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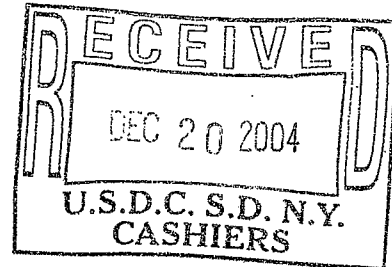
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAN BROWN and RANDOM HOUSE, INC.,

Plaintiffs,

-against-

LEWIS PERDUE,

Defendant,

LEWIS PERDUE,

Counterclaimant,

-against-

COLUMBIA PICTURES INDUSTRIES, INC., SONY
PICTURES ENTERTAINMENT INC., SONY PICTURES
RELEASING CORPORATION, IMAGINE FILMS
ENTERTAINMENT, LLC,

Additional Counterclaim
Defendants.

Civil Action No.: 04 CV 7417
(GBD)

**ANSWER WITH
COUNTERCLAIMS**

JURY TRIAL DEMANDED

Defendant, LEWIS PERDUE, ("Defendant"), by and through his attorneys,

FISCHBEIN•BADILLO•WAGNER•HARDING, LLP, answers the Complaint ("Complaint") of

Plaintiffs, DAN BROWN and RANDOM HOUSE, INC., upon information and belief, as follows:

1. As to the narrative contained in paragraph "1" of the Complaint, admits the allegations contained in the first sentence; admits the allegations contained in the first portion of the second sentence; denies the allegations in the second portion of the second sentence; admits the portion of the third sentence that alleges that Defendant claims that The DaVinci Code infringes copyrights in Defendant's works, and otherwise denies the allegations in that sentence; denies the allegations contained in the fourth sentence; and denies the allegations contained in the fifth sentence.

2. Admits the allegations contained in Paragraph "2" of the Complaint.

3. Denies the allegations contained in Paragraph "3" of the Complaint, except admits that this Court has personal jurisdiction over the Defendant.

4. Admits the allegations contained in Paragraph "4" of the Complaint.

5. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "5" of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "6" of the Complaint.

7. Admits the allegations contained in Paragraph "7" of the Complaint.

8. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "8" of the Complaint, except alleges that much of Brown's work was

based on Defendant's works, and refers the Court to the specific writings referred to in Paragraph "8" of the Complaint.

9. Denies the allegations contained in Paragraph "9" of the Complaint, and refers the Court to the text of The DaVinci Code.

10. Denies the allegations contained in Paragraph "10" of the Complaint, except admits that there are certain historical and legendary elements contained in The DaVinci Code.

11. Admits the allegations contained in Paragraph "11" of the Complaint.

12. Admits the allegations contained in Paragraph "12" of the Complaint as to a filed Certificate of Registration, but because of the infringing nature of the DaVinci Code, denies the validity of said Registration.

13. Admits the allegations contained in Paragraph "13" of the Complaint.

14. Admits the allegations contained in Paragraph "14" of the Complaint.

15. Admits the allegations contained in Paragraph "15" of the Complaint.

16. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "16" of the Complaint.

17. Denies knowledge or information sufficient to form a belief as to the allegations contained in Paragraph "17" of the Complaint.

18. Denies the allegations contained in Paragraph "18" of the Complaint.

19. Denies the allegations contained in Paragraph “19” of the Complaint, except admits that the Plaintiffs infringed on The DaVinci Legacy, published in 1983 and Daughter of God, published in 2000.

20. Denies the allegations contained in Paragraph “20” of the Complaint, and refers the Court to the text of The DaVinci Legacy.

21. Admits the allegations contained in Paragraph “21” of the Complaint.

22. Denies the allegations contained in Paragraph “22” of the Complaint, and refers the Court to the text of Daughter of God.

23. Denies the allegations contained in Paragraph “23” of the Complaint.

24. Denies the allegations contained in Paragraph “24” of the Complaint, and refers the Court to the contents of said communications.

25. Denies the allegations contained in Paragraph “25” of the Complaint, and refers the Court to the contents of said communication.

26. Denies the allegations contained in Paragraph “26” of the Complaint, except admits that Defendant accused Plaintiffs of copyright infringement and plagiarism and that certain pieces appeared in the media .

27. Denies the allegations contained in Paragraph “27” of the Complaint, except admits certain website postings and refers the Court to the content of said postings.

28. Denies the allegations contained in Paragraph “28” of the Complaint, except admits sales of The DaVinci Legacy and Daughter of God in 2004 and the sale of an option to acquire film rights to his two books.

29. Denies the allegations contained in Paragraph “29” of the Complaint, except admits certain correspondence between Defendant’s representatives and Plaintiffs and refers the Court to the specific content of said communications.

30. Denies the allegations contained in Paragraph “30” of the Complaint.

31. Denies the allegations contained in Paragraph “31” of the Complaint, and refers the Court to the specific content of said communication.

32. Admits the allegations contained in Paragraph “32” of the Complaint, except denies that anything Defendant has done has impaired any of Plaintiffs’ rights, and specifically alleges that people have questioned the legitimacy of Brown’s authorship of The DaVinci Code without any prompting by Defendant.

33. Denies the allegations contained in Paragraph “33” of the Complaint.

**AS AND FOR AN ANSWER TO THE FIRST
CLAIM FOR RELIEF AGAINST DEFENDANT**

34. Denies or admits the allegations contained in Paragraph “34” of the Complaint as have heretofore been either denied or admitted.

35. Admits the allegations contained in Paragraph “35” of the Complaint.

36. Admits the allegations contained in Paragraph “36” of the Complaint, except denies that Defendant threatened immediate commencement of suit if Plaintiffs refused to settle the dispute.

37. Denies the allegations contained in Paragraph “37” of the Complaint to the extent that said allegations purport to be statements of fact.

38. Admits the allegations contained in Paragraph “38” of the Complaint.

39. Denies the allegations contained in Paragraph “39” of the Complaint to the extent that said allegations purport to be statements of fact.

**PRELIMINARY ALLEGATIONS RELATED
TO THE COUNTERCLAIMS**

40. On information and belief, Columbia Pictures Industries, Inc. (“Columbia”) is a Delaware corporation, authorized to conduct business, and conducting business in, among other places, the State of New York.

41. On information and belief, SONY Pictures Entertainment, Inc. (“SPE”) is a Delaware corporation, authorized to conduct business, and conducting business in, among other places, the State of New York.

42. On information and belief, SONY Pictures Releasing Corporation (“SPR”) is a Delaware corporation, authorized to conduct business, and conducting business in, among other places, the State of New York.

43. On information and belief, Imagine Films Entertainment, LLC (“Imagine”) is a Delaware limited liability company, conducting business and deriving income from commerce

and/or trade within the State of New York. Columbia, SPE, SPR and Imagine are hereafter sometimes collectively referred to as “Additional Counterclaim Defendants” or “ACDs”.

44. This Court has jurisdiction over the Additional Counterclaim Defendants pursuant to CPLR 302 (a)(1) in that ACDs transact business within New York State and/or contract to supply goods or services in New York State, including, but not limited to ACDs’ agreements to create, market, sell, distribute, or otherwise arrange for the dissemination and viewing of motion pictures within New York State.

**AS AND FOR A FIRST COUNTERCLAIM
AGAINST BOTH PLAINTIFFS**

45. Defendant is the author of 19 published books, 12 novels and 7 works of non-fiction. Three of the novels are The DaVinci Legacy (“Legacy”), The Linz Testament (“Linz”), and Daughter of God (“Daughter”)(sometimes collectively referred to herein as “Defendant’s Works”). The Works tell the story of an ancient and secret brotherhood or Vatican Organization that is exposed by “world renowned” experts in either Leonardo DaVinci or religion.

46. Legacy was originally published by Pinnacle Books in 1983 and was re-published by Tom Doherty Associates, LLC in 2004 and has to date sold approximately 302,000 copies. Legacy was a best seller; in fact it was, at the time, one of four best sellers in a row authored by Defendant.

47. Defendant holds a valid copyright in and to Legacy, as evidenced by the Certificate of Registration annexed hereto and made a part hereof as Exhibit “A”.

48. Linz was published by Donald I. Fine in 1985 and Pinnacle/Kensington Publishing in 1988 and sold 155,000 copies.

49. Defendant holds a valid copyright in and to Linz, as evidenced by the Certificate of Registration, a copy of which is annexed hereto and made a part hereof as Exhibit "B".

50. Defendant reworked Linz into what became Daughter, which was published by Tom Doherty Associates, LLC in 2000 and which sold 270,000 copies.

51. Defendant holds a valid copyright in and to Daughter, as evidenced by the Certificate of Registration annexed hereto and made a part hereof as Exhibit "C".

52. The Works contain copyrightable elements and material. Defendant never transferred any rights, or granted any license, to Plaintiffs or ACDs, that would allow them to copy any protected element, concept or presentation of Defendant's Works.

53. Plaintiff, Brown, purported to author The DaVinci Code ("Code") in 2002.

54. Upon information and belief, Code was published by Doubleday in 2003.

55. All three of Defendant's Works were published before Code was published in 2003, and thus Brown had access to Defendant's Works prior to his purported authorship and publication of Code. Notably, another of Brown's novels, Angels & Demons (published in 2000), strongly resembles significant elements contained in two novels authored by Defendant-to wit, The Tesla Bequest (published in 1984) and Linz (1985).

56. Defendant's Works are all historically based thrillers that tell the story of art and/or religion experts racing to decipher clues hidden in Leonardo DaVinci's works or other artworks and to unlock one of the world's most baffling religious mysteries.

57. After publication of Code, in or about the Spring of 2003, Defendant began receiving unsolicited emails and other communications from readers calling his attention to similarities between his books and Code.

58. In or about May of 2003, however, after reading a book review of Code in The Washington Post, and then giving the previous communications renewed attention, Defendant bought and read Code. While and after reading Code, Defendant felt not only that he had read Code, but that he had written it.

59. Astounded by the similarities between Code and his novels, in or about mid-May, Defendant-with neither legal representation nor an intention to sue-contacted Plaintiff Random House to determine the identity of the person(s) with whom he could discuss the similarities.

60. Random House refused to provide Defendant with the appropriate contact information, and Defendant, in or about late May of 2003, was able to ascertain that the General Counsel of Random House was Katherine Trager (who was likewise an officer of Random House).

61. In late May of 2003, Defendant wrote to Ms. Trager, outlining, in part, details of some of the similarities between Code and Daughter. Defendant asked Ms. Trager to contact him to discuss the similarities. At that time, Defendant did not include an outline of the

similarities between Code and Legacy; nor did he make any threat (in his letter to Trager or otherwise) about suing anyone for copyright infringement.

62. After waiting in vain for approximately two weeks for Ms. Trager (or anyone else from Random House) to contact him, Defendant contacted Newsweek magazine, and Newsweek published a story on the controversy.

63. Thereafter, in mid-June of 2003, after taking time to circle the wagons, Plaintiffs, via their counsel, Ms. Trager, responded to Defendant with a vehement and threatening denial, stating, among other things, that “[Y]ou should be aware of the fact that, should you bring any action, as you have threatened in the media, Doubleday and Mr. Brown would vigorously defend the action and seek attorneys’ fees. You should be further advised that Doubleday has obtained awards of attorneys’ in similarly meritless cases alleging copyright infringement”.

64. Thus, in response to his request for information and a person to talk to, Plaintiffs threatened Defendant with the wrath of Random House (the largest publisher in the United States) and its parent company, Bertelsmann, (the largest publisher in the world), stating clearly that Defendant would be faced with claims for substantial sums in legal fees should he seek to pursue his rights any further.

65. With the threat delivered by Random House and its counsel, all communication between the parties was effectively cut off before it began.

66. Thereafter, in an effort to determine, among other things, how the reading public viewed the similarities between Code, Legacy, and Daughter, Defendant created an online

forum, posted the correspondence to Ms. Trager referred to above, and requested readers' opinions and thoughts.

67. At no time up to this time had Defendant publicly accused Brown of plagiarism.

68. In or about October of 2003, Defendant learned of and then contacted a forensic linguist and requested that an analysis be done to compare the similarities between Defendant's Works and Code.

69. In or about December of 2003, after Defendant had provided the forensic linguist with copies of all of the books in question, the forensic linguist concluded that Brown had "no doubt" plagiarized Defendant's Works.

70. Thereafter, the forensic linguist provided Defendant with a preliminary analysis, pointing out hundreds of substantial and striking similarities between Defendant's Works and Code, in virtually every aspect of the books including, but not limited to, characters such as the heroes or heroines (physical appearance, background) and the "shapeshifter" type who initially appears to be an ally, but is later shown to be an antagonist, plot (lines, sequences and similarities), certain aspects of the discoveries of the documents in the books, the role of the Church, symbolism (evidencing the author's view of history), overall structure, style, pacing, specific elements [e.g., golden key in painting], and even a virtually identical title. The aspects of the substantial and striking similarity between Defendant's Works and Code are more fully set forth in paragraphs "71" through "87" below.

GENERAL PLOT SIMILARITIES¹

71. The books are about a quest by an identical hero, and an identical heroine, seeking extraordinary documents (158, 73, 73) that prove the divinity of (256, 175, 175) the identical sacred woman who had been wronged by the church and who is a symbol for the Great Goddess.

72. The documents will shake the foundations of the Catholic Church (239, 226, 56). The documents are so incredible they explode (158, 175, 175).

73. The quest is launched by the murder of an art expert (11, 29, 3), who is dying when we first see him in the book (3, 29, 3), and who has a very nice office (26, 2, 2). The art expert is the fourth member of his group to be killed. The art expert is about the same age (76, 79, 146) and appearance (35, 28) and knows the hero (22, 15). The hero is accused of the art expert's murder (47, 260).

74. The art expert, who is the fourth of his type, writes his last message on his own body in his own blood (35, 35). The message sets the hero and heroine off on their quest. The message is an awesome religious puzzle (234, 252) that provides the heroine a clue leading to a painting (132, 55, 55) which was painted on wood (133, 52, 52), and whose name refers to the woman being worshipped in the book. The painting provides the heroine with a gold key, but no instructions on how to use it. The gold key turns no tumblers (139, 367, 367). Gold keys are rare in the real world because of their impracticality due to gold's softness. The golden key provides access to a safe deposit box in a Zurich Bank (171, 276, 277). The safe deposit box holds another a container requiring a combination (197, 316, 316). The contents of the container

¹ Where page numbers appear in the text of paragraphs 71 through 82, they are references to the page numbers of the hardcover edition of *Code*, the 1983 softcover edition of *Legacy*, and the softcover edition of *Daughter of God*, respectively.

from the safe deposit box are another puzzle that sends them on a quest for a container of religious relics and documents (285, 316, 316).

75. The Quest is further complicated by a secretive brotherhood with a contentious relationship with the Vatican headed by a man of the cloth who believes the Catholic Church has strayed and that his Brotherhood's way is the true faith.

76. The hero and heroine are stalked by a "hulk" assassin (12, 8, 66). The hulk assassin is an "educator" or directed by one (12, 8). When the hero and heroine are desperate and being pursued by the police, they turn to a former colleague, a member of the British upper-crust (218, 277). The hero and heroine need help for the journey and turn to a shapeshifter who joins the Quest (219, 221, 221). The shapeshifter is very well educated (227, 39, 23), snobbish and wealthy (217, 39).

77. The Shapeshifter manipulates the hero and heroine and also manipulates the head of a key religious brotherhood. The shapeshifter has no compunction about killing those close to him (387, 7). The shapeshifter has an intense emotional relationship with the Catholic Church and is motivated by that (412, 73, 73).

78. Leonardo's Codex Leicester is used to make an important plot point and the same mistake of fact is duplicated in Code (300, 18). No evidence has been discovered to indicate that the same mistake has ever appeared in any other work.

79. Key to the documents is proof that the church has conducted a spin campaign to smear the Goddess in order to support the male-domination in church ranks (37, 110, 110). The

actions are called a cover-up (249, 317, 317). The cover-up is necessary because Jesus was a feminist (248, 205, 205).

80. The hero and heroine are cornered by a lower-ranking police officer and his fear of acting without his superior causes him to hesitate and allows the hero and heroine to escape (270, 339). Events force a low-ranking policeman to pursue the hero and heroine, but he loses them (280, 343).

81. A dramatic scene of life and death with the hero and heroine present takes place in a rarity in Christian architecture, a round church (343, 348). The shapershifter acquires the prize from the hero and heroine (361, 372, 372). When the hero and heroine find themselves at a loss for direction, they turn to a computer database for help (377, 293). Access to the database is granted via an upper-crust British citizen. The shapeshifter almost wins but ultimately loses the prize (424, 396, 396).

82. The heroine herself is a descendent of and a symbol for the Goddess. The denouement concludes without the prize/Grail in hand and the sentiment (445, 409, 409) that the physical objects are not important, but that the mystery and faith are the real prize (444, 415, 415).

83. SPECIFIC PLOT SIMILARITIES

Some of specific plot similarities are as follows:

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
The book concerns the attempts of the protagonist, Dr. Robert Langdon to	The book concerns the attempts of the protagonist, Curtis Davis to solve the	The book concerns the attempts of the protagonist, Dr. Seth Ridgeway to solve

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
solve the murder of Jacques Saunière the curator of the Louvre Museum in Paris. The title of the novel refers, among other things, to the fact that Saunière's body is found inside the Louvre naked and posed like Leonardo da Vinci's famous drawing, Vitruvian Man, with a cryptic message written on his torso in his own blood [on page 35].	murder of Geoffrey Martini, a prominent Da Vinci scholar who has been found murdered in Amsterdam with a cryptic message written on his torso in his own blood [on page 35].	the disappearance of his wife, Zoe following the murder of Willi Max, a wealthy art curator/collector in Zurich. Missing are works by Da Vinci and a mysterious ancient manuscript hinting at a Vatican cover-up of the divinity of women.
The interpretation of hidden messages inside Da Vinci's famous works, including the Mona Lisa and The Last Supper figure prominently in the solution to the mystery.	The interpretation of hidden messages inside Da Vinci's famous works, including the Codex Leicester and involving The Last Supper and Da Vinci's inventions figure prominently in the solution to the mystery.	The interpretation of hidden messages in ancient manuscripts and works of art figure prominently in the solution to the mysteries.
<p>The main conflict in the novel revolves around the solution to two mysteries:</p> <p>What secret was Saunière protecting that led to his murder? Who is the mastermind behind his murder?</p>	<p>The main conflict in the novel revolves around the solution to two mysteries:</p> <p>What secret was Martini protecting that led to his murder? Who is the mastermind behind Martini's murder?</p>	<p>The main conflict in the novel revolves around the solution to two mysteries:</p> <p>What secret was Max protecting that led to his murder and Zoe's disappearance? Who is the mastermind behind Max's murder and Zoe's disappearance?</p>
PLOT FOCUS While much press has focused on the purported	PLOT FOCUS The Vatican cover-up of a secret that could destroy the	PLOT FOCUS This book is about the Sophia, the Great Goddess

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
marriage of Jesus and Mary Magdalene, Brown makes it clear by the book's end that this is about Sophia, the Great Goddess and the lost feminine and scriptural revisionism in Christianity.	Church and the quest for lost Da Vinci documents detailing a power weapon.	and the lost feminine and scriptural revisionism in Christianity.
The novel has several concurrent story lines that follow different characters. Eventually all the story lines are brought together and resolved at the end of the book.	The novel has several concurrent story lines that follow different characters. Eventually all the story lines are brought together and resolved at the end of the book.	The novel has several concurrent story lines that follow different characters. Eventually all the story lines are brought together and resolved at the end of the book.
The unraveling of the mystery requires the solution to a series of brain-teasers, including anagrams and number puzzles.	The unraveling of the mystery requires the solution to a series of brain-teasers, including mysterious messages and word puzzles.	The unraveling of the mystery requires the solution to a series of brain-teasers, brain-teasers, including mysterious messages and word puzzles.
The solution itself is found to be intimately connected with the possible location of the Holy Grail and to a mysterious society called the Priory of Sion, as well as to the Knights Templar.	The solution itself is found to be intimately connected with the possible location of a Holy Grail-like prize and to a mysterious society called the Elect Brothers of St. Peter which is modeled after the Priory of Sion and the Knights Templar.	The solution itself is found to be intimately connected with the possible location of a Holy Grail-like prize and to a mysterious society within the Vatican
The [non-fictional] Catholic organization Opus Dei also figures prominently in the plot.	The [non-fictional] Catholic organization Congregation for the Doctrine of the Faith also figures prominently in the plot.	The [non-fictional] Catholic organization Congregation for the Doctrine of the Faith (CDF) also figures prominently in the plot.

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
The novel is the second book by Brown in which Robert Langdon is the main character. The previous one, Angels and Demons, took place in Rome and concerned the Illuminati.	The novel is the first of three books by Perdue intertwining Da Vinci, art and Vatican cover-ups of secrets that could destroy the church. The subsequent books were The Linz Testament (1985) and Daughter of God (2000)	The novel is the third of three books by Perdue intertwining Da Vinci, art and Vatican cover-ups of secrets that could destroy the church. The subsequent books were The Linz Testament (1985) and Daughter of God (2000)
WHAT IS BEING SOUGHT? A centuries-old cache of documents, relics and bones that offer proof that Jesus Christ married Mary Magdalene and had children by him.	WHAT IS BEING SOUGHT? A centuries-old cache of Da Vinci's documents, a Codex, describing an idea that could be used to create a modern day weapon of mass destruction much like that described by Brown in his previous book, Angels and Demons.	WHAT IS BEING SOUGHT? A centuries-old cache of documents, relics and bones – the Sophia Passions – that offer proof of a second messiah, a woman named Sophia.
Further, Brown establishes that Mary Magdalene is synonymous with Sophia, the Great Goddess, the feminine Divinity.		Sophia is established in the book as synonymous with the Great Goddess, the feminine Divinity.
Opus Dei, views itself as the rightful inheritors of the Papacy, the last bulwark against the abandonment of conservative church values. It seeks the Grail cache for the power it gives them over the Vatican.	The Elect Brothers of St. Peter, views itself as the rightful inheritor of the Papacy, the last bulwark against the abandonment of conservative church values. It seeks the Da Vinci Codex, for the power it gives them over the Vatican.	The CDF views itself as the rightful inheritor of the Papacy, the last bulwark against the abandonment of conservative church values. It seeks the Sophia passions (Grail cache) for the power it gives them within the Vatican.

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
<p>WHAT IS BEING PROTECTED?</p> <p>The bones of Mary Magdalene, and documents proving the secret of her divinity, marriage to Jesus and their bloodline.</p>	<p>WHAT IS BEING PROTECTED?</p> <p>The bones of St. Peter, and the secrets of Da Vinci's awesome weapon.</p>	<p>WHAT IS BEING PROTECTED?</p> <p>The bones of Sophia, and the secret of her divinity.</p>
<p>Characters -These are the principal characters that drive the plot of the story:</p> <p>Robert Langdon - Professor of Religious Symbolology at Harvard University. A well-respected scholar.</p>	<p>Characters -These are the principal characters that drive the plot of the story:</p> <p>Curtis Davis, a maverick petroleum geologist for an independent oil man and art collector with an emphasis on works by Leonardo. Davis is also a well-respected Da Vinci scholar.</p>	<p>Characters -These are the principal characters that drive the plot of the story:</p> <p>Seth Ridgeway - Professor of Comparative Religion at UCLA, a well-respected scholar.</p>
<p>At the beginning of the story, he is in Paris to give a lecture on his work.</p>	<p>At the beginning of the story, he is in Los Angeles to present his discovery of forged pages in a famous Da Vinci Codex, The Codex Leicester.</p>	<p>After the opening scene where Ridgeway's wife (and heroine, Zoe) visits Willi Max's collection of priceless art in Zurich, we see Seth in a Zurich hotel explaining the significance of an ancient manuscript that Max has given to Zoe. The manuscript concerns the Catholic Church's attempts to relegate women to second class status through revisions of its holy scriptures beginning with Constantine and the Nicean Conference. The manuscript contains hints of the existence of a female messiah named Sophia.</p>

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
Having made an appointment to meet with Jacques Saunière, the curator of the Louvre, he is startled to find the French police at his hotel room door.	Following a lecture at an international Da Vinci symposium in Milan, he goes to Amsterdam, having made an appointment to meet with Da Vinci Scholar Geoffrey Martini. He interrupts an intruder at Martini's residence and gives chase.	
	When he returns to Martini's home, Davis is startled to find Amsterdam police at the scene.	Zoe goes to put the manuscript in the hotel's safe deposit box and never returns.
They inform him that Saunière has been murdered and they would like his immediate assistance at the Louvre to help them solve the crime.	They inform him that Martini has been murdered and they would like his immediate assistance to help them solve the crime.	Seth is startled to find Max has been murdered and Zurich police skeptical that Zoe's disappearance is due to foul play.
Unbeknownst to Langdon, he is in fact the prime suspect in the murder and has been summoned to scene of the crime in order that the police may extract a confession from him.	Unbeknownst to Davis, he becomes in fact the prime suspect in the murder.	Unbeknownst to Seth Ridgeway, he eventually becomes in fact the prime suspect in the murder.
Langdon is physically almost <u>identical</u> to the heroes in Perdue's books and also shares a near-identical educational background, personal quirks, motivations and other close parallels.		

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
<p>Sophie Neveu - the granddaughter of Jacques Saunière. She is a French government cryptographer. She was raised by her grandfather after her parents, grandmother, and brother were killed in an automobile accident when she was a girl. Her grandfather used to call her "Princesse Sophie" (French for Princess Sophie) and trained her to solve complicated word puzzles. As a girl, she accidentally discovered a strange key in her grandfather's room inscribed with the initials "P.S." . Later, as a college student, she made a surprise visit to her grandfather's house in Normandy and observed him participating in an occult sex ritual. The incident led to her estrangement with her grandfather until the night of his murder.</p> <p>Sophie is physically <u>identical</u> to the heroines in Perdue's books and also shares a near-identical educational background and other close parallels.</p>	<p>Suzanne Storm – a U.S. government agent, working under-cover for the CIA. Raised in a wealthy family surrounded by fine art, her cover is as a fine arts journalist for <i>Haute Culture</i> magazine.</p>	<p>Zoe Ridgeway – She is a detective of forged art works and an appraiser of fine art. She was raised by her father after her mother disappeared when she was a girl. She was trained by her father to solve puzzles through logic and perseverance.</p>
<p>RELIGIOUS SYMBOLISM</p> <p>Sophie is the diminutive of Sophia, the Gnostic name</p>		<p>RELIGIOUS SYMBOLISM</p> <p>The name, "Zoe" in the Gnostic Gospels means "the</p>

THE DA VINCI CODE By Dan Brown	THE DA VINCI LEGACY By Lewis Perdue	DAUGHTER OF GOD By Lewis Perdue
for the Great Goddess. The Gnostics (and author Margaret Starbird, cited by Brown as a source) hold that Mary Magdalene was the Great Goddess or that she was sent to Earth by the Goddess.		daughter of Sophia. Sophia is viewed by Gnostics and others as the Great Goddess. The Gnostic Gospels hold that Zoe was sent to the earth as a messenger from Sophia, and that her name on Earth was Eve, the first woman.
Thus Sophie is symbolically the descendent of Sophia, The Great Goddess.		Thus Zoe is symbolically the descendent of Sophia, The Great Goddess.
THE PROTECTED BLOODLINE Jesus and Mary Magdalene	THE PROTECTED BLOODLINE St. Peter	
Jacques Saunière - the curator of Louvre, secret head of the Priory of Sion, and grandfather of Sophie Neveu.	Geoffrey Martini – a world-renowned Da Vinci scholar.	Willi Max – wealthy art collector and curator of a vast and priceless collection of art. Retains Zoe Ridgeway.
Before being murdered by Silas in the museum, he reveals false information to Silas about the Priory's keystone, which supposedly contains information about the true location of the Holy Grail.	Before being murdered in Amsterdam, he reveals information about a missing Da Vinci document, which supposedly contains information about a weapon with modern day uses.	Before being murdered, he reveals information about the existence of a female messiah and the location of irrefutable proof.
After being shot in the stomach, he uses the last minutes of his life to arrange a series of clues [including one in his own blood on his body] for his estranged granddaughter	After being stabbed in the stomach, he uses the last minutes of his life to write one last clue in his own blood on his body which will help Storm and Steele to unravel the mystery of	After Max's death, the clues that he sent allow Zoe and Seth to unravel the mystery of his death, her disappearance and locate the secrets hidden for centuries.

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Sophie to unravel the mystery of his death and preserve the secret kept by the Priory of Sion.	his death and uncover the secret kept by the Elect Brothers of St. Peter.	
He is the fourth Priory of Sion official to be murdered.	He is the fourth Da Vinci scholar to be murdered.	
Bezu Fache - a captain in the DPJF, the French equivalent of the FBI. Tough, canny, persistent, he is in charge of the investigation of Saunière's murder. From the message left by the dying curator, he is convinced the murderer is Robert Langdon, whom he summons to the Louvre in order to extract a confession. He is thwarted in his early attempt by Sophie Neveu, who knows Langdon to be innocent and surreptitiously notifies Langdon that he is in fact the prime suspect. He pursues Langdon doggedly throughout the book in the belief that letting him get away would be career suicide.	Enrico Carducci – Bologna policeman who pursues Storm and Steele once they have become fugitives, accused of the murder of Geoffrey Martini. Carducci is driven by thoughts that capturing the two fugitives will be a sure-fire career advancement.	No directly parallel character to Fache.
Ironically, Neveu and Langdon are allowed to escape when a subordinate – seconds away from apprehending them but fearing his superior officer's (Fache's) wrath if orders	Ironically, Storm and Steele are allowed to escape when Carducci – seconds away from apprehending them but fearing his superior officer's wrath if orders and regulations are not followed	

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and regulations are not followed exactly – hesitates to take direct action.	exactly – hesitates to take direct action.	
Silas - an albino devotee (erroneously called a "monk") of Opus Dei who practices severe Corporal mortification. He was orphaned in Marseilles as a young man, fell into a life of crime, and was imprisoned in the Pyrenees until accidentally freed by an earthquake. He finds refuge with a young priest named Aringarosa who gives him the name Silas and who eventually becomes the head of Opus Dei.	Mehmet Karasoz – an Islamic religious fanatic who calls himself the "Sword of Allah." His efforts to assassinate the Pope are orchestrated primarily by Brother Gregory, the head of the Elect brothers of St. Peter and by shapeshifter James Elliott Kimball IV.	George Stratton – An American religious devotee patterned after the members of Opus Dei who, in addition to their occupations, stand ready to serve the Catholic Church in any way requested.
Silas serves as a henchman/assassin. He dies before the end of the book.	Mehmet serves as an assassin. He dies before the end of the book.	Stratton serves the dual roles of henchman/assassin and shapeshifter. He dies before the end of the book.
Before the beginning of the events in the novel, Aringarosa put him in contact with the Teacher [shapeshifter] and tells him that the mission he will be given is of the utmost importance in saving the true Word of God.	Before the beginning of the events in the novel, Brother Gregory put him in contact with the Kimball [shapeshifter] and tells him that the mission he will be given is of the utmost importance.	Before the beginning of the events in the novel, he has been summoned to Rome by Cardinal Neils Braun, head of the Congregation for the Doctrine of the Faith (CDF) who tells him that the mission he will be given is of the utmost importance in saving the true Word of God.
Under the orders of the Teacher, he murders Jacques Saunière and the other three leaders of the	Under the orders from Brother Gregory and Kimball, he nearly murders the Pope while others under	Under the orders of Cardinal Braun, he murders a number of people and chases Seth and Zoe in

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Priory of Sion in order to extract the location of the Priory's "keystone".	their control, including The Teacher, murder Geoffrey Martini and the other three Da Vinci scholars in order to extract the location of the missing Da Vinci Codex pages.	order to extract the location of the "Sophia Passions."
Discovering later that he has been duped with false information, he chases Langdon and Neveu in order to obtain the actual keystone. He does not know the true identity of the Teacher. He is reluctant to commit murder, knowing that it is a sin, and does so only because he is assured his actions will save the Church.		
Bishop Manuel Aringarosa - the world-wide head of Opus Dei and the patron of the albino monk Silas. Six months before the start of the narrative, he is summoned by the Vatican to a meeting at an astronomical observatory in the Italian Alps and told, to his great surprise, that in six months the Pope will withdraw his support of Opus Dei.	Brother Gregory - the head of the Elect brothers of St. Peter, a shadowy organization patterned after the Knights Templar and Priory of Sion. All of its members trace their bloodline to St. Peter. The Elect Brothers also possess the bones of St. Peter and are dedicated to continuing the bloodline and protecting the bones.	Cardinal Neils Braun – is the world-wide head of The Congregation for the Doctrine of the Faith and the patron of the assassin/shapeshifter, Stratton. When not in Rome, Braun resides at an estate high in the Austrian Alps. Six months after the start of the narrative, Stratton is summoned by Braun to a meeting near the Vatican where he is told, to his great surprise, that evidence exists for a female Messiah

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		and that the Church has suppressed the divine feminine for nearly 1,700 years.
Since he believes that Opus Dei is the force keeping the Church from disintegrating into the corruption of the modern era, he believes his faith demands that he take action to save Opus Dei. Shortly after the meeting with the Vatican officials, he is contacted by a shadowy figure calling himself the "The Teacher" who has learned somehow of the secret meeting. The Teacher informs him that he can deliver an artifact to Aringarosa so valuable to the Church that it will give Opus Dei extreme leverage over the Vatican.	Since he believes the Vatican has strayed from its roots and that the Elect Brothers are the force keeping the Church from disintegrating into the corruption of the modern era, he believes his faith demands that he take all measures to obtain an artifact so valuable to the Church that it will give The Elect Brothers extreme leverage over the Vatican.	Since he believes that the CDF is the force keeping the Church from disintegrating into the corruption of the modern era, he believes his faith demands that he take all measures to obtain an artifact so valuable to the Church that it will give him extreme leverage over the Vatican.
	In a scene reminiscent of the first scene in Da Vinci Code, Gregory is discovered by Steele and Storm bloody, naked and dying and uses his last moments to reveal vital clues to them.	
The Teacher - shadowy figure who drives the plot of the story. He has learned not only about the plight of Opus Dei, but also the identities of the four leaders of the Priory of Sion, who	The Schoolmaster – shadowy figure who arranges for a spectacular murder in which a man is impaled upon Giambologna's crucifix during the holy sacraments	

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<p>in turn know the location of the keystone. He contacts Aringarosa and agrees to supply him with a fantastic artifact that will give Opus Dei great power, namely documents that, if released, would destroy the Church. Aringarosa, acting out of self interest and piety, agrees to his offer in order to save both Opus Dei and the Church. The Teacher uses Silas, Aringarosa's protectee, to carry out his plans.</p>	<p>in the Duomo in Pisa. He is subsequently killed.</p>	
<p>Sir Leigh Teabing - British Royal Historian, [blueblood] a Knight of Realm, Grail scholar, and friend of [hero] Robert Langdon.</p>	<p>Tony Fairfax – British blueblood, Rome station chief for MI-12 and a friend of heroine Suzanne Storm.</p>	<p>George Stratton – American New England blueblood, agent working for the National Security Administration and a friend/associate of hero Seth Ridgeway.</p> <p>Using the cover of a diplomatic functionary in Zurich, Stratton befriends Seth as he looks for Zoe. Later in Los Angeles, Stratton saves Seth's life after an attack by people seeking clues to the location of the Sophia Passions.</p>
<p>Independently wealthy, he lives outside Paris in a chateau where Langdon and Neveu take refuge after escaping from the Depository Bank of Zurich with the rosewood box containing the keystone.</p>	<p>Storm and Steele seek refuge with and help from him after escaping from the Elect Brothers of St. Peter monastery in Como.</p>	<p>Independently wealthy, Stratton uses his diplomatic cover to offer refuge to Zoe and Seth.</p>

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He [along with Langdon] reveals to Neveu the "real" interpretation of the Grail (see below). After they are discovered at his home simultaneously by Silas and the French police, the three of them flee with his chauffeur Rémy, flying to England in his private jet.		After they escape from the bank in Zurich, Seth turns up in Alt Aussee where he again pretends to be their ally and to offer his help.
Langdon and Neveu use Teabing's name to obtain access to a computer system that provides vital clues.	Steele and Storm are allowed by Fairfax to obtain access to a computer system that provides vital clues.	After entering the old salt mine that houses the vault containing the Sophia Passion, Stratton assists them in unlocking the second combination lock leading to the grail of their quest.
After Neveu solves the combination lock of the keystone, he interprets the enclosed riddle as meaning they should go to the Temple Church in London to find the next hidden clue that will let them unlock the second combination lock of the keystone.	James Elliott Kimball IV – American, New England Blueblood, member of the global Bremen Legation and a friend of heroine Suzanne Storm. Kimball helps save Steele's life and Suzanne seeks help from him early in the book.	Once the grail is obtained, Stratton seizes it and flees.
As a shapeshifter, Teabing tricks Opus Dei, Langdon and Neveu in an ultimately unsuccessful attempt to obtain the Grail relics and documents for himself.	As a shapeshifter, Kimball tricks the Legation, the Brothers, Steele and Storm in an ultimately unsuccessful attempt to obtain the documents for himself.	As a shapeshifter, Stratton tricks Seth and Zoe in an attempt to obtain the Sophia Passion relics and documents for Braun.
André Vernet - president of the Paris branch of the Depository Bank of Zurich. He is surprised when Neveu	<i>No directly parallel character</i>	Josef Mutters – vice president of the Thule Gesellschaft Bank of Zurich. He is surprised

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and Langdon arrive at the bank and inform him that Jacques Saunière, a long-time account holder at the bank, has died and that Neveu now possesses the depository key to the account.		when Seth and Zoe arrive at the bank and inform him that they now possesses the depository keys to an account dating from decades before.
A bank security officer makes a telephone call to alert police that the two fugitives they are seeking have showed up there.		A bank security officer makes a telephone call to alert an unknown party that the two fugitives they are seeking have showed up there.
His[Vernet's] suspicions are aroused when Neveu and Langdon, after accessing the bank with the key, do not know the account number, indicating that they have no legitimate business being in the bank. When he sees a news report that Neveu and Langdon are fugitives suspected in Saunière's murder, he returns to where he left them, but he finds that they have indeed entered the correct account number and retrieved the contents of Saunière's deposit box.		The suspicions of bank personnel are aroused when Zoe and Seth, after first entering the bank do not know how to proceed, indicating that they have no legitimate business being in the bank
Realizing they are legitimate clients according to the strict rules of the bank, he feels duty-bound to help them escape.		Realizing they are legitimate clients according to the strict rules of the bank, Mutters assists them in accessing the box despite the fact that they are obviously unfamiliar with the procedures to be followed.

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<p>Alerted by the bank security officer, police arrive to arrest Langdon and Neveu.</p> <p>Acting as a bank driver, he bluffs his way past the police in one of the bank's trucks with Langdon and Neveu concealed in the back of the truck. He later changes his mind and attempts to turn them in, but is thwarted by Langdon, who steals the truck and escapes with Neveu to the nearby chateau of his friend, Sir Leigh Teabing.</p>		<p>Alerted by the bank security officer, assailants arrive to attack Seth and Zoe. Mutters is killed; Seth and Zoe escape.</p>
<p>Rémy - chauffeur of Leigh Teabing. After flying with Teabing, Langdon, and Neveu to England, he drives them to the Temple Church in London. Unbeknownst to the others, he is in fact working for the Teacher. While they are inside the Temple Church, he meets with Silas, who was tipped off by the Teacher to meet Rémy there. Armed with a pistol, he enters the church before the others can locate and solve the riddle supposedly hidden there. He takes Teabing hostage and demands the keystone from Langdon. When Langdon gives him the keystone, he and Silas flee in his car with Teabing as hostage.</p>	<p>Minor Character - No direct parallel. However, Remy Martin is the hero's favorite cognac.</p>	<p>Minor Character - No direct parallel.</p>

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Docent at Rosslyn Chapel - he is giving a guided tour of Rosslyn Chapel to Langdon and Neveu when he sees the rosewood box they are carrying and realizes that it seems to be an exact duplicate of a box owned by his grandmother, who is the head of the trust that oversees the chapel.	Minor Character - No direct parallel	Minor Character - No direct parallel.
Guardian of the Rosslyn Trust - she is, in fact, the wife of Jacques Saunière and Sophie Neveu's grandmother. The docent is Sophie's brother. Believing that they had been targeted for assassination by the Church for knowing the powerful secret of the Priory of Sion, she and Saunière agreed that she and Sophie's brother should live secretly in Scotland. Only Sophie's parents were in the car at the time even though the whole family was supposed to be there. Saunière told the authorities that Sophie's grandmother and her brother were in the car. She tells Neveu and Langdon that although the Holy Grail and the secret documents were once buried in the vault of Rosslyn Chapel, they were removed to France by the Priory of Sion only several years ago. Reading the	Minor Character - No direct parallel.	Minor Character - No direct parallel.

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<p>parchment inside the second keystone, she realizes where the Grail is now hidden, but refuses to tell Langdon, saying he will figure it out eventually on his own. According to her, the Priory of Sion never intended to reveal the secret of the Grail according to any set timetable.</p>		
<p>She believes that such a revelation is unnecessary anyway, since the true nature and spiritual power of the Grail is emerging into the world without the location of the actual artifact being revealed.</p> <p>She also informs Sophie Neveu of her true identity through her bloodline</p>		<p>The Sophia Passions are ultimately destroyed in a fire. But the Pope comments on the destruction by saying that the true nature and spiritual power of faith is a stronger when people believe without having an actual artifact.</p>
<p>Secret of the Holy Grail</p> <p>According to the novel, the secrets of the Holy Grail, as kept by the Priory of Sion, are as follows:</p>		<p>Secrets of the Sophia Passion</p> <p>According to the novel, the secrets of the Sophia Passion are as follows:</p>
<p>Mary Magdalene was of royal descent (through the Jewish House of Benjamin) and was the wife of Jesus, of the House of David.</p>		<p>There is not one Christian messiah, but at least two and one is a woman, Sophia.</p>

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That she was a prostitute was a slander invented by the Church to obscure their true relationship.		The story that Mary Magdalene was a prostitute was a slander invented by the Church to obscure her true relationship with Jesus Christ and the indication that he saw her, and not Peter, as the head of his ministry.
At the time of the Crucifixion, she was pregnant. After the Crucifixion, she fled to Gaul where she was sheltered by the Jews of Marseilles. She gave birth to a daughter, named Sarah. The bloodline of Jesus and Mary Magdalene became the Merovingian kings of France. The French expression for the Holy Grail, San gréal, actually is a play on words for Sang réal, which literally means "royal blood".		
The Grail relics consist of the documents that testify to the bloodline, as well as the actual bones of Mary Magdalene.	The relics possessed by the Elect Brothers consist of the documents that testify to the bloodline, as well as the actual bones of St. Peter.	The Sophia Passion and relics consist of the documents that testify to the indisputable existence, as well as the actual bones of Sophia.
The Church has suppressed the truth about Mary Magdalene and Jesus' bloodline for 2000 years. This is principally because they fear the power of the sacred feminine, which they have demonized as Satanic.	The Church has suppressed the truth about St. Peter and his true inheritors of spiritual power and bloodline for 2000 years. This is because the orthodox ruling structure fears losing its power.	The Church has suppressed the truth about Sophia and the divine feminine for 2000 years. This is principally because they fear the power of the sacred feminine, which they have demonized as Satanic.

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Sophie Neveu and her brother are descendants of the original bloodline of Jesus and Mary Magdalene (their last name was changed to hide their ancestry).	Brother Gregory and the other Elect Brothers of St. Peter are descendants of the original bloodline of St. Peter.	Zoe Ridgeway is the symbolic descendent of the feminine divine which includes Mary Magdalene and Sophia.
The existence of the bloodline was the secret that was contained in the documents discovered by the Crusaders after they conquered Jerusalem in 1099 (see Kingdom of Jerusalem). The Priory of Sion and the Knights Templar were organized to keep the secret.	The existence of St. Peter's bloodline has been covered up by the Vatican since the Renaissance.	The existence of Sophia was the secret that Constantine and every pope since him tried to cover up. But the internecine battles, including those involving the Crusaders and the Knights Templar created chaotic conditions that allowed the secret to slip away from their grasp.
<p>The secrets of the Grail are connected to Leonardo Da Vinci's work as follows:</p> <p>Da Vinci was a member of the Priory of Sion and knew the secret of the Grail. The secret is in fact revealed in The Last Supper, in which no actual chalice is present at the table. The figure seated next to Christ is not a man, but a woman, his wife Mary Magdalene. Most reproductions of the work are from a later alteration that obscured her obvious female characteristics.</p>	Da Vinci served most of the great Renaissance courts as an artist, scientist, inventor and military architect and strategist. As such he was close to the power figures of the day, both secret and above-board including Antonio de' Beatis, the secretary of the Cardinal of Aragon	
The Mona Lisa is actually a self-portrait by Leonardo as a woman. The androgyny	The diary of Antonio de' Beatis figures prominently in Derek Steele's detection	

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reflects the sacred union of male and female which is implied in the holy union of Jesus and Mary Magdalene.	of the Da Vinci Codex forgery.	
Such parity between the cosmic forces of masculine and feminine has long been a deep threat to the established power of the Church. The name Mona Lisa is actually an anagram for "Amon L'Isa", referring to the father and mother gods of Ancient Egypt (namely Amon and Isis).		Sophia was killed by Constantine and her entire village wiped out because the parity of masculine and feminine in the form of a divine woman were a threat to the established power of the Church.
Inspiration and influences The novel is part of the late twentieth century revival of interest in Gnosticism. Its emphasis on the role of Mary Magdalene in early Christianity comes straight from Gnostic scriptures, as does much of its portrayal of fertility rites and mystery cults in the practices of the ancient church.		Inspiration and influences The novel is part of the late twentieth century revival of interest in Gnosticism. Its emphasis on the role of Mary Magdalene in early Christianity comes straight from Gnostic scriptures, as does much of its portrayal of fertility rites and mystery cults in the practices of the ancient church.
The later ecclesiastical history described in Langdon and Teabing's lengthy soliloquies is largely adapted from modern interpretations of the relationship between Gnosticism and Christianity; the most influential of these is probably Holy Blood, Holy		The later ecclesiastical history described in Seth's, Zoe's and Hans Morgen's lengthy soliloquies is largely adapted from modern interpretations of the relationship between Gnosticism and Christianity; the most influential of these is probably "The Gnostic

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Grail. (The book explicitly names this work, among several others, on p. 253.)		Gospels" by Elaine Pagels.
Summary of Spoilers Jacques Saunière was the head of the Priory of Sion and therefore possessed the knowledge of the "keystone", which in turn reveals the location of the Holy Grail, as well as documents which would shake the foundation of Christianity and the Church. He was killed in order to extract this information from him and eliminate the members of the Priory of Sion.	Summary of Spoilers (Not directly applicable, but some similarities are apparent.) Geoffrey Martini was one of four top Da Vinci scholars who therefore possessed the knowledge of the "missing Da Vinci Codex" which describes an awesome weapon. Knowledge of this also reveals the location of St. Peter's bones, as well as documents which would shake the foundation of Christianity and the Church. He was killed in order to extract this information from him.	Summary of Spoilers (Not directly applicable, but some similarities are apparent.) Willi Max possessed knowledge of a "female messiah" and had obtained a painting which, which in turn reveals the location of the Sophia Passion as well as documents which would shake the foundation of Christianity and the Church. He was killed in order to extract this information from him.
The reason that Sophie Neveu broke off contact with her grandfather is that she witnessed him participating in a pagan sex ritual (Hieros Gamos) at his home in Normandy, when she made a surprise visit there during a break from college.	No direct parallel	No direct parallel
The message Saunière wrote with a black-light pen on the floor before dying contained the extra line	No direct parallel	No direct parallel

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<p>"P.S. Find Robert Langdon". This was the reason Bezu Fache suspected Langdon of being the murderer. Fache had erased this line before Langdon arrived so that Langdon would not be aware that the police suspected him. Sophie Neveu saw the entire text of the message by accident when it was faxed to her office by the police. Sophie realized immediately that the message was meant for her, since her grandfather used to call her "Princesse Sophie" (i.e. "P.S.") when she was a girl. From this she also knew Langdon to be innocent. She informs him of this secretly when they are in the Louvre by telling him to call her personal voicemail box and listen to the message that she had left there for him.</p>		
<p>The other three lines of Saunière's blood message are anagrams. The first line is the digits of the Fibonacci sequence out of order. The second and third lines ("O Draconian Devil!" and "Oh, Lame Saint!") are anagrams respectively for "Leonardo da Vinci!" and "The Mona Lisa!" (in English). These clues were meant to lead to a second set of clues.</p>	<p>By following a clever set of clues, Derek Steele concludes that pages are missing from Da Vinci's Codex Leicester and that forged pages have been inserted to cover this up.</p> <p>When top Leonardo scholars begin to die mysteriously, Steele concludes that the missing Da Vinci Codex pages are somehow connected.</p>	<p>Seth Ridgeway is perplexed when a desperate woman shows up at his live-aboard sailboat in Los Angeles during a fierce winter storm seeking an old painting.</p> <p>The name of the painting, "The Home of the Lady our Redeemer," is similar to "Madonna of the Rocks," the Da Vinci painting in the Louvre behind which Saunière hid the gold</p>

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		Zurich bank safe deposit box key so Sophie would find it.
On the glass over the Mona Lisa, Saunière wrote the message "So Dark the Con of Man" with a curator's pen that can only be read in black light. The second clue is an anagram for Madonna of the Rocks, another Da Vinci painting hanging nearby. Behind this painting, Saunière hid a key. On the key, written with the curator's pen, is an address.	He follows a set of obscure clues, hints and word games including a name written in blood on the body of one slain scholar, that leads him to a meeting beneath Da Vinci's "Last Supper," the monastery of a strange sect of renegade and murderous Catholic monks on the shores of Lago di Como.	After following a series of obscure clues including a dying man's admonition to "Beware of Brown," Seth eventually finds that his painting, like the one in Da Vinci Code, conceals a gold key that provides access to a safe deposit box in a Zurich Bank.
The key opens a safety deposit box at the Paris branch of the Depository Bank of Zurich. Saunière's account number at the bank is the Fibonacci sequence digits, arranged in the correct order.	The Elect Brotherhood of St. Peter has monks. But, interestingly, the Da Vinci Code mistakenly describes its albino assassin, Silas as a "monk" of Opus Dei despite the fact that Opus Dei has no monks.	The following sequence is identical in events, pacing and tone and sequence both this book and Da Vinci Code: <ol style="list-style-type: none"> 1. A slain curator of art leaves a gold key, 2. concealed in a work of art, 3. painted on wood. 4. That work of art is named for the divine feminine at the center of the book. 5. The gold key is not a traditional key that opens a tumbler. 6. The key is left (with no instruction) for the book's heroine 7. who is, herself, a symbol of and related to the divine feminine. 8. The gold key allows

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		<p>access (but does not turn a lock) to a safe deposit box in a Zurich bank.</p> <p>9. The safe deposit box holds another container which has a combination that must be set.</p> <p>10. The contents of the container holds additional clues to finding the object of their search that send the hero and heroine to a foreign country.</p> <p>11. The object of their search is a set of bones and documents relating to the divine feminine at the heart of the book.</p>
<p>The instructions that Saunière revealed to Silas at gunpoint are actually a well-rehearsed lie, namely that the keystone is buried in the Church of Saint-Sulpice beneath an obelisk that lies exactly along the ancient "Rose Line" (the former Prime Meridian which passed through Paris before it was redefined to pass through Greenwich). In reality, the message beneath the obelisk simply contains a reference to a passage in the Book of Job which reads "Hitherto shalt thou go and no further". When Silas reads this, he realizes he has been duped.</p>		

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The keystone is a actually a cryptex, a cylindrical device invented by Leonardo Da Vinci for transporting secure messages. In order to open it, the combination of rotating components must be arranged in the correct order.	The Elect Brothers of St. Peter prevent valuable captives from ever escaping by implanting them with a sac of deadly poison.	No direct parallel.
If forced open, an enclosed vial of vinegar will rupture and dissolve the message, which was written on papyrus.	If forced open by attempts to remove it, the membrane would rupture, causing a painful death.	
The rosewood box containing the cryptex contains clues to the combination of the cryptex, written in backwards script in the same manner as Leonardo's journals. While fleeing to England aboard Teabing's plane, Langdon solves the riddle and finds the combination to be "S-O-F-I-A", the ancient Greek form of Sophie's name, also meaning wisdom.		
The keystone cryptex actually contains a second smaller cryptex with a second riddle that reveals its combination. The riddle, which says to seek the orb above a tomb of "a knight a pope interred" refers not to a medieval knight, but rather to the tomb of Sir Isaac Newton, who was buried in Westminster Abbey, and was eulogized by Alexander Pope (A.		

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Pope). The orb refers to the apple observed by Newton which led to his discovery of the Universal Law of Gravitation, and thus the combination to the second cryptex is "A-P-P-L-E".		

CHARACTER SIMILARITIES

84. The following similarities exist between the Heroes of the novels:

HERO COMPARISON			
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God, Linz Testament
DATE PUBLISHED	2003	1983	1985 (Linz), 2000
NAME	Robert Langdon	Curtis Davis	Seth Ridgeway
OCCUPATION	Professor of Religious Symbology, Harvard	Leonardo Da Vinci Scholar expert, geologist (DVL:15, 16,63,64)	Professor, Comparative Religion, UCLA (DoG:4)
SPECIALTY	Expert in Constantine, Leonardo and the Goddess	Leonardo Da Vinci Scholar expert (DVL:15, 16,63,64)	Expert in Constantine and the Goddess (DoG:4)
EDUCATION	vague, unspecified	Boston educated, MIT (DVL:63) and Cambridge (DVL:65)	vague, unspecified
EYES	Blue (DVC:8)	Blue (DVL:63)	blue (DoG:65)
HAIR	Black (DVC:8)	Dark Brown (DVL:63)	unspecified
AGE	forty-something (DVC:8)	Mid- to late-30s (DVL:63)	40 years old (DoG:9)

FACE	Strong jaw (DVC:8)	Muscular square jaw (DVL:140)	
PHOBIA	Mild Claustrophobia (DVC: 98)		Mild Claustrophobia (DoG: 34)
PHYSICAL APPEARANCE	Good physical shape (DVC:9)	good physical shape (DVL:13)	Trim, good shape (DoG:9)
CURRENT APPEARANCE	Fatigued, graying hair, looking older. "The past year had taken a heavy toll on him" (DVC:ch1)"	Fatigued, looking older, bags under eyes, past months not kind to him (DVL:114)	Fatigued, looking older, bags under eyes, past six months not kind to him (DoG:Ch4, beginn)
ATTRACTIVENESS	Intriguing, women love him (DVC:9)	Intriguing, women love him (DVL:63)	
GREEK	Reads Greek (DVC:299)		Reads Greek (DoG:11)
PRESENCE	In much demand as a conference speaker (DVC:7,8,448)	In much demand as a conference speaker 77-80	
PRESENCE - 2	"captivating" (DVC:9) CONTEXT: at podium	"captivating" (DVL:midCh8) CONTEXT: at podium	Smile "captivated": (DoG:earlyCh2) CONTEXT: at podium
LOST LOVE	As book opens, haunted by lost love (DVC:16)	As book opens, haunted by lost love (DVL:16, 23, 114)	As book opens, haunted by lost love (DoG:35,39)
EMOTIONAL STATE	Lost love created emotional void (DVC:Ch6)	Lost love created emotional void, (DVL:23)	Lost love created: "hollow void in his chest." (DoG:ChBegin 10)
FINDING LOVE	By end of book, finds love (Heroine, Sophie)	By end of book, finds love (Heroine, Suzanne)	By end of book, finds love (Zoe)
FALSELY ACCUSED	Hero accused of the murder of a Leonardo scholar, a curator/colleague (DVC:Chapters 6, 8,11and subsequent)	Hero accused of the murder of Leonardo Scholars, a colleague and other people. (DVL:265,200)	Hero accused of curator/colleague murder and other people (DoG:300)
HIS QUEST	Locate and obtain the Grail documents and the tomb of the woman worshipped as a goddess, Mary Magdalene.	Searching for Grail (DVL:73) Missing Da Vinci Codex	Locate and obtain the documents and shroud of the woman worshipped as a goddess, Sophia

MOTIVATION 1	Protect heroine, Sophie	Protect heroine, Suzanne	Protect heroine, Zoe
MOTIVATION 2	Avoid being killed by the bad guys and arrested by authorities who want him for murder.	Avoid being killed by the bad guys and arrested by authorities who want him for murder.	Avoid being killed by the bad guys and arrested by authorities who want him for murder.

85. The following similarities exist between the heroines of the novels:

HEROINE COMPARISON			
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God, Linz Testament
DATE PUBLISHED	2003	1983	1985 (Linz), 2000
NAME	Sophie Neveu	Suzanne Storm	Zoe Ridgeway
OCCUPATION	Paris police officer, Cryptographer	Art journalist	Art broker, forgery detective
SECONDARY PREOCCUPATION	Art, religion	Undercover CIA agent	Religion
EDUCATION	French and English-speaking: Parisian, unspecified undergraduate and Royal Holloway (U.K.) (DVC:Ch54)	French and English-speaking: Sorbonne (Paris) Skidmore (U.S.) (DVL:62)	Dutch and English-speaking: UCLA, Stedlijk Museum, Amsterdam (DoG:111)
EYES	Green eyes (DVC:378)	green (DVL:65)	not specified
EYES: IDENTICAL WORDS	Sophie Neveu entered, her green eyes flashing fear. (DVC:ch12)	"Why did you do that?" she asked sharply, her green eyes flashing bright with the anger she battled to contain. (DVL:middle ch11)	
HAIR	"thick burgundy hair" --(DVC:50)	auburn (DVL:18)	not specified

AGE	32 (DVC:50)	26 (DVL:83)	30-ish (DoG:12,35)
PHYSICAL APPEARANCE	Distinctive, robust, not thin or "waifish" (DVC:50)	Ample figure (DVL:77)	
OUTSTANDING PSYCHOLOGICAL CHARACTERISTICS	Capable, strong, resourceful woman who saves hero at least once.	Capable, strong, resourceful woman who saves hero at least once.	Capable, strong, resourceful woman who saves hero at least once.
HERO RECOGNIZES HER EXTRAORDINARY ABILITIES	Hero recognizes that the heroine is highly capable of taking care of the both of them. (DVC:86)	Hero recognizes that the heroine is highly capable of taking care of the both of them. (DVL:180)	
JUMPING AT IDEAS	At the heroine's suggestion (Sophie), the reluctant and confused hero (Langdon) simulates his escape from the Louvre restroom when she throws a bar of soap, containing a tracking device, out the window. (DVC:86)	At the heroine's suggestion (Suzanne) and the reluctant and confused hero (Davis) escape from the Brotherhood's monastery by jumping off the roof into Lake Como. (DVL:263)	
HAUNTED BY THE PAST	... were trying to speak to her and offer some kind of resolution to the emptiness that had " <u>haunted her all these years.</u> " (DVC: Ch69)	The television show, and her conduct, " <u>came back to haunt her.</u> " (DVL:Ch8,begin)	
CHILDHOOD TRAGEDY THAT SHAPED HER PERSONALITY	After parents are killed, she is raised by Grandfather who is artistic and very capable with his hands. He remains influence in her life		After mother vanishes, she is raised by father who is artistic and very capable with his hands. He remains influence in her life .(DoG:63)
GIFT	Ability to spot the code solutions others miss (DVC:77)		ability to spot art forgeries others miss (DoG:5)

86. The following similarities exist among organizations playing prominent roles in the novels:

DUELING BROTHERHOODS					
AUTHOR	DAN BROWN	LEWIS PERDUE	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	The Da Vinci Code	Daughter of God	Daughter of God
DATE PUBLISHED	2003	1983	2003	2000	2000
NAME	Brotherhood, Priory of Sion	Elect Brotherhood of St. Peter	Opus Dei	Father Morgen's Group	Congregation for the Doctrine of the Faith (Cardinal Neils Braun)
LONGEVITY	Has Existed for Centuries	Has Existed for Centuries	Has existed for 69 years, since 1934	Has existed for 58 years, since approximately 1945	Has Existed for Centuries
ORGANIZATIONAL CHARACTERISTICS	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful	aggressive, highly secretive, tremendously resourceful
FINANCIAL POSITION	Wealthy	Wealthy	Wealthy	Bare bones, not wealthy	Wealthy
CURRENT POSITION	They Have Grail Documents.	Have come Da Vinci Documents, need others to Consolidate Power over Vatican	Need Grail Documents to Consolidate Power over Vatican	Searching for Sophia documents	Need Sophia documents to Consolidate Power over Vatican and be elected Pope

PURPOSE 1 FOR EXISTING: (DVC:258)	Protect the Sangreal Documents and the truth about Jesus and Mary Magdalene.	Protect the treasure house of art and documents including Leonardo Da Vinci's documents. (DVL:105, 106, 229)	Conceal the truth about Mary Magdalene and the Grail documents	Protect the truth about Sophia, the female Messiah	Conceal the truth about Sophia, the female Messiah
PURPOSE 2 FOR EXISTING: (DVC:258)	Protect tomb of Mary Magdalene	Protect tomb of St. Peter (DVL:225-226)	Return Church to "True" path (conservative)	Return Church to path of truth (spiritual).	Return Church to "True" path (conservative)
PURPOSE 3 FOR EXISTING: (DVC:258)	Obsessed with perpetuating the bloodline of Jesus	Obsessed with perpetuating the bloodline of St. Peter (DVL:251)			
PURPOSE 4 FOR EXISTING: (DVC:258)	Make the proof public about the sacred feminine, the Goddess, Mary Magdalene	Keep the secrets and their power for themselves.	Keep the Grail secrets and their power for themselves.	Make the proof public about the sacred feminine, the Goddess, Sophia	Keep the truth about Sophia secret and the power for themselves.
FAMOUS PEOPLE ASSOCIATED WITH BROTHERHOOD (PARTIAL LIST)	Leonardo Da Vinci, Isaac Newton, Claude Debussy, Botticelli, Victor Hugo, (DVC:326-327)	Leonardo Da Vinci Galileo, Mozart, Monteverdi, Ambrose Bierce, (DVL:213, 227)			

PROTECTED BONES:	Bones of Mary Magdalene protected by her bloodline. (DVC:257)	Bones of St. Peter protected by his bloodline. (DVL:225)			
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87. The following similarities exist among the sharpshifters in the novels:

SHAPESHIFTER			
AUTHOR	DAN BROWN	LEWIS PERDUE	LEWIS PERDUE
BOOK TITLE	The Da Vinci Code	The Da Vinci Legacy	Daughter of God, Linz Testament
DATE PUBLISHED	2003	1983	1985 (Linz), 2000
NAME	The Teacher (revealed at end to be Lee Teabing)	James Elliott Kimball IV	George Stratton
EDUCATION	Oxford, Harvard (Ivy League) as "backup" (DVC:227)	Ivy League (DVL:39)	Ivy League (DoG:23)
SOCIAL STANDING	Snobbish, Wealthy English blueblood (DVC:217) Knight (DVC:endCh51)	Snobbish, wealthy New England blueblood (DVL:39)	
OCCUPATION	Historian, Grail expert (DVC:216)	Killer for the Bremen Legation (DVL:40)	Attache, American Consulate, Zurich (DoG:40)
SHAPESHIFTER ROLE	The Teacher (DVC:411-412)	Works for Russians (DVL:318)	Works for Cardinal Braun(DoG:28)
WHO DOES HE MANIPULATE?	Bishop Aringarosa, hero and heroine, assassin Silas	Brother Gregory, Hero, Heroine	Hero, heroine, U.S. government
MAIN VICTIMS	Hero and heroine turn to him for help, to their disadvantage	Hero and heroine turn to him for help, to their disadvantage	Hero and heroine turn to him for help, to their disadvantage

KILLS THOSE CLOSE TO HIM	Kills his right-hand man, Remy (DVC:386), sets up death of his key assassin, Silas (DVC387,393)	Kills his key assassin, The Schoolmaster (DVL:7,8)	
MOTIVATION	Hates Catholic Church, wants to damage it (DVC:412)	Hates Catholic Church (DVL:3,4)	Worships Catholic Church, wants to protect it (DoG:73)
MOTIVATION 2	MOTIVATION: "Teabing has spent his life trying to broadcast the truth about the Holy Grail." (DVC:218)	out for himself	Guardian of the Secret Messiah, must keep it a secret or destroy it. (DoG:81)
CONTEXT OF THE CONFLICT	In Da Vinci Code, the hero and heroine seem to be caught between two opposing camps, The Vatican and Opus Dei, who want control of the Grail Documents. In the end, however, we find that both groups have been manipulated by a third-party shapeshifter (Teabing) who wants the Grail documents for his own personal motivations.	In Da Vinci Legacy, the hero and heroine seem to be caught between two opposing camps, The Elect Brotherhood of St. Peter and the Bremen Legation, who want control of the Da Vinci Documents. In the end, however, we find that both groups have been manipulated by a third-party shapeshifter (Kimball) who wants the Da Vinci documents for his own personal motivations.	
EYES	hazel eyes (DVC:Ch54)	Glacial Blue eyes 37	
HAIR	bushy red hair (DVC:Ch54)	blond hair, 6'3" (DVL:367)	fair-haired (DoG:23)
HEIGHT	tall	6'3" (DVL:367)	Tall (DoG:23)

88. Throughout the spring and summer of 2004, the Defendant received multiple communications from readers outlining what to them were clearly substantial similarities in every aspect, between Code and Defendant's Works.

89. Samples of some of the communications received by Defendant from readers of Code and Defendant's Works are set forth below.

90. By way of example and not by way of limitation or exclusivity, the communications state, among other things:

"My husband read it first, and then passed it over to me. (He rarely gets to read a book first.) We were laying in bed, both reading, and he asked me what I thought. I was puzzled and said 'I think I've read this before...' Basically, the books were enough similar that ten years after having read your book, I felt 'déjà vu' reading Brown's book...His book, as I recalled on my own, before even remembering your name, is essentially a rewrite of yours"—Katherine Coble.

"DaVinci Code is not the only book that Dan Brown used your ideas for"—Margaret Rainstein

"It now appears to me Brown and Kaufman lifted directly from you..."—Craig Dirgo

"I traded with a friend who had Code. Déjà Vu!! I felt like I was reading parts of the same book over again. That's when I checked the date on yours & realized yours was WAY first. I mean I've seen some similarity in romance, but how many boy-girl scenarios can you have? This was beyond the acceptable coincidence. I love to read, but I can't write, so I respect the work authors put into their novels. I really think you are justified in your claim of plagiarism...Anyway, I just wanted to say a few words in support of you & let you know that there are people out there who know that YOU are the original."—Gretchen Uchello

"After reading Daughter, Legacy & Code, I can't see how anyone could miss the blatant similarities between your books and Code. It's a meld of elements from both your works, but, in this case, the total is less than the parts. I've heard that imitation is the sincerest form of flattery – unless you're a writer!!"—Gretchen Uchello

"I read it [Daughter of God] before I read The DaVinci Code, and as I was reading Dan Brown's book, I kept feeling as though it was very similar to yours."—Ruth Borkowski

“I was reading your book Daughter of God and before I even finished half, I was checking the publication dates between your book and the DaVinci Code. I didn’t know anything of the controversy beforehand...Unfortunately, I think the promotion of “The Code” is so widespread, it is beyond recall no matter what you can prove. You have my complete sympathy. There is nothing worse than being the victim of someone else’s lack of integrity. Were I Dan Brown, I would feel the proceeds of the book to be ill gotten dirty money...I will show my support for your original work by promoting it to my book club along with your other publications. It’s not much, but at least you know there are some common folk out there who understand that it’s right to honor intellectual property and ideas.”—Melinda Robino

91. The foregoing makes clear that after reading Defendant’s Works and Code, objective members of the reading public believed that Code was substantially similar to Defendant’s Works in virtually every substantive and significant way.

92. The Defendant is entitled to protection of his intellectual property and ideas, as embodied in the Defendant’s Works, pursuant to 17 U.S.C. §§ 101, 102, and pursuant to the Certificates of Registration previously filed with the United States Copyright Office (Exhibits “A”, “B”, & “C” hereto).

93. As the foregoing indicates, Plaintiffs have infringed and will continue to infringe on Defendant’s valid, existing copyrights in Defendant’s Works by continuing publication and sales of Code, and by placing in the public marketplace, products relating thereto, thereby depriving the Defendant of the value of his intellectual property, preventing Defendant from fully exploiting Defendant’s Works, and causing Defendant significant damage, all for the commercial gain of the Plaintiffs to the sole detriment of the Defendant.

94. As a result of the foregoing, pursuant to 17 U.S.C. § 504, Defendant is entitled to recover from Plaintiffs, jointly and severally, either compensatory or statutory damages.

95. Upon information and belief, the Plaintiffs have, as a result of their violation of Defendant's valid copyrights, received millions of dollars in income from worldwide sales and distribution of Code, and the sale or licensing of marketing, merchandising, movie, and/or other rights in connection with Code.

96. Upon information and belief, Plaintiffs have published over 20 Million copies of Code in 42 languages.

97. Plaintiffs' conduct as aforesaid has caused Defendant irreparable harm that will no doubt continue to be inflicted by the Plaintiffs unless they are permanently enjoined by this Court. Defendant is entitled to an injunction restraining Plaintiffs, their agents and employees, and all others acting in concert with them, from engaging in such further acts as are in violation of Defendant's copyrights, including, but not limited to, enjoining any further publication, distribution, or sale of Code. Defendant is also entitled to have all existing copies of Code (in whatever form or format) seized and destroyed.

98. As a result of the forgoing, the Defendant is entitled to recover from the Plaintiffs the damages, including attorneys fees, he sustained and will sustain, and any gains, profits, and advantages obtained by the Plaintiffs as a result of Plaintiffs' acts of infringement. At present, the amount of such damages is unknown to Defendant, but believed to be in excess of \$150 Million Dollars.

**AS AND FOR A SECOND COUNTERCLAIM
AGAINST BOTH PLAINTIFFS**

99. Defendant repeats and realleges each and every allegation contained in Paragraphs "40" through "98" hereof with the same force and effect as if fully set forth at length herein.

100. By virtue of Plaintiffs' illegal and unauthorized violation of Defendant's copyrights, Plaintiffs are required to pay Defendant royalties and damages, measured, in part, by profits (direct and indirect) that Plaintiffs received as a result of Plaintiffs' improper exploitation of Defendant's intellectual property.

101. Defendant is unable to ascertain the amount of money owed by Plaintiffs unless Plaintiffs furnish Defendant with a full and complete accounting.

102. As a result of the foregoing, Defendant is entitled to receive from Plaintiffs a full and complete accounting of all income, expenses, and profits, and other pertinent information directly or indirectly related to Code, and any related works, products, or projects.

**AS AND FOR A THIRD COUNTERCLAIM
AGAINST PLAINTIFFS**

103. Defendant repeats and realleges each and every allegation contained in Paragraphs "40" through "102" hereof with the same force and effect as if fully set forth at length herein.

104. As a result of Plaintiffs' illegal and improper exploitation of Defendant's intellectual property, Plaintiffs have been unjustly enriched at the sole expense and to the sole detriment of the Defendant. On information and belief, Plaintiffs have in the past and intend in

the future to retain all of the benefits derived from Plaintiffs' violation of Defendant's copyrights.

105. The Plaintiffs should not, in equity and in good conscience, be allowed to retain the benefits received as a result of their infringement, and they should be required to pay any such sums to Defendant.

106. As a result of the unjust enrichment of the Plaintiffs, the Defendant is entitled to damages, jointly and severally, in an amount that is presently unknown but believed to be in excess of \$150 Million Dollars.

**AS AND FOR A FOURTH COUNTERCLAIM
AGAINST PLAINTIFFS AND ADDITIONAL
COUNTERCLAIM DEFENDANTS**

107. Defendant repeats and realleges each and every allegation contained in Paragraphs "40" through "106" hereof with the same force and effect as if fully set forth at length herein.

108. On information and belief, either or both of the Plaintiffs have agreed with some or all of ACDs to film and release a motion picture based on Code. On information and belief, in consideration therefor the Plaintiffs have been and/or will be paid substantial amounts of money by ACDs for rights and/or licenses in connection therewith.

109. On information and belief, unless enjoined, Plaintiffs and/or some or all of ACDs intend to take steps to cast, finance, and film a motion picture based on Code. According to press releases, Tom Hanks has agreed to star in the motion picture which is tentatively scheduled for release on May 19, 2006.

110. As Plaintiffs, in connection with Code, have infringed on Defendant's copyrights in Defendant's Works, Plaintiffs could not properly or legally transfer licenses or any other rights in and to Code to any third party(ies).

111. Defendant has no adequate remedy at law to redress all of the injuries that Plaintiffs have caused, and will cause in the future, by their conduct.

112. As a result of the infringement of Defendant's copyrights as aforesaid, the Plaintiff Brown had no valid copyright in Code. As a result, Brown could not license, sell, or otherwise transfer any rights in and to Code without further infringing Defendant's Works.

113. Any motion picture or related work based on Code will, in effect, be a motion picture or related work based, in whole or in part, on Defendant's Works.

114. Defendant has not sold or otherwise transferred any license(s) or other rights to exploit Defendant's Works to Plaintiffs or ACDs.

115. If the Court does not enjoin Plaintiffs and/or ACDs from further exploiting Defendant's Works without Defendant's permission, Defendant will continue to be irreparably harmed and the value of his intellectual property will be destroyed.

116. Defendant is entitled to a [preliminary and] permanent injunction, enjoining Plaintiffs, ACDs, and any other person or entity from casting, producing, financing, filming, releasing, publishing, or otherwise disseminating any motion picture, or similar or related work or product or project based, in whole or in part, on Defendant's Works.

117. Defendant has no adequate remedy at law.

WHEREFORE, Defendant Lewis Perdue, requests judgment dismissing the Complaint against him with prejudice and declaring that Plaintiffs infringed on Defendant's copyrights, and granting him judgment against Plaintiffs and the Additional Counterclaim Defendants as follows:

a) On the First Counterclaim, directing the Plaintiffs to immediately and permanently cease and desist from infringing on Defendant's copyrights and directing that all copies of The DaVinci Code, regardless of form or format, be seized and destroyed by appropriate authorities; and

b) On the First Counterclaim, damages against Plaintiffs in an amount presently unknown, but equal to all income and profits received or derived by Plaintiffs from sales of The DaVinci Code and any related products or projects, speaking engagements or appearances, plus reasonable attorneys fees and expenses in an amount to be determined by the Court, which amounts are presently unknown, but believed to be in excess of \$150,000,000.00 plus appropriate interest; and

c) On the Second Counterclaim, directing Plaintiffs to provide a full and complete accounting by Plaintiffs of all income, profits, expenses and all other pertinent financial information relating to The DaVinci Code and any related works, products, or projects; and

d) On the Third Counterclaim, damages against Plaintiffs, jointly and severally, in an amount presently unknown, but equal to all income and profits received or derived by Plaintiffs from sales of The DaVinci Code and any related products or projects,

speaking engagements or appearances, plus reasonable attorneys fees and expenses in an amount to be determined by the Court, but believed to be in excess of \$150,000,000.00 plus appropriate interest; and

e) On the Fourth Counterclaim, judgment against Plaintiffs and Additional Counterclaim Defendants, permanently enjoining each and every one of them from casting, producing, financing, filming, distributing, releasing, publishing, or otherwise disseminating any motion picture or similar or related work or product or project based in whole or in part on The DaVinci Code, or otherwise exploiting Defendant's Works, without the express written permission of the Defendant; and

f) the costs and disbursements of this action.

Dated: New York, New York
December 20, 2004

FISCHBEIN•BADILLO•WAGNER•HARDING, LLP
Attorneys for Defendant and Counterclaimant

By: 

Donald N. David (5222)

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Of Counsel

Michael I Rudell
Katherine J. Trager

Columbia Pictures Industries, Inc.
Sony Pictures Entertainment Inc.
Sony Pictures Releasing Corporation
Imagine Films Entertainment, LLC

DEMAND FOR JURY TRIAL

LEWIS PERDUE hereby demands a trial by jury of his Counterclaims.

Dated: New York, New York
December 20, 2004

~~FISCHBEN • BADILLO • WAGNER • HARDING, LLP~~
Attorneys for Defendant and Counterclaimant

By: 
Donald N. David (5222)

909 Third Avenue
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Attn: Elizabeth McNamara

Of Counsel

Michael I Rudell
Katherine J. Trager

Columbia Pictures Industries, Inc.
Sony Pictures Entertainment Inc.
Sony Pictures Releasing Corporation
Imagine Films Entertainment, LLC

EXHIBIT A

FORM TX
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER

IX 1-179-413
TX TXU

EFFECTIVE DATE OF REGISTRATION

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Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

THE DA VINCI LEGACY

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared Title of Collective Work ▼

If published in a periodical or serial give Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

NAME OF AUTHOR ▼

Lewis Perdue

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

1949

Was this contribution to the work a "work made for hire"?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▼ U.S.A.
Domiciled in ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If you answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed ▼

entire text

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▼
Domiciled in ▼

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If you answer to either of these questions is "Yes," see detailed instructions.

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Briefly describe nature of the material created by this author in which copyright is claimed ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

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☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▼
Domiciled in ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If you answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP

Briefly describe nature of the material created by this author in which copyright is claimed ▼

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases.
1983

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Complete this information ONLY if this work has been published.
June 20 1983 U.S.A.

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Lewis Perdue
c/o William Morris Agency
1350 Ave. of the Americas
New York, NY 10019

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

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If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.**a. Preexisting Material** Identify any preexisting work or works that this work is based on or incorporates. ▼**b. Material Added to This Work** Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼See instructions
before completing
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Account Number ▼

DA 025275

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name Address Apt City State Zip ▼

Kevin J. Mulroy

Pinnacle Books, Inc., 1430 Broadway

New York, NY 10018

Area Code & Telephone Number ▼

Be sure to
give your
daytime phone
number**CERTIFICATION** I, the undersigned, hereby certify that I am the

Check one ▶

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of Lewis Perdue

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant or owner of exclusive right(s) ▶

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3

Kevin J. Mulroy

date ▶ June 20, 1983

Handwritten signature (X) ▼

MAIL
CERTIFI-
CATE TOCertificate
will be
mailed in
window
envelope

Name ▼

K. Mulroy - Pinnacle Books, Inc.

Number-Street-Apartment Number ▼

1430 Broadway

City State ZIP ▼

New York, NY 10018

Have you:

- Completed all necessary spaces?
- Signed your application in space 10?
- Enclosed check or money order for \$10 payable to Register of Copyrights?
- Enclosed your deposit material with the application and fee?

MAIL TO: Register of Copyrights
Library of Congress, Washington
D.C. 20559

* 17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

EXHIBIT B

FORM TX
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER

TX 1 730 154

TX TXU
EFFECTIVE DATE OF REGISTRATION

Month JAN Day 3 Year 1986

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

THE LINZ TESTAMENT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

NAME OF AUTHOR ▼

Lewis Perdue

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☒ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

U.S.A.

OR { Citizen of ▼
Domiciled in ▼

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼
entire text

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▼
Domiciled in ▼

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▼
Domiciled in ▼

WAS THIS AUTHOR'S CONTRIBUTION TO
THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to either
of these questions is
"Yes," see detailed
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of the material created by this author in which copyright is claimed. ▼

YEAR IN WHICH CREATION OF THIS
WORK WAS COMPLETED This information
must be given
in all cases.

1985

Year

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information
ONLY if this work
has been published.

Month

September

Day

5

Year

1985

U.S.A.

Nation

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the
same as the author given in space 2. ▼

Lewis Perdue
100 Lorain Place
Los Gatos, CA 95030

TRANSFER If the claimant(s) named here in space 4 are different from the author(s) named
in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED
JAN 03 1986
ONE DEPOSIT RECEIVED
TWO DEPOSITS RECEIVED
JAN 03 1986
REMITTANCE NUMBER AND DATE

MORE ON BACK ► • Complete all applicable spaces (numbers 5-11) on the reverse side of this page.
• See detailed instructions • Sign the form at line 10.

DO NOT WRITE HERE
Page 1 of 2 pages

EXAMINED BY *123*

FORM TX

CHECKED BY

TX 1 730 154

☐ CORRESPONDENCE
Yes☐ DEPOSIT ACCOUNT
FUNDS USEDFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼☐ This is the first published edition of a work previously registered in unpublished form.☐ This is the first application submitted by this author as copyright claimant.☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a & 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

See instructions
before completing
this space.

MANUFACTURERS AND LOCATIONS If this is a published work consisting preponderantly of nondramatic literary material in English, the law may require that the copies be manufactured in the United States or Canada for full protection. If so, the names of the manufacturers who performed certain processes, and the places where these processes were performed must be given. See instructions for details.

Names of Manufacturers ▼

Haddon Craftsmen

Places of Manufacture ▼

O'Neill Highway, Dunmore, PA

REPRODUCTION FOR USE OF BLIND OR PHYSICALLY HANDICAPPED INDIVIDUALS

A signature on this form at space 10, and a check in one of the boxes here in space 8, constitutes a non-exclusive grant of permission to the Library of Congress to reproduce and distribute solely for the blind and physically handicapped and under the conditions and limitations prescribed by the regulations of the Copyright Office: (1) copies of the work identified in space 1 of this application in Braille (or similar tactile symbols); or (2) phonorecords embodying a fixation of a reading of that work; or (3) both.

a ☒ Copies and Phonorecordsb ☐ Copies Onlyc ☐ Phonorecords Only

See instructions.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/Zip ▼

Rick Horgan/Donald I. Fine, Inc.

128 East 36th St.

New York, N.Y. 10016

Area Code & Telephone Number ▶ 212 696-1838

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check one ▶

☐ author☐ other copyright claimant☒ owner of exclusive right(s)☐ authorized agent of

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

Typed or printed name and date ▼ If this is a published work, this date must be the same as or later than the date of publication given in space 3.

Rick Horgan

date ▶ Dec. 19, 1985

Handwritten signature (X) ▼

MAIL
CERTIFI-
CATE TOCertificate
will be
mailed in
window
envelope

Name ▼

Rick Horgan/Donald I. Fine, Inc.

Number/Street/Apartment Number ▼

128 East 36th Street

City/State/ZIP ▼

New York, N.Y. 10016

Have you:

- Completed all necessary spaces?
- Signed your application in space 10?
- Enclosed check or money order for \$10 payable to Register of Copyrights?
- Enclosed your deposit material with the application and fee?

MAIL TO: Register of Copyrights
Library of Congress, Washington
D.C. 20559

* 17 U.S.C. § 506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

EXHIBIT C

FORM TX

For a Nondramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

110892199



TX 5-107-044



TX0005107044

EFFECTIVE DATE OF REGISTRATION

Month 12 Day 15 Year 99

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

DAUGHTER OF GOD

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

NAME OF AUTHOR ▼

a Lewis Perdue

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▶ USA
Domiciled in ▶ USA

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼
text

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▶
Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☒ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of ▶
Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonymous? ☐ Yes ☒ No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

a 1999

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

b Complete this information ONLY if this work has been published.

Month ▶ December Day ▶ 15 Year ▶ 1999

USA

Nation

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼
Lewis Perdue

Tom Doherty Associates, LLC
175 Fifth Avenue, New York, NY 10010

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

DEC 15 1999

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

DEC 15 1999

FUNDS RECEIVED

MORE ON BACK ▶ • Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions.

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EXAMINED BY

FORM TX

CHECKED BY

CORRESPONDENCE

☐ YesFOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼1. ☐ This is the first published edition of a work previously registered in unpublished form.2. ☐ This is the first application submitted by this author as copyright claimant.3. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a. _____

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

See instructions
before completing
this space.

6

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼ Account Number ▼

a. Tom Doherty Associates, LLC DAO 45179

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

b. Sarah Brock c/o Tom Doherty Associates, LLC

175 Fifth Avenue, Room 600

New York, NY 10010-7848

Area code and daytime telephone number ▶ 212-674-5151 ext. 606

Fax number ▶ 212-529-0594

Email ▶ sarah.brock@stmartins.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▶

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of

Lewis Perdue

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

the work identified in this application and that the statements made
me in this application are correct to the best of my knowledge.

8

Signed and dated or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Sarah Brock

Date ▶ 12/15/99

Handwritten signature (X) ▼

X

The filing fee of \$20.00 is effective through December 31, 1998. After that date, please write the Copyright Office,
check the Copyright Office Website at <http://www.loc.gov/copyright>, or call (202) 707-3000 for the latest fee information.I
afficateI
afficate
be
led in
dow
elope

Name ▼

Sarah Brock c/o Tom Doherty Associates, LLC

Number/Street/Apt ▼

175 Fifth Avenue, Room 600

City/State/ZIP ▼

New York, NY 10010-7848

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

9

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAN BROWN and RANDOM HOUSE, INC.,

Plaintiffs,

-against-

LEWIS PERDUE,

Defendant,

LEWIS PERDUE,

Counterclaimant,

-against-

COLUMBIA PICTURES INDUSTRIES, INC., SONY
PICTURES ENTERTAINMENT INC., SONY PICTURES
RELEASING CORPORATION, IMAGINE FILMS
ENTERTAINMENT, LLC,

Additional Counterclaim
Defendants.

Civil Action No.: 04 CV 7417

(GBD)

**AFFIDAVIT OF SERVICE BY
MAIL**

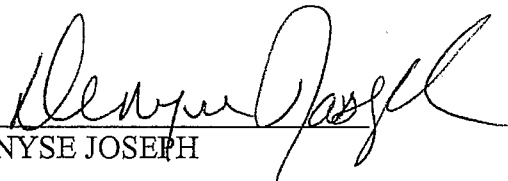
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

DENYSE JOSEPH, being duly sworn, deposes and says that: Deponent is not a party to this action, is over 18 years of age and is employed by Fischbein•Badillo•Wagner•Harding LLP, 909 Third Avenue, New York, New York 10022.

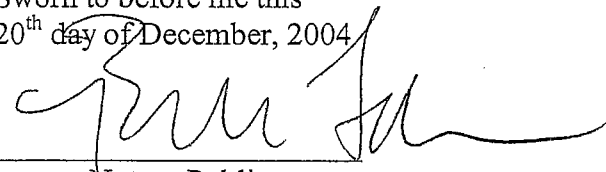
On December 20, 2004, Deponent served the within **ANSWER WITH COUNTERCLAIMS** upon:

DAVIS WRIGHT TREMAINE LLP
Attorneys for Plaintiffs
Dan Brown and Random House, Inc.
1633 Broadway
New York, New York 10019-6708
Attn: Elizabeth McNamara Exterior Street

by depositing a true copy thereof in a securely sealed, properly addressed fully postpaid, first class mail wrapper in an official depository under the exclusive care and custody of the United States, and via e-mail at LizMcNamara@DWT.com.


DENYSE JOSEPH

Sworn to before me this
20th day of December, 2004


Notary Public

BRUCE N. LEDERMAN
Notary Public, State of New York
No. 02LE4710769
Qualified in Suffolk County
Commission Expires March 30, 2006