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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA

9  
10 EVOX PRODUCTIONS LLC, a  
Delaware limited liability company,

11 Plaintiff,

12 v.

13 THE LELAND STANFORD  
14 JUNIOR UNIVERSITY,

15 DOES 1-10,

16 Defendants.

CASE NO. 5:24-cv-09521

**SECOND AMENDED COMPLAINT  
FOR:**

- 17 (1) **DIRECT COPYRIGHT  
INFRINGEMENT**
- 18 (2) **CONTRIBUTORY  
COPYRIGHT INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

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1 Plaintiff EVOX Productions LLC (“**Plaintiff**” or “**EVOX**”) brings this  
2 Second Amended Complaint against The Leland Stanford Junior University  
3 (“**Stanford**”) and DOES 1-10 (collectively, “**Defendants**”), and alleges as follows:

4 **JURISDICTION AND VENUE**

5 **Subject Matter Jurisdiction**

6 1. This Court has subject matter jurisdiction over the copyright claim  
7 pursuant to 17 U.S.C. Section 501, *et seq.*, and 28 U.S.C. Sections 1331 and  
8 1338(a).

9 **Personal Jurisdiction: Stanford**

10 2. This Court may exercise personal jurisdiction over Stanford because it  
11 is a California Statutory Corporation organized under the laws of California, and  
12 upon information and belief, is headquartered in Stanford, California.

13 **Venue**

14 3. Venue for EVOX’s copyright claim is proper in the District pursuant to  
15 28 U.S.C. Section 1400(a) because, as alleged herein, Defendants are amenable to  
16 personal jurisdiction here.

17 **PARTIES**

18 4. EVOX is a Delaware limited liability company with its principal place  
19 of business in Chino, California.

20 5. Stanford is a California Statutory Corporation organized under the laws  
21 of California.

22 6. The true names and capacities of Defendants named herein as DOES 1  
23 through 10 are unknown to EVOX, who therefore sues them by fictitious names.  
24 EVOX will amend this Complaint to allege the true names and capacities when  
25 ascertained.

26 7. Upon information and belief, in performing the acts or omissions  
27 described in this Complaint, Stanford and each of the DOE defendants were acting  
28 as the principal, representative, agent, employee or alter ego of each other, and were

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1 acting within the scope of such agency or employment to commit the acts alleged  
2 herein. Each defendant sued herein aided and abetted the other with the intent that  
3 each would be successful in their mutual endeavors. Each defendant contributed to  
4 EVOX’s damages and the statutory violations alleged herein.

5 **NATURE OF THE ACTION**

6 8. EVOX has been a pioneer in the industry of automobile photography  
7 for over 25 years. During that time, it has meticulously catalogued the highest  
8 quality still images, interactive images, and videos of several thousand vehicle  
9 makes and models. EVOX licenses these images to a variety of entities in the  
10 automobile industry.

11 9. Given the proprietary methods that EVOX uses to maintain the  
12 consistency of its images, each image is a valuable intellectual property asset.  
13 Indeed, each of its images can be individually licensed. Accordingly, EVOX  
14 protects each image in its library with copyright registration.

15 10. In or around September 2020, EVOX discovered that Stanford, along  
16 with representatives of other nonparty universities, reproduced, distributed, and  
17 publicly displayed EVOX’s copyrighted images without license or authorization.  
18 This action ensues.

19 **SPECIFIC ALLEGATIONS**

20 **EVOX Develops a Comprehensive Library of Standardized**  
21 **Images That Are Each Protected By A Unique Copyright Registration**

22 11. Over 25 years ago, EVOX began developing a standardized set of high-  
23 quality digital images (“**Images**”) for every vehicle commercially available. Each  
24 year, it adds Images of approximately 500 new vehicles – representing all newly  
25 released makes, models, and trims.

26 12. EVOX’s photography team created a comprehensive set of interior,  
27 exterior, and interactive Images for each of the vehicles. The process includes an  
28 intensive post-production review.

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1 13. Over the years, EVOX has refined its process to such a degree that its  
2 images are widely regarded as the highest-quality digital automotive images in the  
3 industry. Each EVOX Image can be separately licensed.

4 14. Given their independent value, EVOX protects its intellectual property  
5 rights by securing Certificates of Copyright Registration from the Register of  
6 Copyrights for each Image. Today, EVOX owns and maintains the copyrights in  
7 more than one million Images pursuant to the United States Copyright Act.

8 **EVOX Learns that Stanford and Others are Using EVOX’s**  
9 **Copyrighted Images Without License or Authorization**

10 15. To protect its valuable intellectual property, EVOX has procedures in  
11 place to monitor the internet for the unauthorized use of its copyrighted Images in  
12 order to protect its licensing business.

13 16. In or around September 2020, EVOX discovered that representatives of  
14 Stanford, including at least one from Stanford’s Artificial Intelligence Laboratory,  
15 had scoured the internet in order to gather images of vehicles. Among the images  
16 collected were EVOX’s copyrighted Images.

17 17. Based upon EVOX’s investigation, Stanford initially used the images it  
18 gathered to develop a computer program.

19 **Stanford Reproduces, Distributes, and Publicly Displays**  
20 **EVOX’s Copyright Images as the “Stanford Cars Dataset”**

21 18. After Stanford had completed its work, it made 11,364 of EVOX’s  
22 Images publicly available from the following links at Stanford’s website:

23 [http://imagenet.stanford.edu/streetview/car\\_dataset/](http://imagenet.stanford.edu/streetview/car_dataset/)

24 <http://imagenet.stanford.edu/internal/annotations/annotations.zip>

25 19. EVOX is informed and believes that the copyrighted Images that  
26 Stanford made publicly available on its website were downloaded repeatedly by  
27 other users without license or authorization.

28 20. In fact, it appears that Stanford’s actions have facilitated the

1 unauthorized use of EVOX’s copyrighted images for commercial uses.

2 21. For instance, the company Sighthound is a for-profit company that  
3 develops advanced license plate recognition software. It has publicly stated: “After  
4 fine-tuning our model on the Stanford Cars training data, we observe that we can  
5 achieve better results compared to previously published methods.”

6 22. To date, EVOX has been able to identify the copyright registrations for  
7 7,875 of the 11,364 Images in this first set. Attached as Exhibit A is a listing of the  
8 first set of Images, including the uniform resource locator (“URL”) where they were  
9 located on the Stanford server, and the associated copyright registration number (if  
10 it has been located).

11 **Stanford Reproduces, Distributes, and Publicly**

12 **Displays a Second Set of EVOX’s Copyright Images**

13 23. EVOX learned that as recently as January 2023, Stanford made a  
14 second set of 225 of EVOX’s copyrighted Images publicly available from the  
15 following link at Stanford’s website:

16 [https://ai.stanford.edu/~jkrause/cars/car\\_dataset.html](https://ai.stanford.edu/~jkrause/cars/car_dataset.html)

17 24. Although Stanford had not created the images, it nevertheless branded  
18 the images as the “Stanford Cars Dataset.”

19 25. EVOX is informed and believes that the second set of copyrighted  
20 Images that Stanford made publicly available on its website were downloaded  
21 repeatedly by other users without license or authorization.

22 26. This second set of EVOX’s copyrighted Images were later made  
23 available from a series of third party websites. Among them:

24 [www.tensorflow.org](http://www.tensorflow.org)

25 [www.kaggle.com](http://www.kaggle.com)

26 [paperswithcode.com](http://paperswithcode.com)

27 [datasets.activeloop.ai](http://datasets.activeloop.ai)

28 [universe.roboflow.com](http://universe.roboflow.com)

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1 academicorrents.com

2 pytorch.org

3 aistudio.baidu.com

4 hyper.ai

5 27. EVOX is informed and believes that Stanford was aware that these  
6 third party websites had copied the EVOX Images from Stanford’s website, and  
7 were making them available to the public at large without license or authorization.

8 28. EVOX is informed and believes that Stanford took no action to prevent  
9 the infringement of EVOX’s Images by these third party websites, even though  
10 Stanford was aware of it.

11 29. Upon information and belief, the copyrighted Images that were made  
12 available on these third party websites were downloaded repeatedly by other users  
13 without license or authorization.

14 30. To date, EVOX has been able to identify the copyright registrations for  
15 all 225 Images in this second set. Attached as Exhibit B is a listing of the second set  
16 of Images, including the URL where they were located on the Stanford server, and  
17 the associated copyright registration number.

18 **Stanford Infringed EVOX’s Copyrighted Images Willfully**

19 31. The facts and circumstances surrounding Stanford’s use of EVOX’s  
20 copyrighted Images without authorization suggests that the infringement was  
21 willful.

22 32. For instance, in an article related to the Stanford’s use of EVOX’s  
23 copyrighted Images, Stanford acknowledged that the use of certain data . . .

24 . . . can be constrained by privacy and **copyright concerns**  
25 that prevent individual researchers from obtaining the raw  
data underlying published analyses.

26 (Emphasis added.)

27 33. In fact, in an earlier version of the same article, Stanford’s recognition  
28 of the copyright concerns was less muted. There, Stanford observed that these

1 datasets are . . .

2 . . . typically constrained by such **serious** privacy and  
3 **copyright concerns** that individual researchers cannot  
4 obtain the raw data underlying any given published  
analysis.

5 (Emphasis added.)

6 34. Thus, although Stanford was obviously aware that certain data may be  
7 protected by copyright, and that such protections were “serious,” it nevertheless  
8 appropriated EVOX’s copyrighted Images and subsequently used them without  
9 seeking license or authorization.

10 35. Stanford was clearly aware that it was collecting images from  
11 commercial sources, and that those images may be copyrighted. In the same article,  
12 it acknowledged that it “leveraged e-commerce websites” such as “cars.com” to  
13 collect the images.

14 36. After collecting EVOX’s copyrighted Images for its own use, Stanford  
15 then shared them with others without regard for EVOX’s intellectual property rights.

16 37. Stanford’s conscious infringement of EVOX’s copyrighted Images  
17 reflects a reckless disregard for intellectual property rights that apparently plagues  
18 Stanford’s other activities and operations.

19 38. For instance, an article that was posted on Stanford’s website, which  
20 was apparently authored by a representative of Stanford, is aptly titled:

21 **How I Learned to Love FAIR USE or how to bring a**  
22 **\$300,000 lawsuit down to \$0 if you’re a library,**  
**archive, or nonprofit educational institution.**

23 39. The article appears to reflect an institutional belief that Stanford and  
24 other educational institutions need not respect the intellectual property rights of  
25 others simply by virtue of their status and privilege.

26 40. In an effort to resolve the dispute, EVOX and Stanford entered into a  
27 tolling agreement effective May 31, 2023 that suspended the running of the statute  
28 of limitation.

**COUNT ONE**

**(Copyright Infringement – 17 U.S.C. § 501, *et seq.*)**

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2  
3 41. EVOX re-alleges the allegations in the preceding paragraphs as though  
4 fully set forth herein.

5 42. Each of the Images is an original pictorial work and constitutes  
6 copyrightable subject matter pursuant to 17 U.S.C. §§ 101 and 102.

7 43. Stanford was not, and is not, licensed or otherwise authorized to  
8 reproduce, distribute, publicly display, or make available the Images.

9 44. Stanford infringed EVOX’s copyrights by reproducing, distributing,  
10 publicly displaying, and making available EVOX Images without license or  
11 authorization.

12 45. First, Stanford violated EVOX’s exclusive right of reproduction when  
13 its representatives, among other things, gathered EVOX’s copyrighted Images and  
14 assembled them into a dataset on Stanford’s servers.

15 46. Second, Stanford violated EVOX’s exclusive right of distribution when  
16 its representatives, among other things, copied EVOX’s copyrighted Images and  
17 made them available to the public at large.

18 47. Third, Stanford violated EVOX’s exclusive right of public display  
19 when its representatives, among other things, made EVOX’s copyrighted Images  
20 available for download by others from Stanford’s servers.

21 48. EVOX is informed and believes that the Stanford’s infringement of  
22 EVOX’s copyrights was willful. Stanford’s representatives were aware that  
23 copyrighted materials could not be used without license or authorization, and yet  
24 they used EVOX Images anyway.

25 49. EVOX has been damaged by Stanford’s willful infringement in an  
26 amount to be determined.

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**COUNT TWO**

**(Contributory Copyright Infringement – 17 U.S.C. § 501, *et seq.*)**

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2  
3 50. EVOX re-alleges the allegations in the preceding paragraphs as though  
4 fully set forth herein.

5 51. Stanford made EVOX’s copyrighted Images available on its servers  
6 with the express purpose of sharing them with third parties that did not have license  
7 or authorization to use them.

8 52. Indeed, Stanford expected that the Images would be reproduced,  
9 distributed, and publicly displayed by other third party websites.

10 53. EVOX has confirmed that third party websites copied the EVOX  
11 Images available from Stanford’s servers and infringed EVOX’s copyrights.

12 54. EVOX is informed and believes that Stanford was aware of this  
13 infringement by the third party websites, and encouraged it in order to advance its  
14 own interests.

15 55. EVOX is informed and believes that third parties who retrieved  
16 EVOX’s Images from Stanford’s servers have used them to develop commercial  
17 products.

18 56. Stanford’s representatives were aware that the Images were protected  
19 by copyright registration because they knowingly gathered them from commercial  
20 sources.

21 57. Third parties violated EVOX’s exclusive rights of reproduction by  
22 downloading the copyrighted Images from Stanford’s servers.

23 58. Upon information and belief, many of these third parties also violated  
24 EVOX’s exclusive right of distribution and public display by further disseminating  
25 the copyrighted Images, and making them available from their own servers.

26 59. Thus, Stanford is liable for contributory infringement because its  
27 representatives materially contributed and knowingly induced others to violate  
28 EVOX’s copyrights by reproducing, distributing, publicly displaying, and making

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1 available EVOX Images without license or authorization.

2 Material Contribution

3 60. Stanford could have easily prevented the infringement of EVOX’s  
4 copyrighted Images by third parties if it had simply refrained from making them  
5 available for download by others from its servers.

6 61. To the extent that it was necessary for Stanford to store EVOX’s  
7 copyrighted Images, Stanford could have easily made them inaccessible to the  
8 public at large by implementing remedial security measures. These measures could  
9 have included password protection of the server where the Images were stored, and  
10 other forms of controlled access.

11 62. Stanford further exacerbated the infringement of EVOX’s copyrighted  
12 Images by third parties by continuing to make them available for download from its  
13 servers for an indefinite period of time. Thus, Stanford could have prevented  
14 additional infringement by simply deactivating the link to EVOX’s copyrighted  
15 Images.

16 Inducement

17 63. As a separate and independent basis for contributory infringement  
18 liability, Stanford’s conduct also induced infringement of EVOX’s copyrighted  
19 Images. Stanford’s representatives were responsible for gathering and assembling  
20 EVOX’s copyrighted Images into datasets. Stanford then distributed these datasets  
21 by making them available for download from Stanford’s servers.

22 64. The assembly, reproduction, distribution, and public display of  
23 EVOX’s images from Stanford’s servers constituted copyright infringement.

24 65. The third parties that ultimately reproduced and downloaded the  
25 datasets containing EVOX’s copyrighted Images from Stanford’s servers also  
26 infringed EVOX’s copyrights, because they did not have authorization or license to  
27 do so.

28 66. Stanford distributed the Images from its servers with the sole intent that

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1 third parties would download the images, thereby violating EVOX’s exclusive  
2 rights.

3 67. To be clear, Stanford had no other purpose for distributing EVOX’s  
4 copyrighted Images from its servers other than inducing the copyright infringement  
5 by others.

6 68. Indeed, it is standard academic practice for researchers to publish and  
7 make available datasets used to develop their work, so that other researchers can test  
8 their research methods. This is widely referred to as “peer review.”

9 69. That is precisely what happened here. In fact, Stanford has  
10 acknowledged that it distributed the datasets containing EVOX’s copyrighted  
11 Images for the express purpose of allowing other researchers to confirm the validity  
12 of its underlying research. This does not excuse Stanford’s failure to license  
13 EVOX’s copyrighted work, however, prior to sharing it with others.

14 70. Moreover, Stanford has no means of confirming that the third parties  
15 who reproduced, distributed, or publicly displayed EVOX’s copyrighted Images did  
16 so for academic purposes.

17 71. But for Stanford’s conduct, additional acts of copyright infringement  
18 by third parties would not have occurred.

19 72. EVOX has been damaged by Stanford’s contributory infringement in  
20 an amount to be determined.

21 **PRAYER FOR RELIEF**

22 WHEREAS, EVOX prays for relief as follows:

23 1. For maximum statutory damage with respect to each copyrighted work  
24 infringed, or such other amounts as may be proper pursuant to 17 U.S.C. § 504(c).  
25 Alternatively, EVOX, at its election, is entitled to damages and/or wrongful profits  
26 pursuant to 17 U.S.C. § 504(b) for each separate infringement.

27 2. For pre-judgment and post-judgment interest.

28 3. For EVOX’s costs in this action, including reasonable attorney’s fees,

1 pursuant to 17 U.S.C. § 505.

2 4. For such other and further relief as is just and proper.

3  
4 DATE: November 19, 2025

CALLAHAN & BLAINE, PC

5  
6 By:   
7 Michael Sachs  
8 Jason Casero  
9 Attorneys for Plaintiff EVOX  
10 PRODUCTIONS LLC  
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**DEMAND FOR JURY TRIAL**

In accordance with Federal Rule of Civil Procedure 38(b), Plaintiff EVOX demands a trial by jury on all issues triable by jury.

DATE: November 19, 2025

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