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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12

13 RIOT GAMES, INC., a Delaware
14 corporation,

15 Plaintiff,

16 v.

17 SUGA PTE, LTD., a company
incorporated under the laws of
18 Singapore; IMBA TECHNOLOGY
COMPANY LIMITED, a division of
19 SUGA PTE, LTD., a company
incorporated under the laws of
20 Singapore; IMBA NETWORK LLC, a
Delaware limited liability company;
21 DOES 1-10, inclusive,

22 Defendants.
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CASE NO. 2:22-cv-00429

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

Demand For Jury Trial

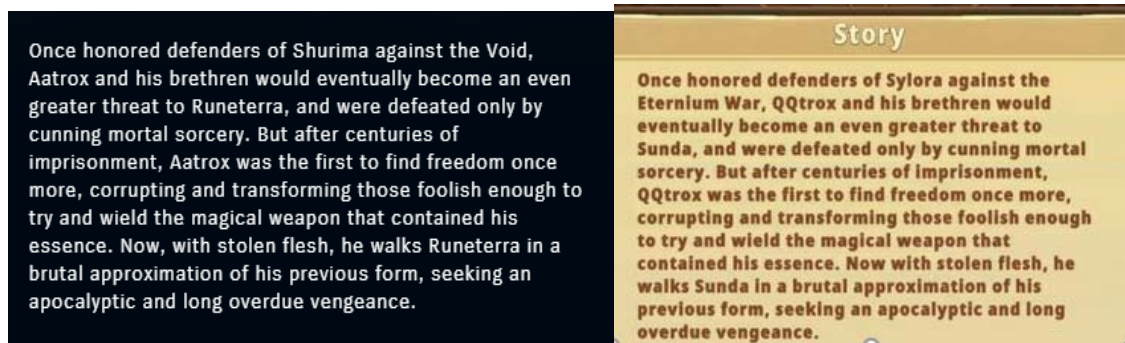
INTRODUCTION

1
2 1. Los Angeles-based Riot Games, Inc. (“Riot”) is among the world’s
3 leading video game companies and the owner of the game titled “League of
4 Legends” and its several spin-off titles (collectively, “LoL”). LoL titles include
5 “Teamfight Tactics” (available in both the LoL PC game client or as a standalone
6 mobile app) and “League of Legends: Wild Rift,” (a standalone mobile app). All
7 LoL titles feature characters (or “champions”) from LoL. LoL is among the most
8 popular games in the world, played by more than 100 million people each month.
9 LoL also is a hugely popular spectator “esport,” with live and online events that
10 attract enormous numbers of fans. LoL’s iconic and colorful “champions” are
11 recognized throughout the world, and have been featured in television programs
12 (such as Netflix’s “Arcane”), consumer products, clothing, action figures, comic
13 books, and a variety of other goods.

14 2. Unfortunately, because LoL and its champions are so popular,
15 developers of low-budget mobile games have sought to leverage that popularity
16 and goodwill by featuring knock-off versions of LoL champions in their own
17 games. Defendants Suga Pte, Ltd. Imba Technology Company, Limited; and Imba
18 Network, LLC (collectively, “Imba”), are among the latest companies to do so.

19 3. In 2020, Imba, a small mobile developer based in Vietnam but with
20 affiliates, offices or employees in California and Delaware, released via the Google
21 Play and Apple App Stores its own LoL knock-off, titled “I Am Hero: AFK
22 Tactical Teamfight” (“I Am Hero” or the “Infringing Game”). The Infringing
23 Game, whose title itself is an obvious reference to Riot’s “Teamfight Tactics” and
24 features a roster of “heroes” that Imba deliberately designed to be substantially and
25 confusingly similar to LoL’s champions. Specifically, many (if not all) of the
26 “heroes” featured in the Infringing Game are characters that bear significant
27 similarities to LoL champions, including in their character designs, names,
28 abilities, and background stories (*i.e.*, “lore”). Indeed, in many instances, Imba

1 lifted whole paragraphs of textual material *verbatim* from LoL, such as the “story”
 2 of “Qqtrox” (a character from the Infringing Game), which was copied directly
 3 from the LoL character “Aatrox,” as illustrated below. LoL is on the left, and the
 4 Infringing Game is on the right:



4. Imba not only is well aware that its game infringes Riot’s copyrights; that plainly was its intent. Imba’s company name is a nod to LoL jargon, and its employees are avid LoL players. The company even sponsors its own LoL tournaments. Moreover, in response to player comments noting the similarities between LoL and the Infringing Game, Imba stated merely “So what[.]” This response is not surprising. Since Imba’s business is dependent upon members of the public discovering (and then downloading and playing) the Infringing Game among the thousands of other mobile titles, Imba obviously hopes that its use of popular and familiar characters will help the Infringing Game stand out or make it immediately appealing to LoL players and fans.

5. Imba not only must cease its infringement, but also must account to Riot for the unjust profits it received from its use of Riot’s intellectual property. Accordingly, Riot requests that this Court order that the Infringing Game be removed from sale and award to Riot both monetary and injunctive relief.

THE PARTIES

6. Riot is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in Los Angeles, California. Riot is in the business of producing, developing, publishing, distributing, and marketing a catalog of high quality video game products, including the immensely popular game titled “League of Legends.”

7. Riot is informed and believes, and on that basis alleges, that Defendant Suga PTE, Ltd. (“Suga”) is a company incorporated under the laws of Singapore. Riot is informed and believes, and on that basis alleges, that among Suga’s divisions or subsidiaries is Imba Technology Company, Limited (“Imba”) (formerly known as Suga Studios). Imba is a mobile game development studio with its principal place of business at Ho Chi Min City, Vietnam, but with offices and/or employees in San Francisco, California and Dover, Delaware. Riot has not yet determined whether Imba is a subsidiary company of Suga (or simply a division of Suga), and will amend its Complaint once this has been determined.

8. Imba Network LLC (“Imba, LLC”) is a limited liability company registered, formed and currently existing in good standing under the laws of Delaware. Imba, LLC was formed on December 18, 2020. Riot is informed and believes, and on that basis alleges that the business address of Imba, LLC is 3500 S. Dupont Hwy., Dover, DE, 19901, but that Imba, LLC sometimes lists their business address with a typo, *i.e.*, 3000 S. Dupont Hwy. An individual named Do Tuan Minh serves as both “Head of Imba” and as a director and/or member of Imba, LLC. Imba, LLC is listed as the U.S. “seller” of the Infringing Game on Apple App Stores as well as a variety of other online app retailers. Riot has not yet determined whether Imba, LLC is a subsidiary or division of Imba and Suga, respectively, and will amend its Complaint once this has been determined.

9. The true names and capacities, whether individual, corporate, associate, or otherwise, of the defendants sued herein as Does 1-10 inclusive, are

1 unknown to Riot, which has therefore sued said defendants by such fictitious
2 names. These defendants may include individuals whose real identities are not yet
3 known to Riot, but who are acting in concert with one another, often in the guise of
4 Internet aliases, in committing the unlawful acts alleged herein. Riot will seek
5 leave to amend this complaint to state their true names and capacities once said
6 defendants' identities and capacities are ascertained. Riot is informed and
7 believes, and on that basis alleges, that all defendants sued herein are liable to Riot
8 as a result of their participation in all or some of the acts set forth in this complaint.
9 (All of the aforementioned defendants collectively are referred to herein as
10 "Defendants.").

11 10. Riot is informed and believes, and on that basis alleges, that at all
12 times mentioned in this complaint, each of the Defendants was the agent of each of
13 the other Defendants and, in doing the things alleged in this complaint, was acting
14 within the course and scope of such agency.

15 16 **JURISDICTION AND VENUE**

17 11. This is a civil action seeking damages, injunctive relief, and other
18 equitable relief under the Copyright Act, 17 U.S.C. § 101 *et seq.*

19 12. This Court has subject matter jurisdiction over Riot's claim for
20 copyright infringement pursuant to 28 U.S.C. §§ 1331 and 1338(a). Additionally,
21 this Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1332 because the
22 amount in controversy exceeds the sum or value of \$75,000, and the action is
23 between a California citizen and citizens of a foreign jurisdiction.

24 13. This Court has personal jurisdiction over Defendants because they
25 have purposefully directed their activities at the United States, and at California in
26 particular and have purposefully availed themselves of the benefits of doing
27 business in California. Riot is informed and believes, and on that basis alleges,
28 that, without limitation:

1 (a) Defendants distribute the Infringing Game in the United States and the
2 State of California through the Google Play and Apple App Store, both operated
3 from the State of California. Riot is informed and believes, and on that basis
4 alleges, that Defendants necessarily uploaded the Infringing Game to servers
5 located in the United States, and specifically requested that the Google Play and
6 Apple App Stores distribute the Infringing Game worldwide, including in the
7 United States;

8 (b) Defendants conduct extensive and ongoing business with customers in
9 the United States and the State of California, including through in-game purchases
10 made by customers in the United States and the State of California. Defendants
11 promote and advertise those in-game purchases on the Google Play and Apple App
12 Store in U.S. Dollars. Riot is informed and believes, and on that basis alleges, that
13 such in-game purchases included charges in U.S. Dollars made to customers by
14 California-based Apple, which then takes a 30% platform fee (and other assessed
15 charges) in California before remitting any payment (also in U.S. Dollars) to
16 Defendants;

17 (c) Riot is informed and believes, and on that basis alleges, that
18 Defendants created and operate a U.S. affiliate, Imba, LLC, for the purpose of
19 conducting the above-described U.S. sales and promotion of the Infringing Game.
20 Imba, LLC is listed as the “seller” of the Infringing Game on its profile page on the
21 Apple App Store as well as many other online, English-language and U.S.-facing
22 app stores. Additionally, the Infringing Game’s profile page on Google Play lists
23 Imba’s place of business as 3000 South Dupont Highway, City of Dover, County
24 of Kent, Delaware 19901. Riot is informed and believes, and on that basis alleges,
25 that the listed address includes a typographical error (*i.e.*, 3000 vs. 3500).

26 (d) Riot is informed and believes, and on that basis alleges, that
27 Defendants engage in development and maintenance activities with respect to the
28 Infringing Game in the United States, and particularly in the State of California.

1 Riot is informed, and believes, that at least one of the Infringing Game's
 2 developers carries out work on the Infringing Game from San Francisco,
 3 California, as an employee and/or agent of Imba.

4 (d) Defendants have directed their unlawful activities at Riot, including
 5 by deliberately copying and appropriating Riot's copyrighted content. Defendants
 6 did so knowing and intending that Riot would be harmed by their conduct in the
 7 United States and primarily in the State of California, where Riot has its principal
 8 place of business;

9 (e) Defendants advertise and market the Infringing Game in the United
 10 States and the State of California, and communicate directly with users in the
 11 United States, including for the purposes of soliciting downloads of the Infringing
 12 Game by such users. For example, on the official "I am Hero" Facebook page,
 13 Defendants guide users to YouTube videos about the Infringing Game, including
 14 from influencers based in the U.S. and targeting a U.S. audience.¹ Defendants
 15 likewise seek out and communicate directly with U.S. influencers to solicit
 16 feedback about the Infringing Game and create a promotional relationship.

17 (f) Defendants enter into contracts with numerous California and U.S.
 18 citizens, including each California or U.S. resident end-user that installs and plays
 19 the Infringing Game on his or her mobile device. In these contracts, Defendants
 20 include a governing law exception specifically to accommodate U.S. residents
 21 playing the Infringing Game. While all non-U.S. end-users' contracts are
 22 governed by the laws of Vietnam, U.S. residents' contracts are governed "in all
 23 respects by California law[,]" including to resolve any disputes.

24 (g) Defendants enter into contracts with, and utilize the services of,
 25 numerous U.S. companies, including domain name registrars, hosting providers,
 26

27
 28 ¹ See e.g., <https://www.facebook.com/PlayIamHero/videos/3154059441369252/>,
 directing users to "Kodeations," a U.S. based YouTube video creator.

1 and payment processors. They also enter into license agreements with U.S.-based
2 software companies for the use of software or programming tools.

3 14. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)
4 because this is a judicial district in which a substantial part of the events giving rise
5 to the claims occurred, and/or in which Riot's injury was suffered.

6
7 **FACTS APPLICABLE TO ALL CLAIMS**

8 **Riot and "League of Legends"**

9 15. Riot is a video game developer and publisher based in Los Angeles,
10 California. Riot is engaged in the business of producing, financing, developing,
11 marketing, and distributing a catalog of video games and interactive entertainment
12 products. Among Riot's games is the immensely popular game "League of
13 Legends" and its spin-offs, including "Teamfight Tactics" and "Wild Rift"
14 (collectively, "LoL"). Riot, with its partners and affiliates, develops, publishes,
15 markets, advertises, distributes, maintains, and services LoL in numerous countries
16 throughout the world. Riot owns valid registered copyrights in LoL.

17 16. LoL is a fast-paced, highly competitive online game. In LoL, two
18 five-player teams of powerful "champions," each with a unique design and
19 playstyle, battle head-to-head across multiple computer-generated battlefields and
20 in a variety of game modes and types. LoL blends the speed and intensity of a
21 "real-time" strategy game with elements of fantasy role-playing and character
22 development.

23 17. One of the defining characteristics of LoL is its roster of playable
24 champions. LoL currently allows players to choose among more than 150 different
25 champions. Each of these champions has a unique and distinctive appearance; a
26 unique set of abilities; and a specific set of animations. Each LoL champion also
27 has a unique backstory and "lore" developed around that champion. In this way,
28 LoL champions are more than just archetypes or game pieces; they are fully

1 fleshed-out characters, each driven by a different motivation and with a specific
 2 skill set that reflects the character's background and personality. LoL's champions
 3 have become so popular and beloved that they have been featured in comic books,
 4 toys, and an animated television series on Netflix. LoL's champions include, by
 5 way of example:

6 (a) **Zac**, a green, amorphous blob whose life began as a product of
 7 a toxic spill but evolved into a thinking, sentient being. Zac is depicted in LoL
 8 (and related games and merchandise) as a creature with soft green skin, a jagged
 9 mouth and horn-like protrusion from his head.

10 (b) **Heimerdinger**, a diminutive, bearded scientist and inventor
 11 who wears goggles and loves tinkering with his fantastic mechanical inventions.

12 (c) **Viktor**, a scientist whose body is part human and part metal.
 13 He seeks the advancement of humankind by obtaining a greater understanding of
 14 technology.

15 (d) **Teemo**, a furry creature with pointed ears and hat with goggles,
 16 who carries a telescopic-shaped projectile weapon. Teemo scouts the world with
 17 boundless enthusiasm and energy.

18 18. Each LoL champion possesses four unique abilities that reflect the
 19 character's distinctive personality. Each of these abilities (which grow
 20 increasingly powerful as the game progresses) has a unique and distinctive name
 21 and a particular effect on the battlefield. For example, the LoL character "Talon"
 22 has the following abilities: (1) "Noxian Diplomacy," which causes Talon to leap to
 23 a target and inflict damage; (2) "Rake," which causes Talon to toss a volley of
 24 blades that damage enemies both when released and upon their return to Talon; (3)
 25 "Assassin's Path," which enables Talon to vault over the nearest structure or
 26 terrain; and (4) "Shadow Assault," which causes Talon to disburse a ring of blades
 27 and become invisible for a short time. Each character ability is represented in the
 28 game by a distinctive and colorful piece of artwork (i.e., an "icon.")

1 19. Another distinctive element of LoL is that throughout each game, LoL
2 champions generate currency that may be spent at an in-game shop. At the in-
3 game shop, LoL players may “purchase” and temporarily acquire a variety of
4 unique equipment and items, each of which has an original name and identifying
5 icon, as well as a unique set of defined properties. These in-game items enhance
6 the statistics and strength of the player’s champion.

7 20. Each of the elements described herein, including: (1) each champion’s
8 appearance, background “lore,” and suite of abilities, (2) the ability icons that
9 represent each champion’s abilities, and (3) weapon and equipment icons, as well
10 as the overall selection and arrangement of the foregoing elements, is original,
11 creative, and constitutes Riot’s protected expression. Each of these elements either
12 is generated by LoL’s computer code or exists as an art or text file within the LoL
13 software product.

14 21. Riot possesses valid, subsisting, registered copyrights in LoL,
15 including copyright registration numbers PA 1-906-694, PA 1-397-659, and PA 1-
16 971-560. The registrations were obtained within five years of first publication, and
17 thus constitute prima facie evidence of the validity of the copyright and the facts
18 stated therein.

19 **Defendants and Their Release Of The Infringing Game**

20 22. Riot is informed and believes, and on that basis alleges, that Imba is a
21 Vietnam-based video game developer, engaged in the creation and production of
22 mobile games. Imba is a subsidiary or division of Suga, a Singapore company that
23 owns and operates several Vietnam-based companies. Imba’s games are largely (if
24 not entirely) “free-to-play” games. That is, there is no charge to download and
25 play the game. Instead, Imba generates revenue by selling virtual currency, which
26 can be used to “unlock” new characters or speed up a player’s progression in the
27 game.

1 23. Riot is informed and believes, and on that basis alleges, that in or
2 about mid-2020 Imba began offering to the public a mobile game titled *I Am Hero*
3 *AFK Tactical Teamfight* (*i.e.*, the “Infringing Game”) for Android and Apple iOS
4 mobile devices. Specifically, Imba made the Android version of the Infringing
5 Game available for download via the Google Play Store, and the iOS version
6 available via the Apple App Store, through a dedicated U.S. entity, Imba, LLC.

7 24. Riot is informed and believes, and on that basis alleges, that in order
8 to release and distribute the Infringing Game, Imba and/or Imba, LLC created a
9 developer account with the Google Play store and the Apple App Store. It then
10 uploaded a build of the game to Apple and Google servers located in the United
11 States. After Imba uploaded its build of the Infringing Game to the Google Play
12 Store or Apple App Store for distribution to the public, Google and Apple
13 reviewed and tested the Infringing Game as part of its app approval process.

14 25. Riot is informed and believes, and on that basis alleges, that before the
15 Infringing Game was distributed to the public, Imba was presented with a number
16 of options as to where it wished to make the Infringing Game available. Imba
17 specifically elected to make the Infringing Game available throughout the world,
18 knowing that doing so would enable the Infringing Game to be distributed in the
19 United States. Riot is informed and believes, and on that basis alleges, that the
20 Infringing Game has been downloaded (*i.e.*, distributed to the public) at least
21 500,000 times, including by thousands of customers in the United States.

22 26. Riot is informed and believes, and on that basis alleges, that prior to
23 or commensurate with the release of the Infringing Game, Imba engaged in a
24 significant marketing campaign that was designed to reach customers in the United
25 States. This marketing campaign included the creation of a dedicated English-
26 language website (playiamhero.com) (the “Website”), as well as numerous social
27 media pages and profiles. Specifically, Imba created a dedicated Facebook page, a
28 regularly-updated Twitter account, a Discord “server,” and Instagram account, and

1 a dedicated Reddit bulletin board. Each of these communities is designed to attract
2 and communicate with its player community, especially players who speak
3 English.

4 27. Imba also created promotional videos for the Infringing Game, which
5 it shared both on the Google and Apple platforms, as well as on social media
6 pages. These promotional videos are entirely in English, touting features such as
7 the player's ability to "Explore Unique Campaigns" and "Earn Rewards While
8 AFK." One such promotional video is depicted below.



Defendants' Access To LoL

19 28. Riot is informed and believes, and on that basis alleges, that at the
20 time Imba created and designed the Infringing Game, it had access to LoL and was
21 aware of its massive popularity. In fact, the company's name (Imba) is a reference
22 to LoL jargon for a character that is "imbalanced," *i.e.* overpowered. It also is the
23 alias of a well-known professional LoL player.

24 29. Riot is informed and believes, and on that basis alleges, that many (if
25 not most) of Imba's employees are regular LoL players, and play the game
26 regularly and competitively. Imba even holds its own LoL tournaments (the "Imba
27

Cup”) and posts videos and images showing its employees competing in LoL matches on its social media accounts, including Facebook.

Defendants’ Copying of Protectible Expression From LoL

30. The Infringing Game is what is known as an “idle” or “AFK” (“away from keyboard) tactical game. In the Infringing Game, players create a team from a roster of varying characters and then deploy their team to the battlefield to fight against computer-controlled or human-controlled opposing teams. As players progress in the game, they unlock new characters, upgrade existing characters, and purchase weapons and equipment. The Infringing Game presently contains approximately forty playable characters.

31. Riot is informed and believes, and on that basis alleges, that in order to increase the popularity and appeal of the Infringing Game, Imba, without license or authorization from Riot, populated its game with knock-off copies of LoL characters. In so doing, Imba copied from LoL an array of visual, audiovisual, and textual elements. It did so with full knowledge that its conduct was unlawful and would provoke a response from Riot, but with the hope and expectation that Riot would not discover the infringement until after the game developed a large base of players and online community and turned a profit.

32. Among the protected expression from LoL that Imba appropriated and used in the Infringing Game were Riot’s visual depictions of its LoL champions, the roles and skills for each of champion, artwork used to represent equipment or other in-game objects, and textual descriptions and stories about LoL champions. In fact, nearly every one of the heroes in the Infringing Game has a substantially similar appearance, name, backstory, set of abilities (including ability names and icons representing abilities) and set of sound effects, as their counterparts in LoL.

Infringing Elements: Character Names, Design and Artwork

33. Many, if not all, of the heroes from the Infringing Game are knock-offs of LoL champions in both name and appearance. The characters themselves are recognizably the same as LoL champions (*e.g.*, carrying the same accessories, wearing the same costumes, bearing the same bodily special features such as wings) and bear nearly identical names. By way of example, below are several side-by-side comparisons of the actual names and portrait artwork for several LoL champions and characters from the Infringing Game.²

League of Legends Champions	Infringing I Am Hero Characters
 <p>Heimerdinger (Wears goggles, large belt, carries wrench and missiles, pronounced facial hair)</p>	 <p>Dinger (Wears goggles, large belt, carries wrench and missiles, pronounced facial hair)</p>

² Each example is annotated to highlight key similarities, but the annotation is not an exhaustive description of similarities. Additionally, as noted, the illustrations in the Complaint are just a small sample of the overall infringement.



Nautilus
(Wears machined armor plates,
glowing eyes, carries large anchor
weapon)



Nautilus
(Wears machined armor plates,
glowing eyes, carries large anchor
weapon)



Viktor
(Wears hooded cape, etched armor
cuirass and faulds, carries staff with
ringed top)



Viktor
(Wears hooded cape, etched armor
cuirass and faulds, carries staff with
ringed top)

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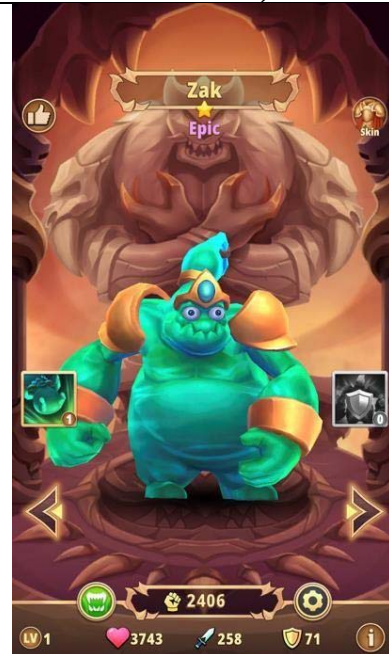
Vi
(Woman with brightly colored hair
and featuring large mechanical fists
and arms)



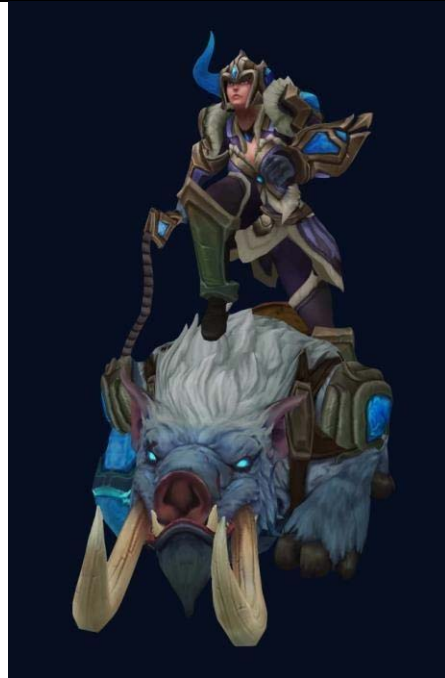
Vy
(Woman with brightly colored hair
and featuring large mechanical fists
and arms)



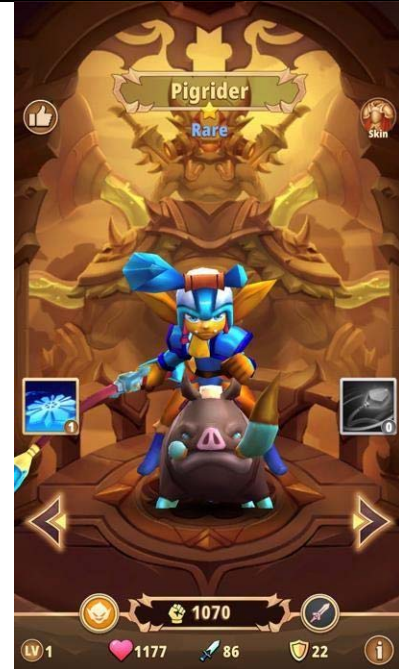
Zac
(Green humanoid creature with soft
“blob” skin and characteristics,
with a jagged mouth and horn-like
protrusion from head)



Zak
(Green humanoid creature with soft
“blob” skin and characteristics, with
a jagged mouth and horn-like
protrusion from head)



Sejuani
(Woman wearing blue horned-helmet and blue-accented armor, riding pig-like creature with prominent tusks)



Pigrider
(Woman wearing blue horned-helmet and blue-accented armor, riding pig-like creature with prominent tusks)



Talon
(Wearing hooded V-shaped cape with diamond-shaped accent on brow, right-handed sharp weapon)



Tolan
(Wearing hooded V-shaped cape with diamond-shaped accent on brow, right-handed sharp weapon)





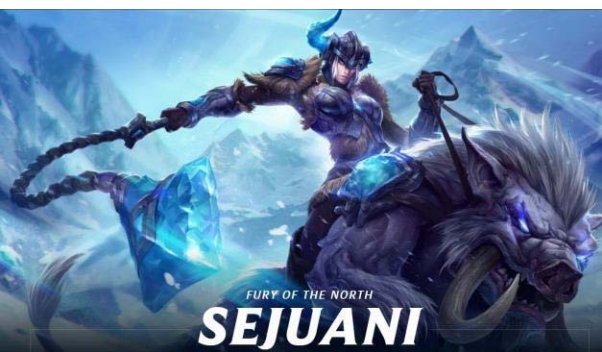

Teemo
(Furry creature with pointed ears,
hat with goggles, carrying telescopic
shaped shooting weapon)

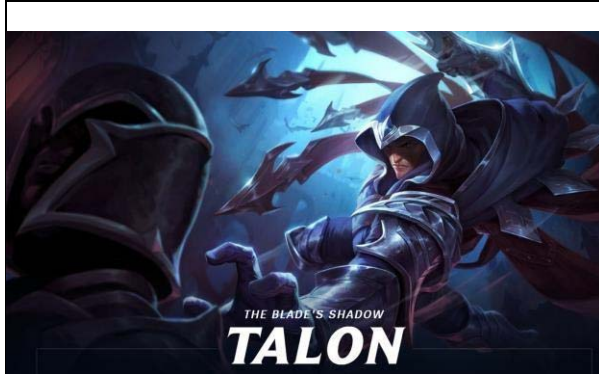


Tomee
(Furry creature with pointed ears,
hat with goggles, carrying telescopic
shaped shooting weapon)

Infringing Elements: Character Nicknames and Backstory Narratives

34. The Infringing Game also contains “stories” and nicknames for each game character. These “stories” and nicknames are nearly identical to, and largely copy/pasted wholesale from, the unique nicknames and “lore” developed for LoL champions and displayed as written narratives. By way of example, below are several side-by-side comparisons of LoL and I Am Hero nicknames and narratives.

League of Legends Champion Nicknames and Lore	Infringing I Am Hero Character Nicknames and Lore
<div data-bbox="285 268 883 617">  </div> <div data-bbox="285 646 883 882"> <p>A brilliant yet eccentric yordle scientist, Professor Cecil B. Heimerdinger is one of the most innovative and esteemed inventors Piltover has ever known. Relentless in his work to the point of neurotic obsession, he thrives on answering the universe's most impenetrable questions. Though his theories often appear opaque and esoteric, Heimerdinger has crafted some of Piltover's most miraculous—not to mention lethal—machinery, and constantly tinkers with his inventions to make them even more efficient.</p> </div> <div data-bbox="386 972 779 1041"> <p>Heimerdinger Lore “The Revered Inventor”</p> </div>	<div data-bbox="964 260 1448 659">  </div> <div data-bbox="984 667 1429 932"> <p>Story</p> <p>A brilliant yet eccentric goblin scientist, Professor Dinger is one of the most innovative and esteemed inventors Amethias has ever known. Relentless in his work to the point of neurotic obsession, he thrives on answering the universe's most impenetrable questions. Though his theories often appear opaque and esoteric, Dinger has crafted some of Amethias' most miraculous not to mention lethal machinery, and constantly tinkers with his inventions to make them even more efficient.</p> </div> <div data-bbox="992 961 1414 1031"> <p>Dinger Lore “The Venerable Inventor”</p> </div>
<div data-bbox="285 1108 883 1457">  </div> <div data-bbox="285 1516 883 1717"> <p>Sejuani is the brutal, unforgiving Iceborn warmother of the Winter's Claw, one of the most feared tribes of the Freljord. Her people's survival is a constant, desperate battle against the elements, forcing them to raid Noxians, Demacians, and Avarosans alike to survive the harsh winters. Sejuani herself spearheads the most dangerous of these attacks from the saddle of her drüvask boar Bristle, using her True Ice flail to freeze and shatter her enemies.</p> </div> <div data-bbox="418 1808 745 1879"> <p>Sejuani Lore “Fury of the North”</p> </div>	<div data-bbox="964 1077 1448 1478">  </div> <div data-bbox="984 1486 1429 1793"> <p>Story</p> <p>There is no such thing as harmony among the creatures of the Satin jungle. By bite, or claw, or pincer, or hoof, even the slightest sign of weakness means a swift death. They say the Rider is one of the most feared tribes of the Destroyer. Her Goblin's survival is a constant, desperate battle against the elements, forcing them to raid Certra, Arora, and Aras alike to survive the harsh summers. Rider herself spearheads the most dangerous of these attacks from the saddle of her boar Pumba, using her whip to chase and shatter her enemies.</p> </div> <div data-bbox="1027 1822 1377 1892"> <p>Pigrider Lore “Wrath of the South”</p> </div>



Talon is the knife in the darkness, a merciless killer able to strike without warning and escape before any alarm is raised. He carved out a dangerous reputation on the brutal streets of Noxus, where he was forced to fight, kill, and steal to survive. Adopted by the notorious Du Couteau family, he now plies his deadly trade at the empire's command, assassinating enemy leaders, captains, and heroes... as well as any Noxian foolish enough to earn the scorn of their masters.

Talon Lore "The Blade's Shadow"



Story

Tolan is the knife in the darkness, a Dark Elves killer able to strike without warning and escape before any alarm is raised. He carved out a dangerous reputation on the brutal streets of Satin, where he was forced to fight, kill, and steal to survive. Adopted by the Naga Gorgon family, he now plies his deadly trade at the empire's command, assassinating enemy leaders, captains, and heroes as well as any Satinian foolish enough to earn the scorn of their masters.

Tolan Lore "The Blade's Shade"



Undeterred by even the most dangerous and threatening of obstacles, Teemo scouts the world with boundless enthusiasm and a cheerful spirit. A yordle with an unwavering sense of morality, he takes pride in following the Bandle Scout's Code, sometimes with such eagerness that he is unaware of the broader consequences of his actions. Though some say the existence of the Scouts is questionable, one thing is for certain: Teemo's conviction is nothing to be trifled with.

Teemo Lore "The Swift Scout"



Story

Undeterred by even the most dangerous and threatening of obstacles, Tomee scouts the world with boundless enthusiasm and a cheerful spirit. A goblin with an unwavering sense of morality, he takes pride in following the Amethias' Code, sometimes with such eagerness that he is unaware of the broader consequences of his actions.

Tomee Lore "The Hasty Scout"



Once honored defenders of Shurima against the Void, Aatrox and his brethren would eventually become an even greater threat to Runeterra, and were defeated only by cunning mortal sorcery. But after centuries of imprisonment, Aatrox was the first to find freedom once more, corrupting and transforming those foolish enough to try and wield the magical weapon that contained his essence. Now, with stolen flesh, he walks Runeterra in a brutal approximation of his previous form, seeking an apocalyptic and long overdue vengeance.

Original Aatrox Lore "The Darkin Blade"



Story

Once honored defenders of Sylora against the Eternium War, QQtrox and his brethren would eventually become an even greater threat to Sunda, and were defeated only by cunning mortal sorcery. But after centuries of imprisonment, QQtrox was the first to find freedom once more, corrupting and transforming those foolish enough to try and wield the magical weapon that contained his essence. Now with stolen flesh, he walks Sunda in a brutal approximation of his previous form, seeking an apocalyptic and long overdue vengeance.

QQtrox Lore "The God Killer"



The herald of a new age of technology, Viktor has devoted his life to the advancement of humankind. An idealist who seeks to lift the people of Zaun to a new level of understanding, he believes that only by embracing a glorious evolution of technology can humanity's full potential be realized. With a body augmented by steel and science, Viktor is zealous in his pursuit of this bright future.

Viktor Lore "The Machine Herald"



Story

The herald of a new age of technology, Victor has devoted his life to the advancement of undeadkind. An idealist who seeks to lift the people of Modoon to a new level of understanding, he believes that only by embracing a glorious evolution of technology can Eternium's full potential be realized. With a body augmented by steel and science, Victor is zealous in his pursuit of this bright future.

Victor Lore "The Evil Machinist"



Zac is the product of a toxic spill that ran through a chemtech seam and pooled in an isolated cavern deep in Zaun's Sump. Despite such humble origins, Zac has grown from primordial ooze into a thinking being who dwells in the city's pipes, occasionally emerging to help those who cannot help themselves or to rebuild the broken infrastructure of Zaun.

**Zac Lore
"The Secret Weapon"**







Story

Zak is the product of a toxic spill that ran through a chemtech seam and pooled in an isolated cavern deep in Sky Kingdom's sump. Despite such humble origins, Zak has grown from primordial ooze into a thinking being who dwells in the city's pipes, occasionally emerging to help those who cannot help themselves or to rebuild the broken infrastructure of Sky Kingdom.

**Zak Lore
"The Amorphous Combatant"**

Infringing Elements: Character Gameplay Abilities

35. The Infringing Game copies not only the names, nicknames, images and backstories of LoL champions, but also the titles and substance of character gameplay abilities. By way of example, below are several side-by-side comparisons of ability titles and descriptions copied from LoL in the Infringing Game.

League of Legends Champion Abilities	I Am Hero Character Abilities
<div data-bbox="310 275 899 615"></div> <div data-bbox="310 653 899 785"> <p>PASSIVE</p> <p>DEATHBRINGER STANCE</p> <p>Periodically, Aatrox's next basic attack deals bonus physical damage and heals him, based on the target's max health.</p> </div> <p data-bbox="326 911 883 1079">Aatrox's "Deathbringer Stance" (Enhances damage inflicted by Aatrox's "next basic attack" while healing Aatrox based on attack target's health)</p>	<div data-bbox="992 260 1468 894"></div> <p data-bbox="976 921 1468 1089">QQtrox's "Harbinger Stance" (Enhances damage inflicted by QQtrox's "next basic attack" while healing QQtrox based on attack target's health)</p>
<div data-bbox="293 1129 902 1491"></div> <div data-bbox="293 1539 902 1644"> <p>UPGRADE!!!</p> <p>Heimerdinger invents an upgrade, causing his next spell to have increased effects.</p> </div> <p data-bbox="358 1829 834 1898">Heimerdinger's "Upgrade!!!" (Enhances next attack)</p>	<div data-bbox="967 1115 1471 1808"></div> <p data-bbox="1032 1835 1403 1904">Dinger's "Upgrade!" (Enhances next attack)</p>



CH-2 ELECTRON STORM GRENADE

Heimerdinger lobs a grenade at a location, dealing damage to enemy units, as well as stunning anyone directly hit and slowing surrounding units.

Heimerdinger's "CH-2 Electron Storm Grenade"
(Damages target enemy and surrounding enemies)



Dinger's "Electron Grenade"
(Damages target enemy and surrounding enemies)



RIPTIDE

Nautilus creates three exploding waves around himself. Each explosion damages and slows enemies.

DEPTH CHARGE

Nautilus fires a shockwave into the earth that chases an opponent. This shockwave rips up the earth above it, knocking enemies into the air. When it reaches the opponent, the shockwave erupts, knocking his target into the air and stunning them.

Nautilus's "Riptide", "Depth Charge"
(("[E]xploding waves" capable of "knocking" and "stunning" enemies)



Tidus' "Wrath Tides"
(("[W]aves of explosions" capable of "knocking" and "stunning" enemies)



RAKE

Talon sends out a volley of daggers that then return back to him, dealing physical damage every time it passes through an enemy. The returning blades deal bonus damage and slow units hit.

Talon's "Rake"
 ("Sends out a volley of daggers" that damage enemies "it passes through"; weapons return to character)



Shadowblade(Level 3)

Tolan sends out a volley of daggers to furthest enemy within 3 cells, dealing 100% physical damage to all enemies they pass through. The daggers linger for 0.75 seconds before flying back to Tolan, dealing 50% physical damage to all enemies they pass through.

Tolan's "Shadowblade"
 ("Sends out a volley of daggers" that damages enemies they "pass through"; weapons return to character)



BLADE'S END

Talon's spells Wound champions and large monsters, stacking up to 3 times. When Talon attacks a champion with 3 stacks of Wound, they bleed for heavy damage over time.

Talon's "Blade's End"
 (Enhanced attack "stacking up to 3 times" and causing enemy with "3 stacks of Wound" to "bleed for heavy damage")



Dagger's End(Level 3)

Tolan's attacks and abilities wound enemy units every time they deal damage, lasting 6 seconds and stacking up to 3 times. Tolan's next basic attack against a target with 3 wounds will cause the target to bleed for 200% physical damage over 3 seconds.

Tolan's "Dagger's End"
 (Enhanced attack "stacking up to 3 times" and causing enemy with "3 wounds" to "bleed for 200% ... damage")



TOXIC SHOT

Each of Teemo's attacks will poison the target, dealing damage on impact and each second after for 4 seconds.

Teemo's "Toxic Shot"
(Attack "will poison the target, dealing damage" for 4 seconds")



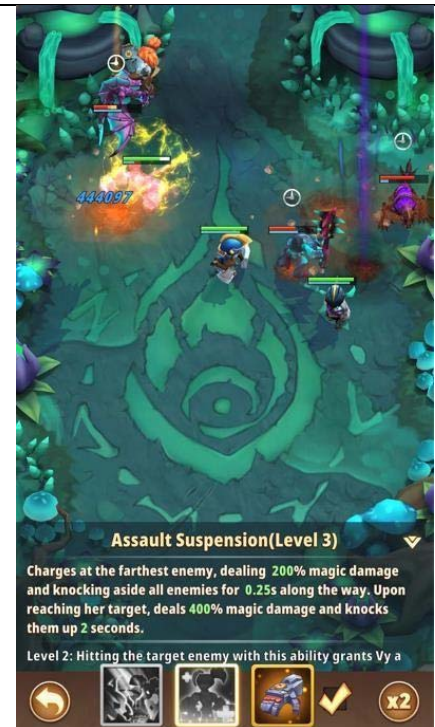
Tomee's "Toxic Shot"
(Attack "will have a poison effect, dealing ... damage" for 3 seconds)



CEASE AND DESIST

Vi runs down an enemy, knocking aside anyone in the way. When she reaches her target she knocks it into the air, jumps after it, and slams it back into the ground.

Vi's "Cease And Desist"
(Character "runs down" an enemy, "knocking aside anyone in the way" and "knocks" the target into the air)



Vy's "Assault Suspension"
(Character "charges" an enemy, "knocking aside all enemies ... along the way" and "knocks" the target")



CHAOS STORM

Viktor conjures a singularity on the field which deals magic damage and interrupts enemy channels. The singularity then periodically does magic damage to all nearby enemies. Viktor can redirect the singularity. Augment: The Chaos Storm moves 25% faster.

Viktor's "Chaos Storm"
(Character "conjures" an electric
"field" that damages nearby enemies)



Chaos Storm(Level 3)

Viktor summons an electric vortex in the center of the enemy formation which persists for 5s, dealing 70% damage per second to all enemies that are trapped in its grasp.

Level 2: Damage increased by up to 75%.

Level 3: The vortex continuously slows enemies 35% and silence

Victor's "Chaos Storm"
(Character "summons an electric
vortex" that damages enemies in
field)



GRAVITY FIELD

Viktor conjures a heavy gravitational field that slows enemies in its radius. Enemies who stay within the device for too long are stunned. Augment: Viktor's non-periodic spells apply a slow to enemies.

Viktor's "Gravity Field"
(Gravitational field slows enemies
therein and stuns them)



Gravity Field(Level 3)

For every 3 attacks, Viktor deploys a trap at the target location, existing in 4s. Whilst under the trap's effects, enemies generate a stack every 0.5s. At 3 stacks, enemies are dealt 200% damage and stunned for 1.5s.

Level 2: If the trap is not activated after 4s, it will detonate

Victor's "Gravity Field"
(Gravitational field traps enemies
therein and stuns them)



CELL DIVISION

Each time Zac hits an enemy with an ability, he sheds a chunk of himself that can be reabsorbed to restore Health. Upon taking fatal damage, Zac splits into 4 bloblets that attempt to recombine. If any bloblets remain, he will revive with an amount of Health depending on the Health of the surviving bloblets. Each bloblet has a percentage of Zac's maximum Health, Armor and Magic Resistance. This ability has a 5 minute cooldown.

Zac's "Cell Division"
(When killed, character splits into 4 sub-parts that each have a percentage of character health and abilities)



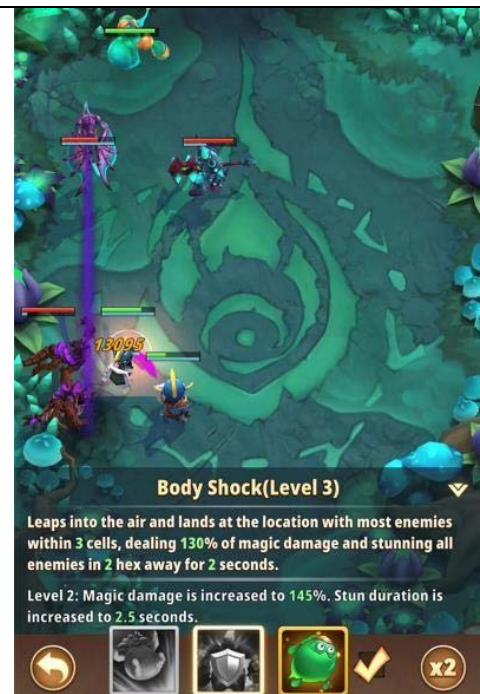
Zak's "Self-division"
(When "slain," character splits into 2 sub-parts that each have a percentage of character attributes)



LET'S BOUNCE!

Zac bounces four times, knocking up enemies hit and slowing them.

Zac's "Let's Bounce!"
(Character bounces in air, damaging and slowing enemies)



Zak's "Body Shock"
(Character "[l]eaps into the air[,] damaging and "stunning" enemies)

Infringing Elements: Character Icons

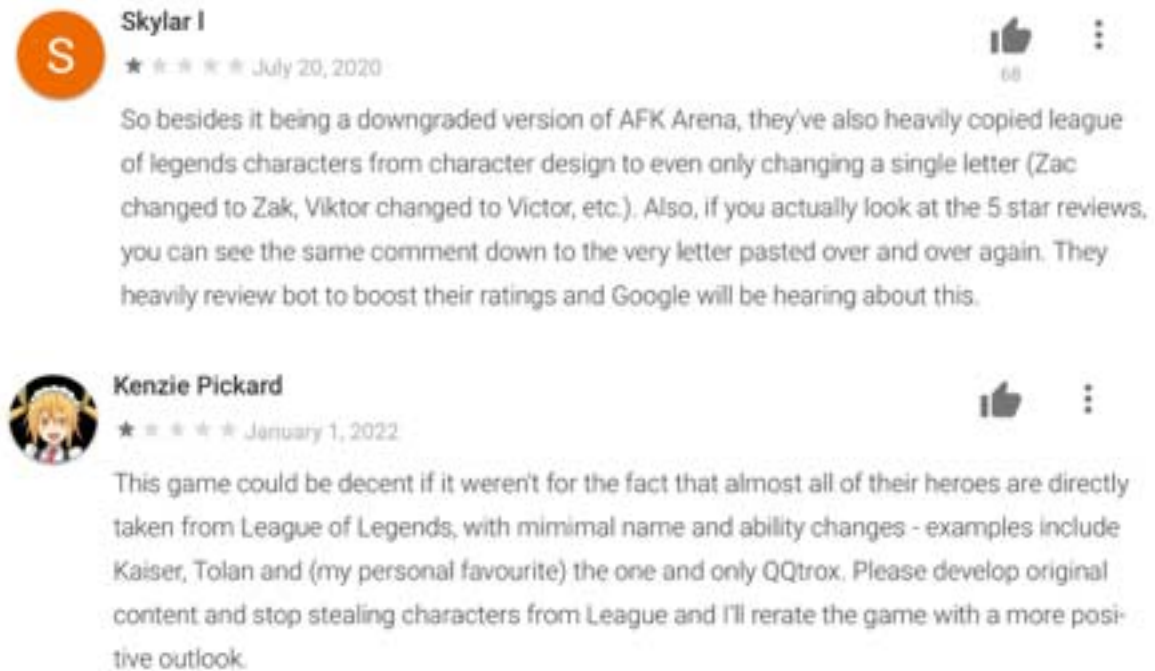
36. I Am Hero characters also bear substantially similar character and character ability icons to icons used for LoL champions. By way of example, below are several side-by-side comparisons of copied icon images.

League of Legends Icons	I Am Hero Icons
 <p>Nautilus' Titan's Wrath Icon</p>	 <p>Tidus' Staggering Blow Icon</p>
 <p>Zac's Let's Bounce! Icon</p>	 <p>Zak's Self-division Icon</p>

Imba's Willful and Intentional Infringement

37. Riot is informed and believes, and on that basis alleges, that all of the foregoing copying was deliberate and intentional and that during the development of the Infringing Game, Imba used LoL artwork as reference material, selected names that were nearly identical to the names of LoL champions, modeled each of its heroes on LoL champions, and “cut-and-pasted” textual material from LoL. Imba did so in order to broaden the appeal of the Infringing Games and entice LoL fans to download and play it.

38. Imba's plan that potential customers would recognize the Infringing Game's heroes was successful. Many players commented on the outright copying of LoL champions in the Infringing Game, such as in the following comments on the Google Play Store:



39. Riot is informed and believes, and on that basis alleges, that Imba and/or Imba, LLC reviews all or nearly all of the comments the Infringing Game received on the Google Play Store and Apple App Store, and it responds to many of them. In response to one such comment pointing out the “disgusting” and “blatant ripoff of League of Legends characters,” Defendants admitted they copied LoL. But rather than taking steps to change its game or seek a license from Riot, Defendants responded: “so what happens if our heroes are some similar (sic) to LOL heroes?”



Alexander Marzullo

★★★★★ July 6, 2020



I don't ever leave a review on apps, because I honestly don't care for it. This game is okay but the blatant ripoff of League of Legends characters is disgusting. They didn't even make the effort for making the names different; Corki is Lorki, Mordekaiser is Kaiser. All the Purple or epic grade heroes are pulled from League, abilities and everything. Just disgusting.

Imba Games July 6, 2020

Hello, We inspire from some games but we make different gameplay and create unique values, so what happens if our heroes are some similar to LOL heroes? We will try our best to improve the quality of the game. Please support us!

40. On December 17, 2021, Riot served Imba with a Cease and Desist Letter, in which it included an extensive but non-exhaustive side-by-side chart of copied characters and gameplay elements. Imba responded on December 20, 2021, admitting that some of its game's content was substantially similar to that of LoL but denying that it had engaged in copyright infringement.

COUNT I

(Copyright Infringement)

41. Riot re-alleges and incorporates by reference the allegations in paragraphs 1 through 40, as if set forth fully herein.

42. Riot is the owner of valid and enforceable copyrights in LoL. Riot has registered or applied for registration for copyrights in LoL, including PA 1-906-694, PA 1-397-659 and PA 1-971-560.

43. Defendants have deliberately and intentionally copied the characters, artwork, and other protectable expression from LoL in the Infringing Game.

44. Riot has never authorized or given consent to Defendants to use their copyrighted works in the manner complained of herein.

45. Thus, Defendants have infringed, and are continuing to infringe, Riot's copyrights by reproducing, adapting, distributing, publicly performing, and publicly displaying, and authorizing others to reproduce, adapt, distribute, publicly

1 perform, and publicly display copyrighted elements of LoL without authorization,
2 in violation of the Copyright Act, 17 U.S.C. § 501 et seq.

3 46. Defendants' acts of infringement are willful, in disregard of, and with
4 indifference to, the rights of Riot.

5 47. As a direct and proximate result of the infringements alleged herein,
6 Riot is entitled to damages and to Defendants' profits in amounts to be proven at
7 trial, which are not currently ascertainable. Alternatively, Riot is entitled to
8 maximum statutory damages of \$150,000 for each copyright infringed, or in such
9 other amount as may be proper under 17 U.S.C. § 504(c).

10 48. Riot further is entitled to its attorneys' fees and full costs pursuant to
11 17 U.S.C. § 505.

12 49. As a result of Defendants' acts and conduct, Riot has sustained and
13 will continue to sustain substantial, immediate, and irreparable injury for which
14 there is no adequate remedy at law. Riot is informed and believes, and on that
15 basis alleges, that unless enjoined and restrained by this Court, Defendants will
16 continue to infringe Riot's rights in LoL. Riot is entitled to temporary,
17 preliminary, and permanent injunctive relief to restrain and enjoin Defendants'
18 continuing infringing conduct.

19
20 **PRAYER FOR RELIEF**

21 WHEREFORE, Riot prays that this Court enter judgment in its favor on
22 each and every claim for relief set forth above and award it relief, including but not
23 limited to an order:

24 1. Preliminarily and permanently enjoining Defendants, their officers,
25 employees, agents, subsidiaries, representatives, distributors, dealers, members,
26 affiliates, and all persons acting in concert or participation with Defendants from:
27 manufacturing, producing, distributing, adapting, displaying, advertising,
28 promoting, offering for sale or selling, or performing any materials that are

1 substantially similar to LoL, and to deliver to the Court for destruction or other
2 reasonable disposition all materials and means for producing the same in
3 Defendants' possession or control.

4 2. Requiring Defendants to deliver to Riot all copies of materials that
5 infringe or violate any of Riot's rights described herein.

6 3. Requiring Defendants to provide Riot with an accounting of any and
7 all sales of products or services that infringe or violate any of Riot's rights, as
8 described herein.

9 4. Awarding Riot actual or statutory damages for copyright infringement
10 and willful infringement under 17 U.S.C. § 504, as appropriate.

11 5. Awarding Riot its full costs and attorneys' fees in this action pursuant
12 to 17 U.S.C. § 505 and other applicable laws.

13 6. Imposing a constructive trust over the proceeds unjustly obtained by
14 Defendants through the sale of the Infringing Game in the United States, and/or
15 any other products or services that violate any of Riot's rights described herein.

16 7. Awarding such other and further relief as this Court may deem just
17 and appropriate.

18
19 DATED: JANUARY 20, 2022

MARC E. MAYER
MITCHELL SILBERBERG & KNUPP LLP

20
21
22 By: /s/ Marc E. Mayer
23 Marc E. Mayer (SBN 190969)
24 Attorneys for Riot Games, Inc.
25
26
27

JURY DEMAND

Riot demands a trial by jury on all issues so triable.

DATED: JANUARY 20, 2022

MARC E. MAYER
MITCHELL SILBERBERG & KNUPP LLP

By: /s/ Marc E. Mayer
Marc E. Mayer (SBN 190969)
Attorneys for Riot Games, Inc.