

Complaint for Copyright Infringement

Between:

TELUS Corporation, a foreign corporation

Plaintiff

And

DENNIS WATSON, an individual,

Defendant

JOINT CASE MANAGEMENT STATEMENT AND PROPOSED ORDER

1. **JURISDICTION AND SERVICE:** The parties do not agree on jurisdiction. I agree that this court has complete jurisdiction within the District of Northern California which is where the service provider for Youtube is located. However, since I am a resident of Canada and since the plaintiff is a foreign corporation, I do not agree this court has jurisdiction over me personally. The parties do agree that this court has the jurisdiction to settle the Youtube dispute.
2. **FACTS:** Unfortunately, the only thing the parties could agree on was to submit separate Case Management Conference Statements since the parties can't even agree on the name of the video or the Jurisdiction of the Court.
3. The parties do agree that I posted several video clips on Youtube that they had taken off on a false copyright claim. Sorry. They say it is a legitimate copyright claim, I say it is not. That is as far as the parties agree.
4. Their letter to Youtube submitted with a copy of this application lists 10 video clips I posted on you tube that they claimed copyright to. They submitted that letter and this application after I filed my counterclaim with Youtube objecting.
5. Prior to that letter they had 23 video clips taken off Youtube through a contested copyright violation claim and from a verbal threat of legal action.
6. Three of those videos were original works. They were songs written and performed by TELUS Employees about the labor dispute between them and TELUS. For TELUS to claim copyright to these songs is fraud.
7. Five of those video clips were news reports on the labor dispute which TELUS had no copyright claim on whatsoever. For TELUS to claim copyright on these news reports is fraud.
8. Three more of those video clips were private home videos taken of rallies and lawful demonstrations during the labor dispute. For TELUS to claim copyright on these home videos is fraud.

9. Three more of those video clips were private home videos of AFI violence against picketers on the picketline during the labor dispute. For TELUS to claim copyright on these home videos is fraud.
10. One of those videos was a taped leadership seminar used for leadership training within TELUS where the CEO, Darren Entwistle, mocks the sexual orientation of John Chambers, CEO of Cisco Systems. Sexual harassment and discrimination based on sexual orientation is illegal in Canada. This video clip is evidence of Darren Entwistle's continued unlawful activity.
11. Finally, eight of those video clips were excerpts from a taped TELUS training seminar called TELUS Idol. It was not called TELUS VOIP. That name was not mentioned once in the entire video. It was not about TELUS' voice over Internet protocol as falsely claimed in this application. To claim it was is a lie.
12. Their letter objects to Youtube reinstating the other videos taken off not listed in their letter, which there is no copyright claim on whatsoever, because there was a technical flaw in my counterclaim. That is malicious censorship and a defiant violation of the First Amendment. Those are the facts.
13. **LEGAL ISSUES:** I contend that I have not violated the copyright act because TELUS Idol is not copyrighted. I submit that TELUS has committed fraud by getting 14 video clips taken off Youtube that there is no possible copyright claim they have on.
14. **AMENDMENT OF PLEADINGS:** There is no amendment to the pleadings other than the fact that I plead innocent and object to being presumed guilty.
15. **RELIEF REQUESTED:** I do ask that this application be dismissed with costs.
16. **OTHER MATTERS:** I am aware of a just, speedy and inexpensive disposition of the matter, which I suggested to Mr. Lopez. Since I am unrepresented and cannot afford a lawyer, I suggested that he withdraw his application and I withdraw my counterclaim. My suggestion was without prejudice, as I simply can't afford a lawyer. I have not filed for pro se status. I would like to have a lawyer but can't afford one and certainly can't afford to pay legal costs.
17. My suggestion came with my recording my dissent that the US Constitution is supposed to guarantee free speech without having to pay large sums of money to enforce that right. The US Constitution is supposed to guarantee equal protection of the law. A rich man and a poor man are supposed to have equal protection of the law. Clearly that is not the case. My dream, like Martin Luther King of old, is simply that the Constitution be lived and not just a nice piece of paper on the wall for public relations.

Signed on this 25th day of November in the year 2007,

Dennis Watson - Defendant