.” The video then shows a screen of Hailuo’s video generator with “Spider-man and Supergirl kissing in the park” typed into the text to video prompt.



172. The advertisement then informs the viewer that they only have to “wait[] a short time and boom!” The result is a video of Disney’s Copyrighted Work, Spiderman; and Warner Bros. Discovery’s Copyrighted Work, Supergirl, kissing in front of a lake in the park.



///

///

///

///

///

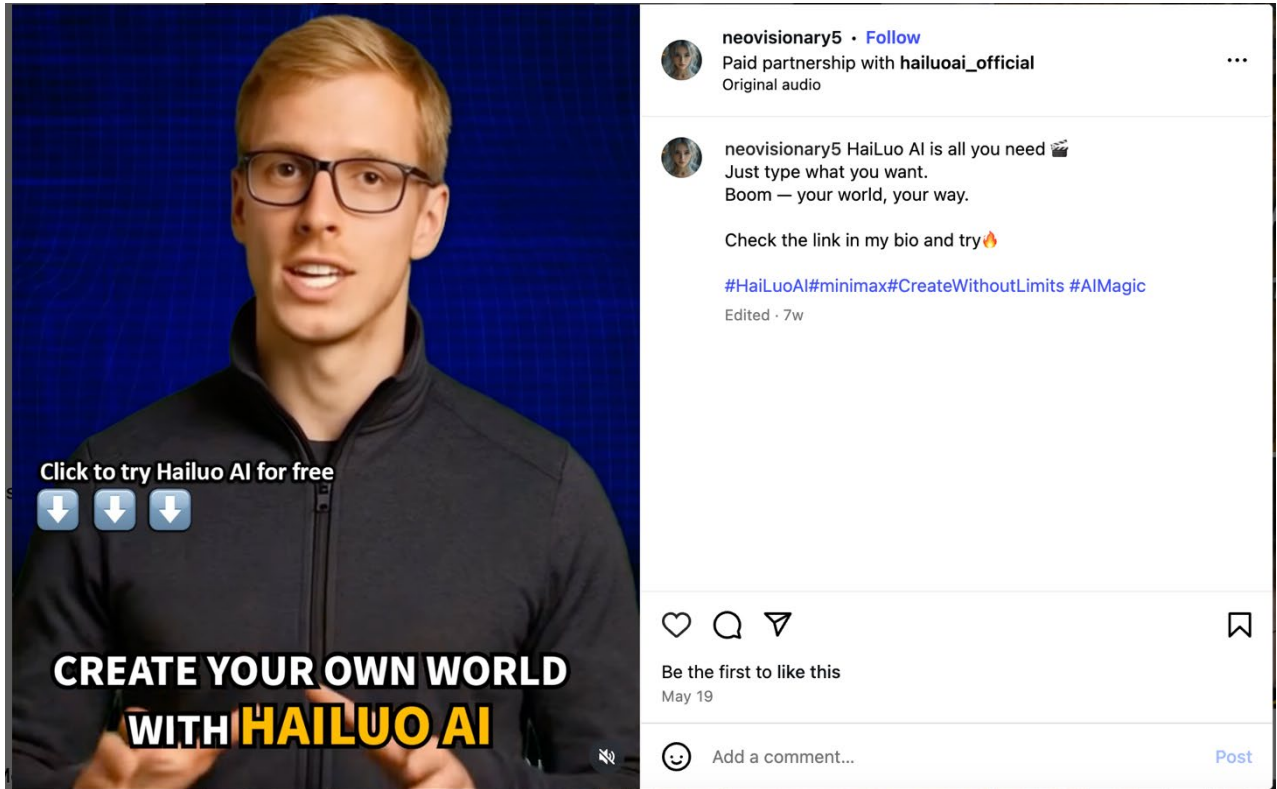
///

///

///

///

173. The advertisement ends with a call to action for consumers (subscribers and potential subscribers) to download the Hailuo AI app based on its ability to generate copies and derivatives of Plaintiffs' copyrighted characters.



///

///

///

///

///

///

///

///

1 174. MiniMax posted an advertisement for Hailuo AI on its official WeChat social
2 media account that featured Disney's Buzz Lightyear and Olaf from *Frozen*, as shown in
3 the screenshot below. WeChat, including MiniMax's official WeChat account, is available
4 in the United States through the Apple App Store, the Google Play Store, and the Microsoft
5 Store, and the advertisement in the screenshot below was accessed in this District.



23
24 ///

25 ///

26 ///

27 ///

1 175. MiniMax also advertises Hailuo AI with a video displaying Disney's Spider-
2 Man that Hailuo AI generated to its official TikTok page, which was viewed 20,100 times
3 and received 1,187 "likes."⁷

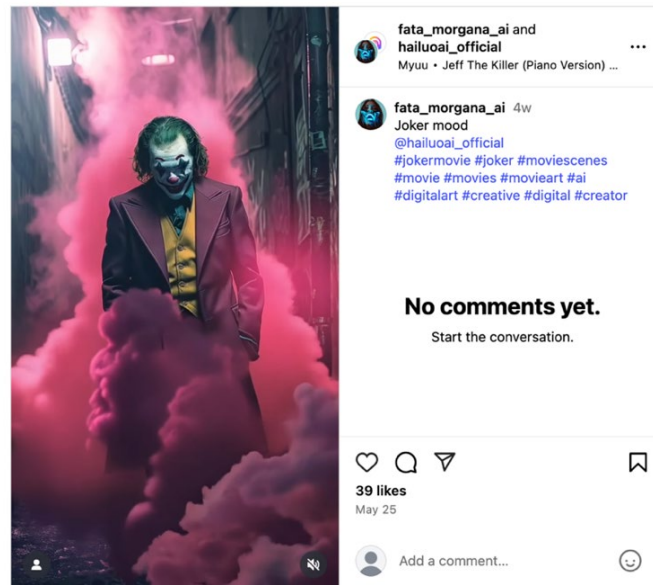


27 ⁷ Video posted by Hailuo AI (MiniMax) (@hailuoai_official), TIKTOK (Nov. 5 2024),
28 <https://www.tiktok.com/t/ZT6kVrfpt/>.

176. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Disney's Incredible Hulk.⁸



177. MiniMax further advertises Hailuo AI with a video on its Instagram page that Hailuo AI generated which features Warner Bros. Discovery's the Joker.⁹



⁸ Video posted by @neovisionary5 & @hailuoai_official, INSTAGRAM (Feb. 19, 2025), <https://www.instagram.com/p/DGPoiyGsllg/>.

⁹ Video posted by @fata_morgana_ai & @hailuoai_official, INSTAGRAM (May 25, 2025), <https://www.instagram.com/p/DKFNCVVoxk5/>.

178. MiniMax again advertises Hailuo AI with a video on its Instagram page that Hailuo AI generated which features Warner Bros. Discovery's characters Rick and Morty.¹⁰



179. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Warner Bros. Discovery's Batman which received more than 2,500 "likes."¹¹

///

///

///

///

///

///

¹⁰ Video posted by @k.real_petrov & @hailuoai_official, INSTAGRAM (Apr. 8, 2025), <https://www.instagram.com/p/DILgRzRMGJm/>.

¹¹ Video posted by @insertitle99 & @hailuoai_official, INSTAGRAM (June 18, 2025), <https://www.instagram.com/p/DLD7HlXuHGu/>.

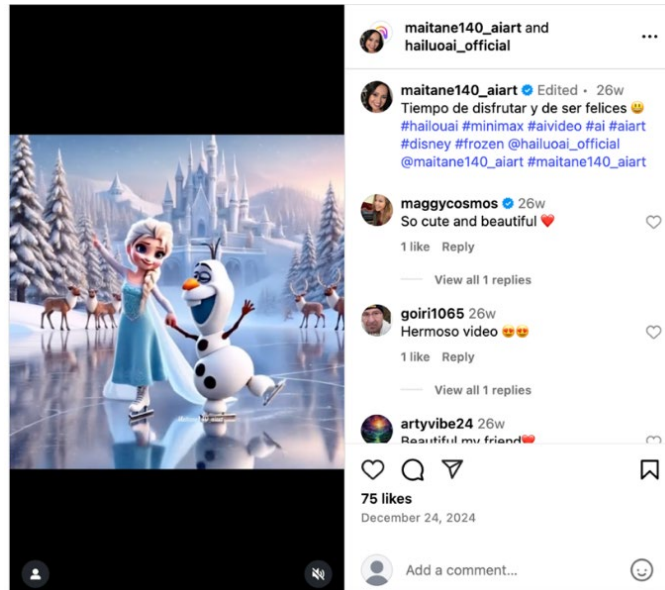


180. MiniMax advertises Hailuo AI with a video on its Instagram page that Hailuo AI generated which features Warner Bros. Discovery's Superman, which received 1,761 "likes."¹²



¹² Video posted by @chillgrid & @hailuoai_official, INSTAGRAM (Apr. 1, 2025), <https://www.instagram.com/p/DH7UglACYzk/>.

181. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Disney's Olaf and Elsa.¹³



182. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Universal's Minions, which received over 3,300 "likes".¹⁴



¹³ Video posted by @maitane140_aiart & @hailuoai_official, INSTAGRAM (Dec. 24, 2024), https://www.instagram.com/reel/DD_q0BPuIsU/?igsh=Mzc3ZTVlOWMwZA%3D%3D.

¹⁴ Video posted by @i3ladimir.neiro & @hailuoai_official, INSTAGRAM (Jan. 18, 2025), <https://www.instagram.com/i3ladimir.neiro/reel/DE-LSNBM-qN/>.

183. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Universal's Shrek and Fiona.¹⁵



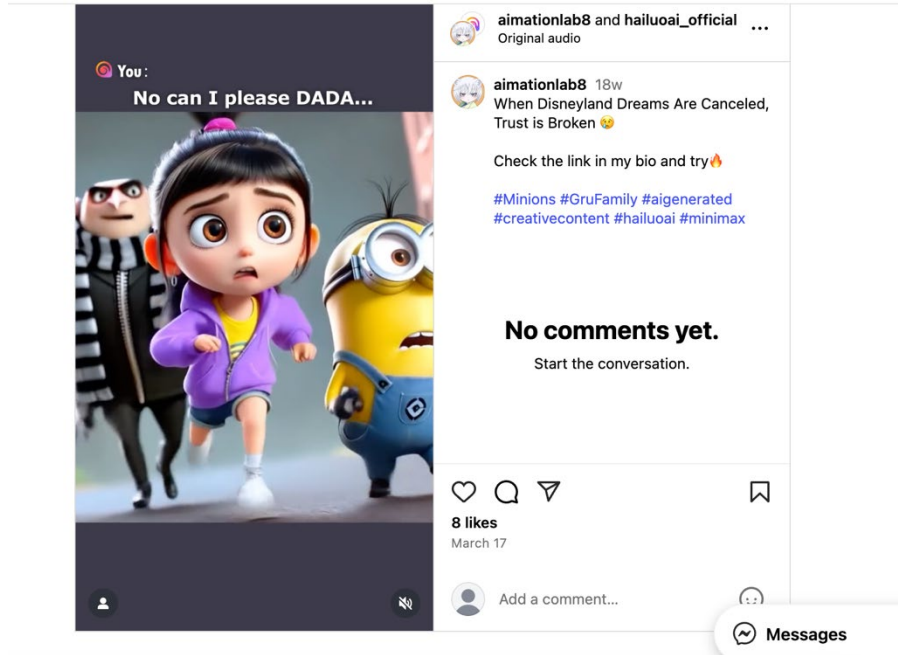
184. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Universal's Minions, which received over 18,600 "likes".¹⁶



¹⁵ Video posted by @max.sh_lab & @hailuoai_official, INSTAGRAM (Jan. 18, 2025), https://www.instagram.com/max.sh_lab/reel/DE-Is0LNWEw/.

¹⁶ Video posted by @i3ladimir.neiro & @hailuoai_official, INSTAGRAM (Jan. 30, 2025), <https://www.instagram.com/i3ladimir.neiro/reel/DFclDBQMO7h/>.

185. On its Instagram page, MiniMax advertises Hailuo AI with a video that Hailuo AI generated which features Universal's *Despicable Me* characters Gru, Agnes, and a Minion.¹⁷



///

///

///

///

///

///

///

///

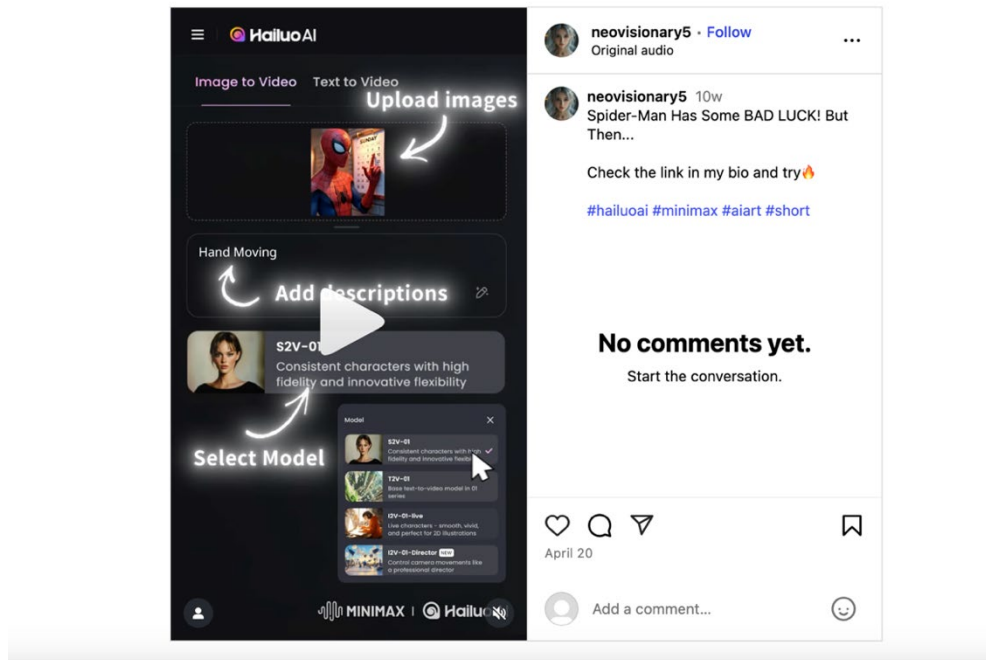
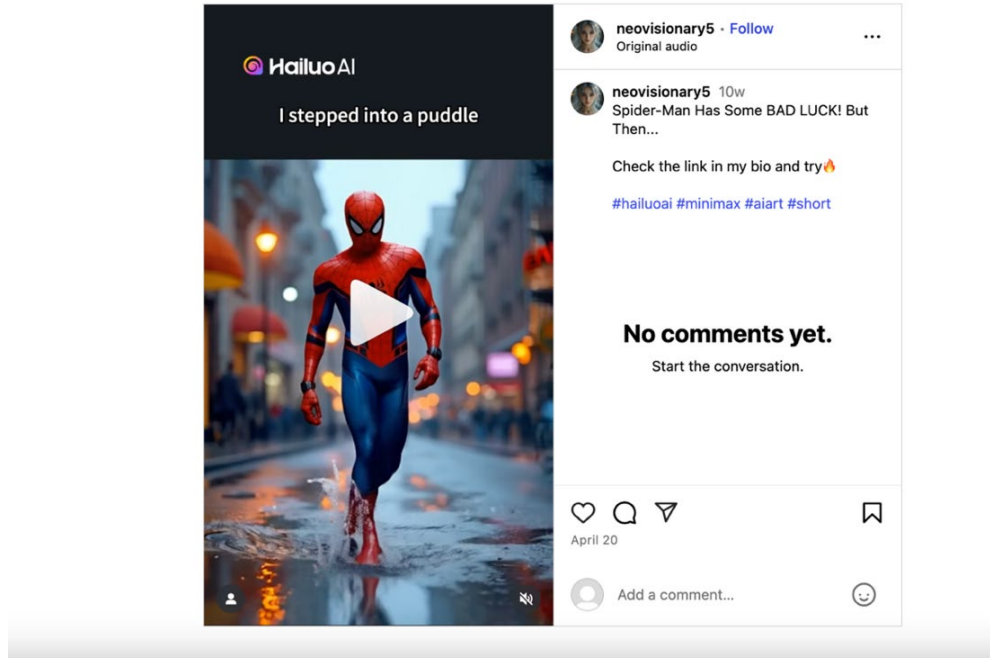
///

///

///

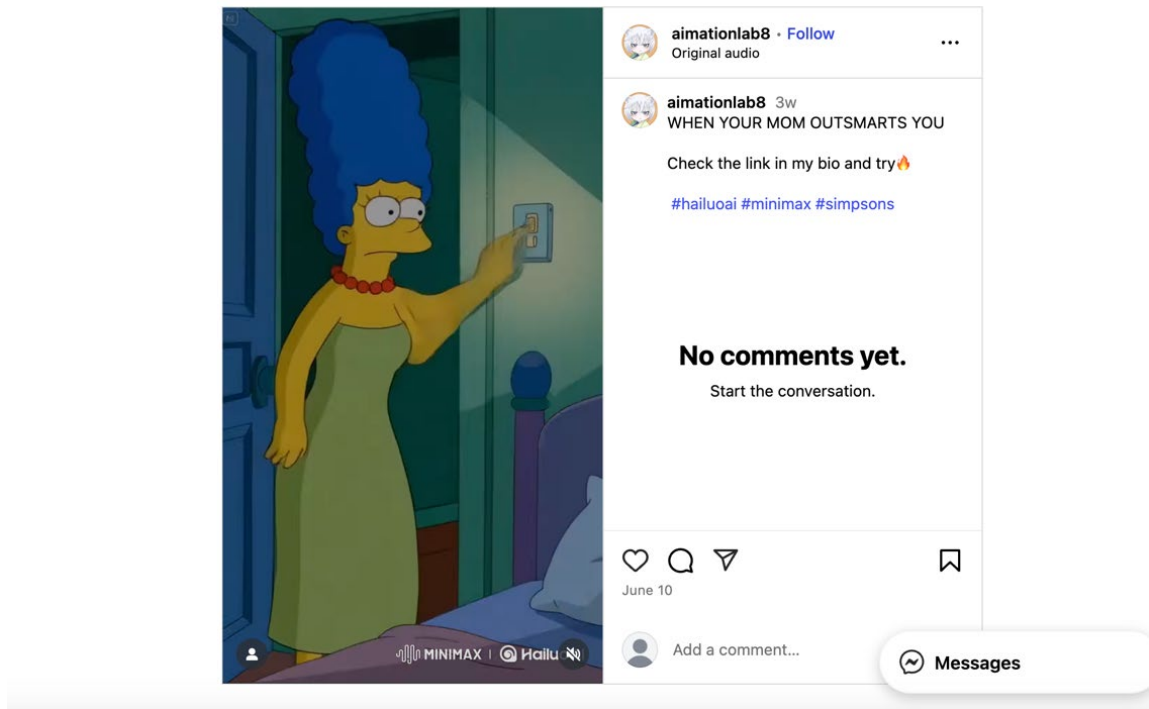
¹⁷ Video posted by @aimationlab8 & @hailuoai_official, INSTAGRAM (Mar. 17, 2025), <https://www.instagram.com/reel/DHUUpojCJRg/>.

186. One Hailuo AI subscriber posted a video on Instagram featuring Disney's Spider-Man, that encourages other users to download MiniMax's Hailuo and request their own videos using Disney's copyrighted characters.¹⁸



¹⁸ Video posted by @neovisionary5, INSTAGRAM (Apr. 20, 2025), <https://www.instagram.com/reel/DIsWSC6s0sR/?igsh=Mzc3ZTVlOWMwZA%3D%3D>.

187. Another Hailuo AI subscriber posted an ad on Instagram featuring Disney's Bart and Marge Simpson, that encourages users to download Hailuo AI and generate their own videos using Disney's copyrighted characters.¹⁹



///

///

///

///

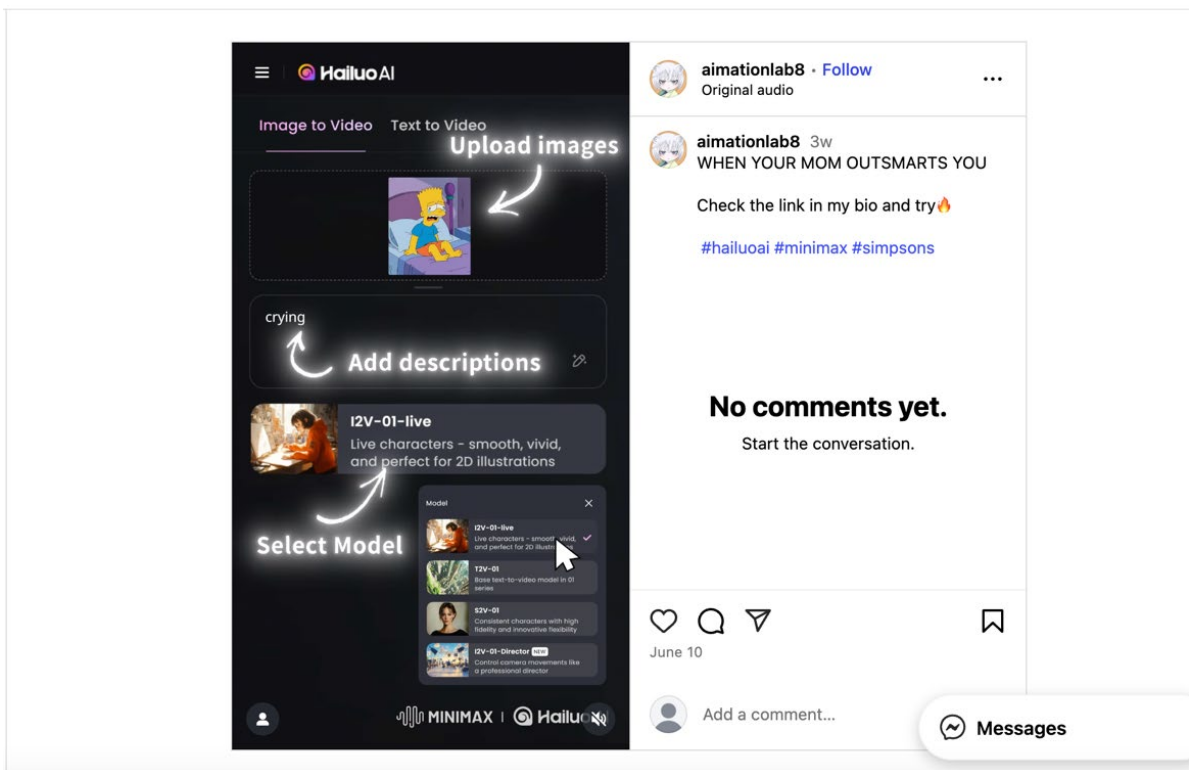
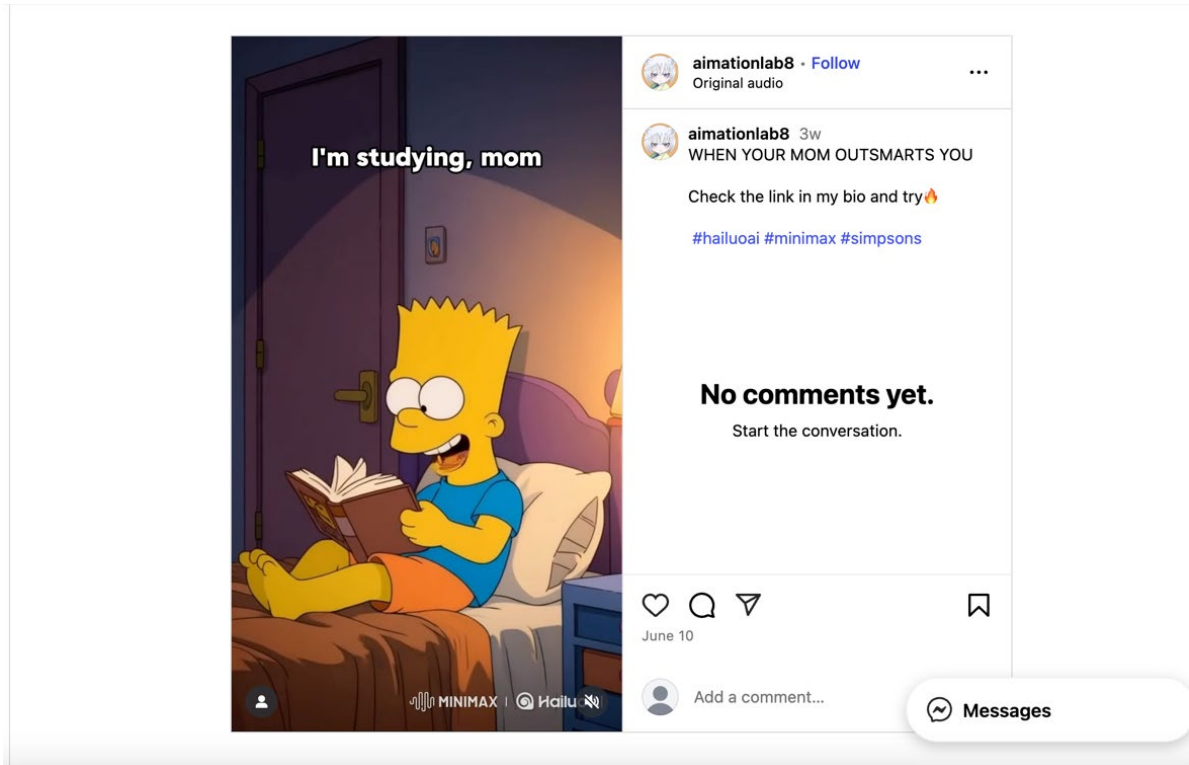
///

///

///

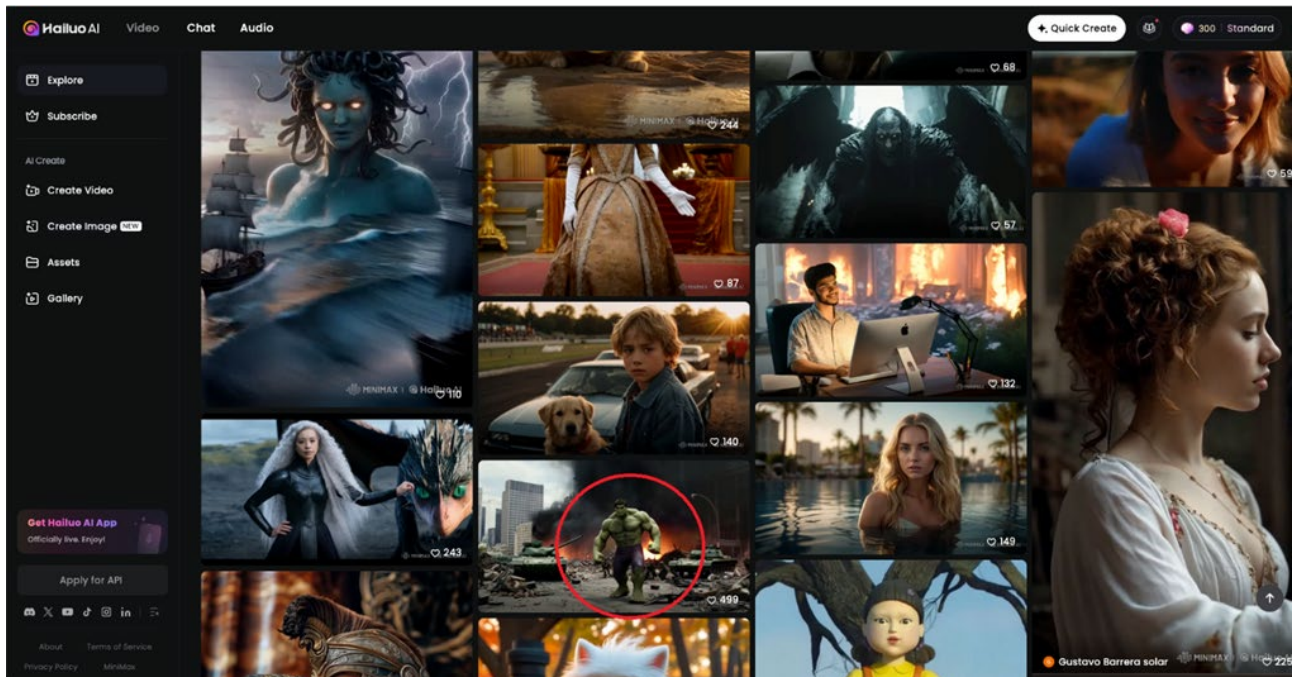
///

¹⁹ Video posted by @aimationlab8, INSTAGRAM (June 10, 2025), <https://www.instagram.com/reel/DKvlDRPCw9X/?igsh=Mzc3ZTVlOWMwZA%3D%3D>.



188. These examples show the popularity of Hailuo AI among consumers who use the service to obtain videos featuring Plaintiffs' copyrighted characters.

189. MiniMax also publicly displays and performs further copies of videos it displayed or distributed to other subscribers on the "Explore" promotional page on its website. There, MiniMax subscribers can view the various videos previously generated by MiniMax for other subscribers. This Explore page features infringing copies of Plaintiffs' Copyrighted Works and showcases how subscribers are drawn to Hailuo AI because of the availability of the Copyrighted Works. Hailuo AI's Explore page publicly displays and performs the following infringing copies of Plaintiffs' works:



///

///

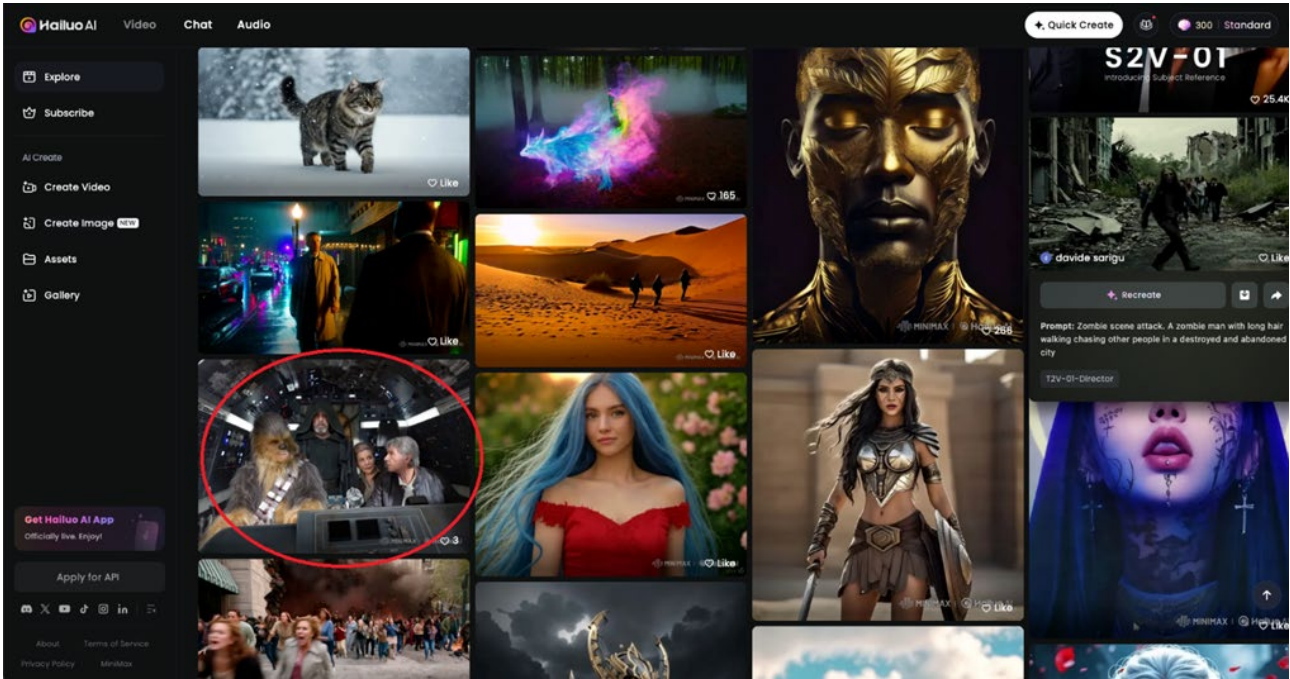
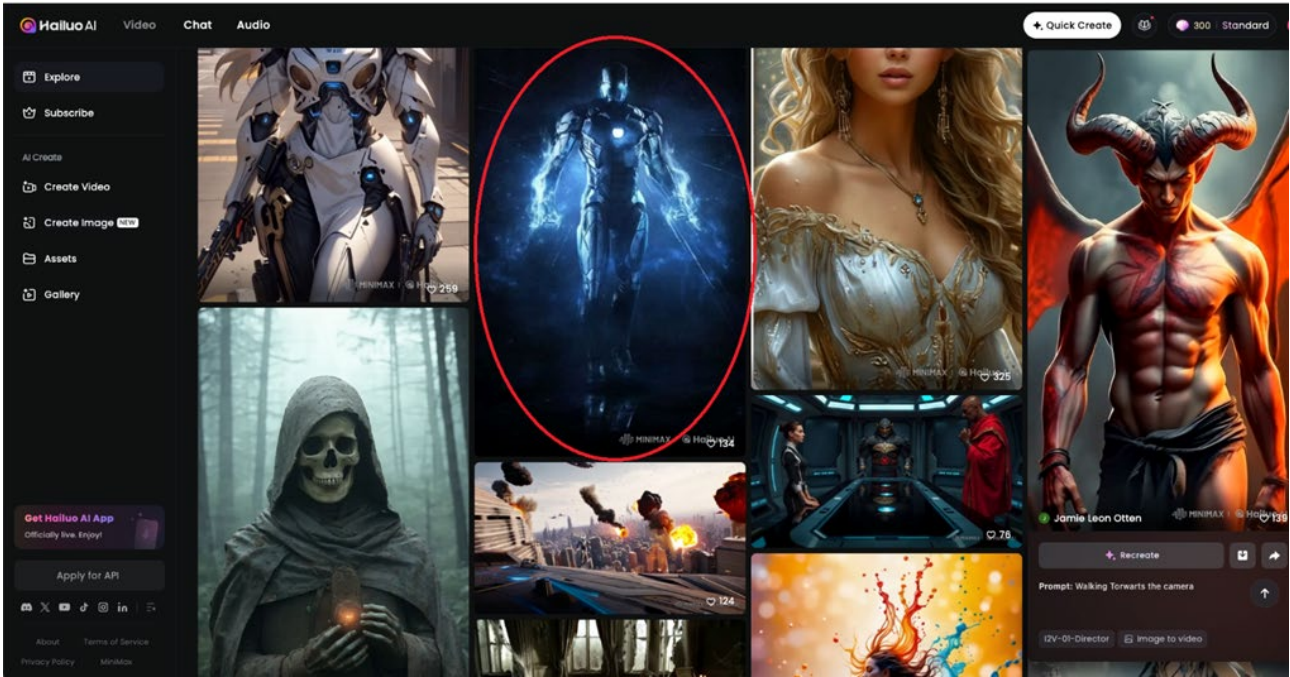
///

///

///

///

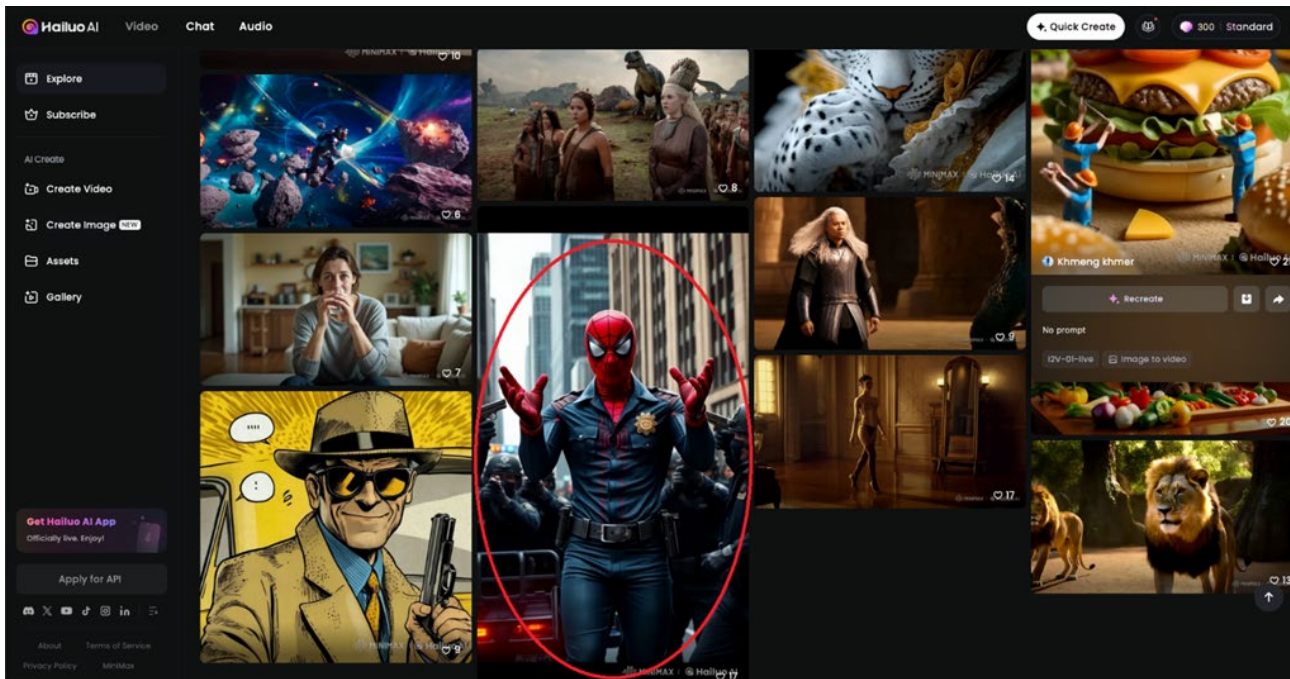
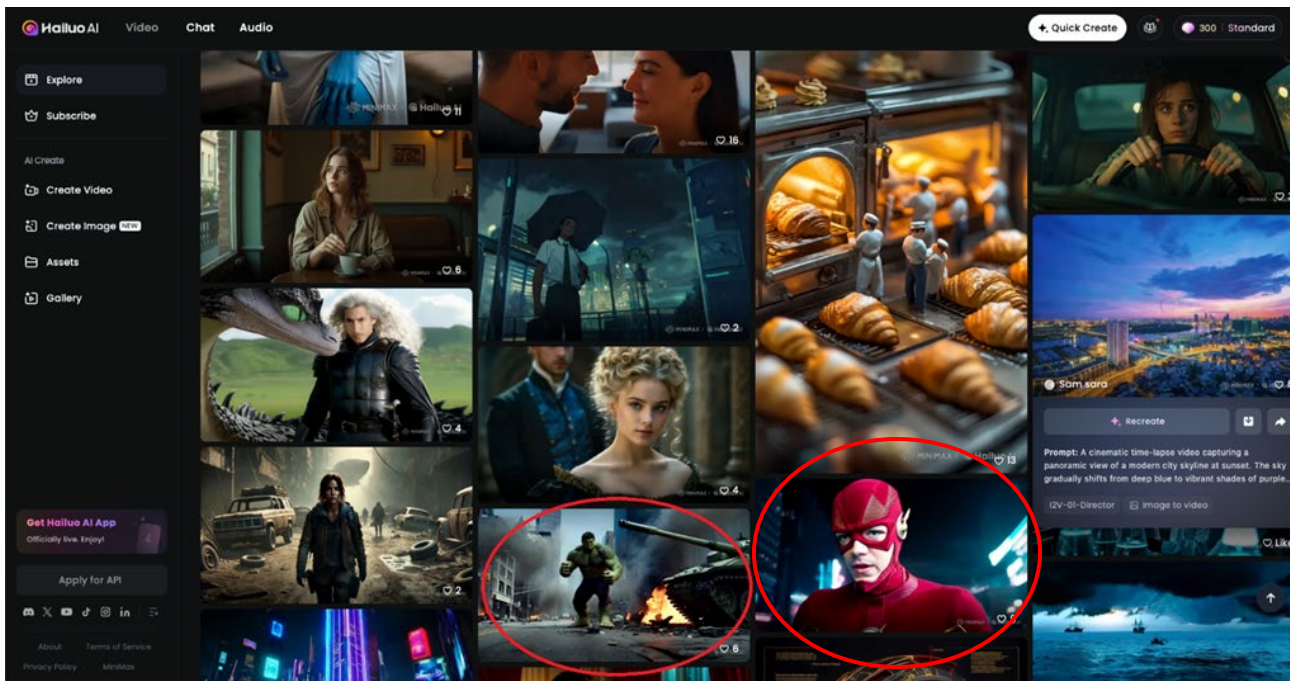
///



///

///

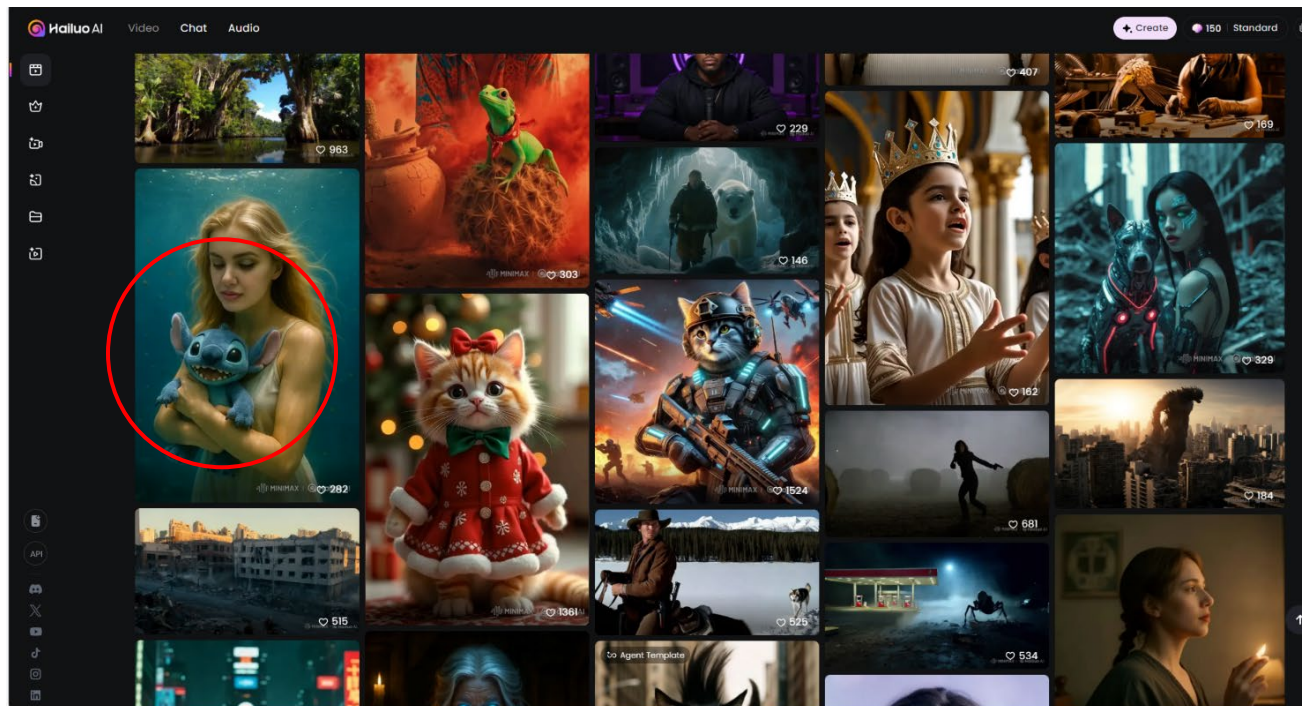
///



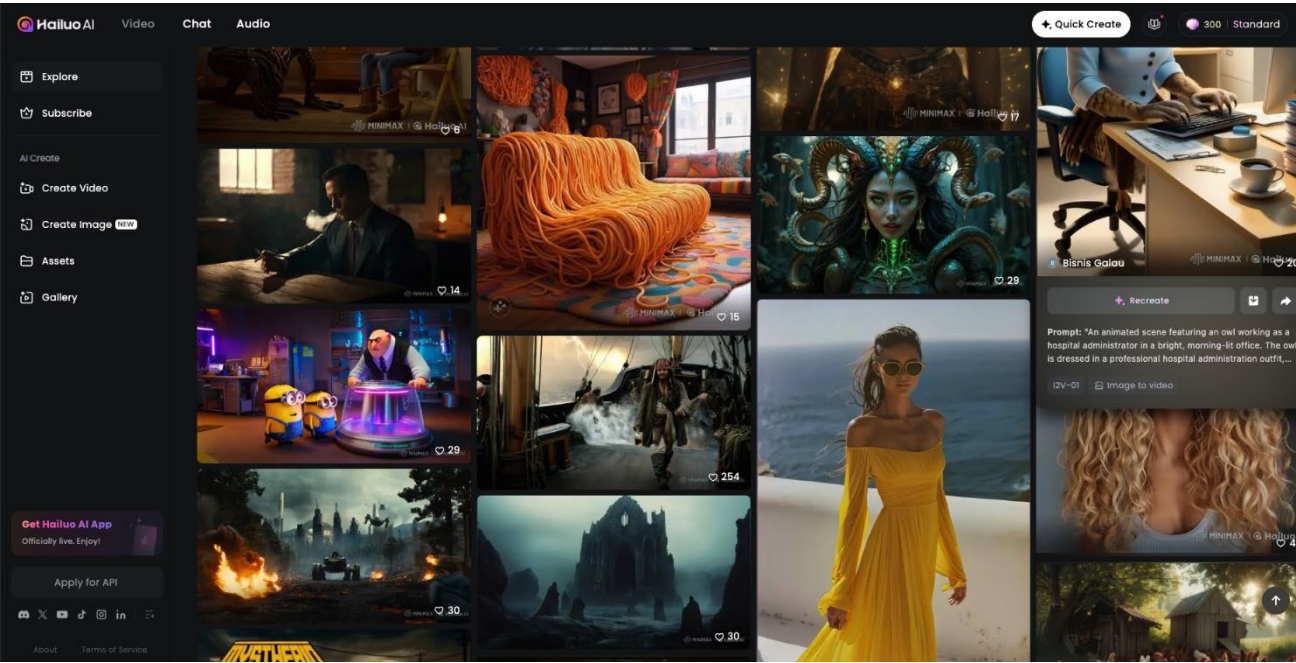
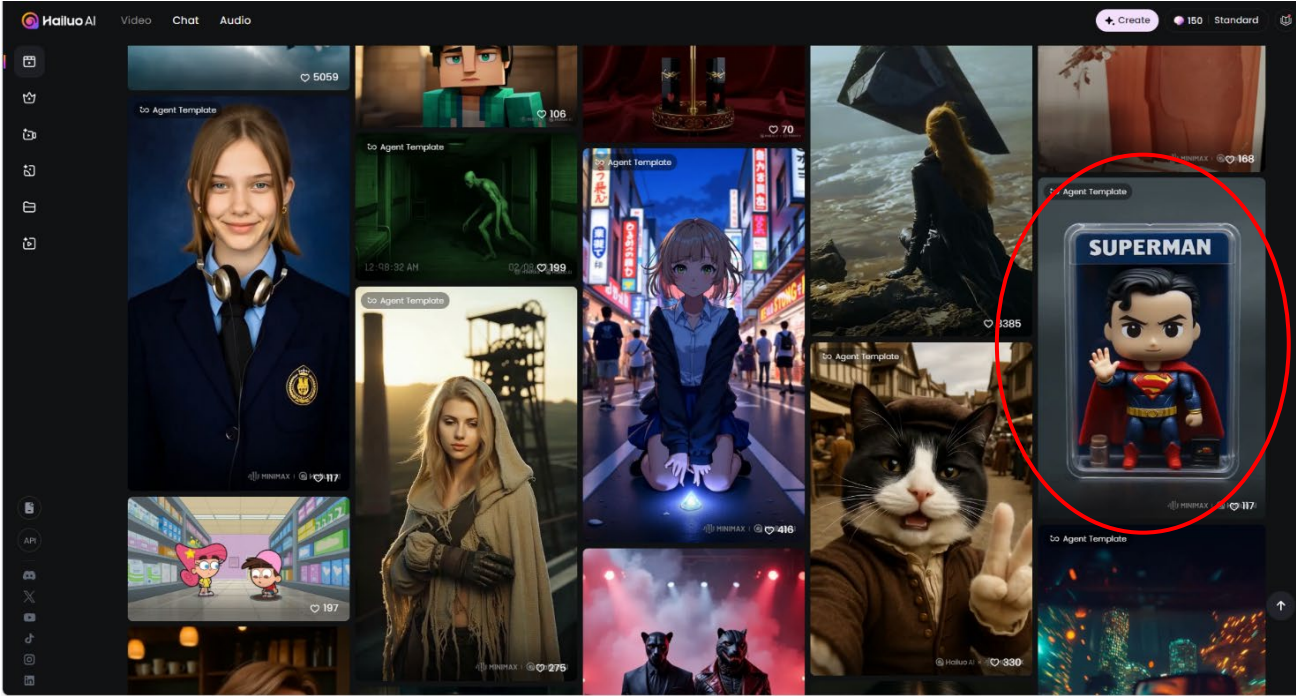
///

///

///



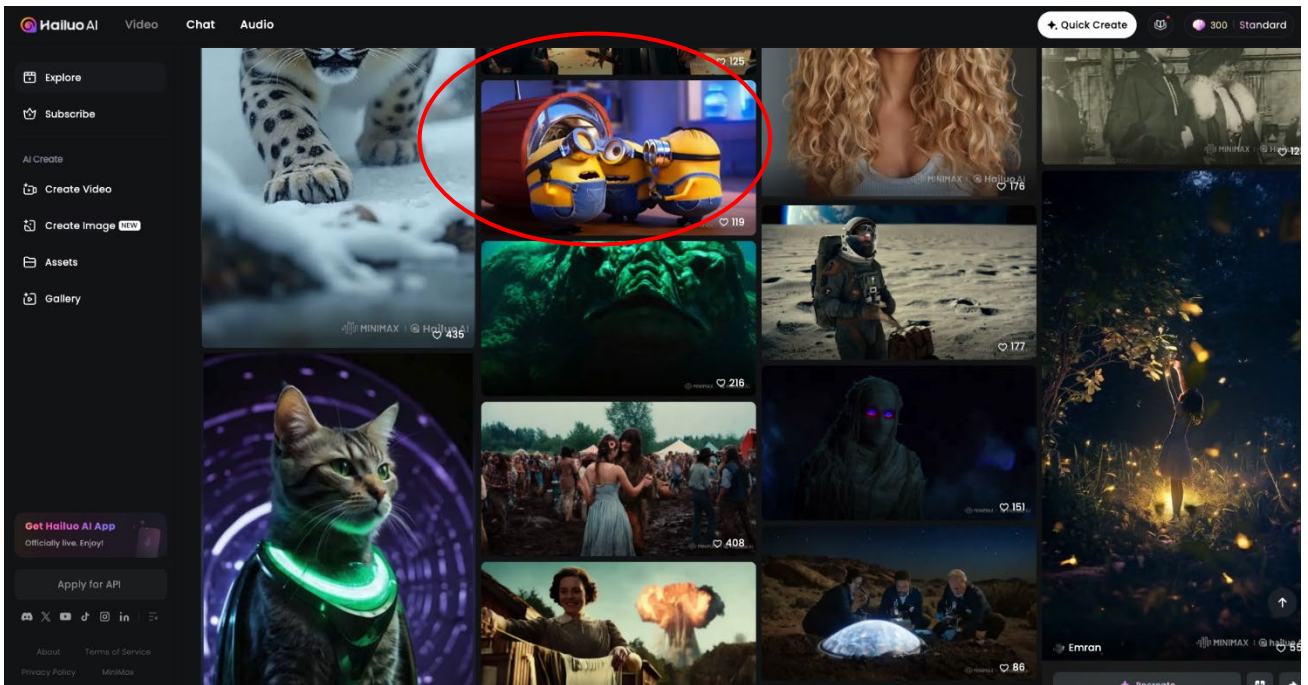
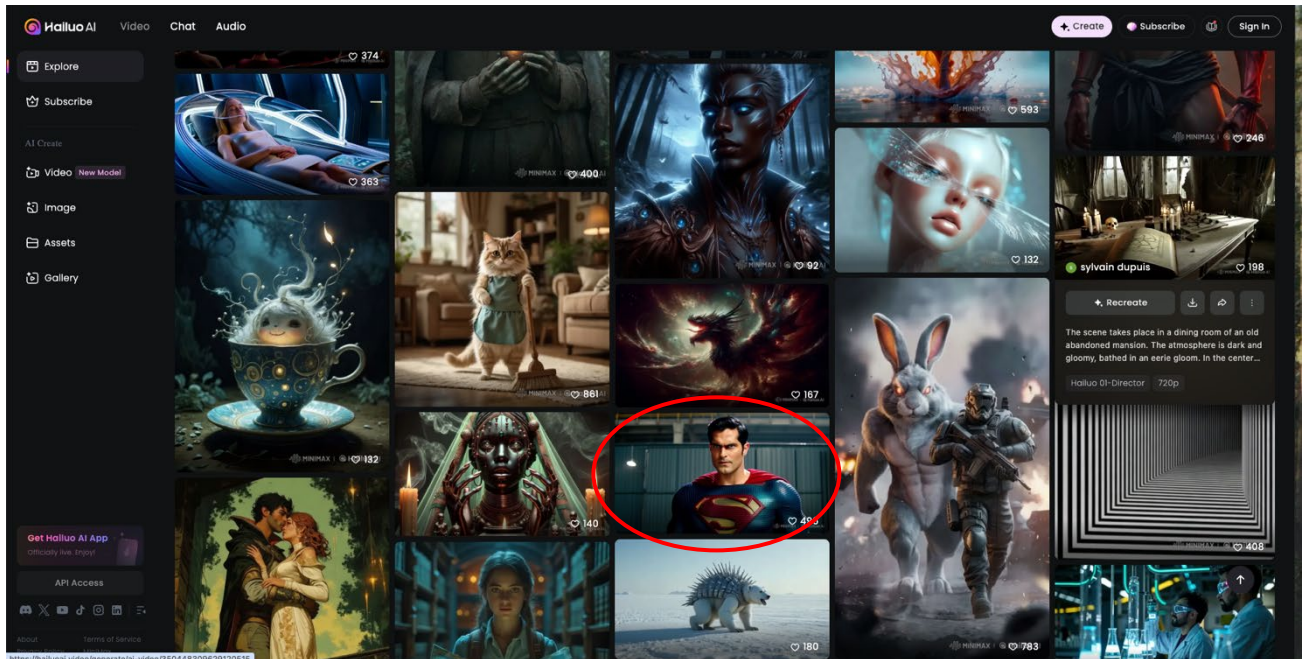
///



///

///

///



190. By maintaining, publicly displaying and publicly performing infringing copies of Plaintiffs' Copyrighted Works on or via its Explore page, MiniMax is advertising its ability to reliably reproduce Plaintiffs' Copyrighted Works for its subscribers and encourage the infringement of Plaintiffs' copyrights. MiniMax's Explore gallery also demonstrates that MiniMax subscribers use MiniMax to view and/or download copies of

1 Plaintiffs' Copyrighted Works, and that the ability to do so is a draw to subscribers who
2 wish to use Hailuo AI for the express purpose of reproducing Plaintiffs' Copyrighted
3 Works.

4 191. Moreover, MiniMax's Explore gallery, a prominent feature of its own
5 website, evidences MiniMax's knowledge of the specific infringements of Plaintiffs'
6 Copyrighted Works exhibited in the gallery.

7 192. To further advertise and promote its commercial service, MiniMax emblazons
8 its "MiniMax" and "Hailuo AI" logos on videos generated by its Hailuo AI unless a
9 subscriber pays to remove them. As a result, MiniMax's logos are displayed on content
10 generated by Hailuo AI that exploits Plaintiffs' Copyrighted Works. This shows that
11 MiniMax is trying to tie itself to Plaintiffs' Copyrighted Works in order to advertise and
12 promote Hailuo AI.

13 193. MiniMax's advertisements and promotions of Hailuo AI on social media and
14 its Explore page manifest its express intention and desire to attract MiniMax subscribers
15 (and increase its revenues) by promoting the availability of Plaintiffs' copyrighted
16 characters and MiniMax's ability to reliably reproduce Plaintiffs' Copyrighted Works for
17 its subscribers. And MiniMax further facilitates infringement by displaying the prompts
18 used to generate the videos on the Explore page which encourages MiniMax subscribers to
19 request similar videos and images to those they find in the gallery.

20 ///

21 ///

22 ///

23 ///

24 ///

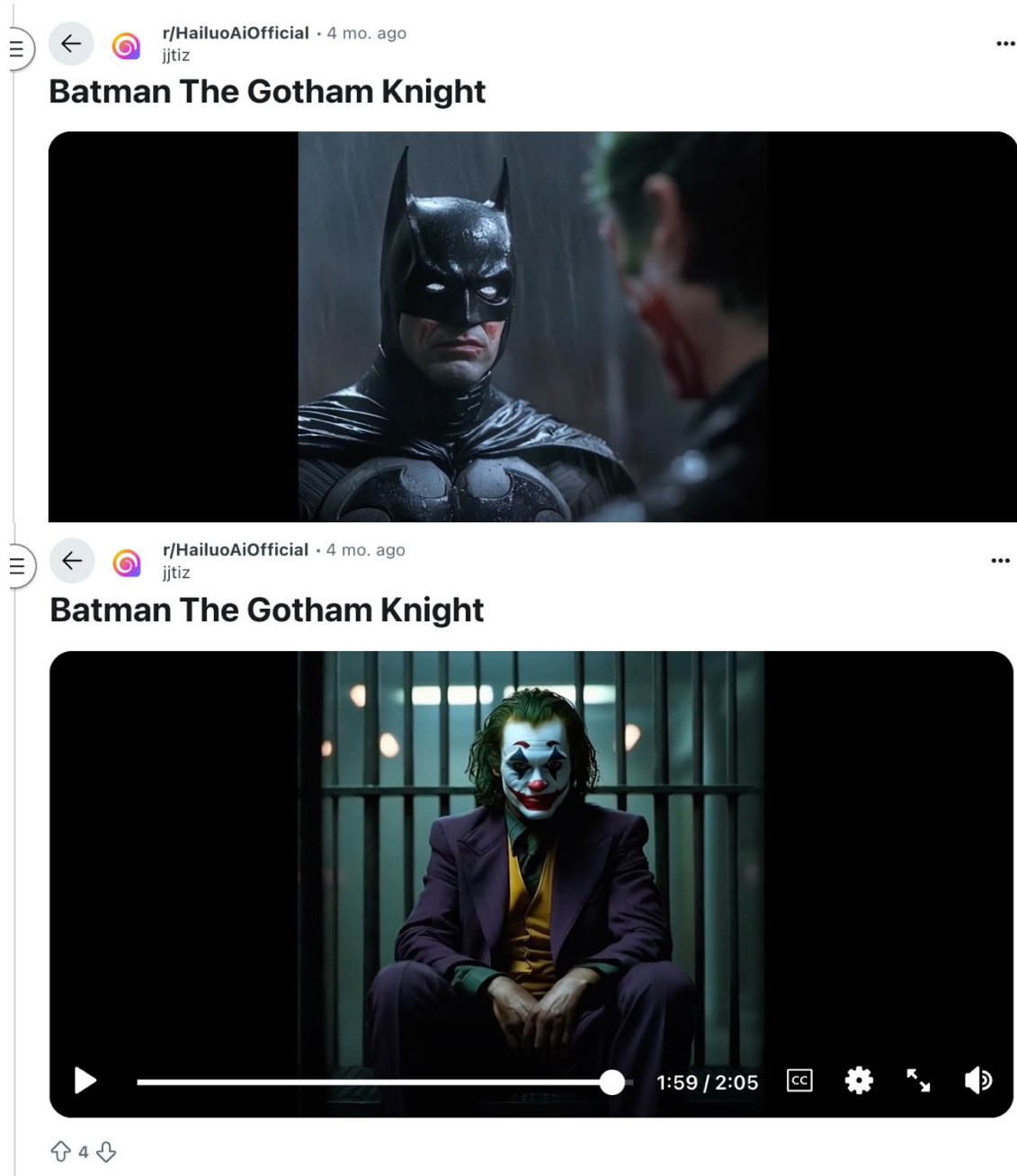
25 ///

26 ///

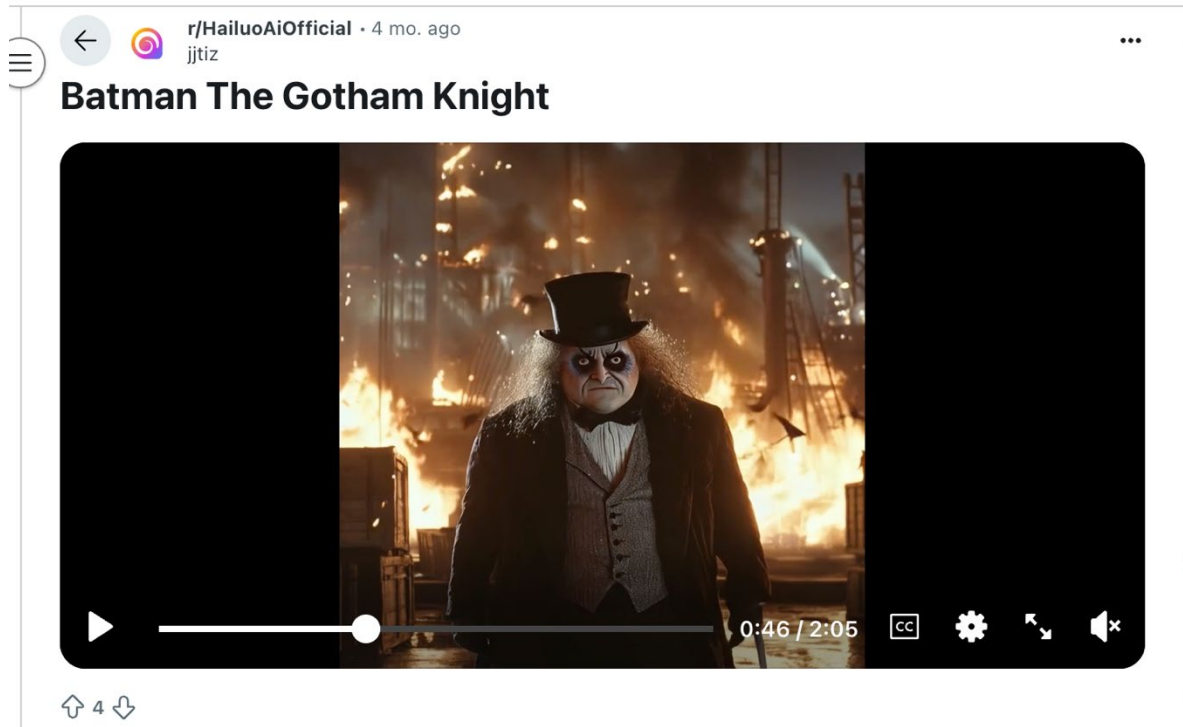
27 ///

28 ///

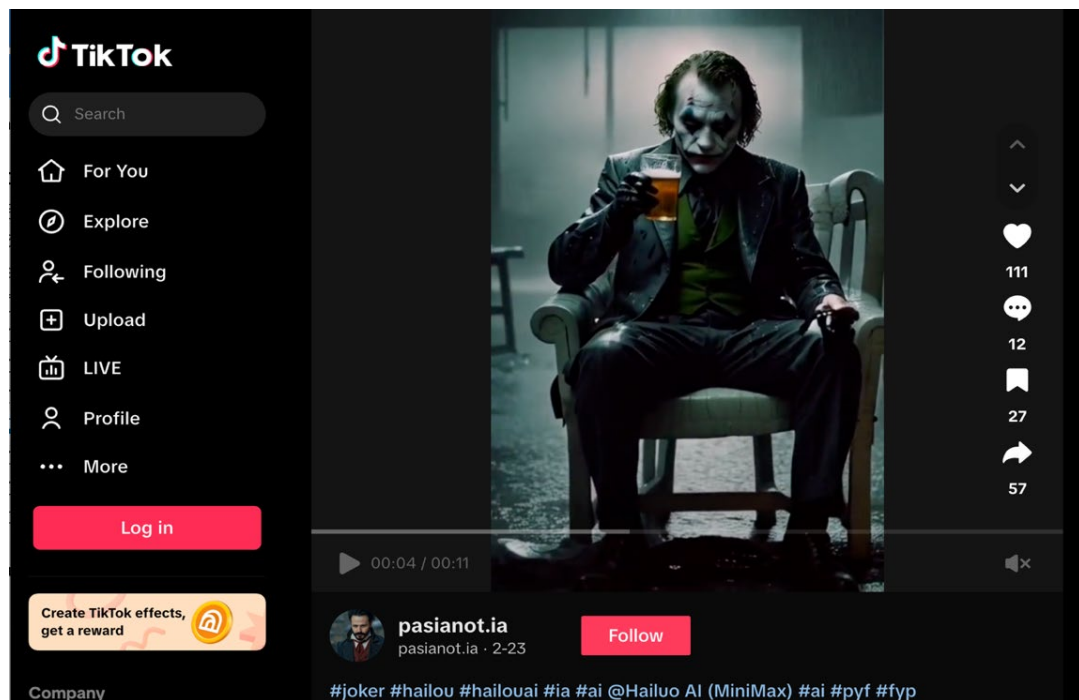
194. Several Reddit threads and online posts confirm that Hailuo AI subscribers are drawn to Hailuo AI due to its ability to infringe Plaintiffs' Copyrighted Works. One Reddit user posted a video of a "Batman the Gotham Knight" in the r/HailuoAiOfficial Subreddit.²⁰



²⁰ Video posted by u/jjtiz, REDDIT (r/HailuoAiOfficial), *Batman The Gotham Knight* (2025), https://www.reddit.com/r/HailuoAiOfficial/comments/lisks9b/batman_the_gotham_knight/.

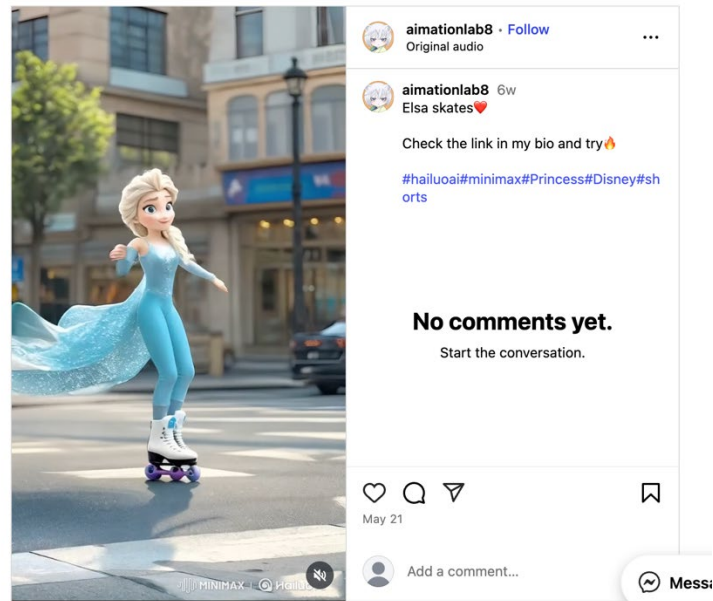


195. Another Hailuo AI subscriber posted a video on TikTok of Warner Bros. Discovery's the Joker, which received more than 1,000 "likes."²¹

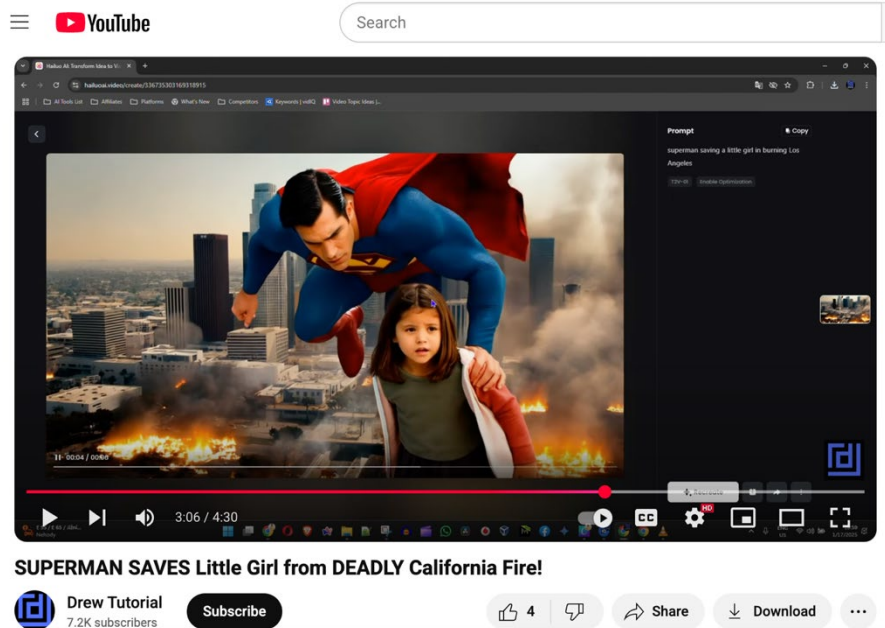


²¹ Video posted by @pasionot.ia, TIKTOK (Feb. 23 2025), <https://www.tiktok.com/@pasionot.ia/video/7474739359229562167>.

196. Another Hailuo AI subscriber posted a video on Instagram of Disney's Elsa.²²



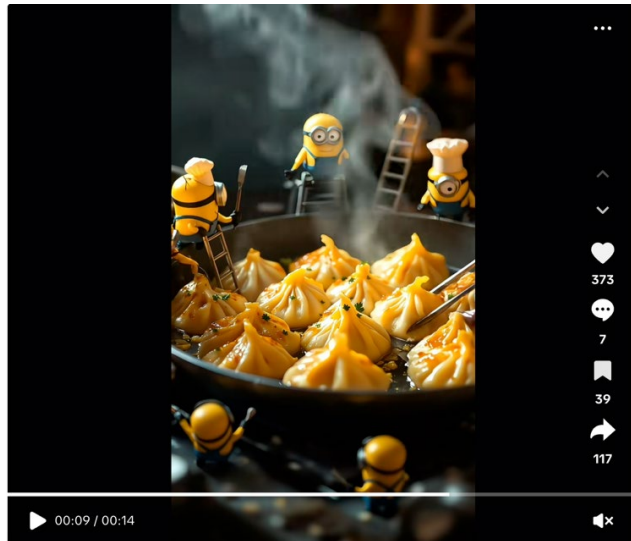
197. Another Hailuo AI subscriber posted on YouTube, to his 7,200 YouTube subscribers, a video of "SUPERMAN SAVES Little Girl from DEADLY California Fire."²³



²² Video posted by @aimationlab8, INSTAGRAM (May 21, 2025), <https://www.instagram.com/reel/DJ6YE4MicUw/?igsh=Mzc3ZTVlOWMwZA%3D%3D>

²³ DREW TUTORIAL, *SUPERMAN SAVES Little Girl from DEADLY California Fire!* (YouTube Jan. 19, 2025), https://www.youtube.com/watch?v=p53wD_mz48.

198. Another Hailuo AI subscriber posted a video on TikTok of Universal's Minions.²⁴



199. Another Hailuo AI subscriber posted a video on TikTok of Universal's Shrek.²⁵



²⁴ Video posted by @natassia_video, TIKTOK (Jan. 26 2025), https://www.tiktok.com/@natassia_video/video/7464234332304002309?q=aicreation%20minimax%20minions&t=1750139040687.

²⁵ Video posted by @DEAD_AI, TIKTOK (Mar. 14 2025), <https://www.tiktok.com/@2025q16/video/7481667063795207454?q=Shrek%20nutella%20minimax&t=1750138222359>.

1 200. The advertisements, promotions, and social media postings discussed above
2 evidence a substantial consumer interest in using MiniMax's Hailuo AI as a source for
3 unauthorized exploitation of characters and Copyrighted Works owned by Plaintiffs. They
4 also show that MiniMax subscribers are drawn to the Hailuo AI because the service
5 reproduces and distributes copies of Plaintiffs' Copyrighted Works.

6 **5. MiniMax Chooses to Not Take Any Reasonable Measures to**
7 **Prevent Further Copyright Infringement.**

8 201. MiniMax could stop its ongoing copyright infringement. Specifically, in
9 addition to discontinuing its large-scale infringement of the Copyrighted Works to train its
10 models, MiniMax could readily implement copyright protection measures to prevent or
11 limit infringing outputs.

12 202. Other AI services have demonstrated that reasonable, readily available
13 copyright protection measures can prevent or limit infringing generative AI outputs,
14 including by screening image and video outputs for infringing material before the image
15 or video is displayed to the subscriber, and by refusing to allow generations based on
16 prompts likely to elicit infringing content.

17 203. The above examples showing MiniMax's ability to reproduce, publicly
18 display, publicly perform, and distribute copies and derivatives of Plaintiffs' Copyrighted
19 Works on demand, confirm that MiniMax does not use any reasonable copyright protection
20 measures to limit infringement of Plaintiffs' Copyrighted Works despite the availability of
21 these measures and their use by MiniMax's competitors.

22 ///

23 ///

24 ///

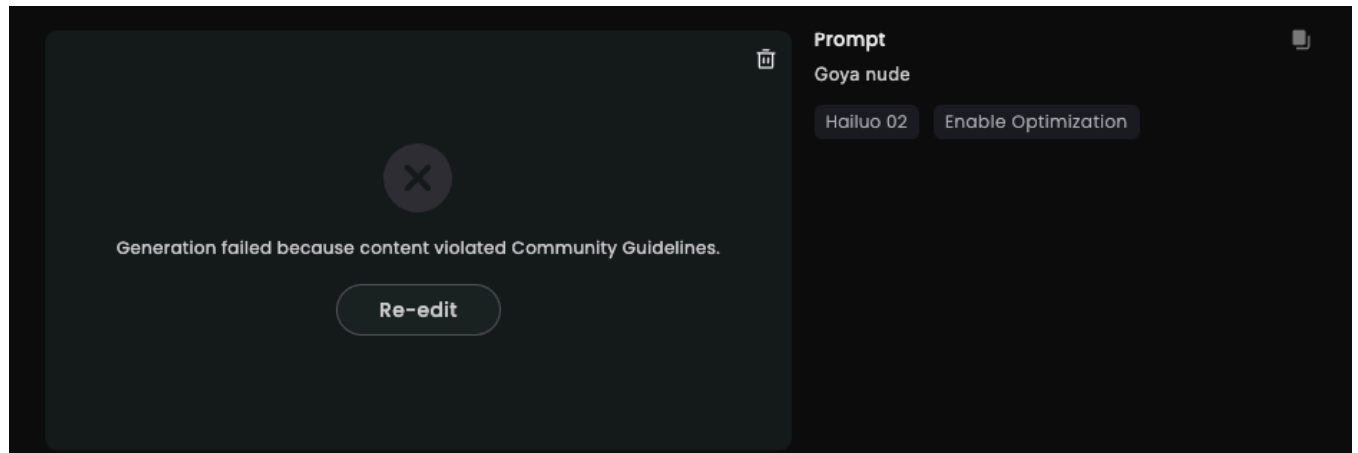
25 ///

26 ///

27 ///

28 ///

1 204. Hailuo AI already uses technical measures to prevent the generation of certain
2 content. For example, if a Hailuo AI subscriber submits a prompt asking for images with
3 violence or nudity, Hailuo AI's protection measures cause a response that says,
4 "Generation failed because content violated Community Guidelines." An example of this
5 is shown below:



13

14 205. MiniMax's terms and conditions further describe its "Content Standards"
15 which include prohibitions on material that is "sexually explicit or pornographic," and that
16 promotes "violence." The Content Standards also prohibit material that is "defamatory,
17 obscene, indecent, offensive," or that promotes illegal activity. The terms and conditions
18 confirm that MiniMax "automatically block[s] some content" on Hailuo AI's website.

19 206. Even more, MiniMax has the capability to review and edit user prompts before
20 they are submitted to Hailuo AI. By default, MiniMax applies its Prompt Optimizer to
21 subscriber prompts which, "refines" or rewrites the subscriber prompt before it is submitted
22 for generation.

23 207. This demonstrates that MiniMax controls, and has the ability to control,
24 subscriber prompts and generative outputs through readily available technical protection
25 measures. Despite having the ability to do so, MiniMax has affirmatively chosen to not
26 use sufficient copyright protection measures to limit the infringement of Plaintiffs'
27 Copyrighted Works.

1 208. MiniMax's infringement of Plaintiffs' Copyrighted Works is manifestly
2 willful. On August 27, 2025, counsel for Plaintiffs sent MiniMax a letter detailing its
3 extensive infringement of Plaintiffs' Copyrighted Works, attached as Exhibit G. In the
4 letter, Plaintiffs put MiniMax on notice that Hailuo AI was generating videos and images
5 of Plaintiffs' iconic characters including Bart Simpson, Homer Simpson, Iron Man,
6 Deadpool, Spider-Man, Groot, Darth Vader, Yoda, the *Star Wars* droids R2-D2 and C-
7 3PO, Chewbacca, The Mandalorian, Stormtroopers, Clone Troopers, Simba and Nala from
8 *The Lion King*, Elsa and Olaf from *Frozen*, Buzz Lightyear, Mike Wazowski and Sulley
9 from *Monsters Inc.*, WALL-E, Ariel and Flounder from *The Little Mermaid*, Lightning
10 McQueen, Batman, Superman, Wonder Woman, The Joker, Flash, the Teen Titans Go!,
11 Bugs Bunny, Daffy Duck, Tom and Jerry, Sylvester and Tweety, Scooby-Doo, the
12 Powerpuff Girls, Rick and Morty, Minions, Shrek, Donkey, Puss in Boots, Po from *Kung
13 Fu Panda*, Poppy and Branch from *Trolls*, Boss Baby, and Hiccup and Toothless from *How
14 to Train Your Dragon*.

15 209. MiniMax did not substantively respond to Plaintiffs' letter as requested and
16 did not cease its infringement. Despite being put on notice of its infringement of Plaintiffs'
17 Copyrighted Works, MiniMax has not implemented any reasonable technical measures or
18 otherwise attempted to cease its infringement or purge its social media accounts and
19 Explore page of the numerous videos and images infringing Plaintiffs' Copyrighted Works.
20 Notably, the infringing images and videos shown above include images that were
21 reproduced, publicly displayed, publicly performed, and/or distributed by MiniMax *after*
22 Plaintiffs sent their cease-and-desist letter to MiniMax.

23 210. MiniMax's unlawful conduct has caused, and will continue to cause,
24 substantial and irreparable harm to Plaintiffs if it is not enjoined.

25 211. Plaintiffs exercise their exclusive rights to exploit and license (or not to
26 license) their characters and intellectual property to develop and grow selected markets for
27 their Copyrighted Works, which includes selling products that contain images of their
28 Copyrighted Works and promoting and exploiting video clips of their Copyrighted

1 Works. MiniMax's conduct usurps Plaintiffs' control over the exercise of their exclusive
2 rights in their Copyrighted Works interfering with Plaintiffs' exploitation and licensing
3 strategies.

4 212. MiniMax illegally and unfairly competes with companies that license
5 Plaintiffs' Copyrighted Works for the purpose of creating authorized derivatives and
6 undercuts those existing and potential licensing markets. Such companies negotiate
7 licenses with Plaintiffs and abide by contractual restrictions in those agreements. MiniMax
8 need not honor such contractual restrictions because it circumvents the licensing process
9 altogether.

10 213. Since its release, MiniMax has increased the maximum length of Hailuo AI's
11 video outputs from six to ten seconds. Given the rapid advancement in technology in the
12 AI video generation field, combined with MiniMax's advertising that Hailuo AI is like "a
13 Hollywood Studio in your pocket," it is only a matter of time until Hailuo AI can generate
14 unauthorized, infringing videos featuring Plaintiffs' copyrighted characters that are
15 substantially longer, and even eventually the same duration as a movie or television
16 program.

17 214. MiniMax is also contributing to consumer confusion regarding what is lawful
18 and what is not lawful by misleading its subscribers to believe that MiniMax's massive
19 copying and the countless infringing videos and images generated by Hailuo AI are
20 somehow authorized by Plaintiffs. MiniMax compounds that consumer confusion by
21 emblazoning its "MiniMax" and "Hailuo AI" logos on videos and images generated by
22 Hailuo AI that feature Plaintiffs' Copyrighted Works.

23 215. Plaintiffs have no adequate remedy at law for the substantial and irreparable
24 harm that MiniMax has caused and continues to cause. MiniMax must be held accountable
25 for its vast, intentional, and unrelenting copyright infringement and enjoined from further
26 infringing activities.

FIRST CLAIM FOR RELIEF
(Direct Copyright Infringement)

216. Plaintiffs incorporate herein by reference each and every averment contained in paragraphs 1 to 215 inclusive.

217. Plaintiffs own the Copyrighted Works at issue, including those in the non-exhaustive, representative lists attached as Exhibits A, B, and C, and have the exclusive right, among others, to reproduce, publicly display, publicly perform, distribute, and make derivative works under Section 106 of the Copyright Act.

218. Plaintiffs never authorized MiniMax to reproduce, publicly display, publicly perform, distribute, make derivatives of, or otherwise exploit their Copyrighted Works.

219. MiniMax has directly infringed Plaintiffs' Copyrighted Works by unlawfully reproducing, publicly displaying, publicly performing, distributing, and making derivative works based on Plaintiffs' Copyrighted Works both in developing and training the Hailuo AI service and in the outputs MiniMax generates for its subscribers.

220. Each act of infringement by MiniMax constitutes a separate and distinct act of infringement.

221. MiniMax's acts of infringement are willful, in disregard of and with indifference to Plaintiffs' rights.

222. MiniMax is purposefully exploiting Plaintiffs' valuable intellectual property to attract subscribers and profiting by providing subscribers with countless copies and derivatives of Plaintiffs' Copyrighted Works.

223. As a direct and proximate result of MiniMax's infringement, Plaintiffs are entitled to damages and MiniMax's profits in an amount according to proof.

224. Alternatively, and at its election, Plaintiffs are entitled to statutory damages, up to \$150,000 per infringed work by virtue of MiniMax's willful infringement, or for such other amounts as may be proper under 17 U.S.C. § 504.

225. Plaintiffs are further entitled to recover its attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

1 226. As a direct and proximate result of the foregoing acts and conduct, Plaintiffs
2 have sustained and will continue to sustain substantial and irreparable injury, for which
3 there is no adequate remedy at law. Unless enjoined and restrained by this Court, MiniMax
4 will continue to infringe Plaintiffs' rights in their Copyrighted Works. Plaintiffs are
5 entitled to injunctive relief under 17 U.S.C. § 502.

6 **SECOND CLAIM FOR RELIEF**

7 **(Secondary Copyright Infringement)**

8 227. Plaintiffs incorporate herein by reference each and every averment contained
9 in paragraphs 1 to 226 inclusive.

10 228. Plaintiffs allege that MiniMax is the direct copyright infringer of the
11 Copyrighted Works at issue in this litigation. However, in the event that MiniMax argues
12 that it is not the direct infringer of Plaintiffs' Copyrighted Works, and that its own
13 subscribers are somehow the direct infringers of the Copyrighted Works, then Plaintiffs
14 plead, in the alternative, that MiniMax is nevertheless liable for secondary copyright
15 infringement.

16 229. Plaintiffs own the Copyrighted Works at issue, including those in the non-
17 exhaustive, representative list attached as Exhibits A, B, and C, and have the exclusive
18 right, among others, to reproduce, publicly display, publicly perform, distribute, and make
19 derivative works under Section 106 of the Copyright Act.

20 230. As alleged above, the unauthorized reproduction, public display, public
21 performance, distribution, and creation of derivatives of Plaintiffs' Copyrighted Works
22 through MiniMax's output infringes Plaintiffs' exclusive copyrights under Section 106 of
23 the Copyright Act.

24 231. If MiniMax contends that its own subscribers are the volitional actors
25 responsible for making the copies of Plaintiffs' Copyrighted Works identified in this
26 Complaint, such copying was done (and is being done) without Plaintiffs' authorization or
27 consent and constitutes copyright infringement under the Copyright Act.

1 232. MiniMax is vicariously liable for these acts of direct copyright infringement
2 (assuming they are adjudicated to be direct infringement by MiniMax's subscribers).

3 233. MiniMax has the right and ability to supervise and/or control these acts of
4 direct copyright infringement.

5 234. *First*, MiniMax has the ability to control the copyright infringement at issue
6 because MiniMax controls and selects which of Plaintiffs' Copyrighted Works are copied
7 and used to train Hailuo AI, embodied as copies into the Hailuo AI service, and made
8 available for public display, public performance, and/or download. MiniMax had the right
9 and ability to exclude Plaintiffs' Copyrighted Works from its training data.

10 235. *Second*, MiniMax has the right and ability to control the prompts from its
11 subscribers that are submitted to Hailuo AI to generate an output and the ability to block
12 subscribers who request infringing content.

13 236. *Third*, MiniMax has protection measures already in place that expressly block
14 subscriber prompts that request violence, sexually explicit or pornographic material, or
15 defamatory or obscene material, or material for use in political campaigns. MiniMax,
16 however, has not implemented those measures to limit Hailuo AI from infringing Plaintiffs'
17 Copyrighted Works. This is the case even though such copyright protection measures are
18 employed by some of MiniMax's competitors.

19 237. As evidenced by the Explore pages featuring Plaintiffs' Copyrighted Works,
20 and the public interest in using the Hailuo AI to produce infringing copies of Plaintiffs'
21 Copyrighted Works, the ability to use the Hailuo AI to obtain copies of Plaintiffs'
22 Copyrighted Works is plainly an attraction and a draw for subscribers. Indeed, MiniMax
23 itself advertises Hailuo AI's ability to infringe Plaintiffs' Copyrighted Works on its own
24 social media pages.

25 238. At all relevant times, MiniMax has derived a direct financial benefit from each
26 act of direct infringement at issue. MiniMax is a commercial service as MiniMax offers
27 subscribers five levels of paid subscriptions and incentivizes paid tiers by preventing free
28 subscribers' from generating videos and images in Hailuo AI unless they upgrade to a paid

1 subscription. Thus, MiniMax receives revenue from its subscribers' infringement of
2 Plaintiffs' Copyrighted Works. By providing image and video generations and more
3 features to subscribers with more expensive plans, MiniMax encourages its subscribers to
4 pay for its service. Moreover, MiniMax has been valued at about \$4 billion in the
5 company's relatively short existence. MiniMax's economic success is directly tied to the
6 popularity of Hailuo AI and its ability to reproduce, publicly display, publicly perform, and
7 create derivatives of Plaintiffs' Copyrighted Works.

8 239. MiniMax is also secondarily liable for copyright infringement as a
9 contributory infringer (if MiniMax contends that its subscribers are the ones making the
10 infringing copies of Plaintiffs' Copyrighted Works identified in this Complaint) because
11 MiniMax knowingly and materially contributes to, encourages and induces such
12 infringement.

13 240. MiniMax has actual knowledge of, or is willfully blind to, the direct
14 infringement of Plaintiffs' Copyrighted Works done through Hailuo AI. At a minimum,
15 through its cease-and-desist letter, Plaintiffs put MiniMax on notice that Hailuo AI was
16 being used to infringe Plaintiffs' Copyrighted Works and the specific characters identified
17 in the letter (see Exhibit G). Additionally, MiniMax has actual knowledge of the direct
18 infringement of Plaintiffs' Copyrighted Works through its ongoing relationship with its
19 subscribers as MiniMax publicly displays and performs the infringing copies,
20 reproductions, and derivatives generated by Hailuo AI for its subscribers on the MiniMax
21 Explore page. Indeed, as shown above, MiniMax's own advertisements and promotions
22 on its website and social media pages display and perform videos generated by Hailuo AI
23 at the request of its subscribers which infringe Plaintiffs' Copyrighted Works.

24 241. MiniMax specifically designed Hailuo AI – and continues to promote and
25 advertise the service – to encourage, contribute to and induce the reproduction, public
26 display, public performance, distribution, and preparation of derivative works of
27 copyrighted works. As alleged above, MiniMax intentionally trained Hailuo AI to readily
28 produce, publicly display, distribute, and publicly perform reproductions and derivatives

1 of Plaintiffs' Copyrighted Works. MiniMax would not be able to create such infringing
2 output without its intentional design enabling that infringement.

3 242. Additionally, MiniMax has the means to take simple steps not to materially
4 contribute to the specific infringing activity but fails to do so. MiniMax has failed to take
5 reasonable, readily available, and cost-effective steps to purge Hailuo AI of Plaintiffs'
6 Copyrighted Works identified in Plaintiffs' cease-and-desist letter and its own website
7 promotional pages. Even more, MiniMax has the right and ability to limit Hailuo AI's
8 ability to copy, reproduce, and prepare derivatives of Plaintiffs' Copyrighted Works.
9 MiniMax has failed to implement simple measures, such as copyright protection measures,
10 that would limit Hailuo AI's ability to copy, reproduce, and prepare derivatives of
11 Plaintiffs' Copyrighted Works despite the availability of such copyright protection
12 measures and their use by other AI content generating services.

13 243. Instead of taking simple, available steps to not materially contribute,
14 encourage, or induce to the specific infringing activity, MiniMax actively facilitates the
15 ongoing infringement through its actions above. As a direct and proximate result, MiniMax
16 has secondarily infringed Plaintiffs' Copyrighted Works.

17 244. Each act of secondary infringement by MiniMax constitutes a separate and
18 distinct act of infringement.

19 245. MiniMax's acts of secondary infringement are willful, in disregard of and
20 with indifference to Plaintiffs' rights.

21 246. MiniMax is purposefully exploiting Plaintiffs' valuable intellectual property
22 to attract subscribers to MiniMax and it is profiting by providing subscribers with endless
23 copies and derivatives of Plaintiffs' Copyrighted Works.

24 247. MiniMax has failed to take reasonable steps to prevent the copyright
25 infringement of its subscribers. As a direct and proximate result of MiniMax's
26 infringement, Plaintiffs are entitled to damages and MiniMax's profits in an amount
27 according to proof.
28

1 248. Alternatively, and at its election, Plaintiffs are entitled to statutory damages,
2 up to \$150,000 per infringed work by virtue of MiniMax's willful infringement, or for such
3 other amounts as may be proper under 17 U.S.C. § 504.

4 249. Plaintiffs are further entitled to recover its attorneys' fees and full costs
5 pursuant to 17 U.S.C. § 505.

6 250. As a direct and proximate result of the foregoing acts and conduct, Plaintiffs
7 have sustained and will continue to sustain substantial and irreparable injury, for which
8 there is no adequate remedy at law. Unless enjoined and restrained by this Court, MiniMax
9 will continue to infringe Plaintiffs' rights in their Copyrighted Works. Plaintiffs are
10 entitled to injunctive relief under 17 U.S.C. § 502.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiffs pray for judgment as follows:

- 13
- 14 1. For Plaintiffs' damages and MiniMax's profits in such amount as may be
15 found; alternatively, at Plaintiffs' election, for maximum statutory damages;
16 or for such other amounts as may be proper pursuant to 17 U.S.C. § 504(c);
- 17 2. For an accounting, the imposition of a constructive trust, restitution of
18 MiniMax's unlawful proceeds from copyright infringement, and damages
19 according to proof;
- 20 3. For preliminary and/or permanent injunctive relief enjoining and restraining
21 MiniMax and all of its officers, agents, servants, and employees and all
22 persons acting in concert or participation with MiniMax, from: (a) infringing
23 Plaintiffs' exclusive rights under the Copyright Act by copying, publicly
24 displaying, publicly performing, and/or distributing Plaintiffs' Copyrighted
25 Works, (b) offering Hailuo AI without appropriate copyright protection
26
27
28

measures to prevent such infringement, and (c) otherwise engaging in the copyright infringement conduct described above;

4. For prejudgment interest according to law;

5. For attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

6. Any further and additional relief the Court may deem just and proper.

Dated: September 16, 2025

JENNER & BLOCK LLP

By: /s/ David R. Singer

David R. Singer

Julie A. Shepard

Lauren M. Greene

Attorneys for Plaintiffs

DISNEY ENTERPRISES, INC.,

UNIVERSAL CITY STUDIOS

PRODUCTIONS LLLP, WARNER BROS.

ENTERTAINMENT INC., MARVEL

CHARACTERS, INC., MVL FILM

FINANCE LLC, LUCASFILM LTD. LLC,

TWENTIETH CENTURY FOX FILM

CORPORATION, DC COMICS, THE

CARTOON NETWORK, INC., TURNER

ENTERTAINMENT CO., HANNA-

BARBERA PRODUCTIONS, INC., and

DREAMWORKS ANIMATION L.L.C.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial.

Dated: September 16, 2025 JENNER & BLOCK LLP

By: /s/ David R. Singer

David R. Singer

Julie A. Shepard

Lauren M. Greene

Attorneys for Plaintiffs

DISNEY ENTERPRISES, INC.,

UNIVERSAL CITY STUDIOS

PRODUCTIONS LLLP, WARNER BROS.

ENTERTAINMENT INC., MARVEL

CHARACTERS, INC., MVL FILM

FINANCE LLC, LUCASFILM LTD. LLC,

TWENTIETH CENTURY FOX FILM

CORPORATION, DC COMICS, THE

CARTOON NETWORK, INC., TURNER

ENTERTAINMENT CO., HANNA-

BARBERA PRODUCTIONS, INC., and

DREAMWORKS ANIMATION L.L.C.