

11 Work as described in paragraph 16 of the Complaint.

12 ANSWER: Plaintiff employs a full-time paralegal and researchers who, on a rotating basis, search the entirety of Plaintiff's image library via google reverse image search to identify and investigate unauthorized uses of Plaintiff's photographs. The infringement at issue in this lawsuit was found via that process by one of Plaintiff's researchers. The same image has been searched multiple times by Plaintiff over the years, and the first time it appeared in a reverse image search by Plaintiff's researchers was June 1, 2022.

13 11. Please identify any and all licenses that you, or any middleman acting with your
14 authority, have granted for Plaintiff's "Work" described in paragraph 11 of the Complaint,
15 or for subscriptions for the use of any group of photos that included the Work.

16 ANSWER: Plaintiff is unable to identify any licensees of the Work through Getty/iStock as
Getty/iStock is solely in control of that information and does not share it with plaintiff.
Plaintiff objects to this request to the extent it requires Plaintiff to identify each and every
one of its subscribers to its library of photographs from 2009 through the present date.
Notwithstanding, Plaintiff directs Defendant to see the documents being produced in
response to Request for Production Nos. 4 and 5.

17 12. Please identify any and all claims that you have made for infringement of the
18 copyright in the Work, or in any group of photos that included the Work.

19 ANSWER: Plaintiff objects to this interrogatory as it is not relevant to the claims or
defenses at issue in the lawsuit. Plaintiff further objects to this interrogatory as overly broad,
in that it would require Plaintiff to identify every pre-suit and filed lawsuit demand that
Plaintiff has ever made with respect to each and every one of its 30,000+ photographs.

20 13. Please state, for each calendar year since 2010, how much revenue Plaintiff
21 derived from the sale of licenses or subscriptions for the use of photographs in which it
22 owned the copyright,

23 ANSWER: Plaintiff began offering the photograph at issue through its subscription model
in 2017. Before 2017, there was no revenue derived from the sale of licenses or
subscriptions. Revenue was derived from the commissions paid to Adlife from Getty/iStock
from 2010 through 2017. For the commissions Plaintiff received, Plaintiff directs
Defendant to its response to Interrogatory No. 21 in Defendant's Second Set of
Interrogatory Requests. From 2017 to August 31, 2023, Plaintiff has received \$755,644 in
Subscription revenue. (2017 – \$67,898, 2018 – \$78,728, 2019 – \$192,870, 2020 – \$180,345,
2021 – \$71,162, 2022 – \$94,157, and 2023 – \$70,484).

24 14. Please state, for each calendar year since 2010, how much revenue Plaintiff
25 derived from claims of infringement that it asserted and/or from filing infringement lawsuits.

26 ANSWER: Plaintiff objects to this interrogatory as it is not relevant to claims or defenses at
issue in this lawsuit.

27 15. Please identify all documents relating in any way to your decision to stop selling
28 licenses for use of individual photographs and to license only the use of your entire