

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

Judy A. Juracek,

Plaintiff

v.

Capcom CO., LTD. and Capcom USA, Inc.,

Defendants

Civil Action No. 3:21-cv-00775

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT; REMOVAL OF
COPYRIGHT MANAGEMENT
INFORMATION**

JURY TRIAL DEMANDED

COMPLAINT

Judy A. Juracek (hereinafter “Plaintiff” or “Juracek”) brings forth this action against Capcom CO., LTD. and Capcom USA, Inc (hereinafter collectively “Capcom” or “Defendants”) and complains and alleges as follows:

INTRODUCTION

1. This is an action for federal copyright infringement under 17. U.S.C. § 101 *et seq*, and removal of copyright management information.

PARTIES

2. Plaintiff Juracek is an individual with an address at 55 Turkey Plain Rd, Bethel CT 06801.

3. Upon information and belief, Defendant, CAPCOM CO., LTD. is a Corporation organized in Japan with an address of 3-1-3 Uchihiranomachi, Chuo-ku Osaka JAPAN 540-0037.

4. Upon information and belief, Defendant, Capcom U.S.A., Inc. is a California corporation having an address at 185 Berry Street, Suite 1200, San Francisco, CA 94107.

5. Capcom, and/or its agents or affiliated companies sell the game and series of games referred to as RESIDENT EVIL throughout the United States and the World, including sales in Connecticut.

JURISDICTION AND VENUE

6. This Court has federal question jurisdiction pursuant to 28 U.S.C. §§ 1331, and 1338 over the copyright claims because the action alleges *inter alia* violations of federal statutes.

7. Venue is proper in this judicial district under 28 U.S.C. §§ 1391, 1400(a) because a substantial part of the events giving rise to the claims raised in the lawsuit occurred in this judicial district, and because Defendants conduct business in this district and Defendant's actions have injured Juracek, a Connecticut resident.

8. Upon information and belief, this Court has jurisdiction over Defendants because Defendants committed acts of copyright infringement in this district and have distributed copies of various infringing works that wrongfully utilize Juracek's photographs as described further herein, causing injury to Plaintiff in this state and district.

9. Defendants sell and market products in Connecticut which include Plaintiff's copyrighted material. Furthermore and upon information and belief, Defendant knew or had reason to believe that Plaintiff was located in Connecticut and that harm would be felt in Connecticut as a result of Defendant's actions.

10. Defendants have purposely availed themselves to this state and this district at least because they have promoted and sold their infringing products to consumers in this state and district.

FACTUAL BACKGROUND

11. Plaintiff has been a professional scenic artist, scene designer and photographer for much of her career, working on numerous well known film and TV productions.

12. As part of Plaintiff's work, she traveled around the world photographing various and unique decorative surfaces and features as part of her research related to set design which photographs are distinctive and exclusive to Plaintiff. These photos are extremely useful to designers and architects looking to create distinctive and memorable scenery and decorative features.

13. As a result of Plaintiff's work over the years, she grouped together various examples of unique and interesting surfaces, textures and features into a book and CD-Rom ("CD-ROM") which represented Plaintiff's extensive personal research work into decorative surfaces and textures.

14. More specifically, plaintiff is the author and photographer of the photography book called "SURFACES" which was published by the W.W. Norton Company and includes a copyright notice "© 1996 by Judy A Juracek All rights reserved" immediately next to the table of contents page. The ISBN is 0-393-73007-7 (the "book"). The book starts off "This collection of photographs began as my private file of photo research..."

15. Juracek is the owner of U.S. Copyright Registration Nos. TX4-442-862 which claims "text, photographs, and compilation in book; compilation on CD-ROM" as found in the book.

16. This book also included a CD-ROM which provided digital copies of the photos ("photographs") and suggested that the photos could be useful for various purposes and invited

interested persons to contact Juracek if licenses were desired. The CD-ROM also contains a copyright notice “© 1996 by Judy A Juracek All rights reserved”.

17. As a result of the book and photographs and CD-ROM, Juracek licensed copies of various photographs to many different parties who sought to use the photos commercially and the book became a very popular way for architects and designers to obtain exclusive high quality examples of unique decorative surfaces and features. The parties were required to contact Juracek to obtain high resolution digital files as the CD-ROM files were not high resolution. For the sake of clarity, anyone seeking a license for the photographs from the book or CD-ROM were required to contact Plaintiff to obtain the photos in a high resolution digital file suitable for commercial use as all rights were reserved as set forth in the copyright notice.

18. At all times, Juracek retained and continues to retain full ownership of book and photographs.

19. The CD-ROM also included a copyright notice on the front of the CD-ROM.

20. Juracek never sold or licensed the photographs to Defendants.

21. In the book, and the CD-ROM, the photographs are numbered. For example “G-79 shattered safety glass” in the book refers to a photo of shattered safety glass which Juracek obtained in Italy.

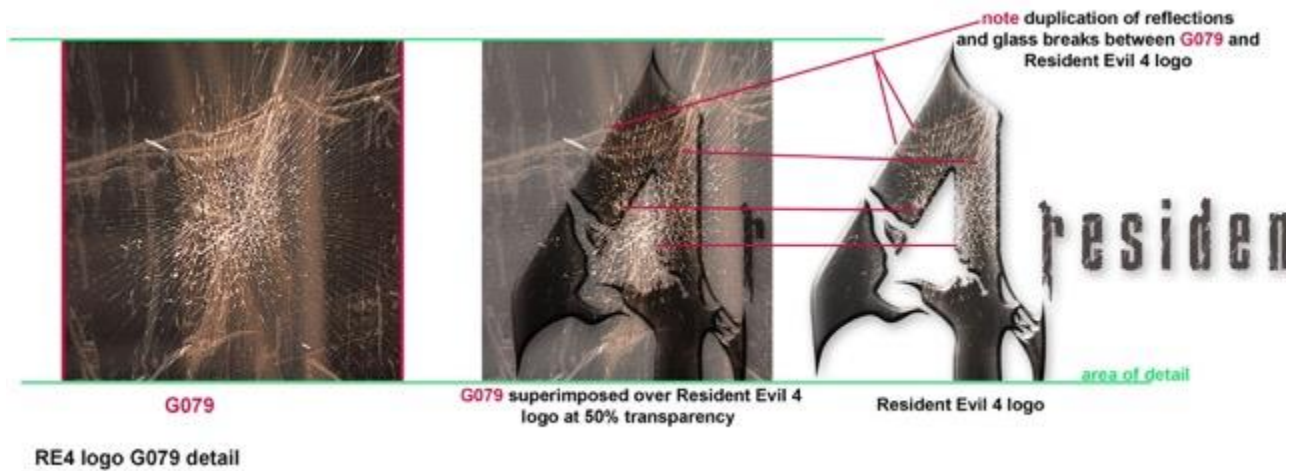
22. The CD-ROM includes a file called “G079” which is the same photo and a copy of that photo is found below.



23. This “G079” is but one example of the many highly unique photographs in Juracek’s book and CD-ROM, more specifically, the photo was taken in Italy of a unique looking glass shatter pattern that upon information and belief would not be duplicated by any other shattering of glass in that the probability of an object hitting the same thickness and configuration of glass identically at any other location is impossible or exceptionally remote.

24. Capcom’s primary logo for RESIDENT EVIL including the game, and related merchandise uses this “G079” photo to create the logo.

25. The below commented analysis shows that Capcom has directly copied “G079”



26. The below commented analysis shows that Capcom has directly copied #_____ which photos were taken in a mansion located in Newport, Rhode Island. The public does not have access or permission to photograph the inside of the mansion. It is not possible for Capcom to have had access to the mansion to photograph such images.

Photo from the mansion:



27. These are but two examples of infringement in which the unique nature of the photo(s) and Defendant's reproduction makes it almost impossible for Defendant to have created or obtained the design from another source.

28. Various versions of Capcom's RESIDENT EVIL game and merchandise have used approximately 80 or more of Juracek's photographs which appeared over 200 times in Defendants' RESIDENT EVIL games. Comparisons showing Plaintiff's photos used by Defendants are found at Exhibit A.

29. Given the wide amount of copying of unique photographs not available elsewhere, it is apparent that Defendant had access to the book or CD-ROM, or both.

30. Specifically, Capcom was subject to a security breach/hacking in 2020 which is believed to have occurred approximately in November 2020.

31. Some Capcom data released by the hackers included high resolution images of artwork used in Resident Evil and other games.

32. The file names for at least one of the images from the Capcom hacked files are the same file names as those used on the CD-ROM.

33. For example, the file name for a metal texture image from the CD-ROM is “ME009” and Capcom has ME009 stored in its files under that name and Capcom used this photograph in its game(s).

34. ME009 is copied below:



35. A photo with the ME009 name is in Capcom’s files and was used in one or more of Capcom’s games, including RESIDENT EVIL. Furthermore, additional galleries that Capcom used in America and Japan are paid for, which demonstrates that Capcom paid for other images aside from Plaintiff’s book. In the Facebook advertising, it is mentioned that that 3,500 textures have been repainted.

36. Furthermore, given that approximately 80 or more Juracek images appear in RESIDENT EVIL and that the primary brand/logo of RESIDENT EVIL employs a specific shattered glass pattern that matches a Juracek photo taken in Italy, as well as the interior mansion door design that the public does not have access to, it is hard to imagine that precise duplication would be possible by independent creation. More specifically, it is hard to imagine that Juracek would take a photo of shattered glass in Italy and interior mansion door design and that Capcom artists would reproduce the exact same pattern of shattered glass in a logo and interior door design without benefit of Juracek's photographs.

37. Capcom's activities show a pattern of misconduct. A Dutch filmmaker is suing Capcom for copying the filmmaker's monster designs and using the designs in the Resident Evil game, see <https://www.thegamer.com/resident-evil-village-dutch-filmmaker-report/>.

38. Accordingly, Capcom did not independently create the shatter pattern which is part of its logo described above in Paragraph 25.

39. Capcom created all of the identified game scenes in Exhibit A using Juracek's photographs without permission.

40. Juracek did not discover the copying until more recently in large part due to Capcom's separation of Juracek's name and copyright notice from her images. Once Juracek noticed the infringement, she quickly gathered examples of copying and provided those to Capcom in the form of a copyright infringement notice letter.

41. Capcom has not ceased use or altered their conduct despite clear and specific identification of numerous infringements.

42. Upon information and belief, Capcom is involved in a virtual reality project with Facebook that includes making games available through a Facebook platform, which games include or will include Juracek's copyrighted works.

43. Capcom also separated the copyright notice on the front of the CD-ROM from the images when Capcom stored the files from the CD-ROM, thus intentionally separating/removing the copyright management information from the images, making it significantly more difficult for Juracek to discover the infringing conduct. The book included a copyright notice which was also separated from the photographs Capcom used.

COUNT I
Copyright Infringement – 17 U.S.C. § 101 et seq

44. Plaintiff repeats and realleges the allegations contained in the prior paragraphs of this Complaint and incorporates them herein by reference.

45. The book, photographs and CD-ROM were created and/or authored Plaintiff and Plaintiff remains the owner of the same.

46. Defendants have copied approximately 80 or more of the photographs and used them over 200 times in the games.

47. Plaintiff's copyright includes a claim to the photographs.

48. Defendants are infringing the copyrights of Plaintiff website by unlawfully reproducing, preparing derivative works, and publicly displaying and selling copies of identical or substantially similar content in games, and merchandise in violation of the U.S. Copyright Act. At no time has Plaintiff authorized Defendants to engage in such conduct.

49. Plaintiff is entitled to actual damages and disgorgement of profits/lost profits or at its election, statutory damages, including an award for each photo infringed, i.e. a statutory award of up to \$150,000 x 80 photographs (i.e. up to \$12,000,000 USD) plus attorney fees and

costs or alternately actual damages and disgorgement of profits plus attorney fees and costs.

50. The full extent of Capcom's infringement is not known and Juracek believes there may be other photos not identified in Exhibit A that Capcom has used without license.

COUNT II
False Copyright Management Information and Removal of Copyright Management Information

51. Plaintiff repeats and realleges the allegations contained in the prior paragraphs of this Complaint and incorporates them herein by reference.

52. Capcom has intentionally separated Juracek's copyright notice from the photos used.

53. Capcom has claimed a copyright in the various Capcom games that use Juracek's photographs, thus falsely claiming complete copyright ownership to the Capcom games when those games use Juracek's copyrighted photographs.

54. Capcom has intentionally separated the Copyright notices on the Juracek book and CD-ROM from the photographs, thus removing the Copyright management information from the photographs and has distributed games and merchandise including photos with removed copyright management information. Further, Capcom has claimed the Copyright is owned by Capcom without any reference to Juracek's copyright.

55. The foregoing was without authority of the Juracek or the law.

56. Juracek is entitled to actual damages and any profits of Capcom or statutory damages of between \$2,500 and \$25,000 per photograph (there are approximately 80 known to Juracek at this time).

57. Juracek is entitled to costs and attorney fees and an injunction to stop the irreparable harm to Juracek's exclusive rights.

58. Juracek is entitled to an order ordering the destruction of all devices or products involved in the removal and/or falsification of Copyright management information.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

- A. An order immediately and permanently enjoining Defendants, its officers, members, agents, servants, employees, attorneys, and all persons in active concert or participating with any of them, from utilizing any of Plaintiff's copyrights in any way.
- B. Direct Defendants to destroy each and every copy of all games, products and other content including Plaintiff's photographs.
- C. That Defendant be ordered to pay to Plaintiff damages sustained as a result of the activities complained of herein, including actual damages, profits, exemplary damages and if elected, statutory damages.
- D. That Defendant be ordered to pay increased damages due to its willful infringement.
- E. That Defendant be ordered to pay Plaintiff's reasonable attorneys' fees and costs incurred in this action.
- F. That Plaintiff be awarded such other and further relief as may be contemplated by statute law and/or equity and such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury on all claims and issues so triable.

Dated: Stamford, Connecticut
June 4, 2021

ST. ONGE STEWARD JOHNSTON & REENS LLC

/s/Jonathan A. Winter/

Gene S. Winter, Esq.

Jonathan A. Winter, Esq.

986 Bedford Street

Stamford, Connecticut 06905-5619

Telephone: (203) 324-6155

Facsimile: (203) 327-1096

Email: gwinter@ssjr.com

jwinter@ssjr.com

litigation@ssjr.com

Attorneys for Plaintiff Judy A. Juracek

Exhibit A

EXHIBIT "A"

Surfaces Original

Used by Capcom – Resident Evil 4



note duplication of reflections and glass breaks between G079 and Resident Evil 4 logo

G079 superimposed over Resident Evil 4 logo at 50% transparency

Resident Evil 4 logo

area of detail

images from Surfaces Vol 1 - w X

Capcom: Resident Evil 4 Official X +

www.residentevil.com/4/us/

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



EXHIBIT "A"

Surfaces Original

Photo from Lockwood Mansion in Norwalk:



Used by Capcom – Resident Evil 4



Resident Evil 4 door and frame is a copy of W061 manipulated to fit game scenery

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil HD

A screenshot from Resident Evil HD showing a stained glass window in a dark, gothic-style interior. A red box highlights the window, and a red line connects it to a smaller inset image labeled 'REHD Remaster' and 'G033'. Below the main screenshot, two smaller images are shown: '1) Capcom texture' and '2) Capcom texture upscaled to roughly native resolution of Surfaces image'. A red line also connects the main screenshot to these two images. The text 'G033 manipulated with Photoshop perspective tool' is written in red at the bottom of the main screenshot.

REHD Remaster

G033

G033 manipulated with Photoshop perspective tool

1) Capcom texture

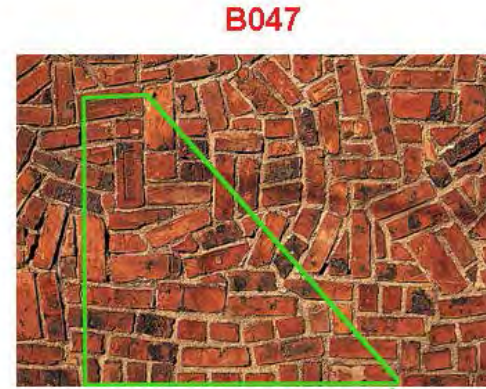
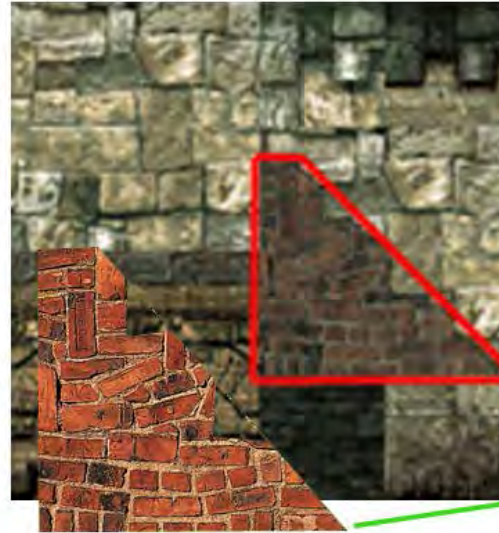
2) Capcom texture upscaled to roughly native resolution of Surfaces image.

EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Care 1
texture board for DMC1



area of crop

scene from
Devil May Care 1

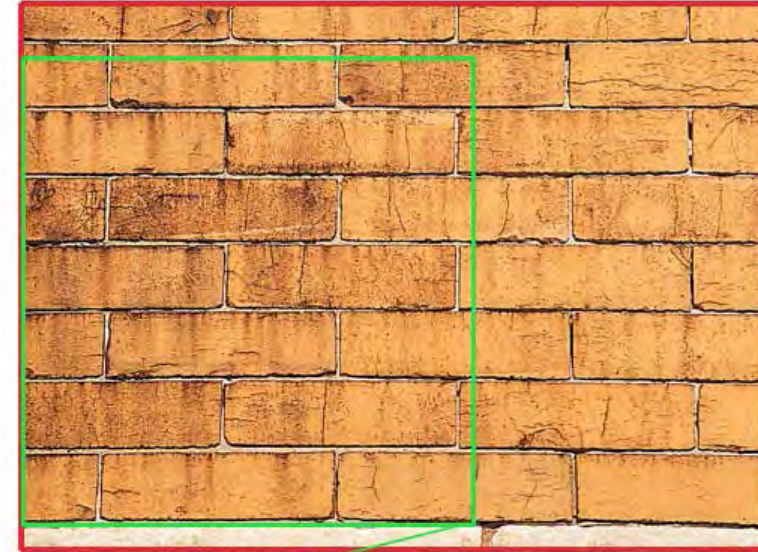


EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Care 1



area of crop

B141



Devil May Care 1

**Section B141 was cropped, scaled and used as wall in back of arch with additional painting.
Note the same coursing and discoloration of brick between B141 and wall.**

EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Care

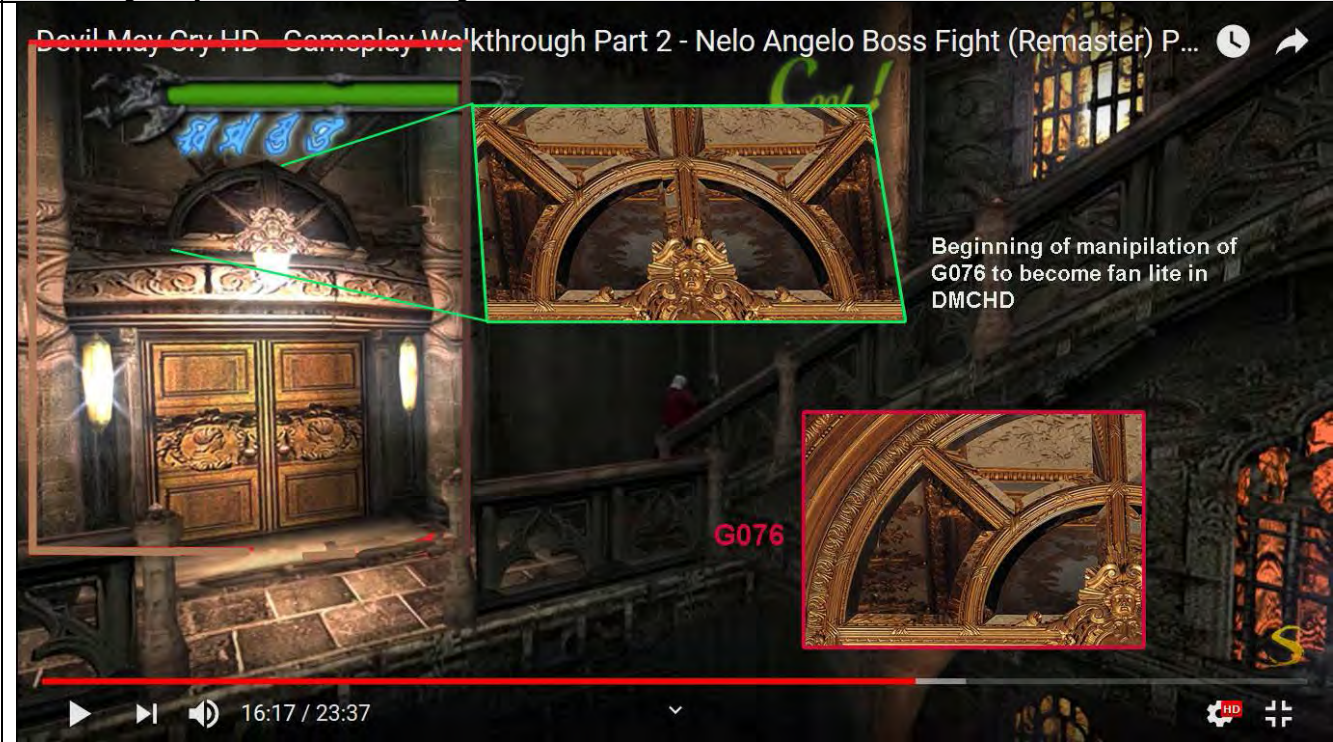


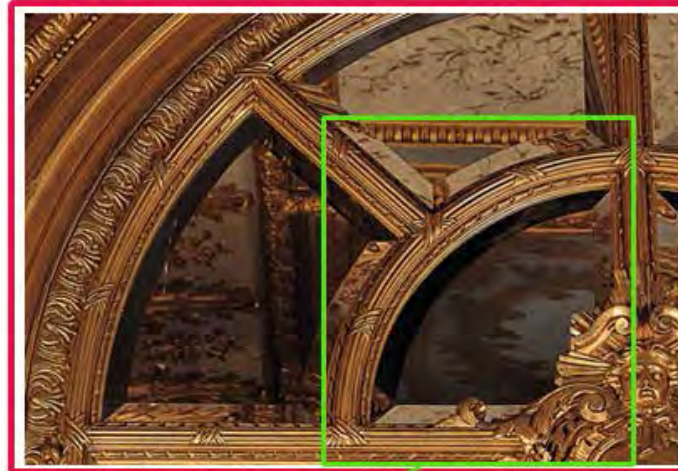
EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

GO76



area of crop



RE 4 scenic element

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



OB2 window glass constructed from combining and manipulating sections of G079



cropped section

cropped section



G079



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



**texture from RE Remake
as built from rotating and stretching
area from G087**

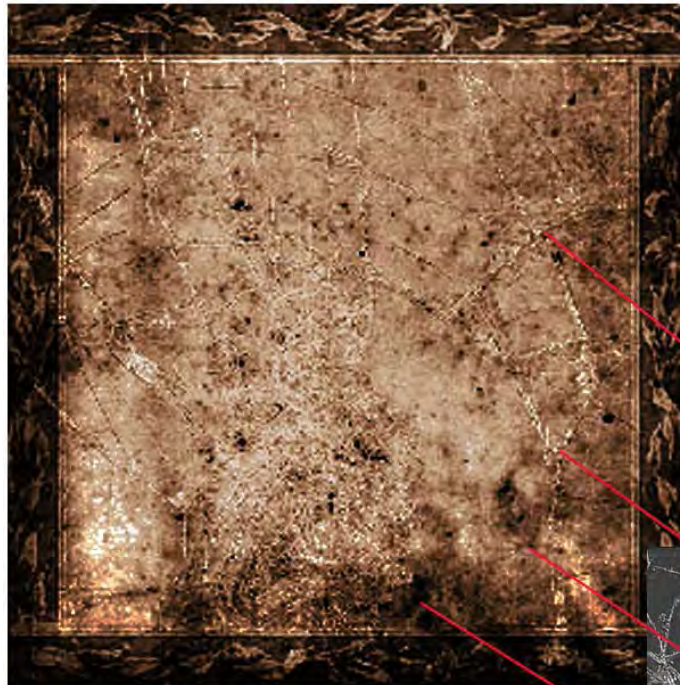


EXHIBIT "A"

Surfaces Original



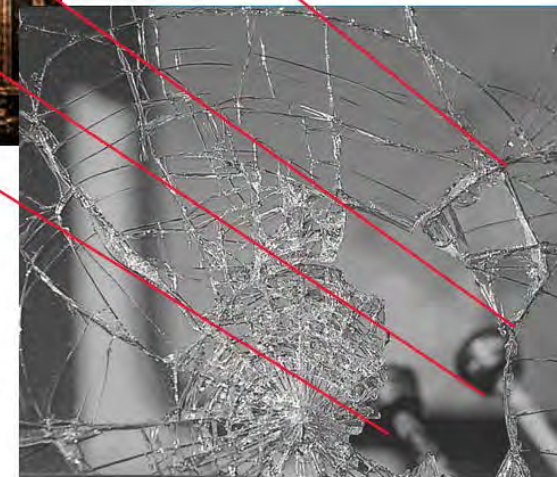
Used by Capcom – OB2



OB2



G088



**"Spider web" texture from OB2
created by overlaying G088.
Note duplication of broken glass shapes
and background elements in both images.**

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



EXHIBIT "A"

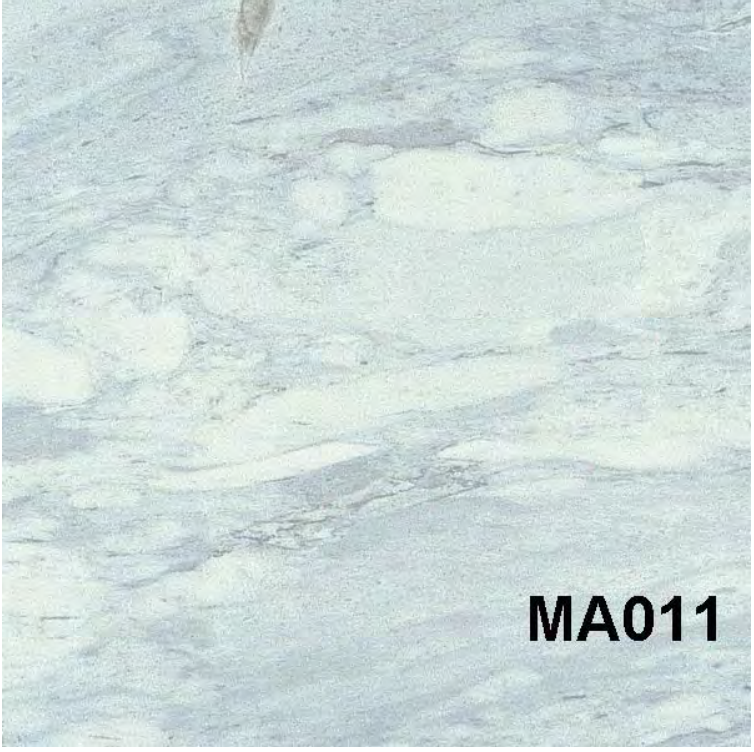
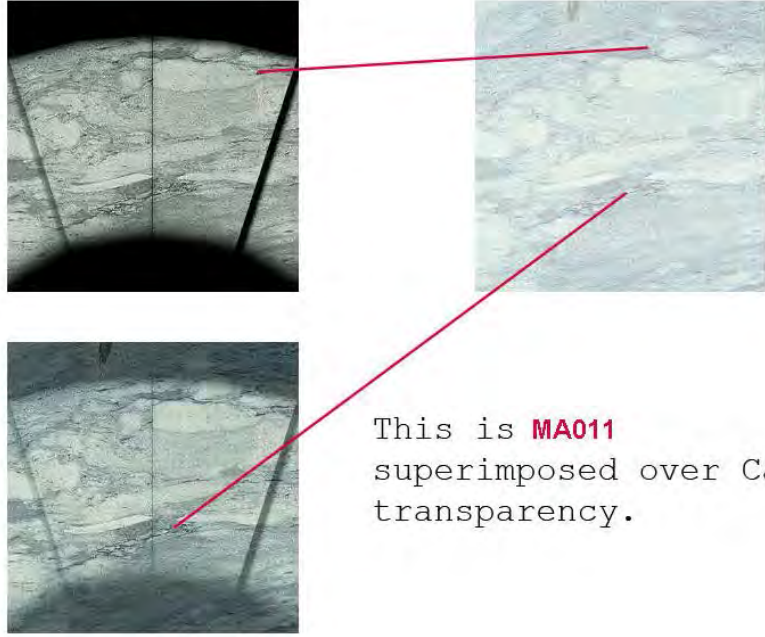
Surfaces Original	Used by Capcom – Resident Evil 4
 <p data-bbox="569 808 768 863">MA011</p>	<p data-bbox="1008 219 1384 373">This manipulated image was used by Capcom in Resident Evil 4.</p>  <p data-bbox="1860 500 1975 532">MA011</p> <p data-bbox="1464 808 2271 922">This is MA011 superimposed over Capcom's image at 50% transparency.</p>

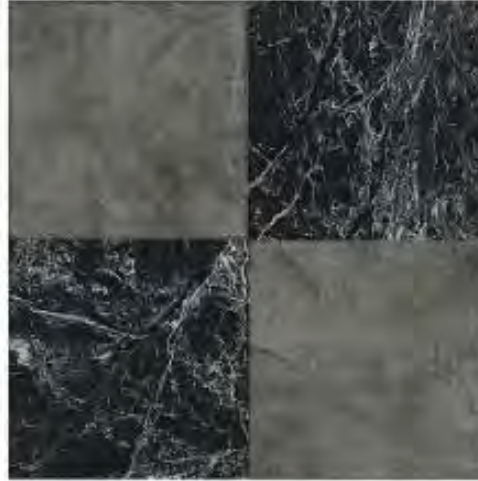
EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

(1) CAPCOM TEXTURE FROM RESIDENT EVIL 4



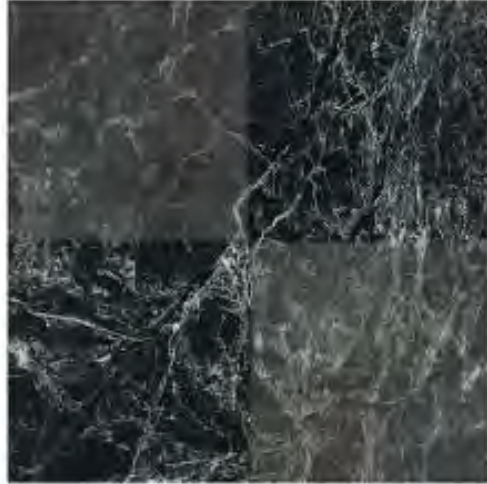
CAPCOM TEXTURE FROM RESIDENT EVIL 4

(2)



EXHIBIT "A"

SURFACES IMAGE SUPERIMPOSED OVER CAPCOM
TEXTURE AT 50% TRANSPARENCY



SURFACES IMAGE SUPERIMPOSED OVER CAPCOM
TEXTURE AT 50% TRANSPARENCY



EXHIBIT "A"

CAPCOM TEXTURE 1 AS IT APPEARS FROM DIFFERENT PERSPECTIVES IN RESIDENT EVIL 4



EXHIBIT "A"

Surfaces Original

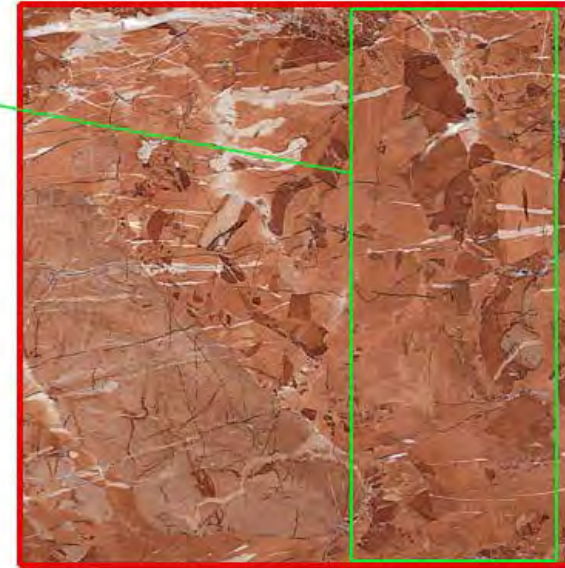


Used by Capcom – Resident Evil 4

RE4 marble from MA027 cropped and flipped



area
of
crop



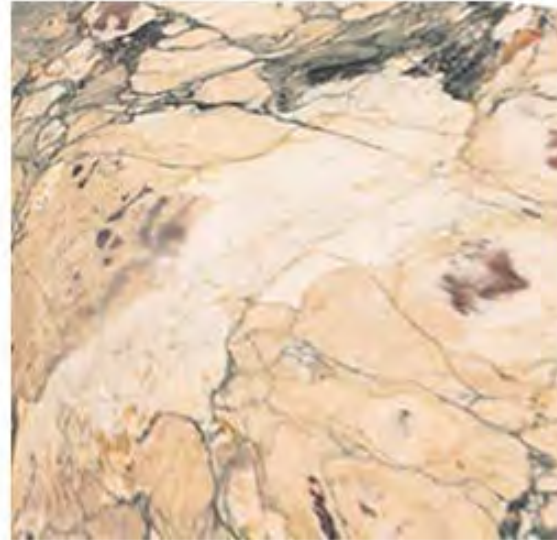
MA027

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



MA046 as manipulated in RE4

EXHIBIT "A"




Surfaces Original	Used by Capcom – Resident Evil 4
 <p data-bbox="680 743 876 797">MA048</p>	 <p data-bbox="1903 277 2107 315">RE4 marble</p>  <p data-bbox="1956 505 2306 586">MA048 cropped and flipped</p>

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

MA061 repeated to build RE4 wall



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

Resident Evil 4



note direct repeats of block coursing,
marble veining and marble tonality.

mouldings are
direct repeats

crop
line



MA062

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



EXHIBIT "A"



note duplication of marble veining, **MA064**
particularly in the brecciated marble tiles

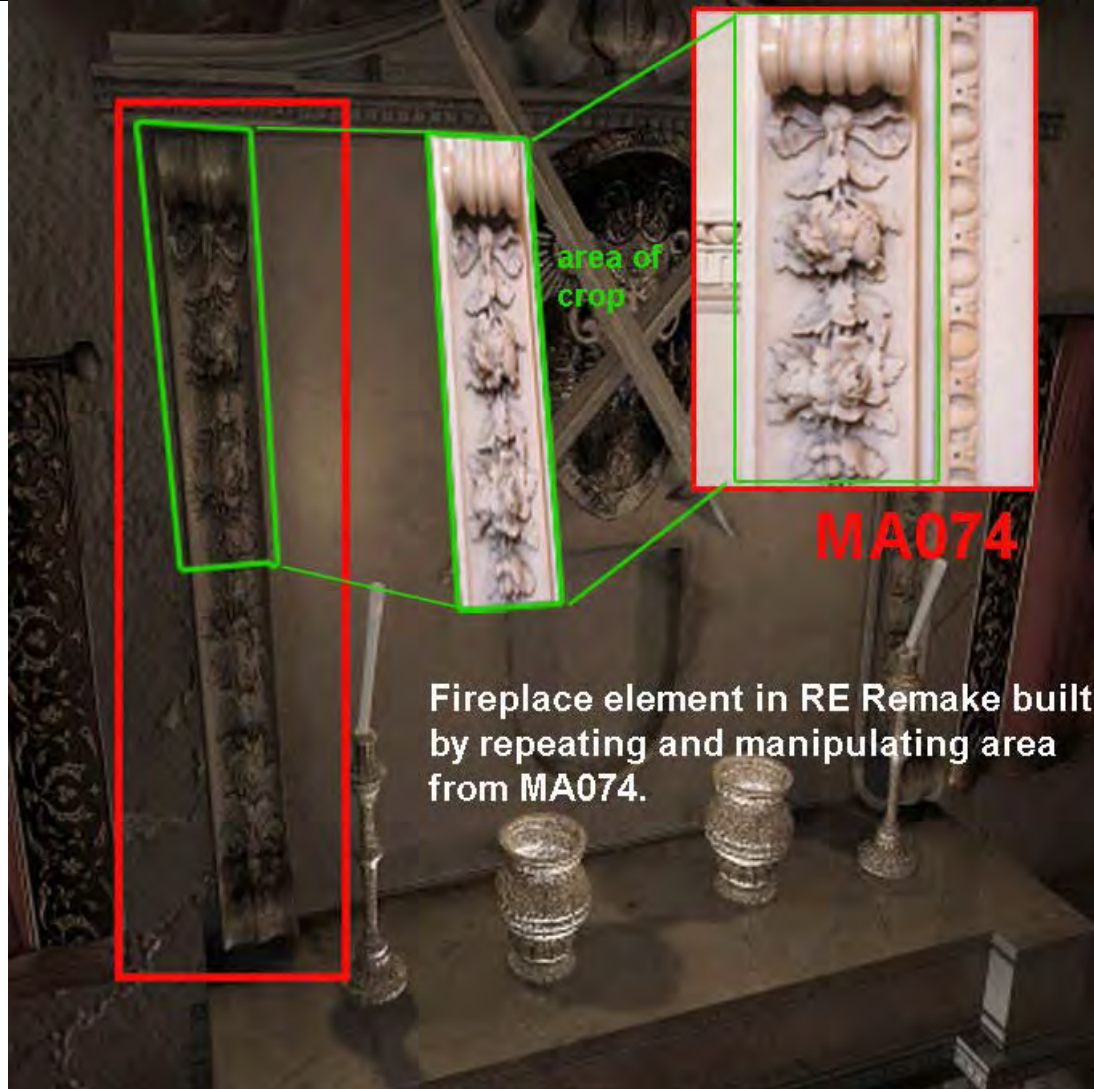
EXHIBIT "A"

Surfaces Original



MA074

Used by Capcom – Resident Evil Remake



area of crop

MA074

Fireplace element in RE Remake built by repeating and manipulating area from MA074.

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

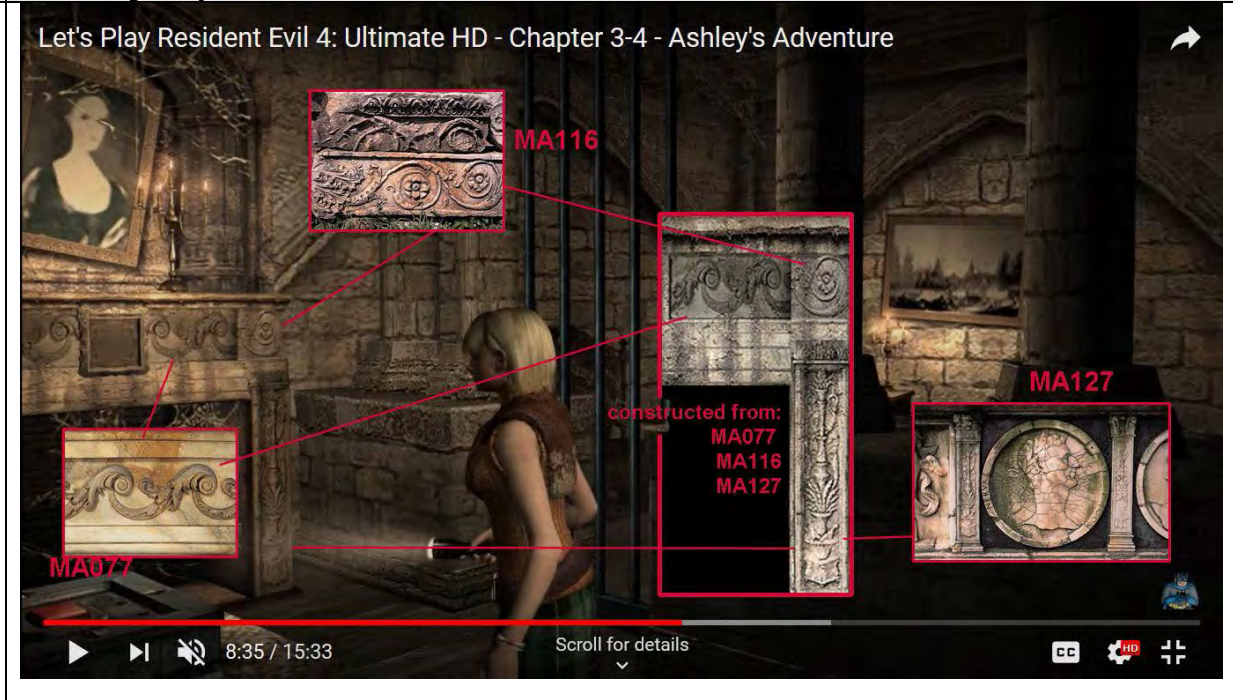


EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry

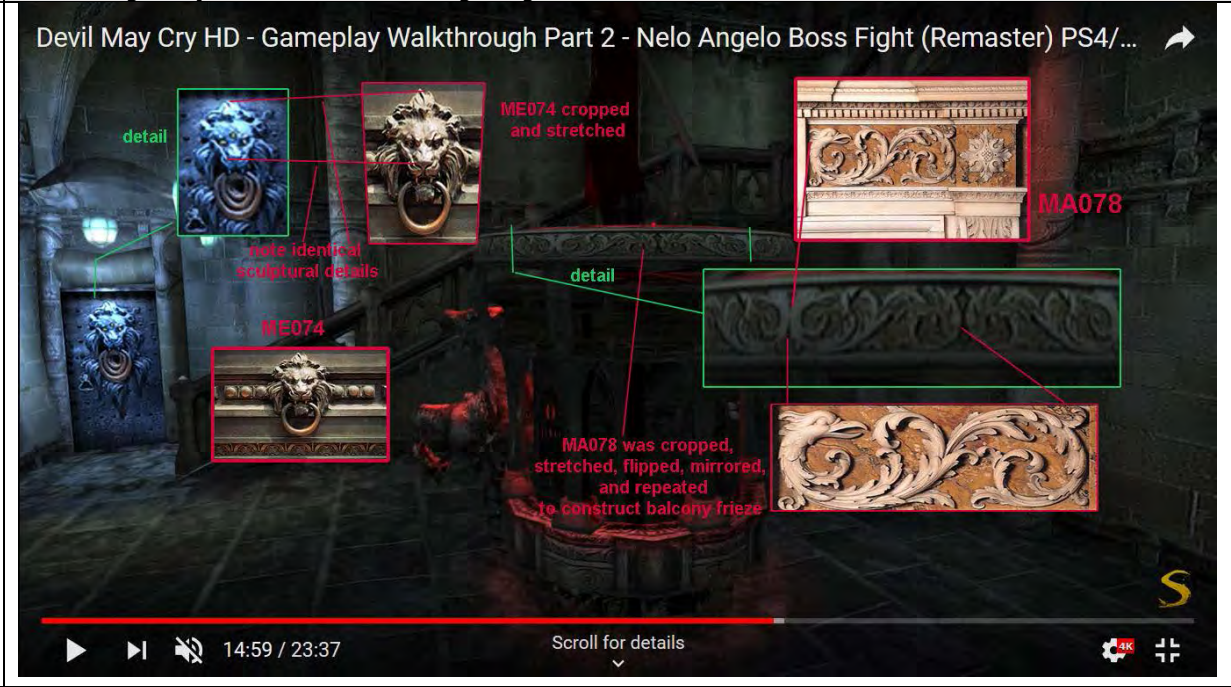


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

Resident Evil 4



MA078

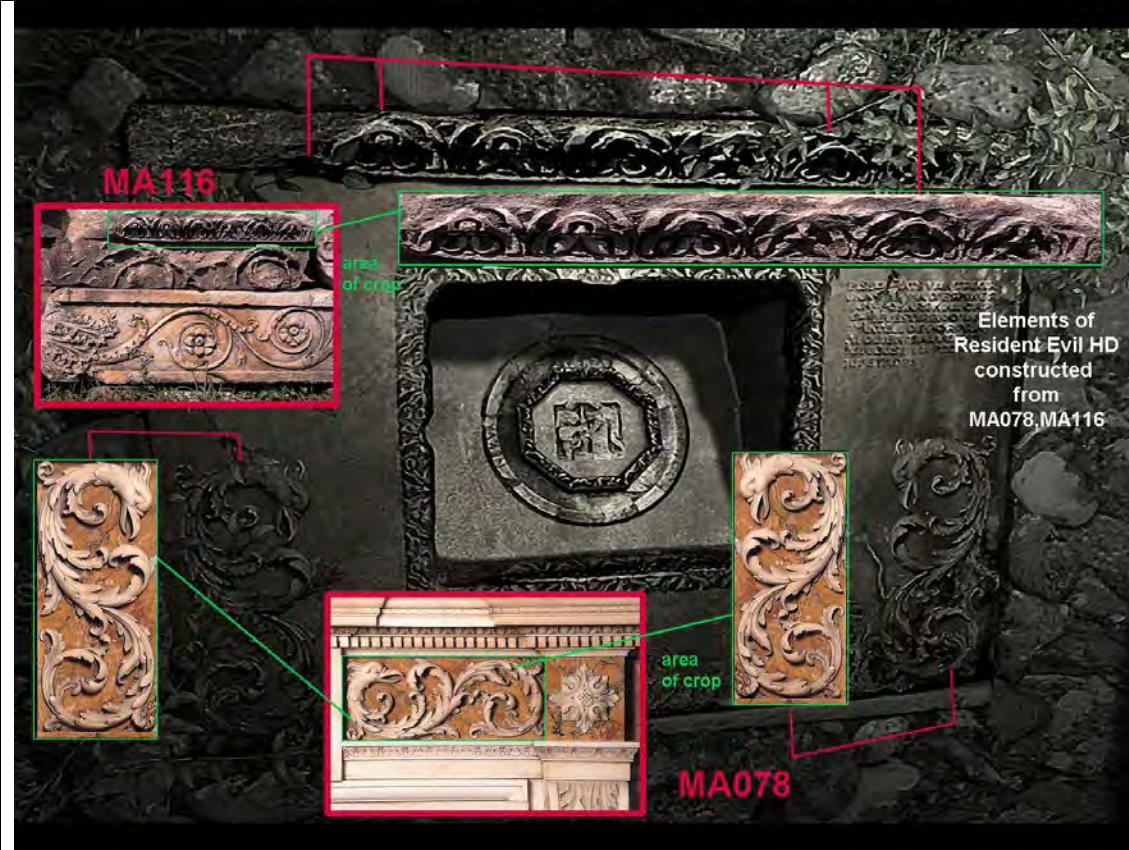
EXHIBIT "A"

Surfaces Original



MA078

Used by Capcom – Resident Evil HD



MA116

area of crop

Elements of Resident Evil HD constructed from MA078, MA116

area of crop

MA078

EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry



EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Care 1

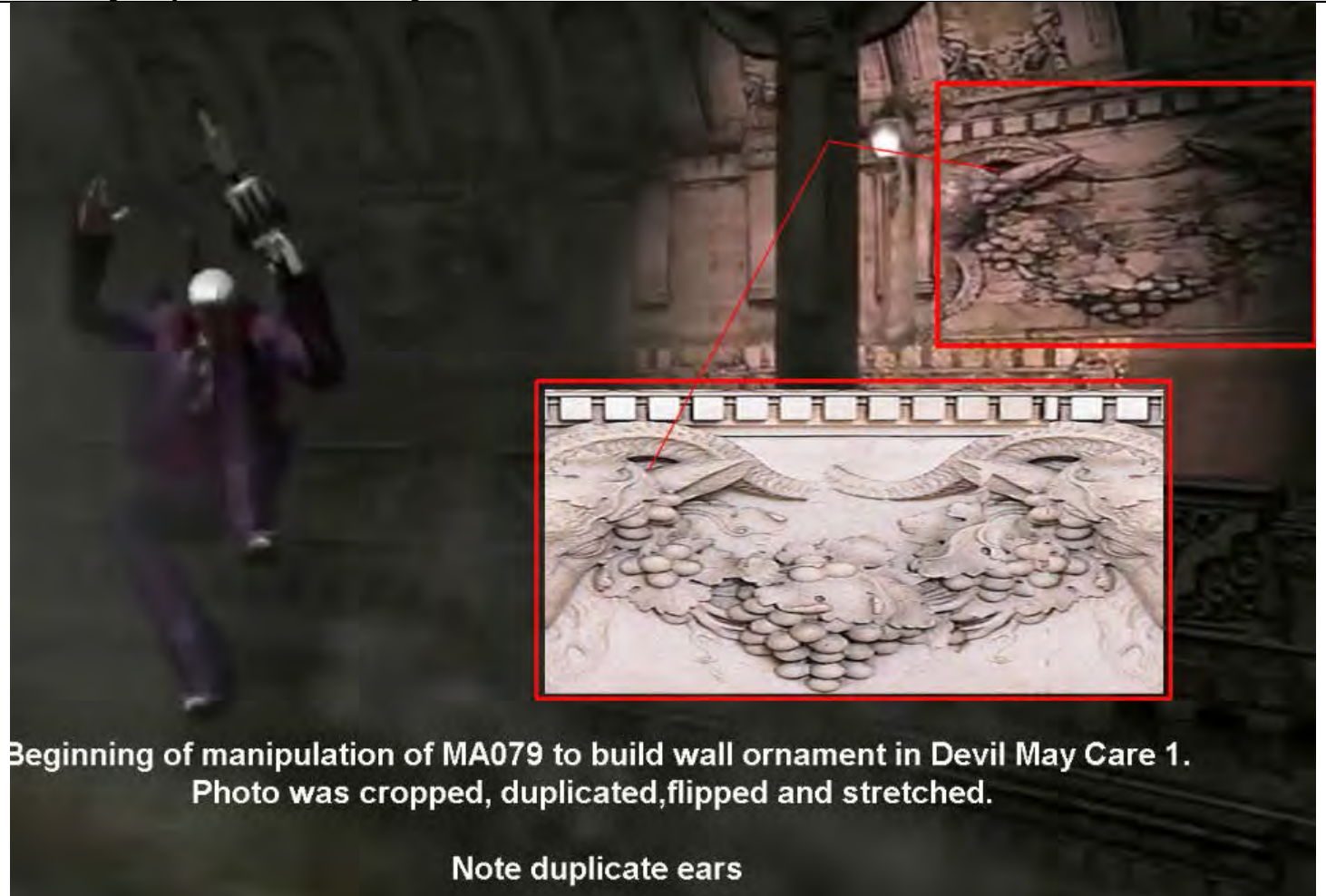


EXHIBIT "A"

Surfaces Original

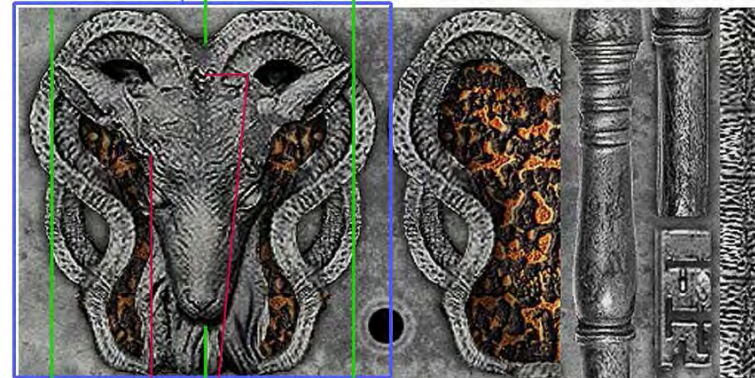


Used by Capcom – Resident Evil 4

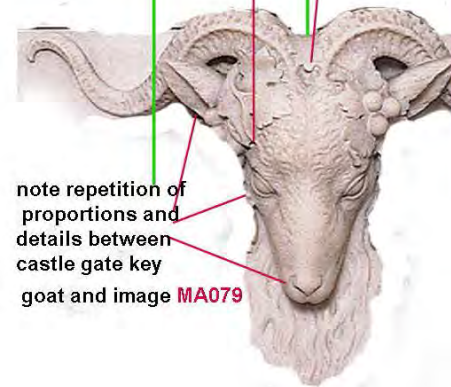
Resident Evil 4



Enlargement of
goat motif on
Castle Gate Key



Rough beginning to construction
of Castle Gate Key goat from
MA079.



note repetition of
proportions and
details between
castle gate key
goat and image MA079

MA079

area of detail



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

RE Remake



EXHIBIT "A"

Surfaces Original



MA090

Used by Capcom – Resident Evil 4

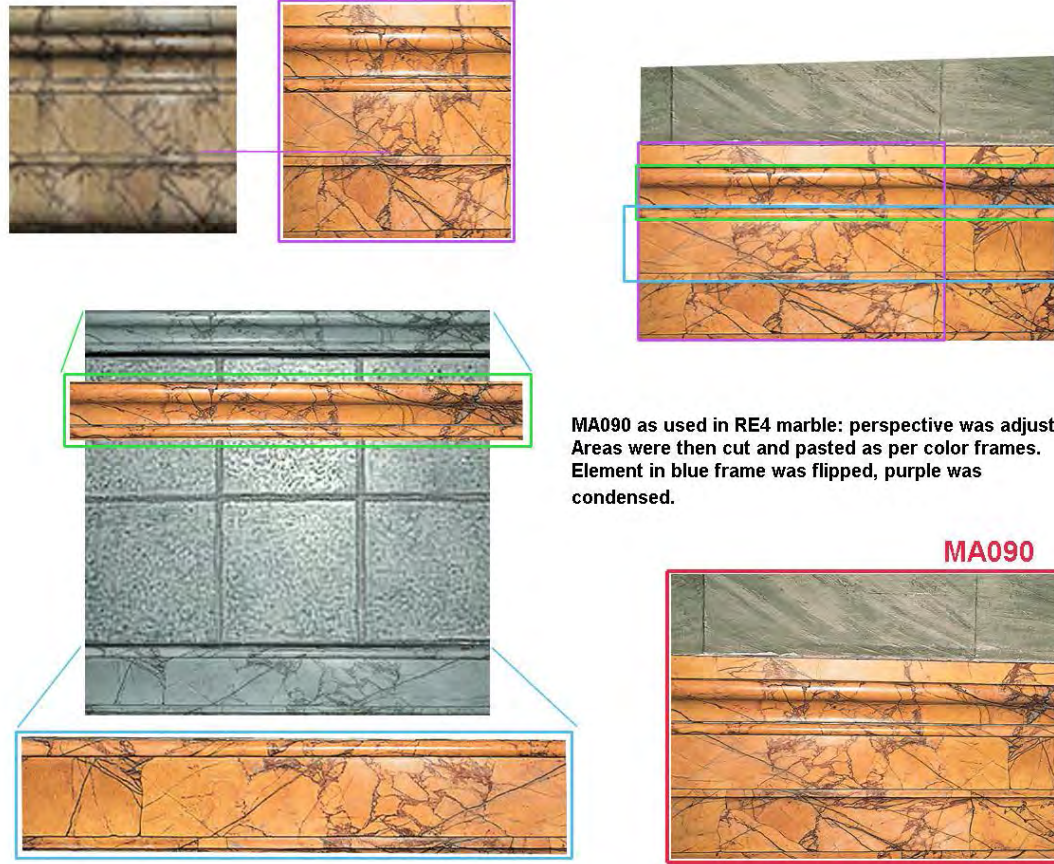


EXHIBIT "A"

Surfaces Original



MA092

Used by Capcom – Resident Evil 4



RE4 as built from MA092



**area of
crop**

MA092

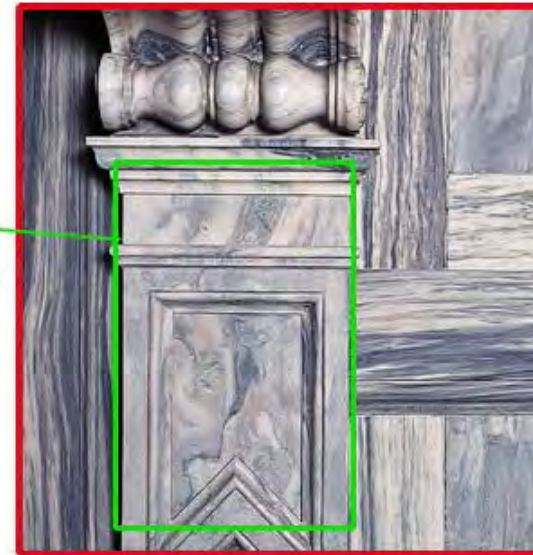


EXHIBIT "A"

Surfaces Original

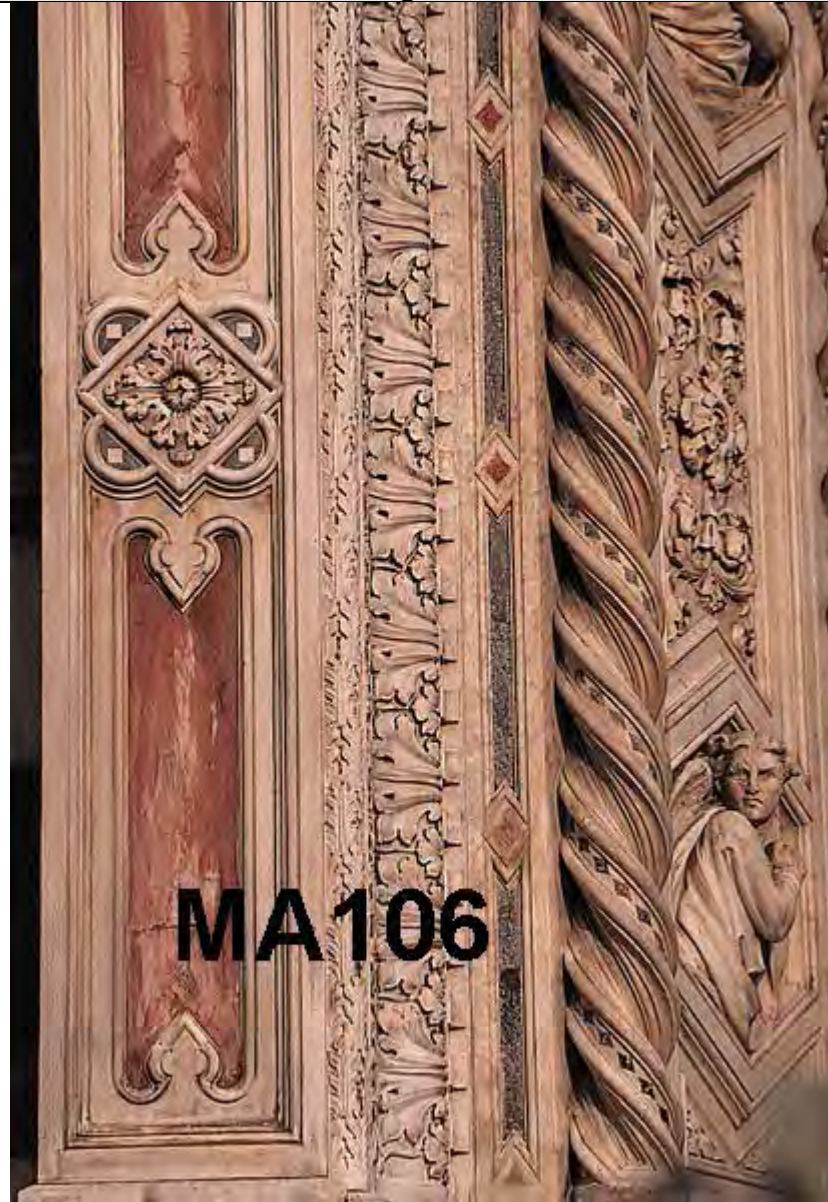


Used by Capcom – Devil May Cry



EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry



EXHIBIT "A"

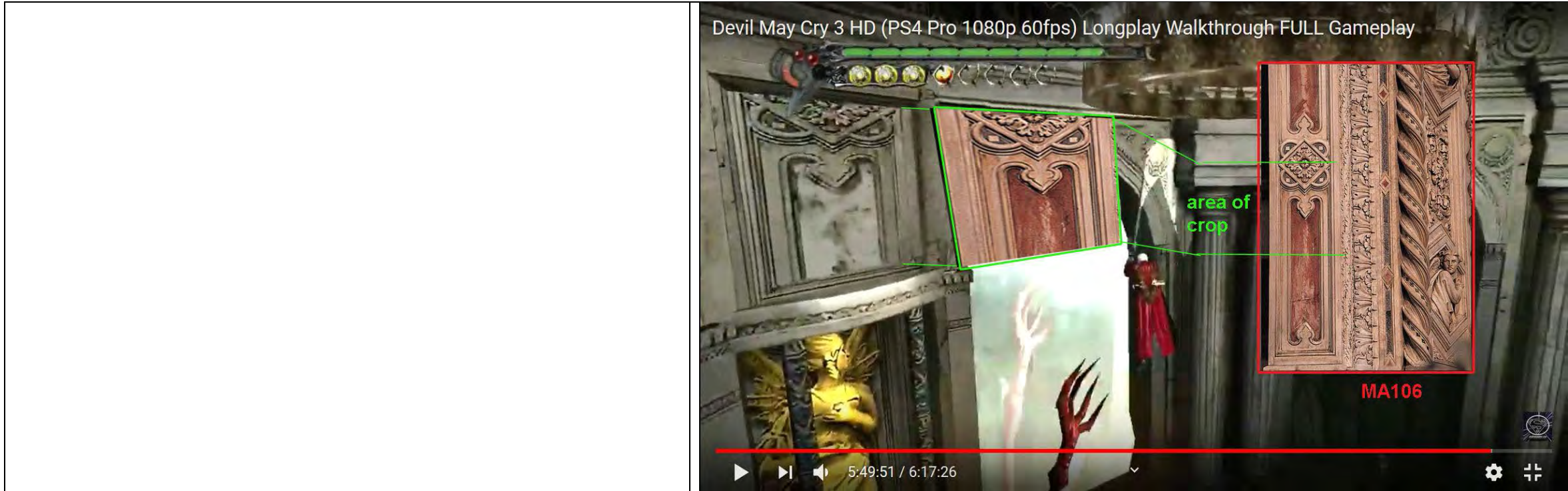
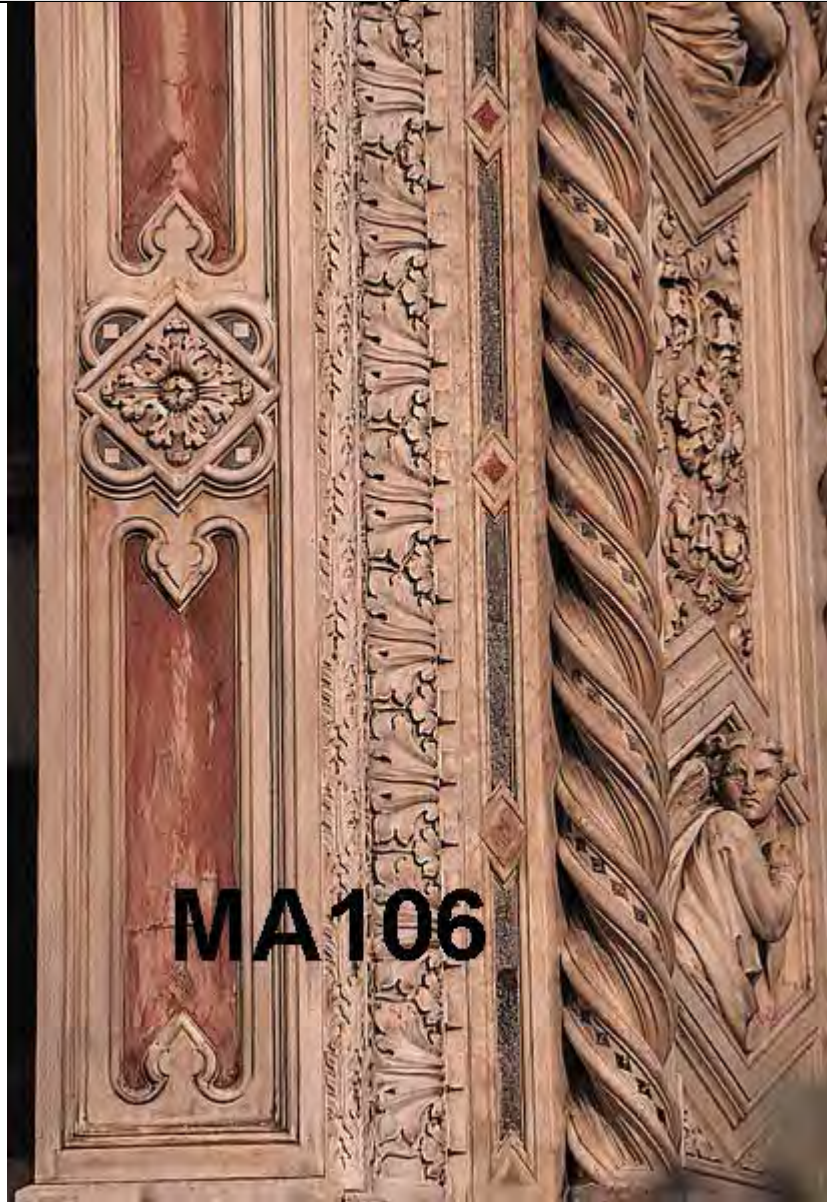


EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry

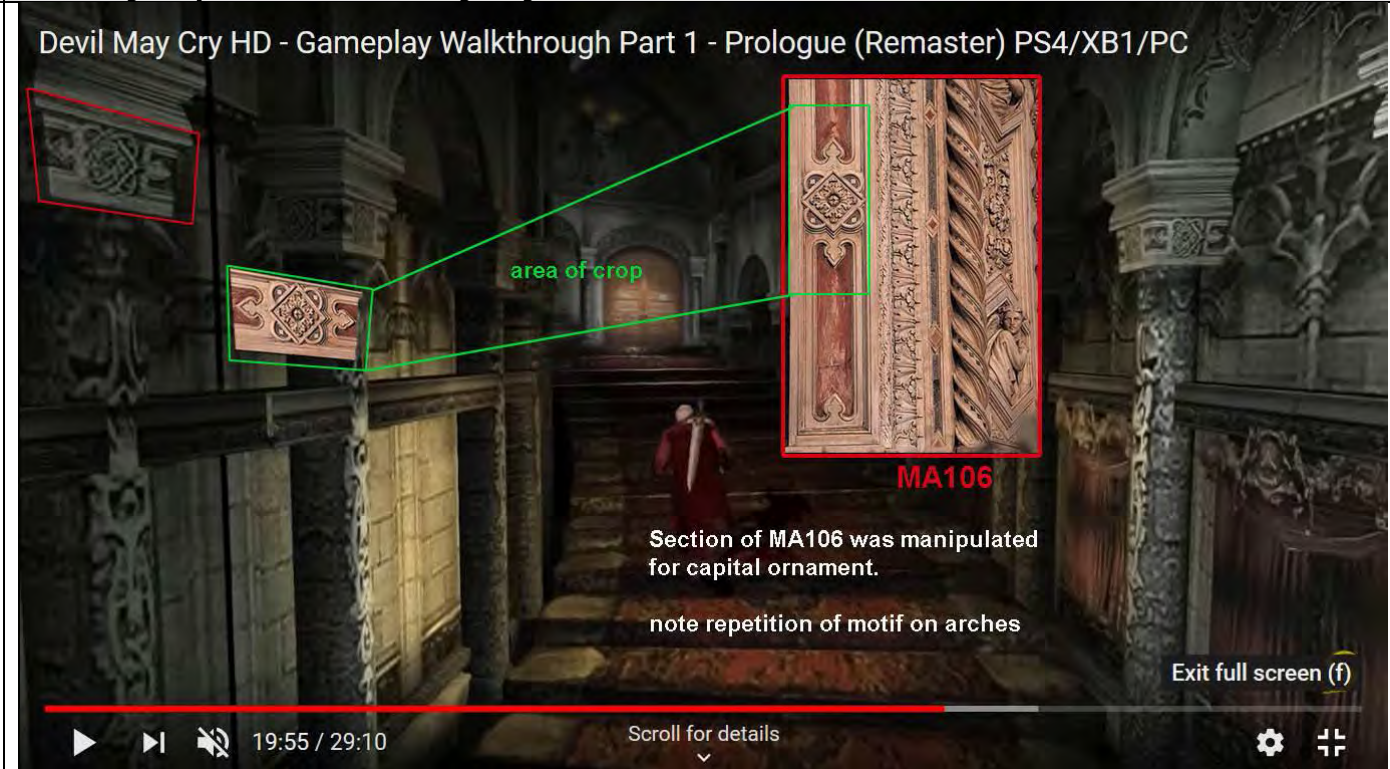


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

Let's Play Resident Evil 4: Ultimate HD - Chapter 3-4 - Ashley's Adventure

A screenshot from the video game Resident Evil 4 showing a stone fireplace. The fireplace is annotated with red boxes and lines. A box labeled "MA116" points to the top decorative frieze. A box labeled "MA077" points to the scrollwork on the left side of the fireplace. A box labeled "MA127" points to the right side of the fireplace. A central box contains the text "constructed from: MA077 MA116 MA127". The video player interface at the bottom shows a progress bar at 8:35 / 15:33 and a "Scroll for details" button.

EXHIBIT "A"

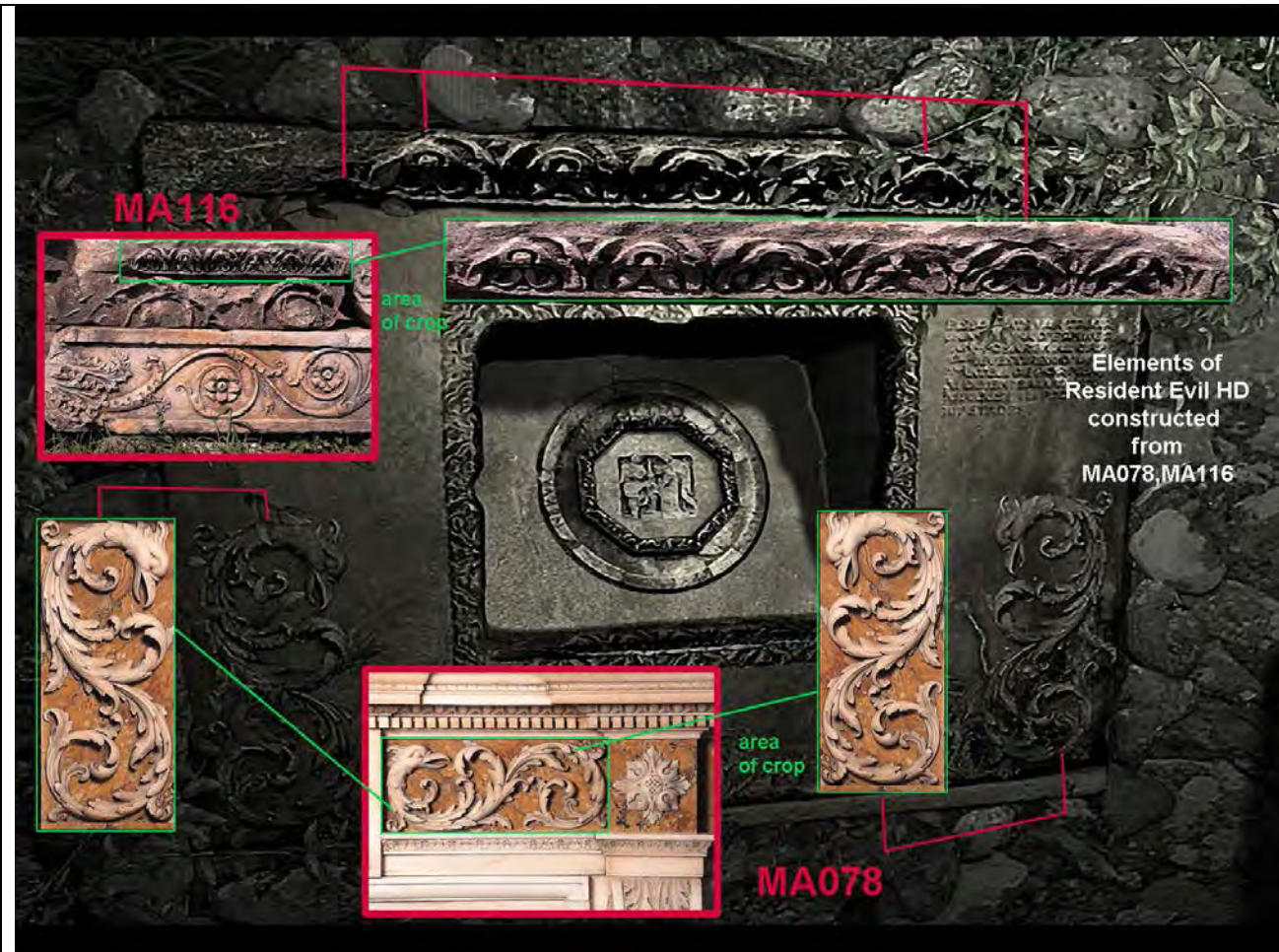
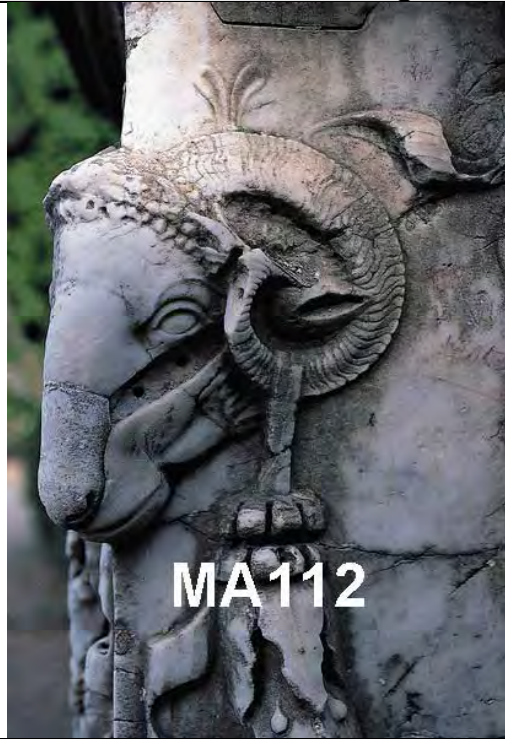


EXHIBIT "A"

Surfaces Original

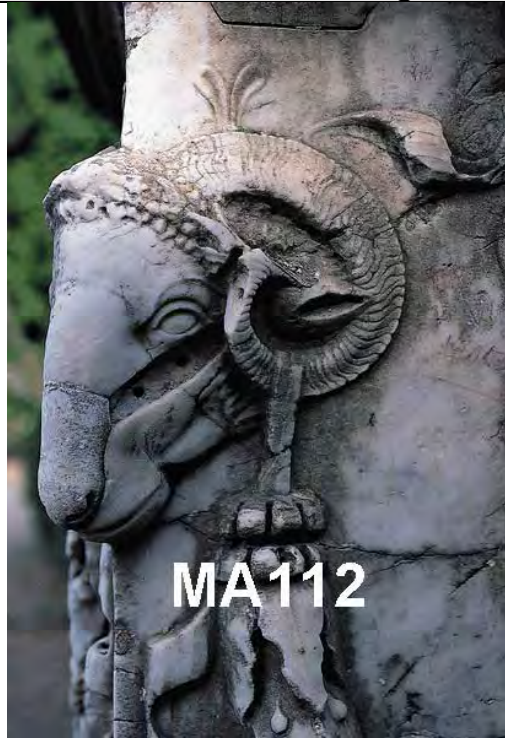


Used by Capcom – Devil May Cry 1



EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry 4

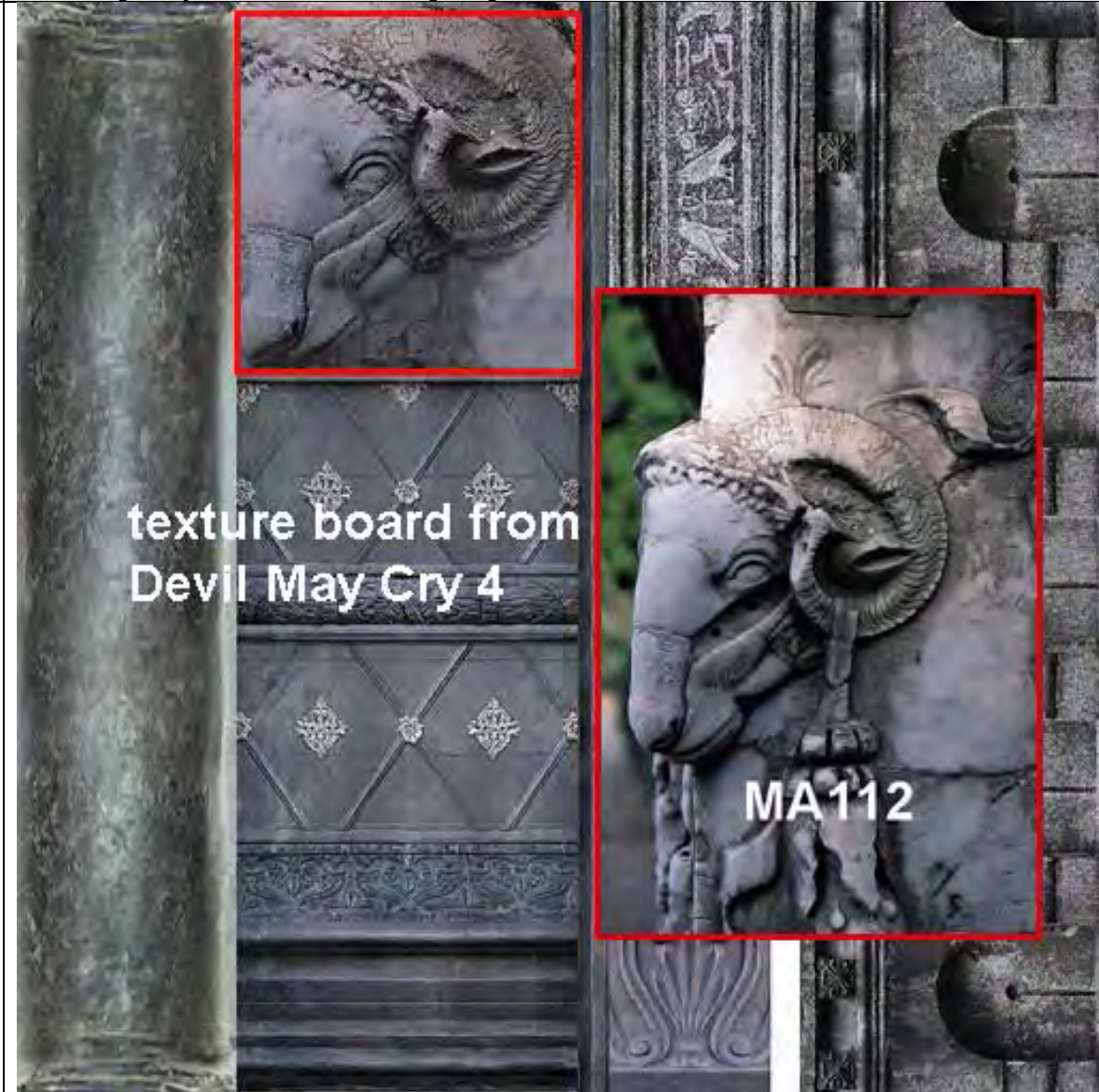
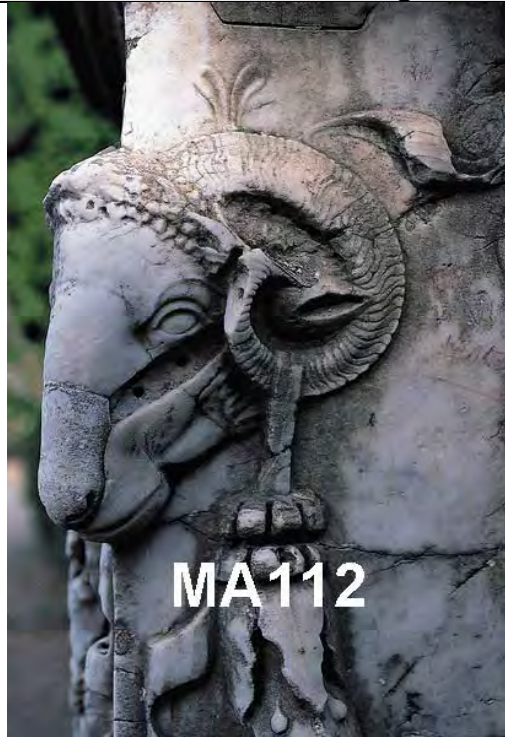


EXHIBIT "A"

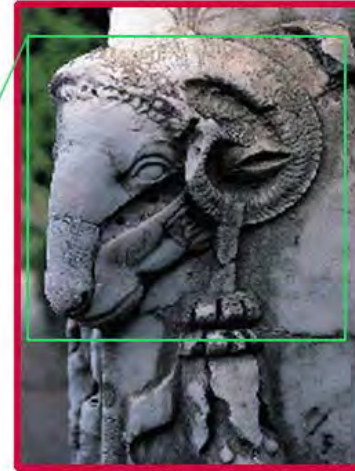
Surfaces Original



Used by Capcom – Resident Evil Book

Ram motif was built from cropping and manipulating MA122

area of crop



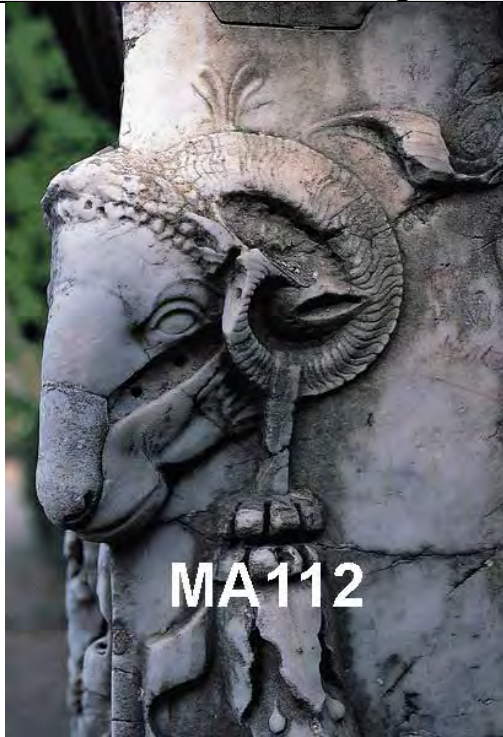
MA122



Resident Evil book

EXHIBIT "A"

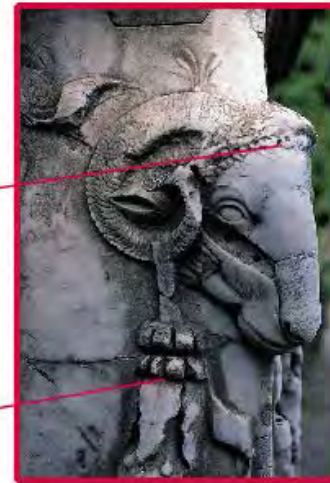
Surfaces Original



Used by Capcom – Resident Evil 4

Resident Evil 4

Detail (as viewed from front)
of Resident Evil 4 pipe
that was constructed from
MA122



MA122



Antique Pipe
There's a detailed engraving on this pipe.
Let's hope it's worth something.

EXHIBIT "A"

Surfaces Original



ME061 rotated and used in DMC2

Used by Capcom – DMC2



DMC2 scenery

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC



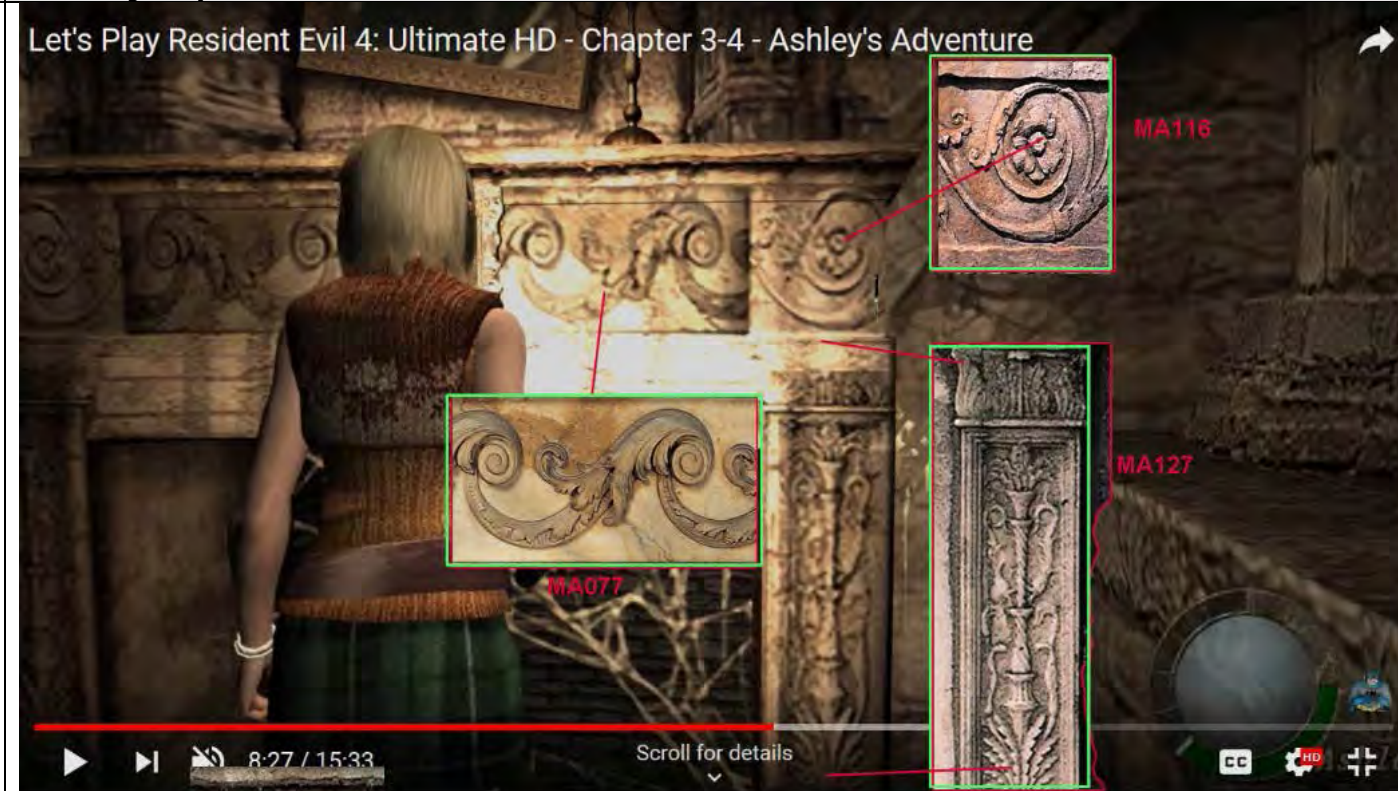
**ME075 used in construction of
REUC library baseboard**

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



construction from
MA077, MA127
MA116



MA127



MA077

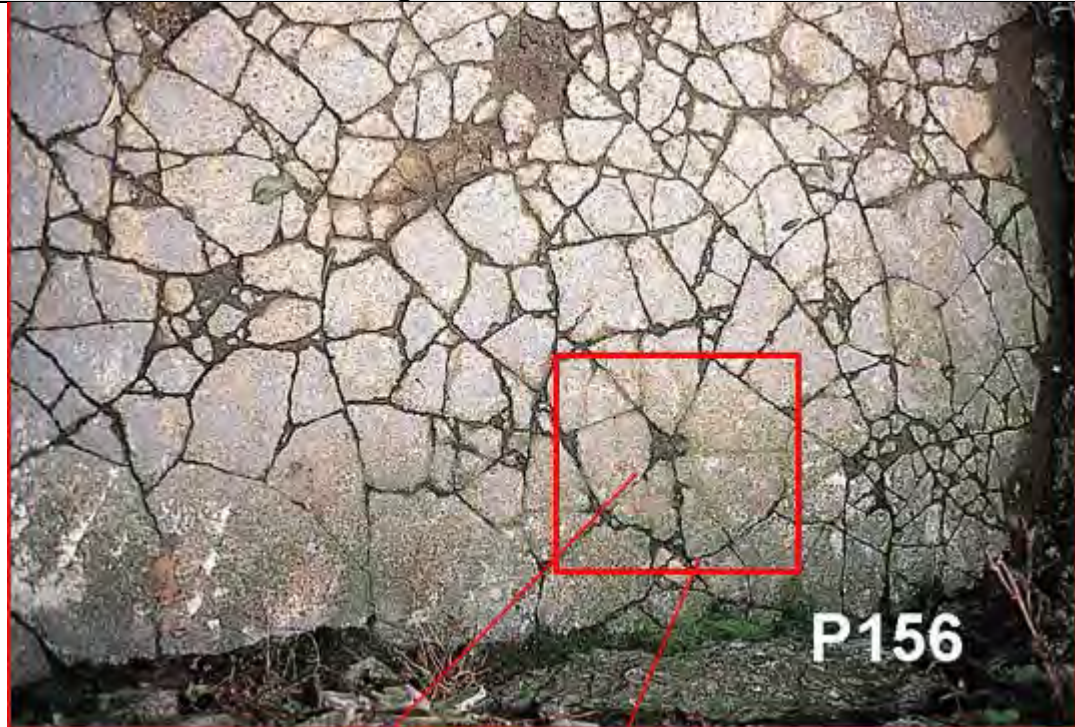


MA116

areas of cropped images used to build fireplace

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Outbreak File

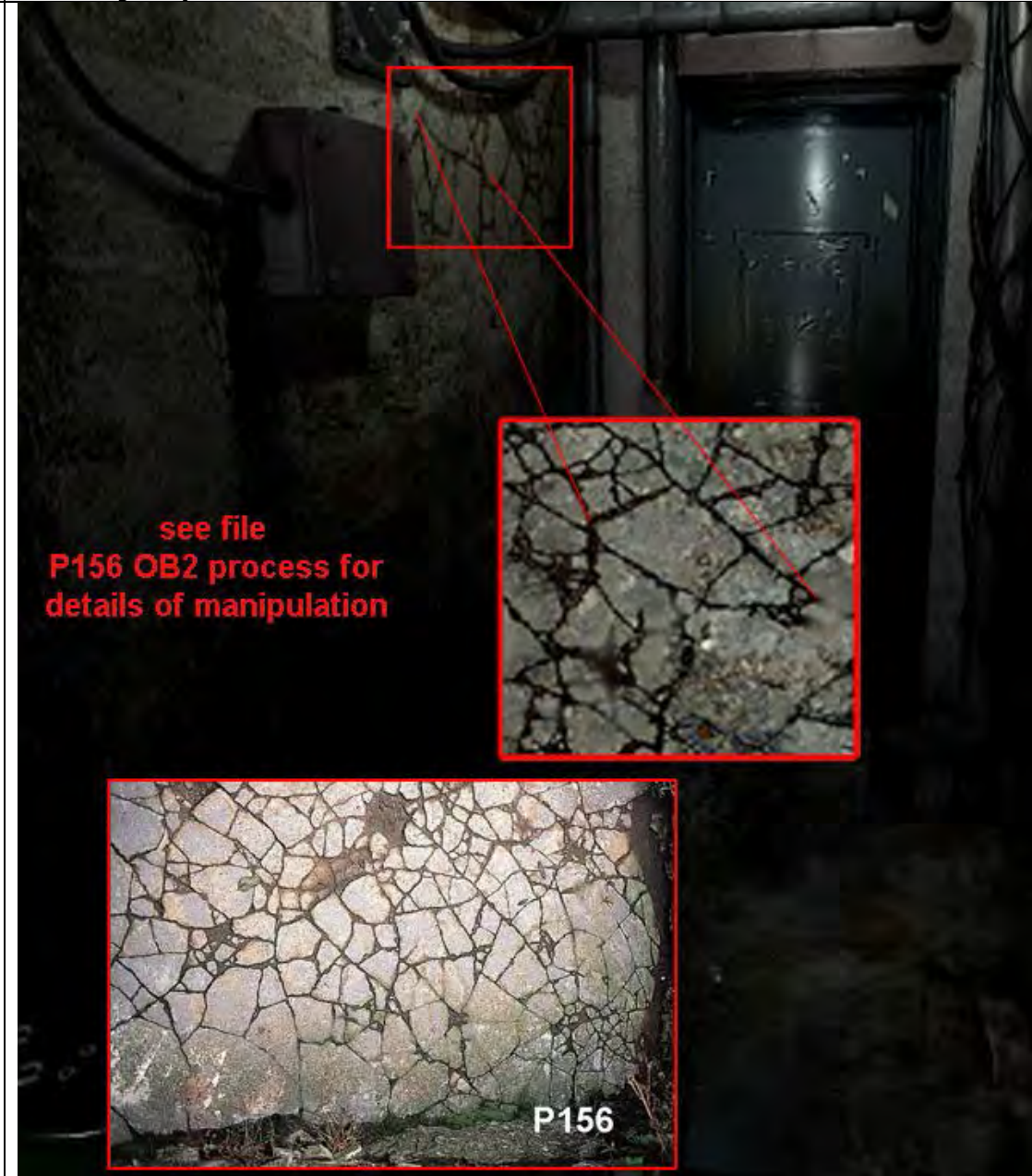
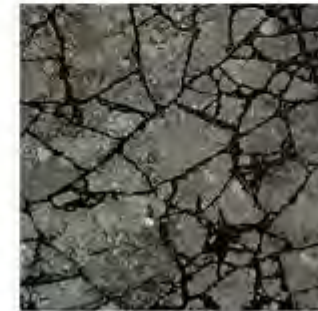


EXHIBIT "A"



**Partial
usage
(made
seamless**



Full usage

EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry HD

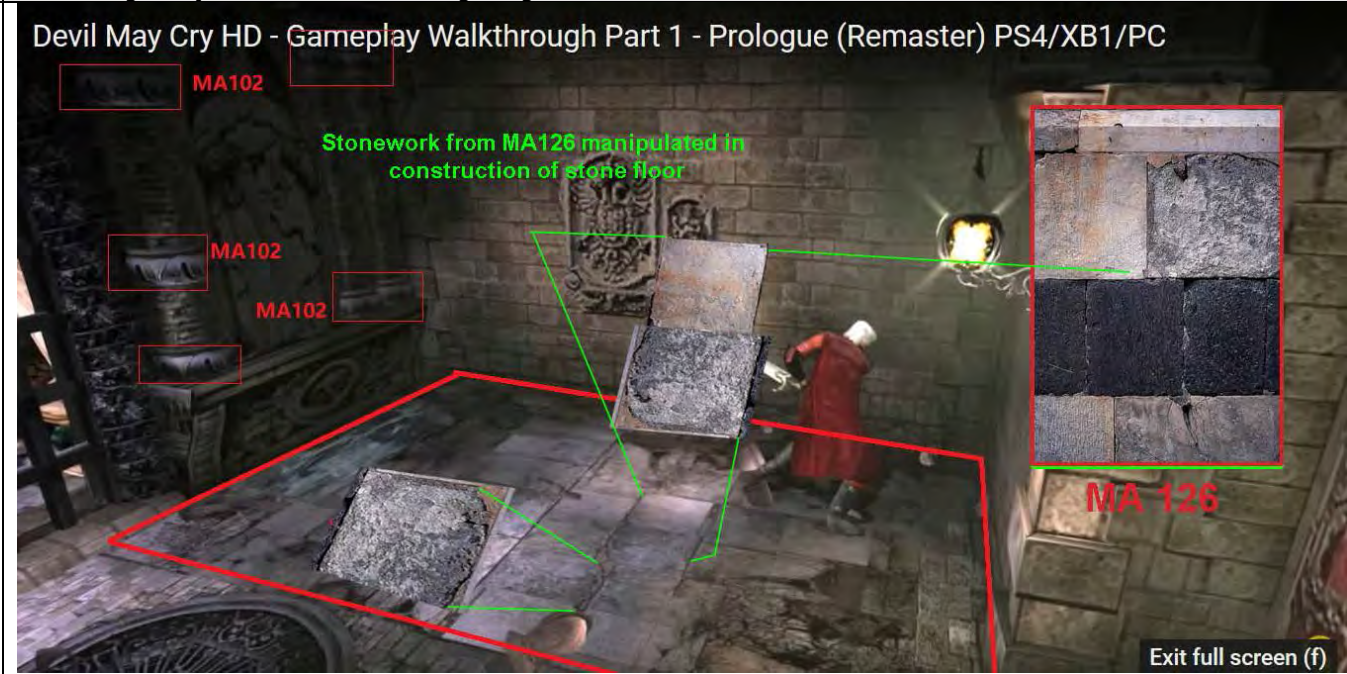
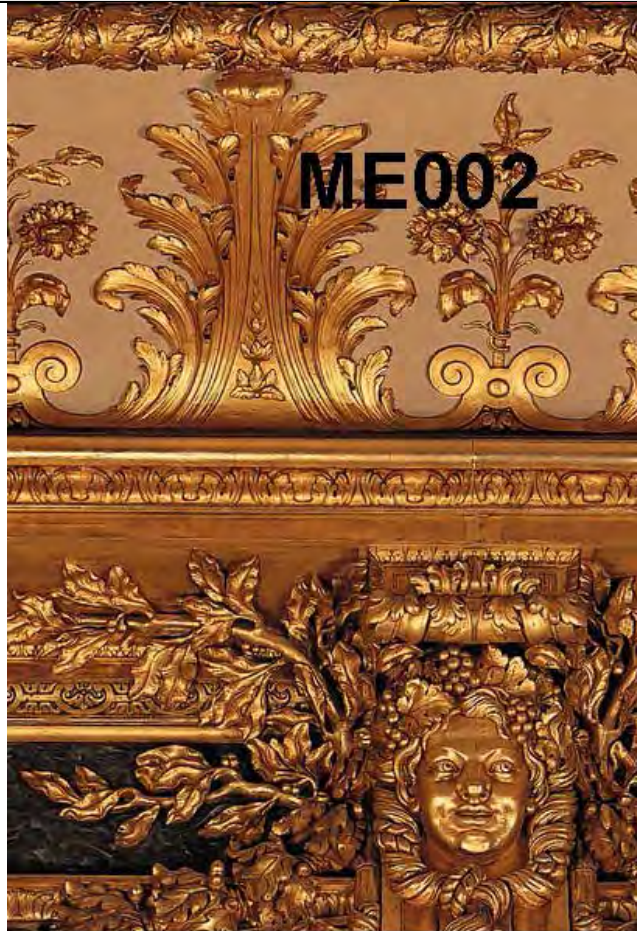


EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry

A screenshot from the video game Devil May Cry, Mission 17, titled "PARTED MEMENTO". The scene shows a dark, arched doorway with a ram's head carved into the stone above it. The text "Devil May Cry" is written in a red, stylized font at the top, with "Mission 17" and "PARTED MEMENTO" below it. Several annotations are present: a red arrow points from the text "MA079 stretched as in beginning construction of Devil May Cry door detail." to a white, stretched image of a ram's head with grapevines; another red arrow points from the text "detail flipped and manipulated" to a red-bordered image of a golden leaf detail; a third red arrow points from the text "ME 002" to a red-bordered image of a golden leaf detail. At the bottom, a red-bordered image of a ram's head is shown next to the text "MA 079 Slash away at the dragon and enter the court with the 'Quicksilver'".

EXHIBIT "A"

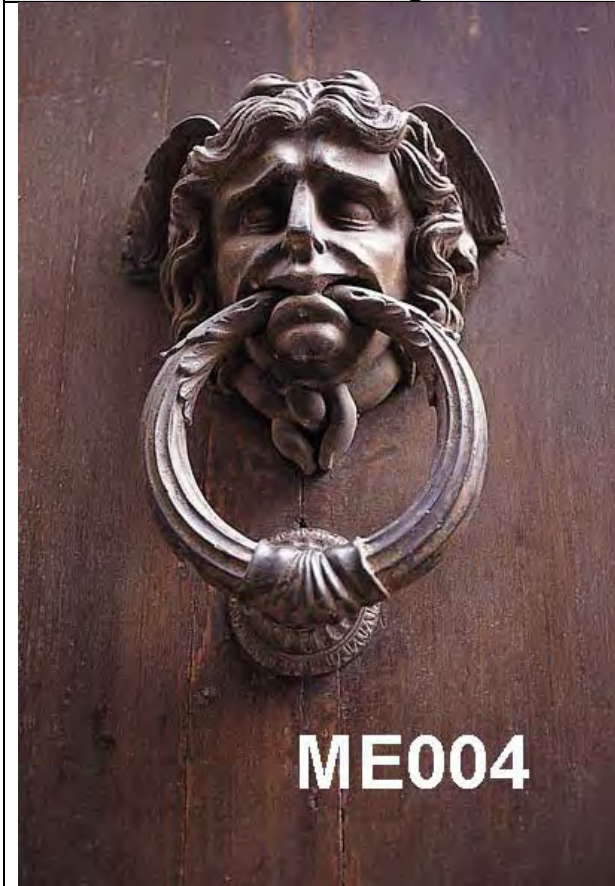
Devil May Cry 3



ME002

EXHIBIT "A"

Surfaces Original

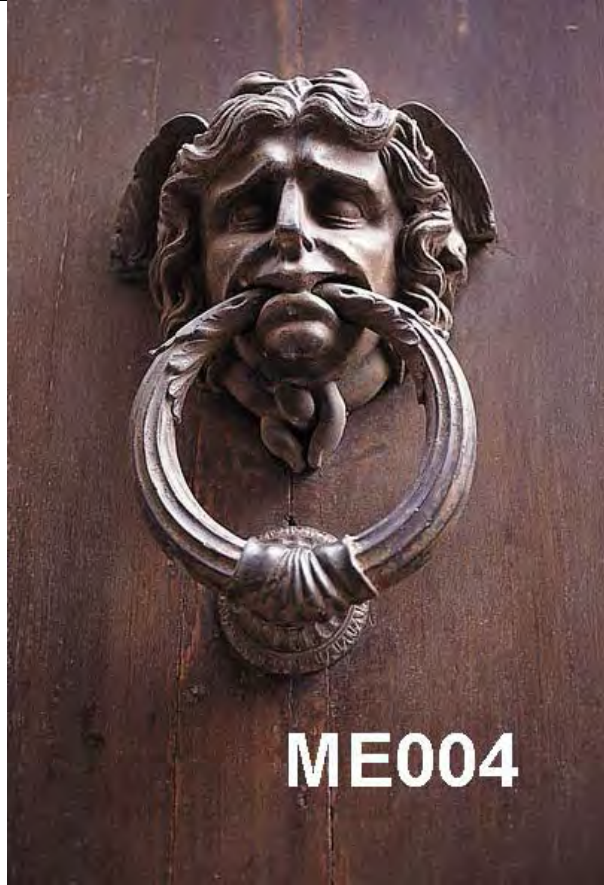


Used by Capcom – Devil May Cry



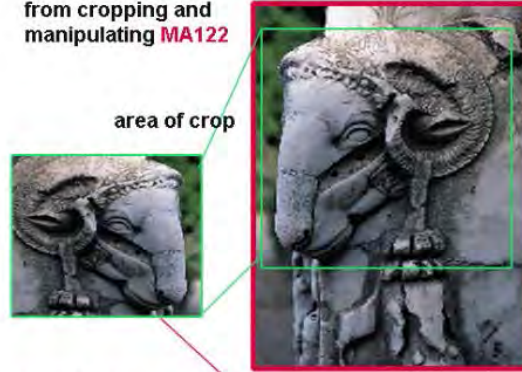
EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Book

Ram motif was built from cropping and manipulating MA122



area of crop



Face motif was cropped and manipulated from ME004



area of crop



ME004

note that door knocker was removed from face to build face element in book.

ME064



area of crop



section from RE book



flipped

section built from ME064. (face is from RE book as based on ME004)

Scroll motif was built by cropping from ME064, and manipulating cropped section.

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



ME007 with granite texture overlay.

note exact repetition of motifs, highlights and shadows on jewellery boxes from ME007.



ME007



ME007 with silver overlay.

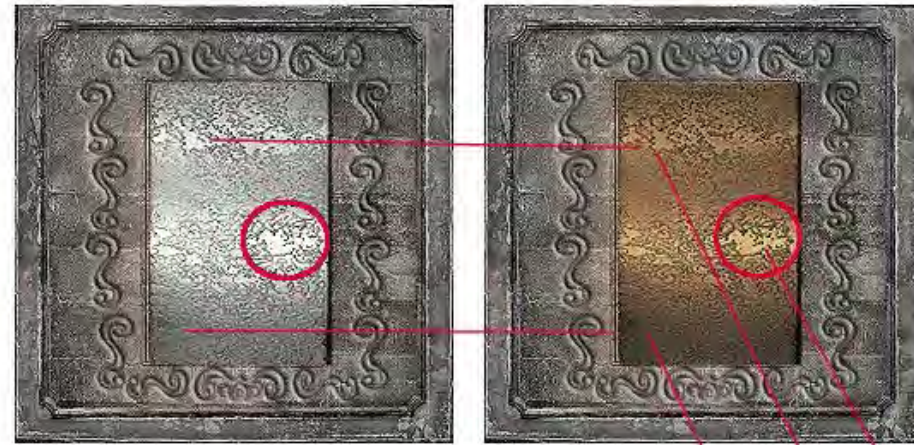
Resident Evil & Resident Evil HD

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



note multiple common shapes between ME009 and both frame interiors.

ME009



area of crop



ME009 cropped and scaled to fit inside of frames

Resident Evil 4

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



**RE4
ornament**



ME018

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC

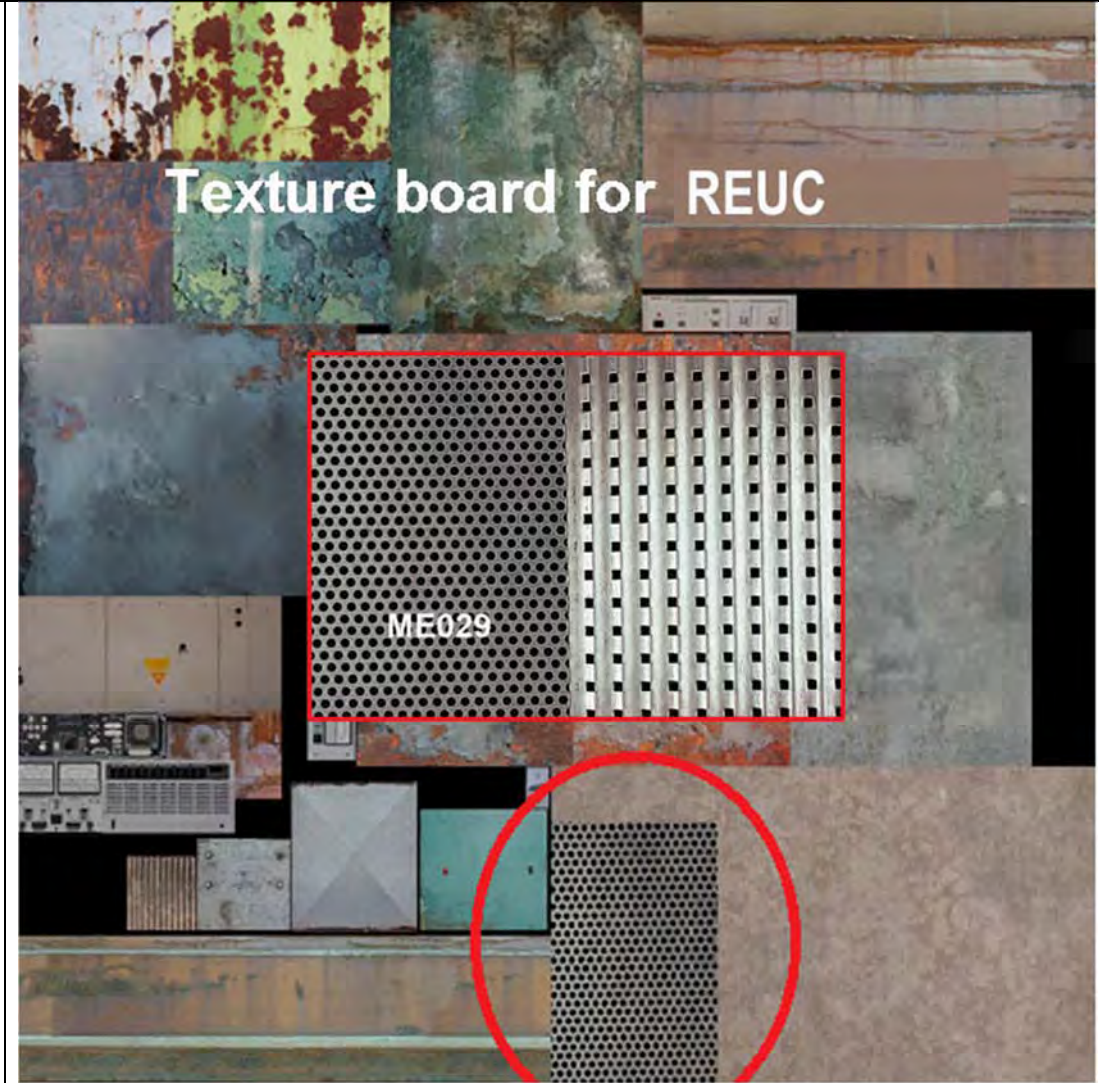


EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC1 & DMC2 & RE Remake



EXHIBIT "A"



EXHIBIT "A"

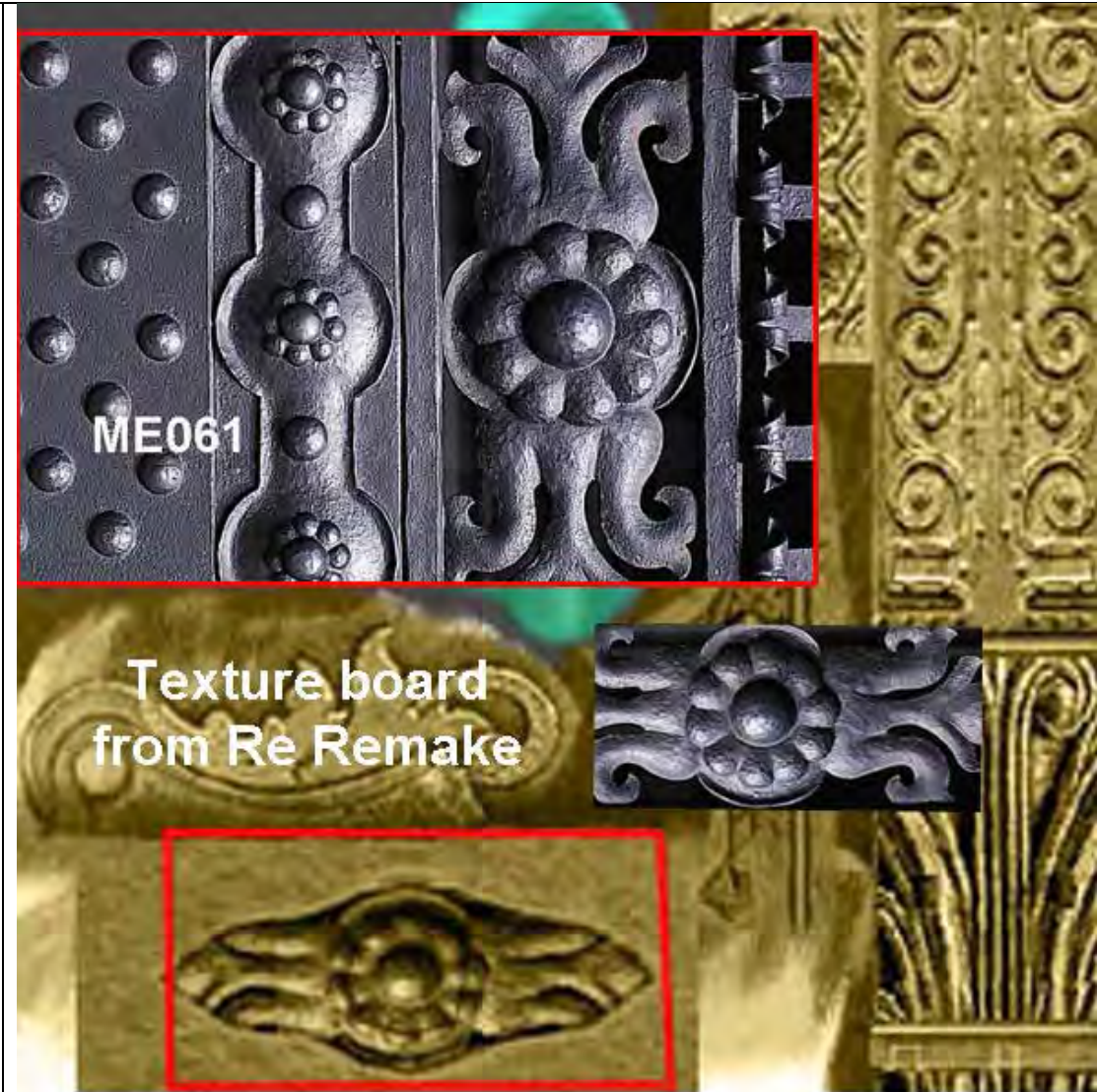


EXHIBIT "A"

Surfaces Original



Used by Capcom – Devil May Cry



EXHIBIT "A"

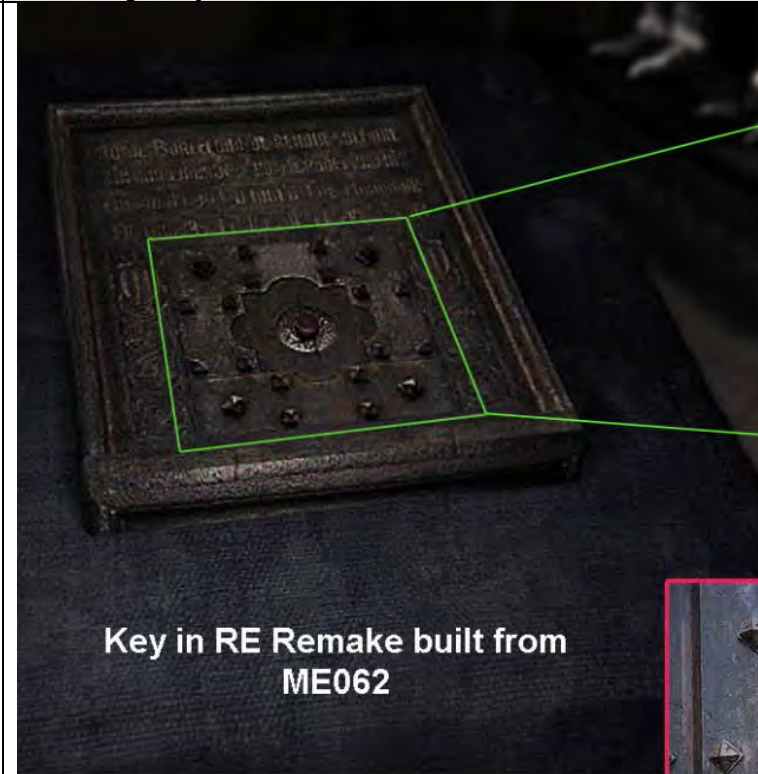


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



beginning manipulation of ME062



ME062

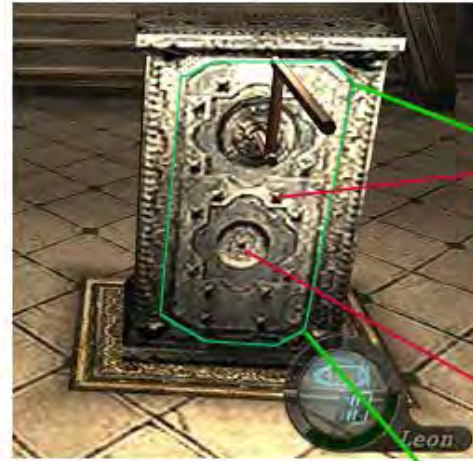


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



note repetition of interior shapes and details.



ME062

cropped and roughly manipulated for beginning construction of Resident Evil 4 crank box.

ME062

crop line

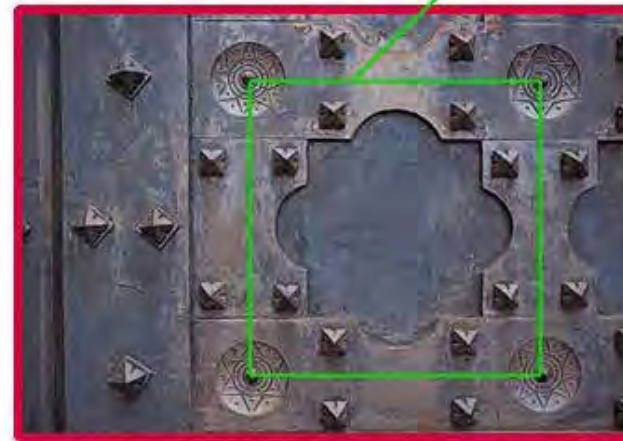


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



ME062 was cropped and manipulated to form element in puzzle key

area of crop



ME062

EXHIBIT "A"

Surfaces Original



Used by Capcom -DMC 1



areas of crop

**ME064 as manipulated for element in
DMC1**



ME064

EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC

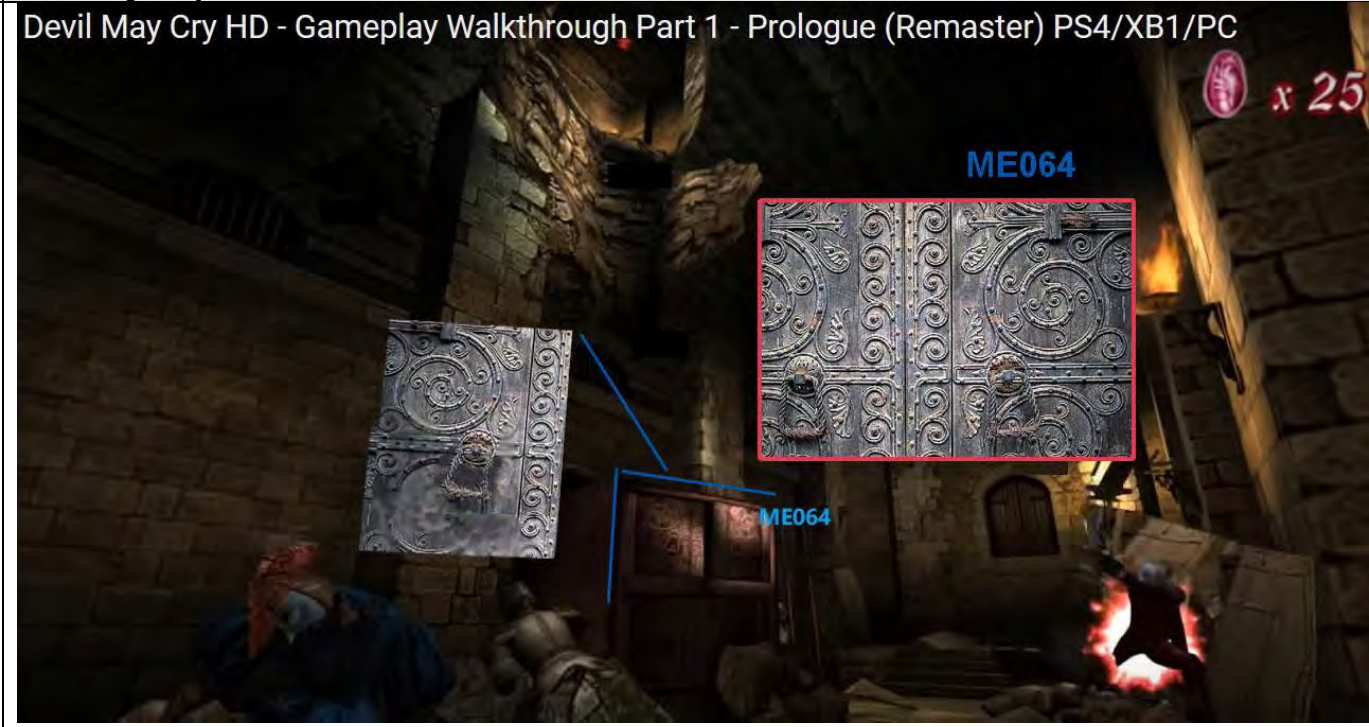


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

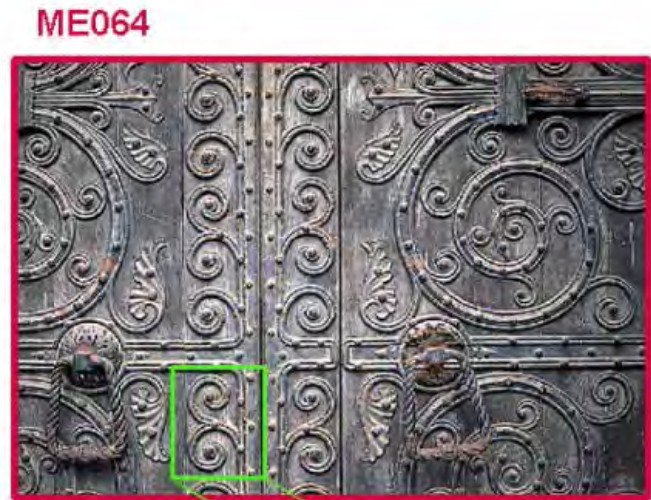


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil book



area of crop

section from RE book

flipped

section built from ME064. (face is from RE book as based on ME004)

Scroll motif was built by cropping from ME064, and manipulating cropped section.

note that door knocker was removed from face to build face element in book.

EXHIBIT "A"

Surfaces Original

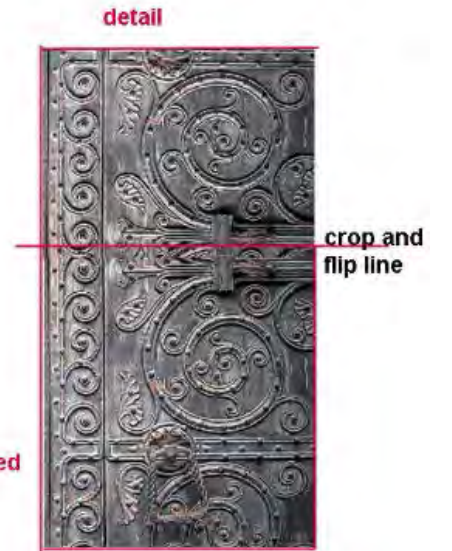


Used by Capcom – Resident Evil 4



ME064

ME064 was cropped and flipped
in construction of RE4 doors



RE4 doors



Resident Evil 4

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4



Enlargement of hourglass detail

Hourglass motif was built on cropped and manipulated ME066

ME066



Resident Evil 4

EXHIBIT "A"

Surfaces Original

Used by Capcom – Resident Evil HD

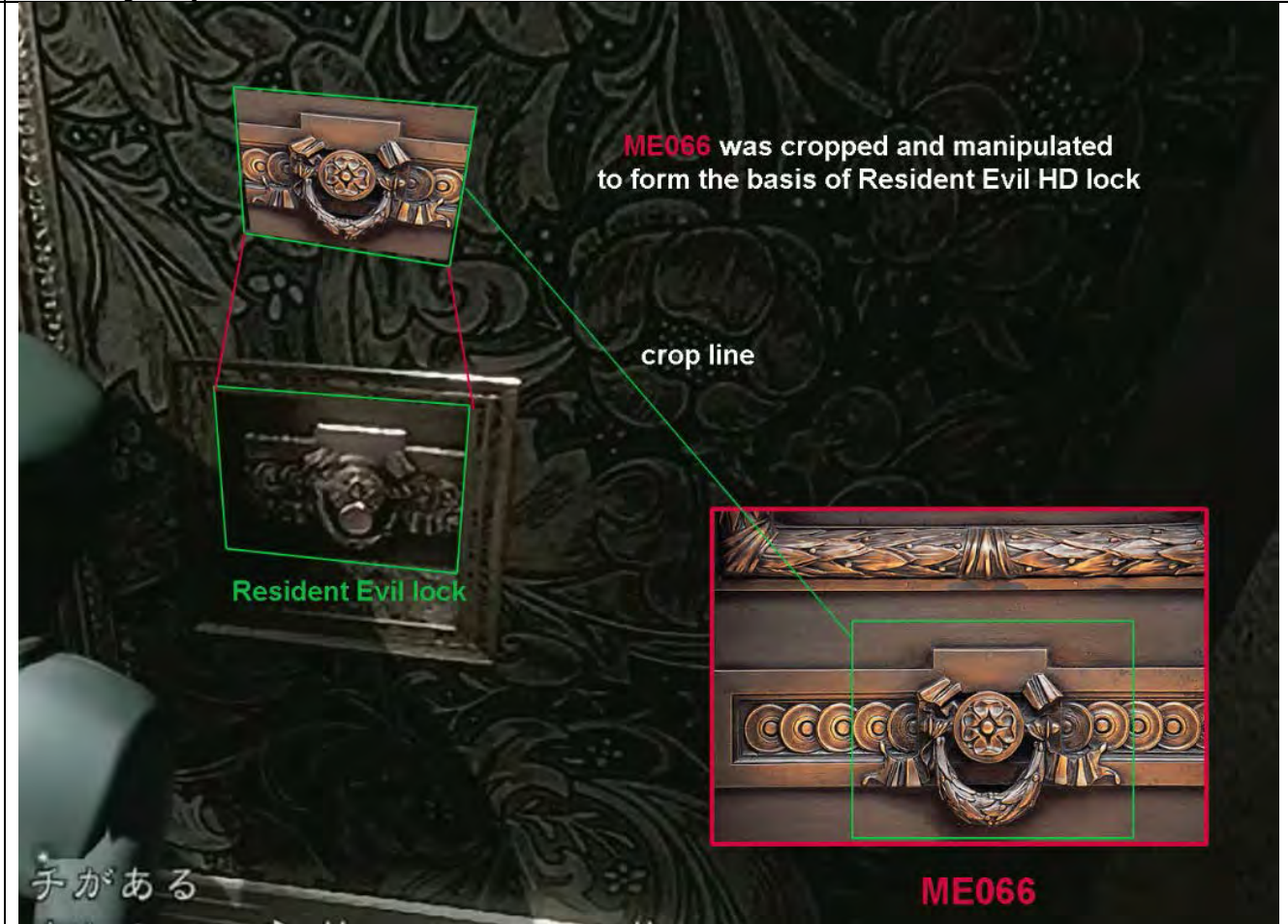


EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC1 and RE Remake



EXHIBIT "A"

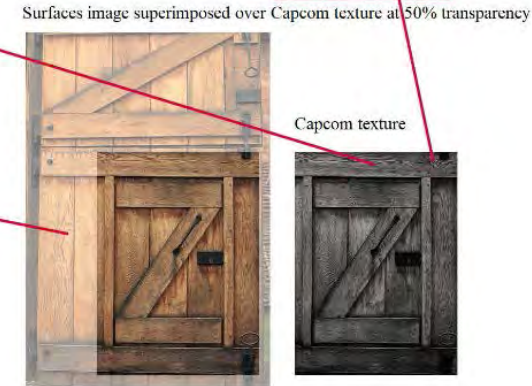


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil



Resident Evil library and RE Umbrella Corps

EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC



EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC



EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC HD

Devil May Cry HD - Gameplay Walkthrough Part 2 - Nelo Angelo Boss Fight (Remast

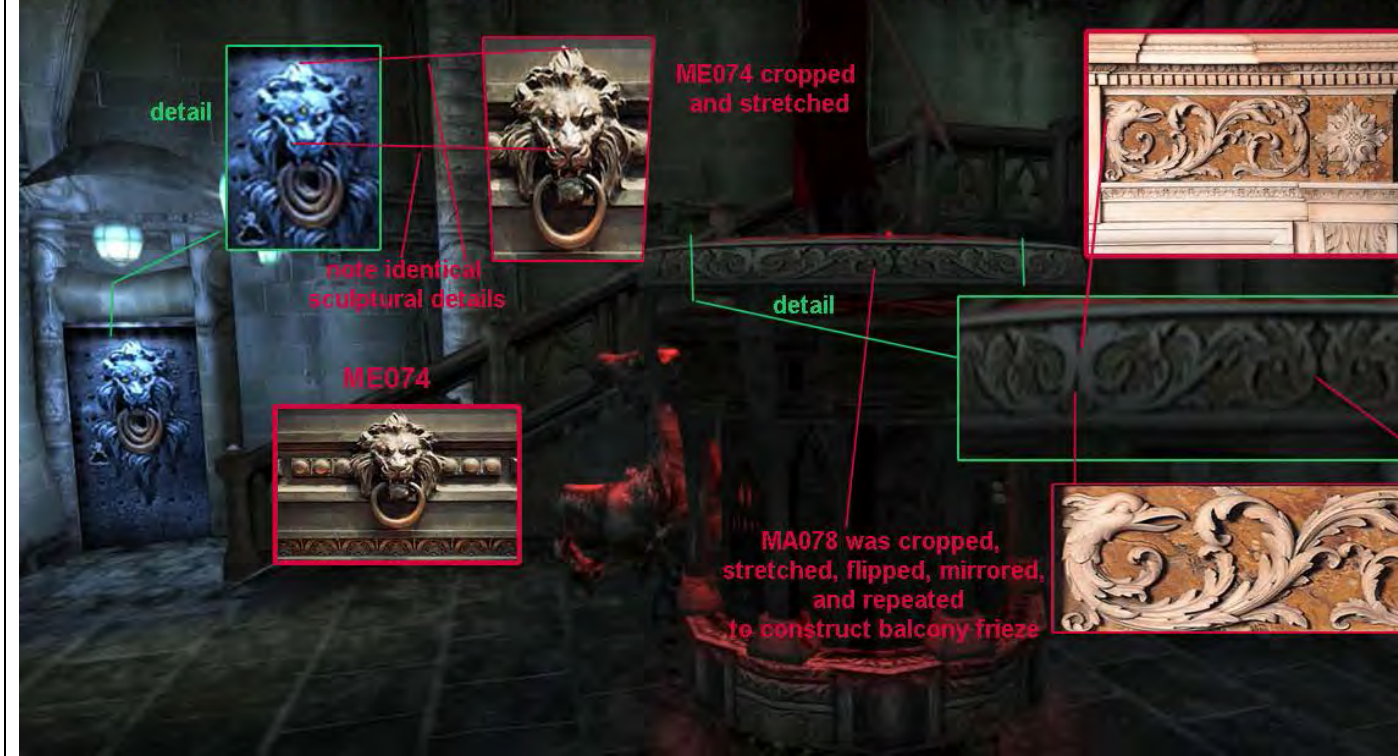


EXHIBIT "A"

Surfaces Original

Used by Capcom – Resident Evil



Basic manipulation
of ME074 to build
Resident Evil shield key



Enlarged view
of shield key

area of crop

ME074

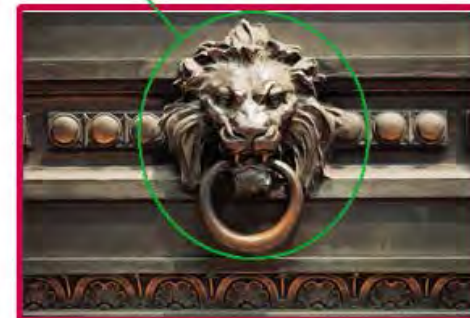
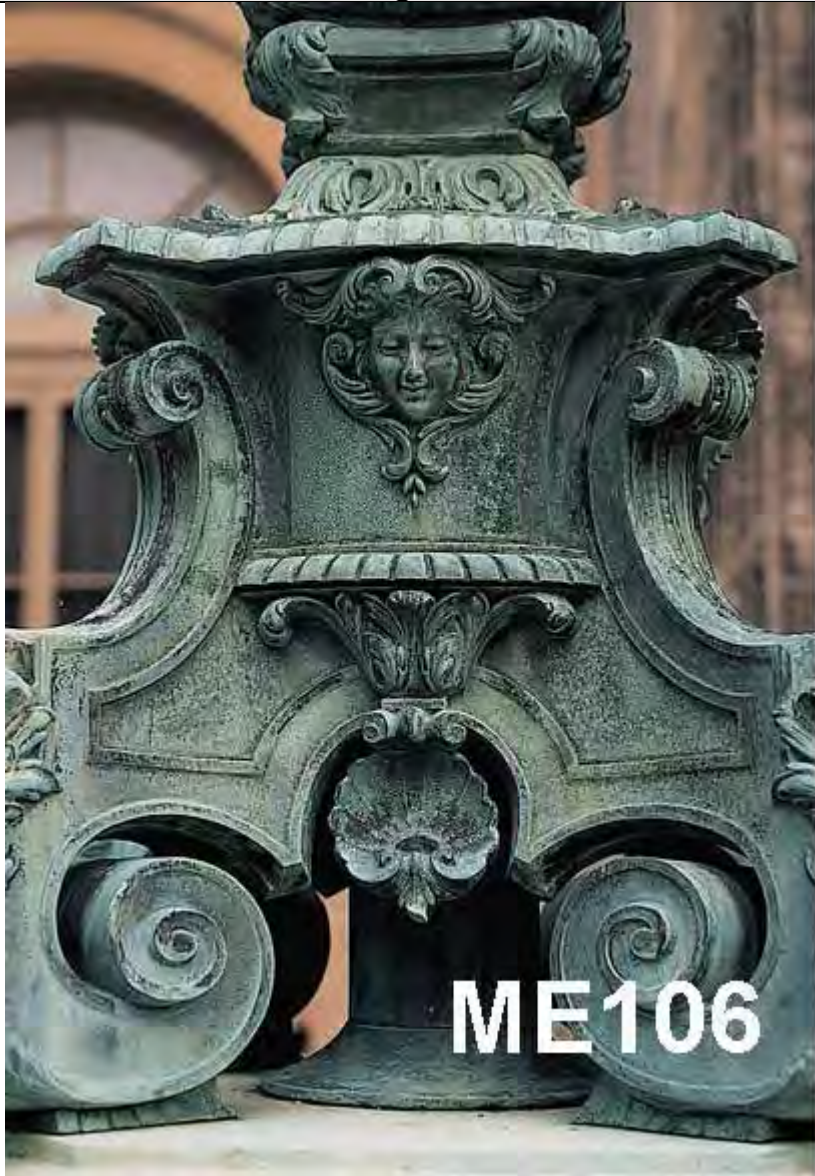
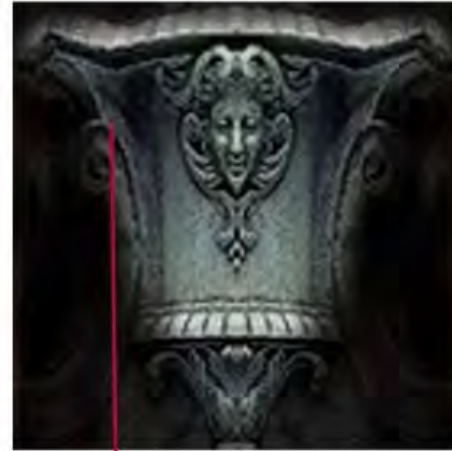


EXHIBIT "A"

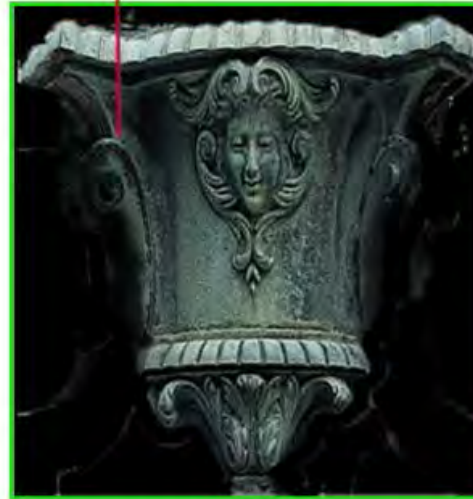
Surfaces Original



Used by Capcom – Resident Evil 4



Resident Evil 4



area of
crop

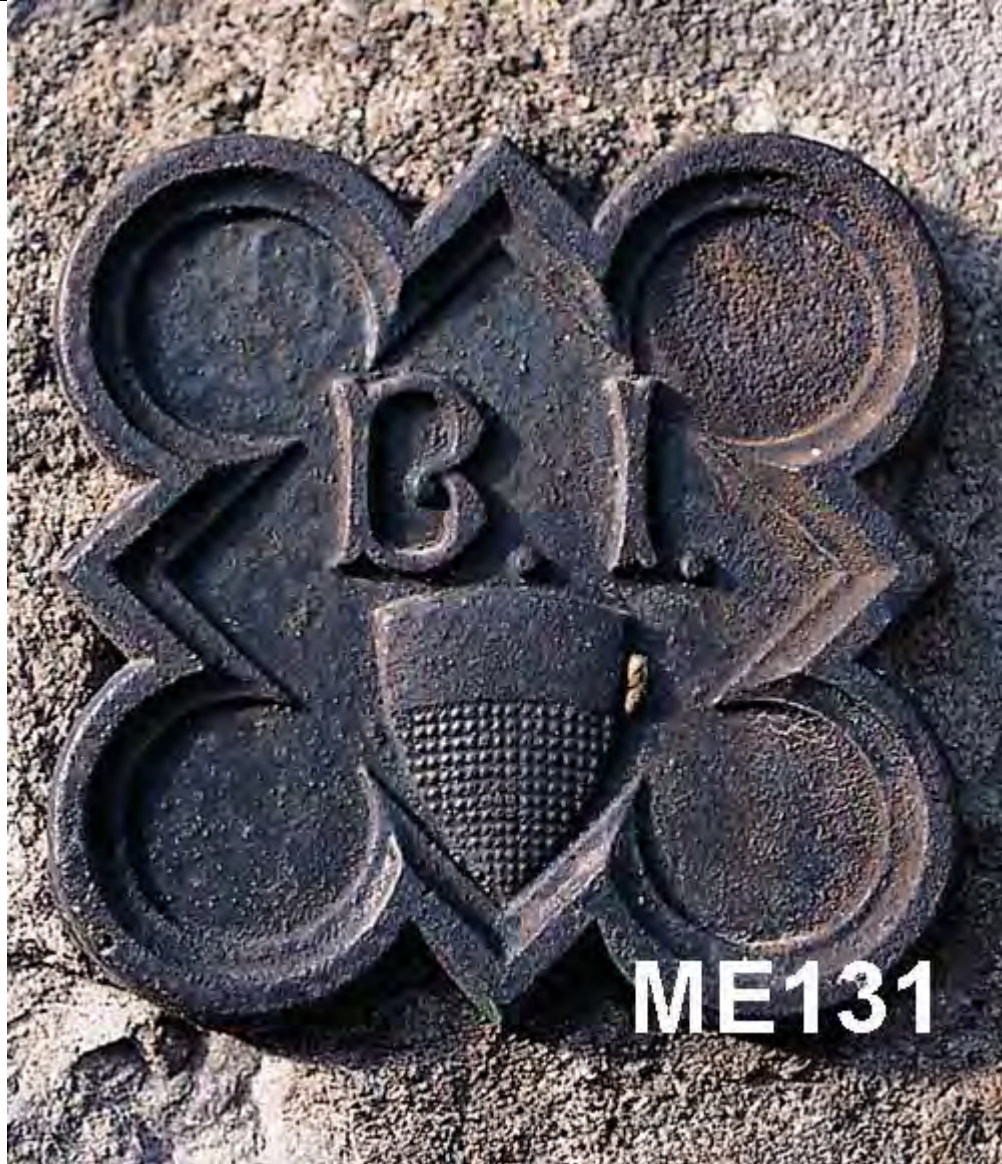


ME106

basic layin for building urn
from ME106

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

CAPCOM TEXTURE FROM RESIDENT EVIL 4



SURFACES TEXTURE SUPERIMPOSED OVER
CAPCOM TEXTURE AT 50% TRANSPARENCY

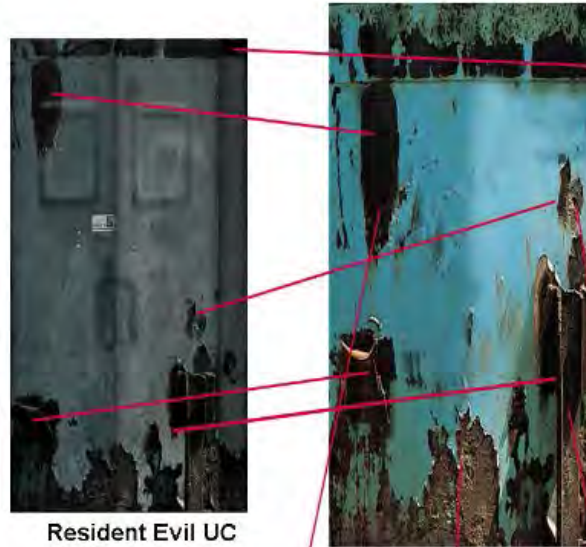


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC



Resident Evil
Umbrella Chronicles

Beginning of construction
of lab door from ME124

ME124 was cropped, stretched,
and manipulated with other
Photoshop tools. Note
multiple instances of
distorted, but duplicate
shapes of rust spots, textures,
hinges, etc. Port hole was
cloned out.

Resident Evil UC
lab door

crop line



ME142

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC



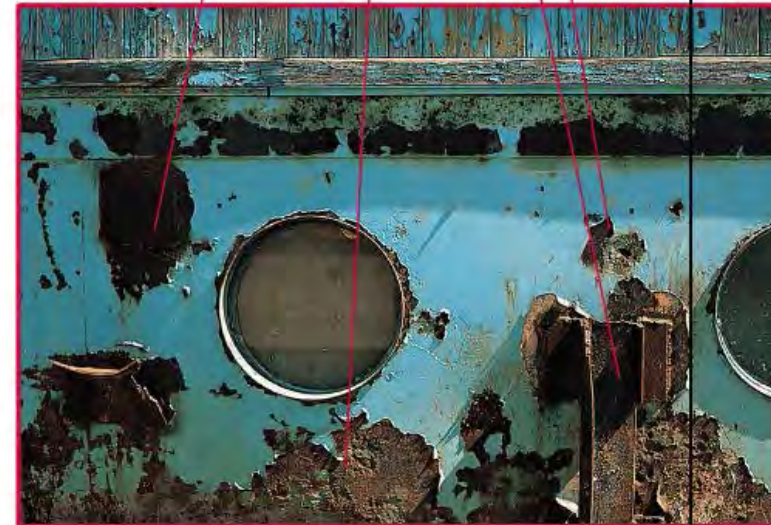
Resident Evil
Umbrella Chronicles

Beginning of construction
of lab door from ME124

ME124 was cropped, stretche
and manipulated with other
Photoshop tools. Note
multiple instances of
distorted, but duplicate
shapes of rust spots, texture
hinges, etc. Port hole was
cloned out.

Resident Evil UC
lab door

crop line



ME142

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

P145



area of
crop



Texture from RE Remake
constructed by cropping, and
rotating P145; and deleting brick.



EXHIBIT "A"

Surfaces Original



P150

Used by Capcom – Resident Evil Remake



P150

scenery was constructed by taking areas from P150 and combining as per color outlines. Window was cloned out with surrounding texture



Scenery in RE Remake

EXHIBIT "A"



**Partial
usage
(made
seamless**



Full usage

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

RE Remake scenery



P158 used as wall in RE Remake.
Cropped area from P158 (in green)
was corrected with the perspective tool.



area of crop

P158



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC & RE

CAPCOM TEXTURE FROM RESIDENT EVIL



SURFACES TEXTURE FLIPPED HORIZONTALLY AND SUPERIMPOSED OVER CAPCOM TEXTURE AT 50% TRANSPARENCY



CAPCOM TEXTURE FROM DEVIL MAY CRY and DEVIL MAY CRY HD COLLECTION



SURFACES TEXTURE FLIPPED 180 AND SUPERIMPOSED OVER CAPCOM TEXTURE AT 50% TRANSPARENCY



THE TEXTURE AS IT APPEARS IN DEVIL MAY CRY FROM ONE OF SEVERAL ANGLES VISIBLE TO THE VIEWER



P163

EXHIBIT "A"

RESIDENT EVIL MOVING WALL CONSTRUCTION



note duplication of bottom of Resident Evil wall, and P163. (P163 is flipped horizontally)

SURFACES TEXTURE FLIPPED HORIZONTALLY AND SUPERIMPOSED OVER CAPCOM TEXTURE AT 50% TRANSPARENCY



P163

area of detail



THE TEXTURE AS IT APPEARS IN RESIDENT EVIL AS PART OF AN INTERACTIVE PUZZLE WHERE THE WALL MOVES SIDE TO SIDE, COMPRISING 3/4 OF THE SCREEN DEPENDING ON WHERE THE MODEL IS POSITIONED.

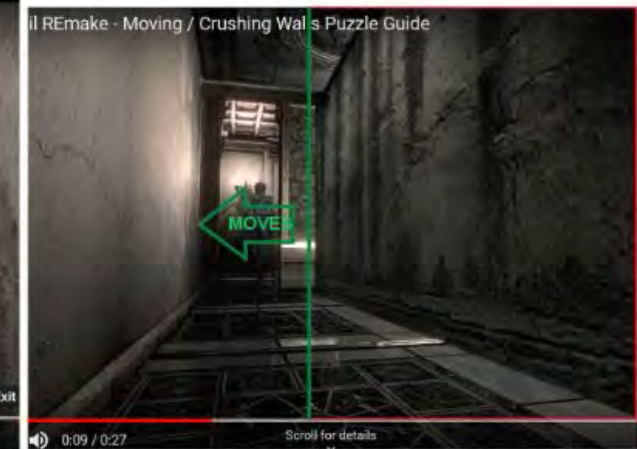


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



Resident Evil remake

P167 cropped and manipulated as in early construction of wall.



P167

EXHIBIT "A"

Surfaces Original

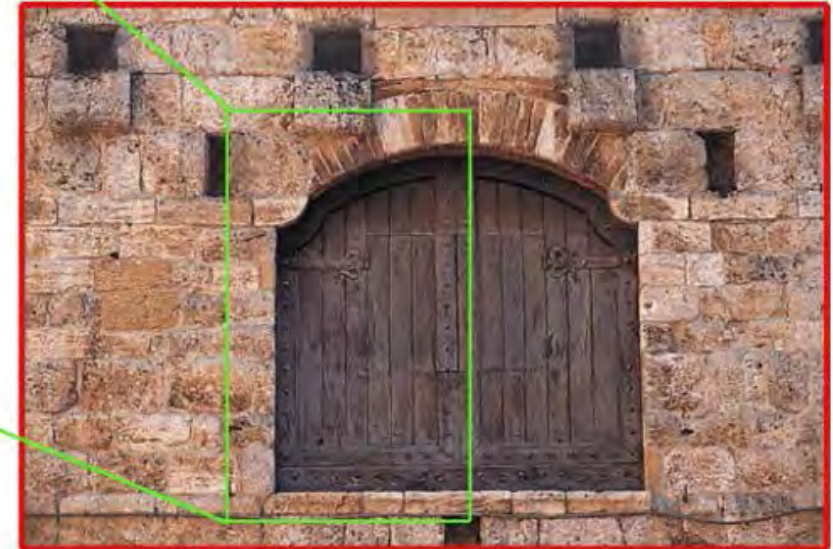


Used by Capcom – DMC1



area of crop

S122



Door in DMC1 constructed from S122

DMC1

EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC



EXHIBIT "A"

Surfaces Original

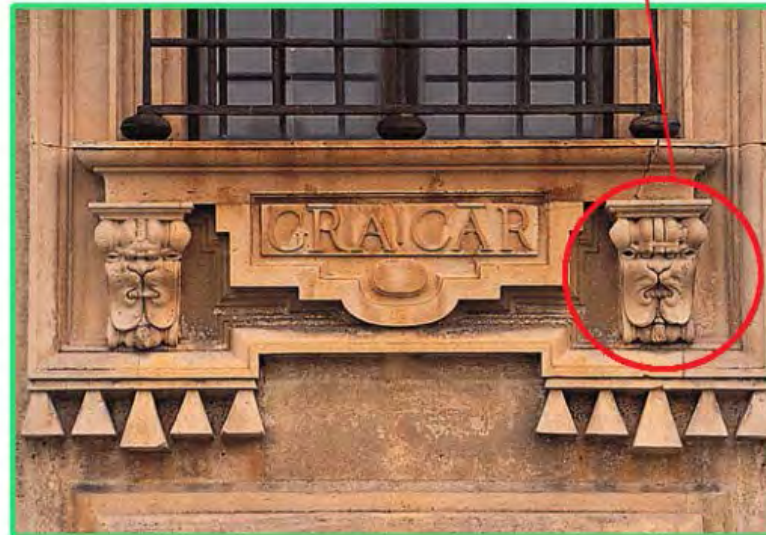


S144

Used by Capcom – Devil May Cry 1



Texture board
from Devil May Cry 1



S144

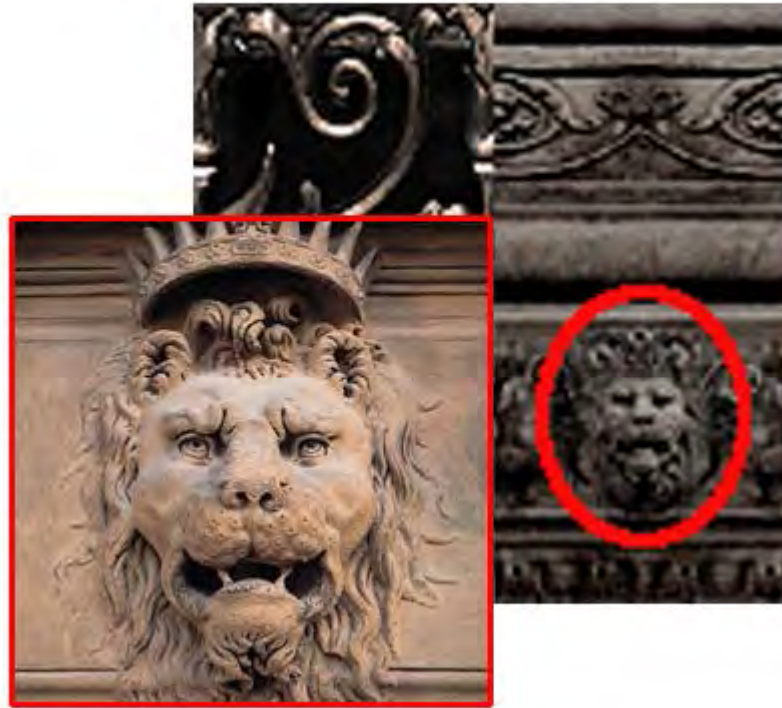
EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC1

DMC1



S148

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

S154

section
A

Wall in RE Remake was built
by recombining sections
A & B from S154.



section
B

line of crop

RE Remake



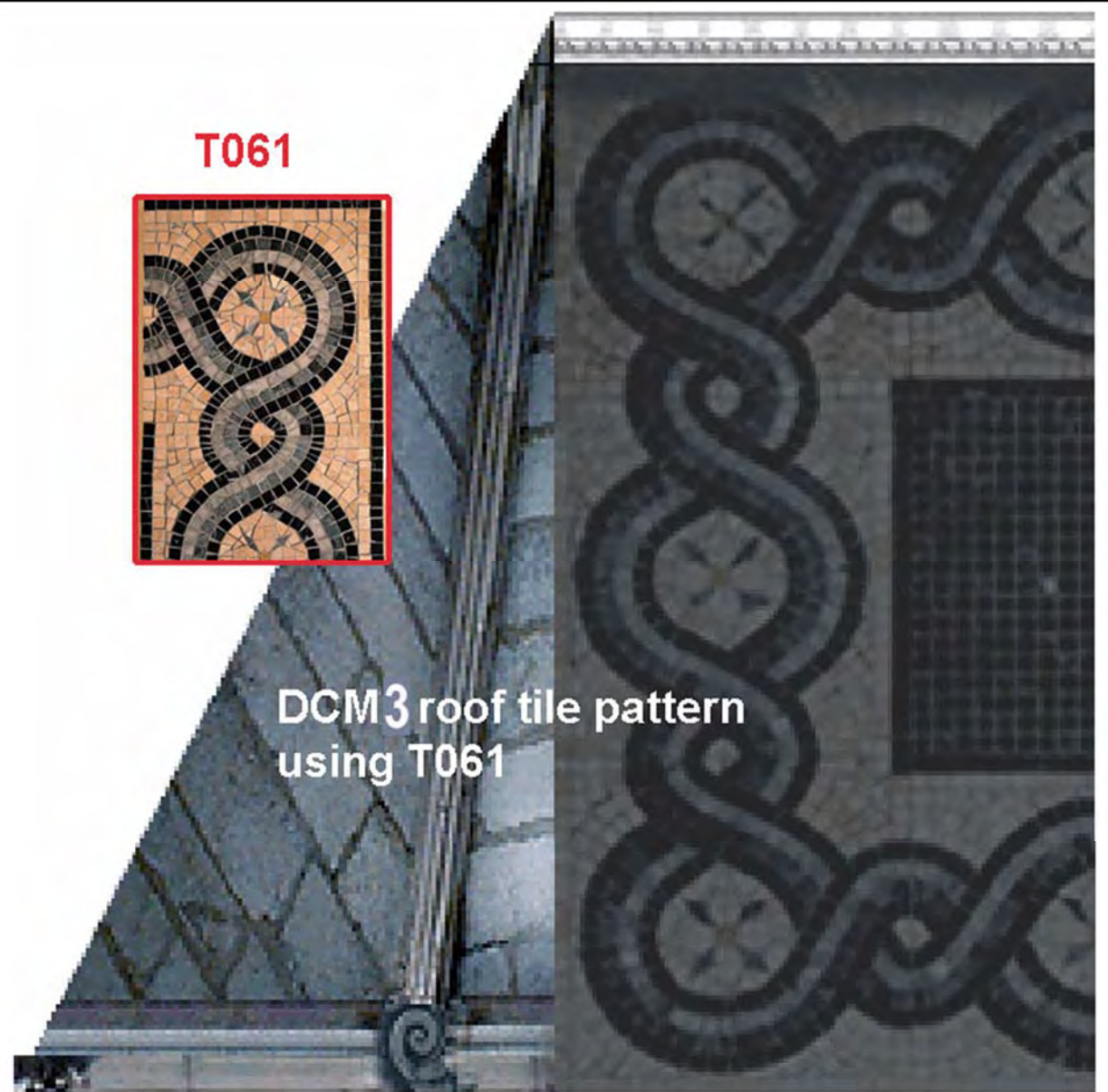
EXHIBIT "A"

Surfaces Original



T061

Used by Capcom – DMC3



T061

**DCM3 roof tile pattern
using T061**

EXHIBIT "A"

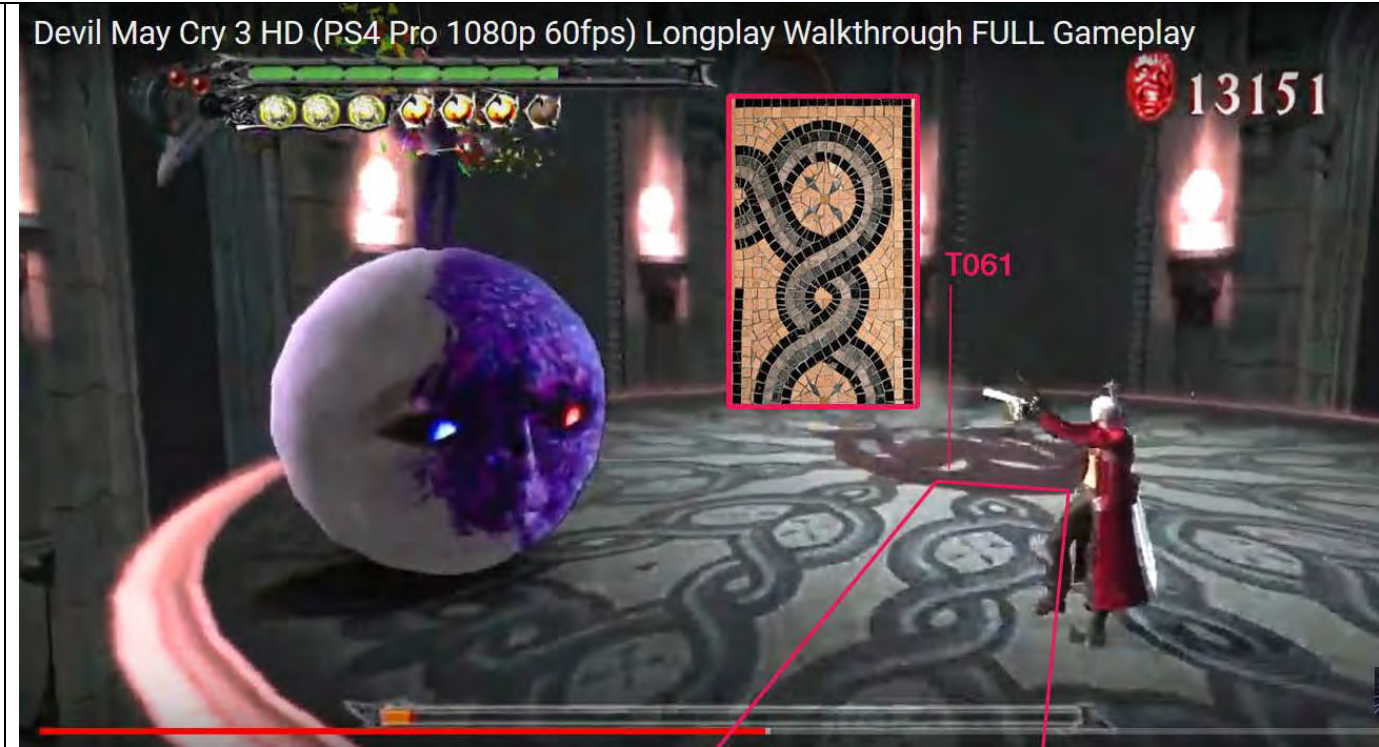


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



EXHIBIT "A"

Surfaces Original

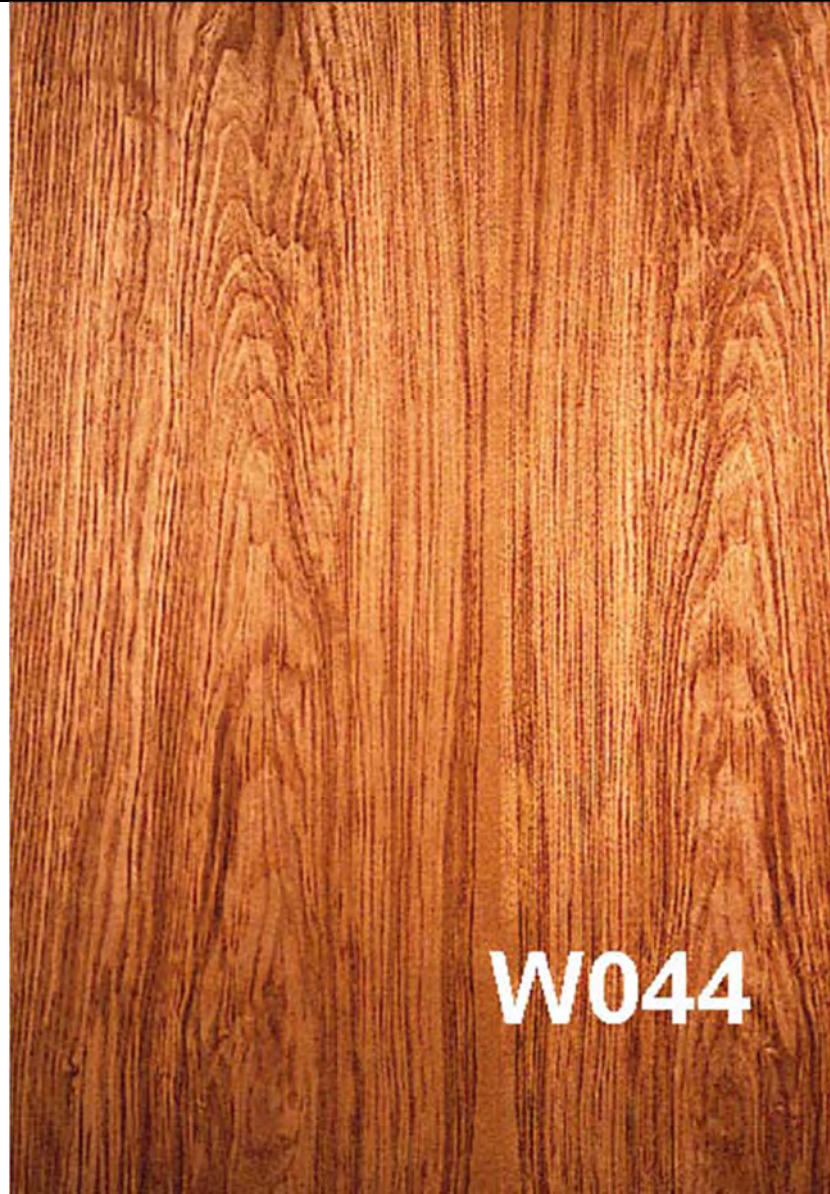


Used by Capcom – Resident Evil



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC



Detail from REUC

using W044

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake



W059

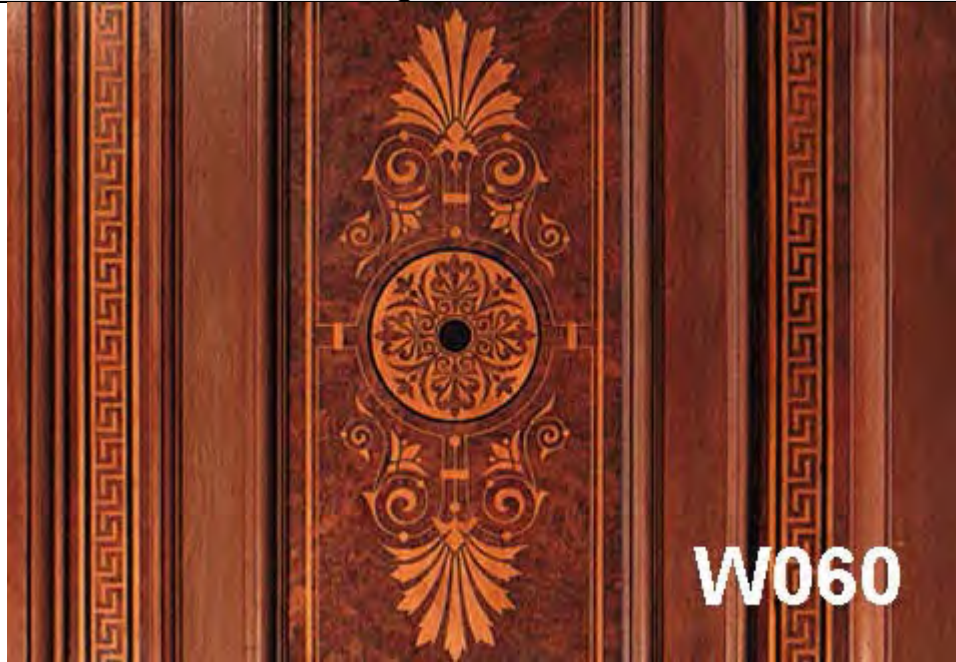


**RE Remake door knocker
built from W059**

**Beginning of manipulation of
W059**

EXHIBIT "A"

Surfaces Original



Used by Capcom – DMCHD

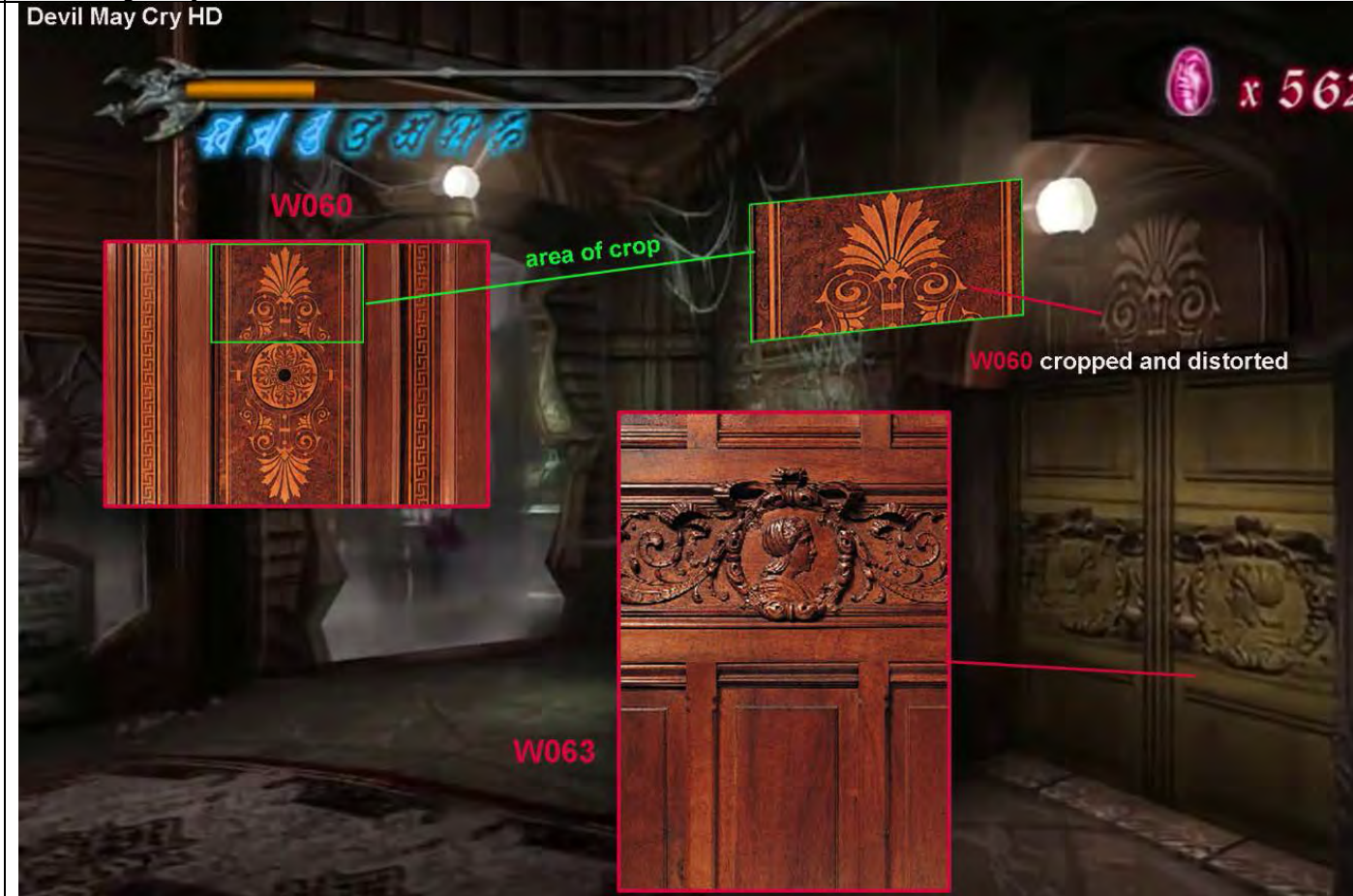
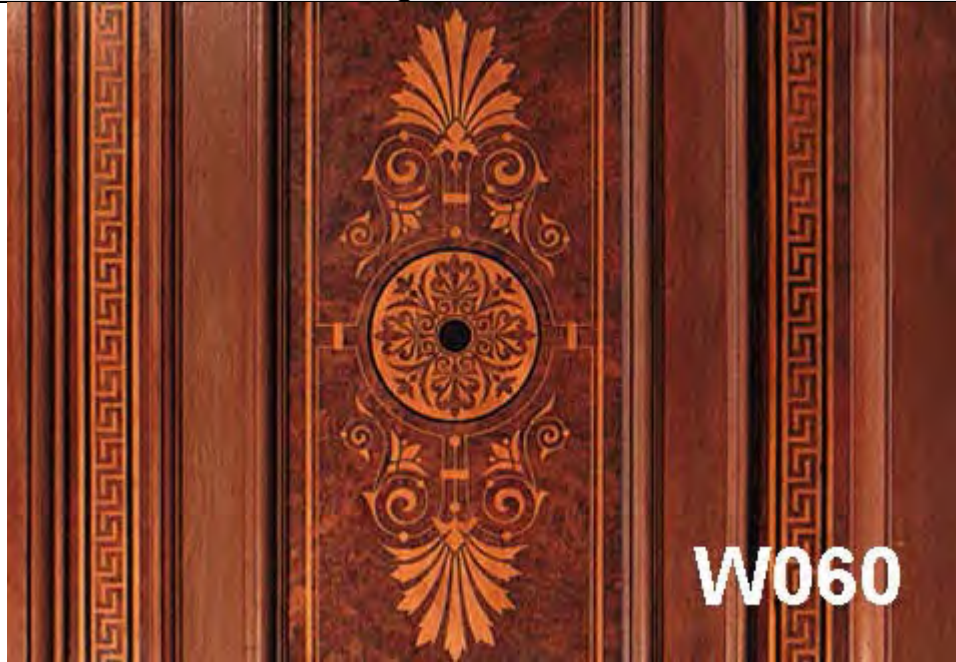


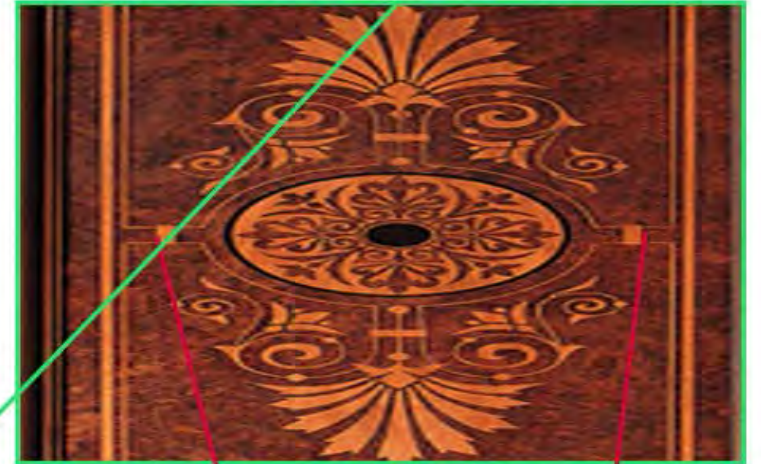
EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil HD

W060 stretched and compressed



W060



area used in Resident Evil HD panel

RE panel



EXHIBIT "A"

Surfaces Original



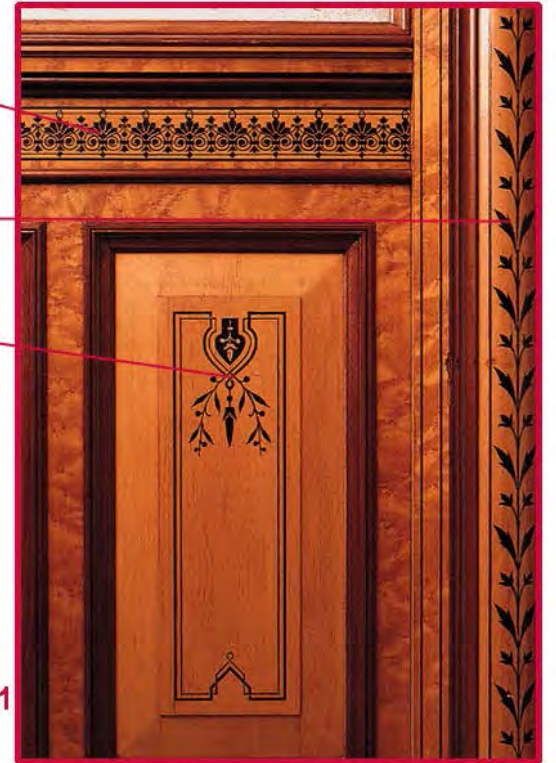
Used by Capcom – Resident Evil Remake



EXHIBIT "A"



Resident Evil 4 door and frame is a copy of W061 manipulated to fit game scenery



W061

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil OB, Remake, Umbrella Corps



EXHIBIT "A"



area of crop

Resident Evil library chairback
built from W062

W062



EXHIBIT "A"

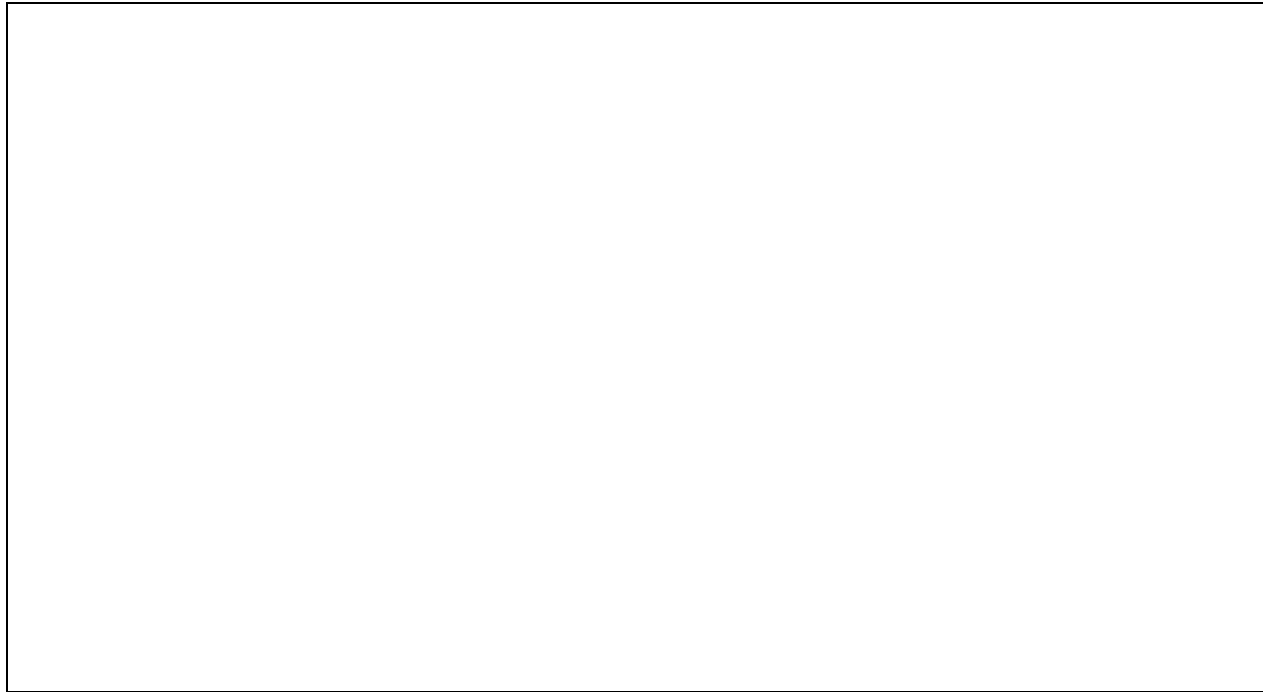


EXHIBIT "A"

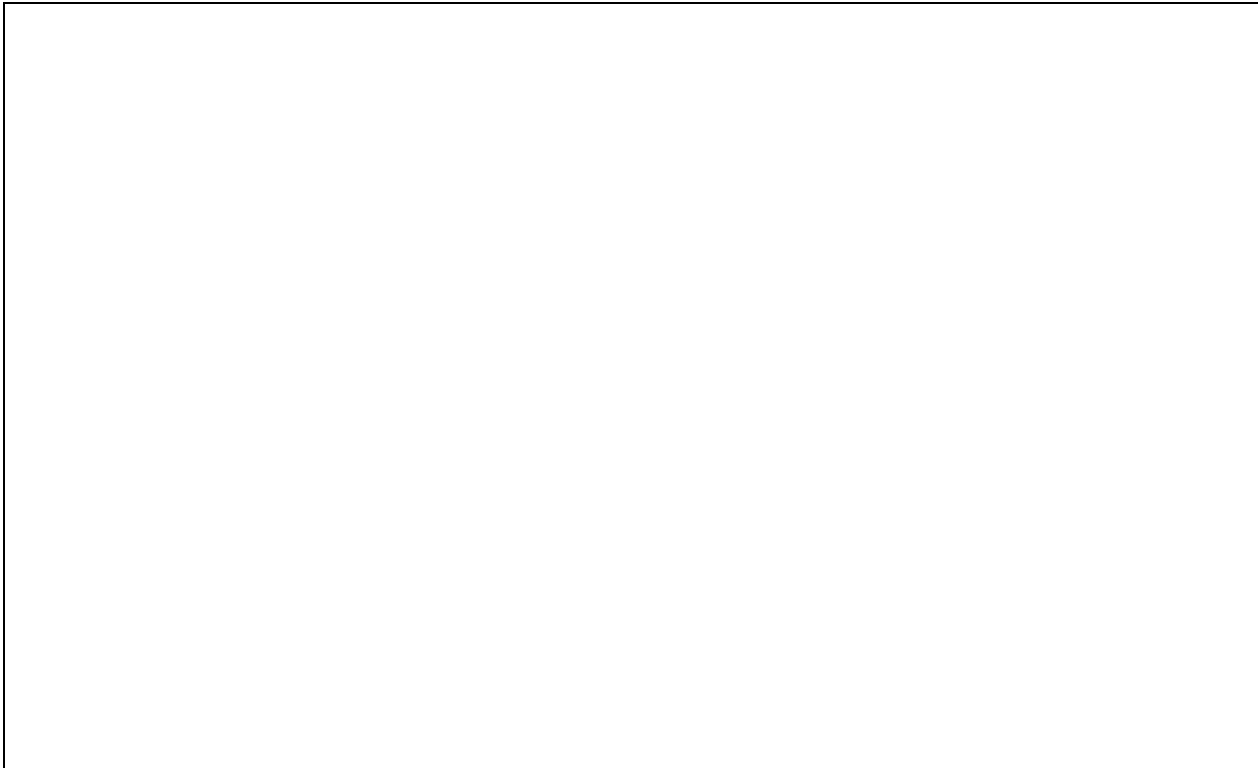


EXHIBIT "A"

Surfaces Original



Used by Capcom – DMC1; DMCHD; OB1 and OB1a



EXHIBIT "A"



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4

Resident Evil 4 texture used by Capcom

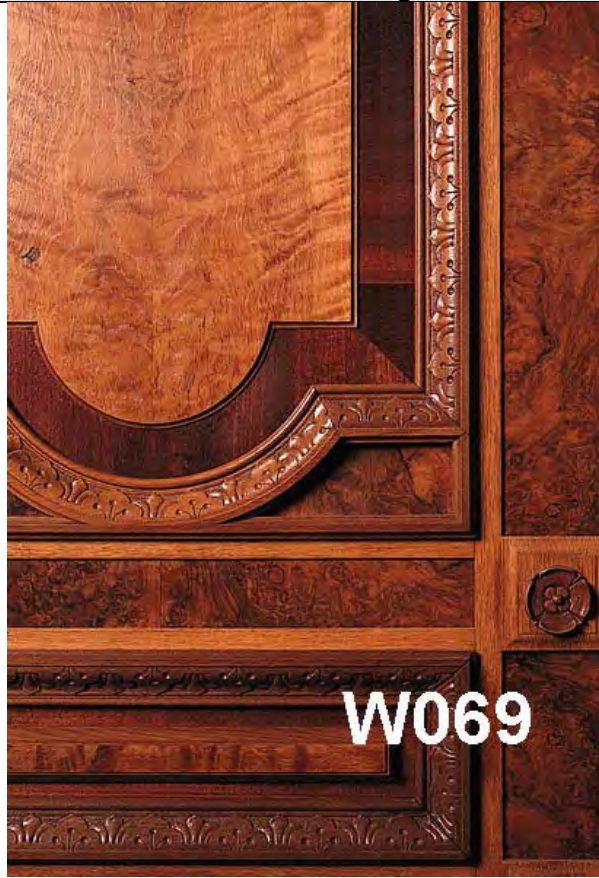


Surfaces texture scaled down and superimposed over Capcom texture at 50% transparency



EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake X-Box

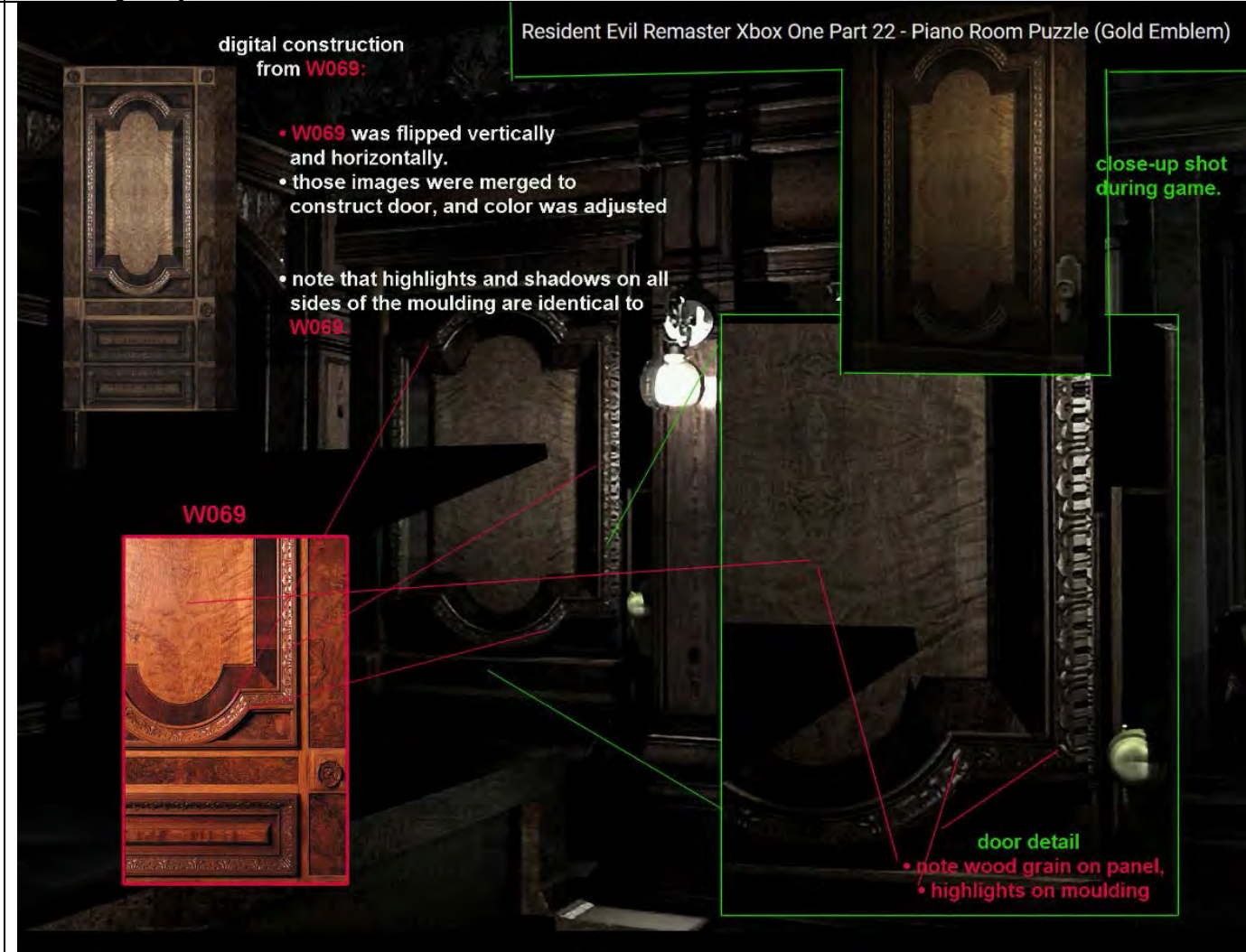
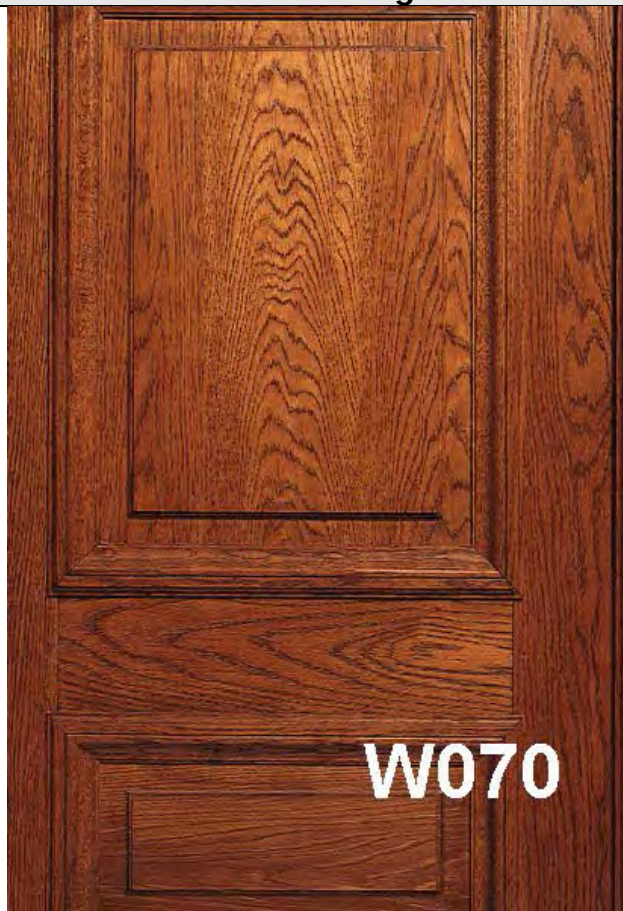


EXHIBIT "A"

Surfaces Original



W070

Used by Capcom – Resident Evil Remake

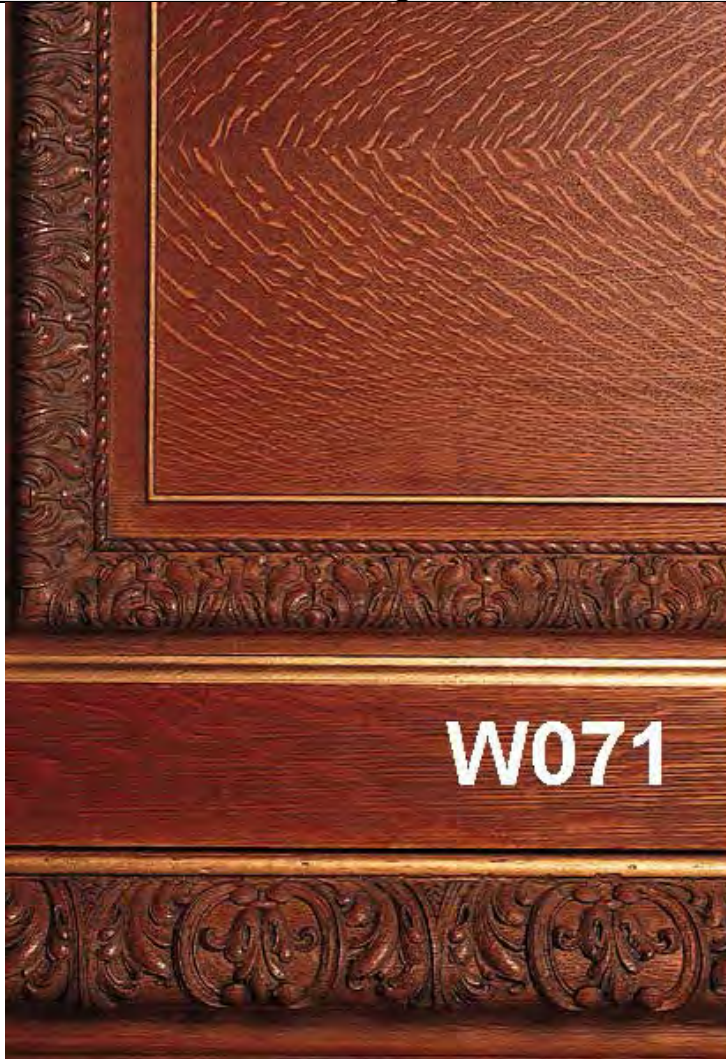


W070

Wood panel from RE Remake

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake, OB, HD, UC

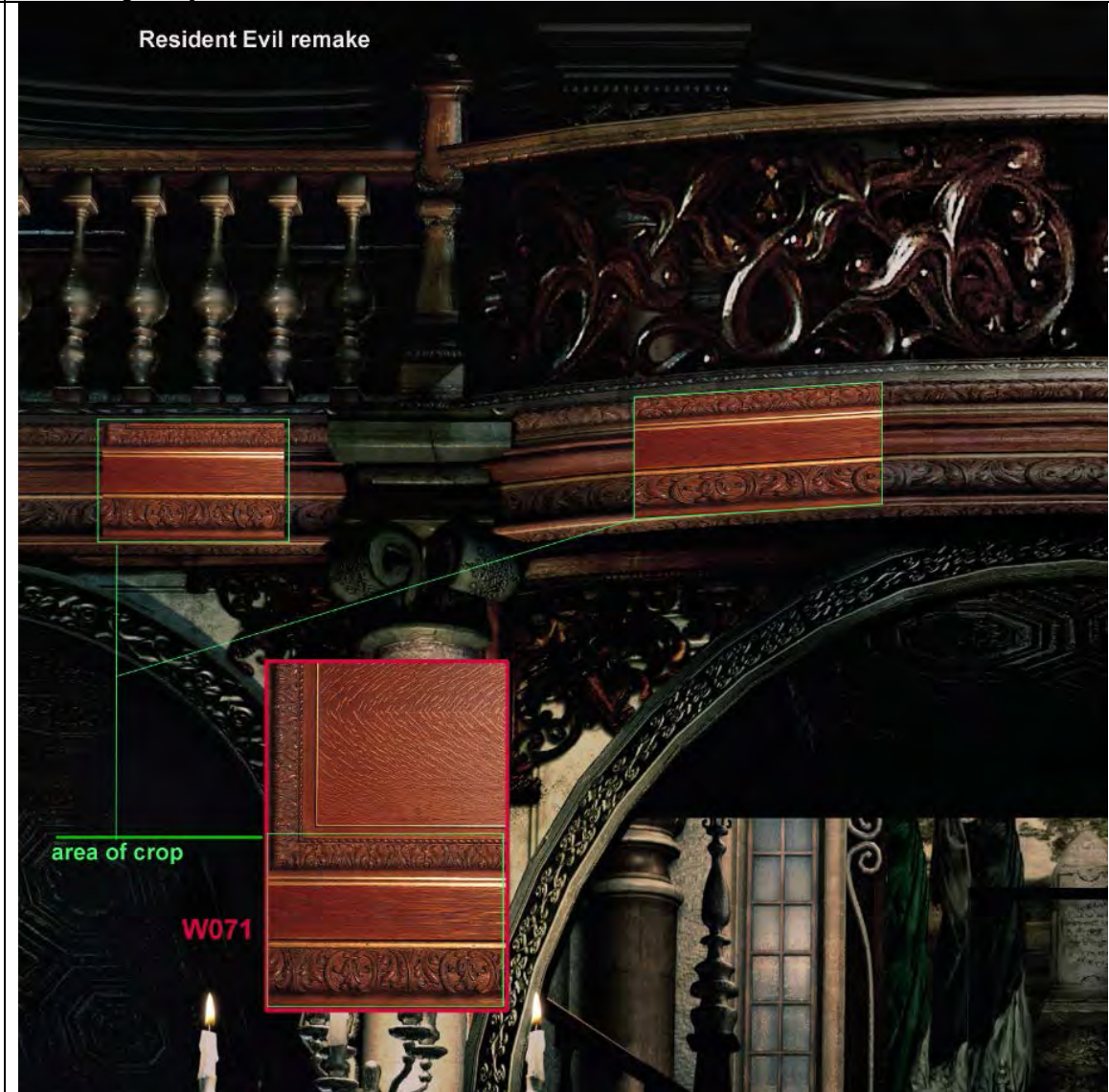
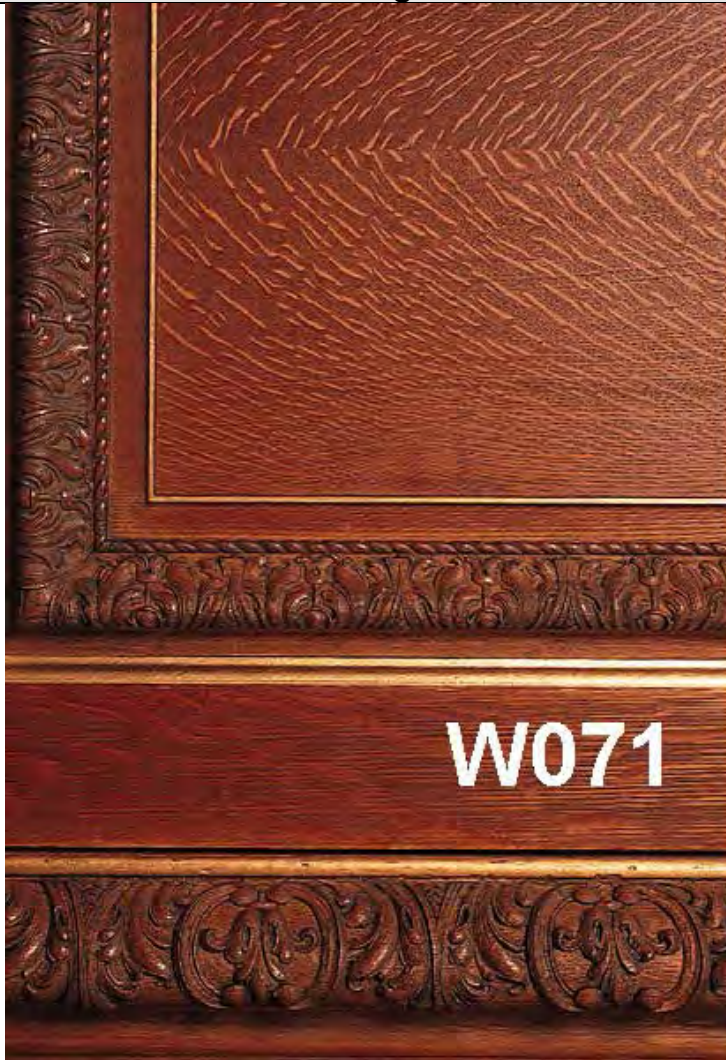


EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake, OB, HD, UC



EXHIBIT "A"

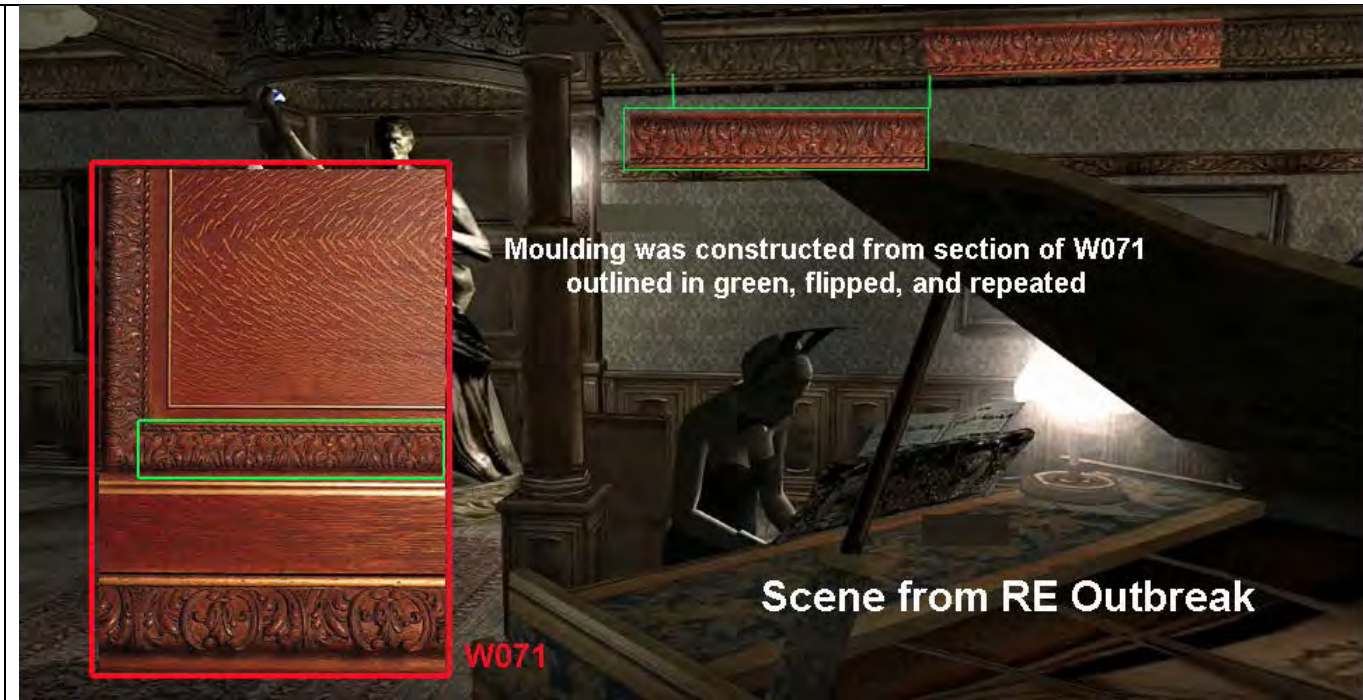
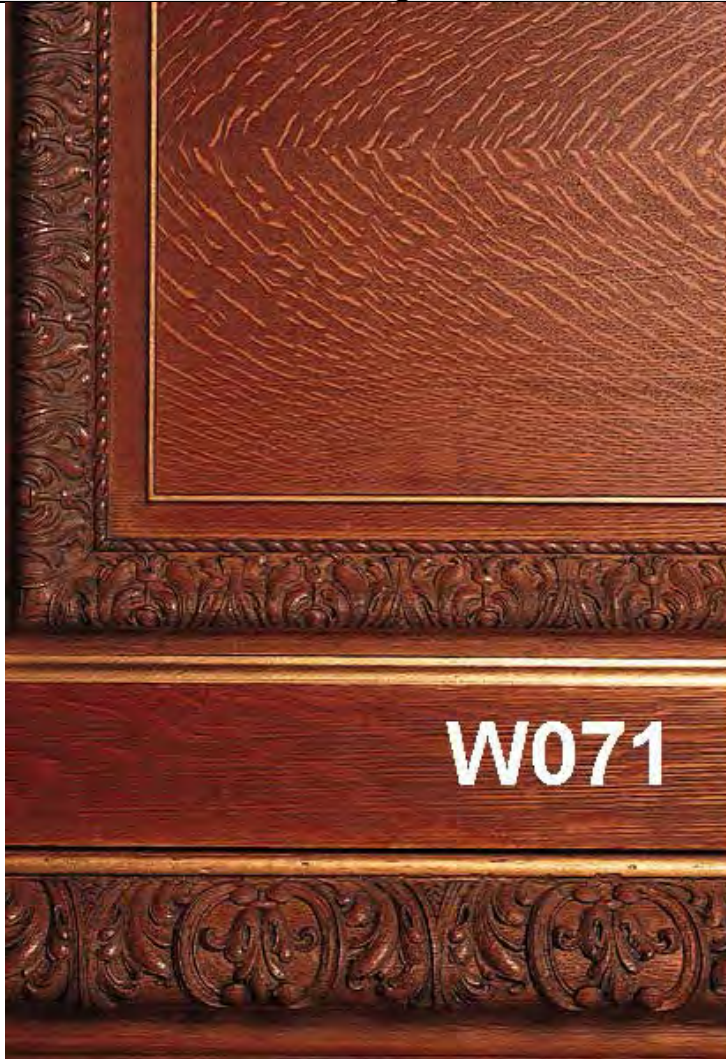


EXHIBIT "A"

Surfaces Original

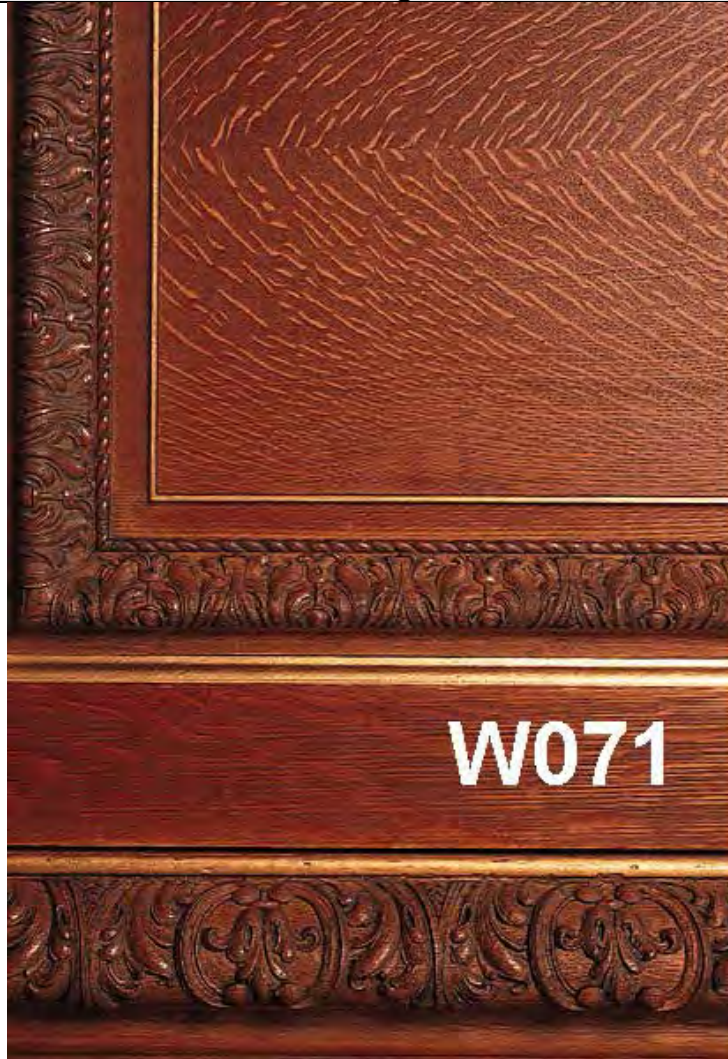


Used by Capcom – Resident Evil Remake, OB, HD, UC



EXHIBIT "A"

Surfaces Original

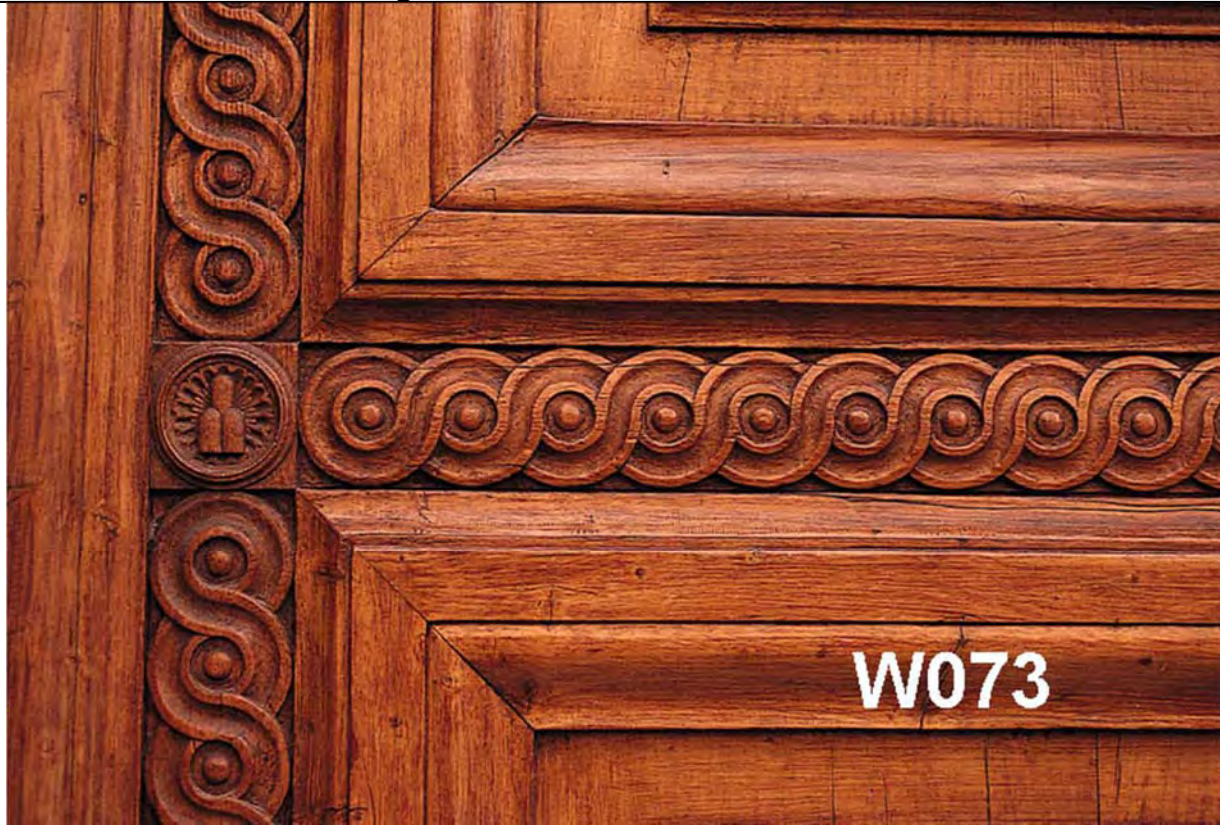


Used by Capcom – Resident Evil UC



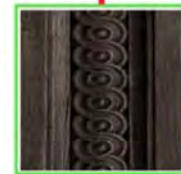
EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil HD

RE or REHD library
woodwork
as built from W073



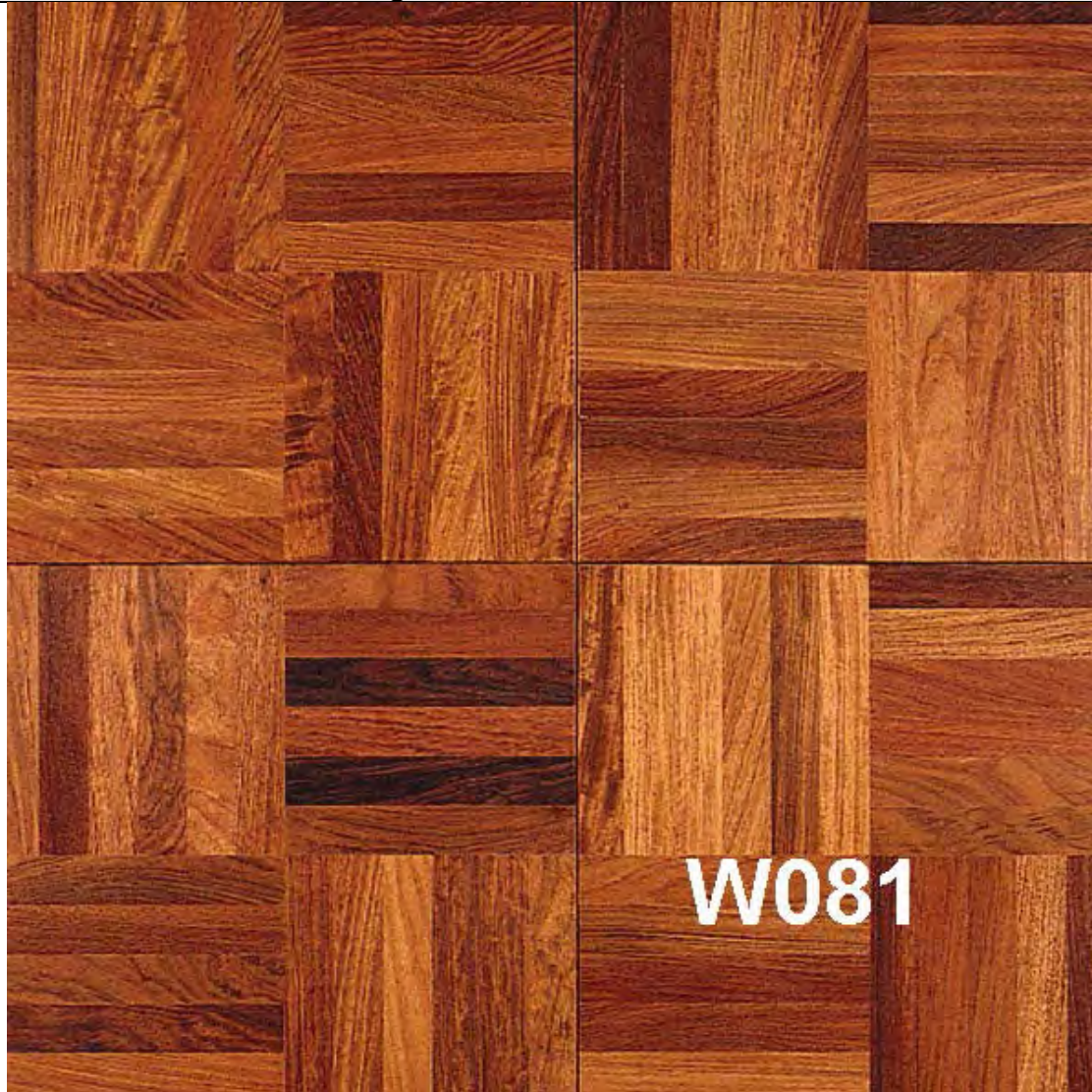
area of crop



W073

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake

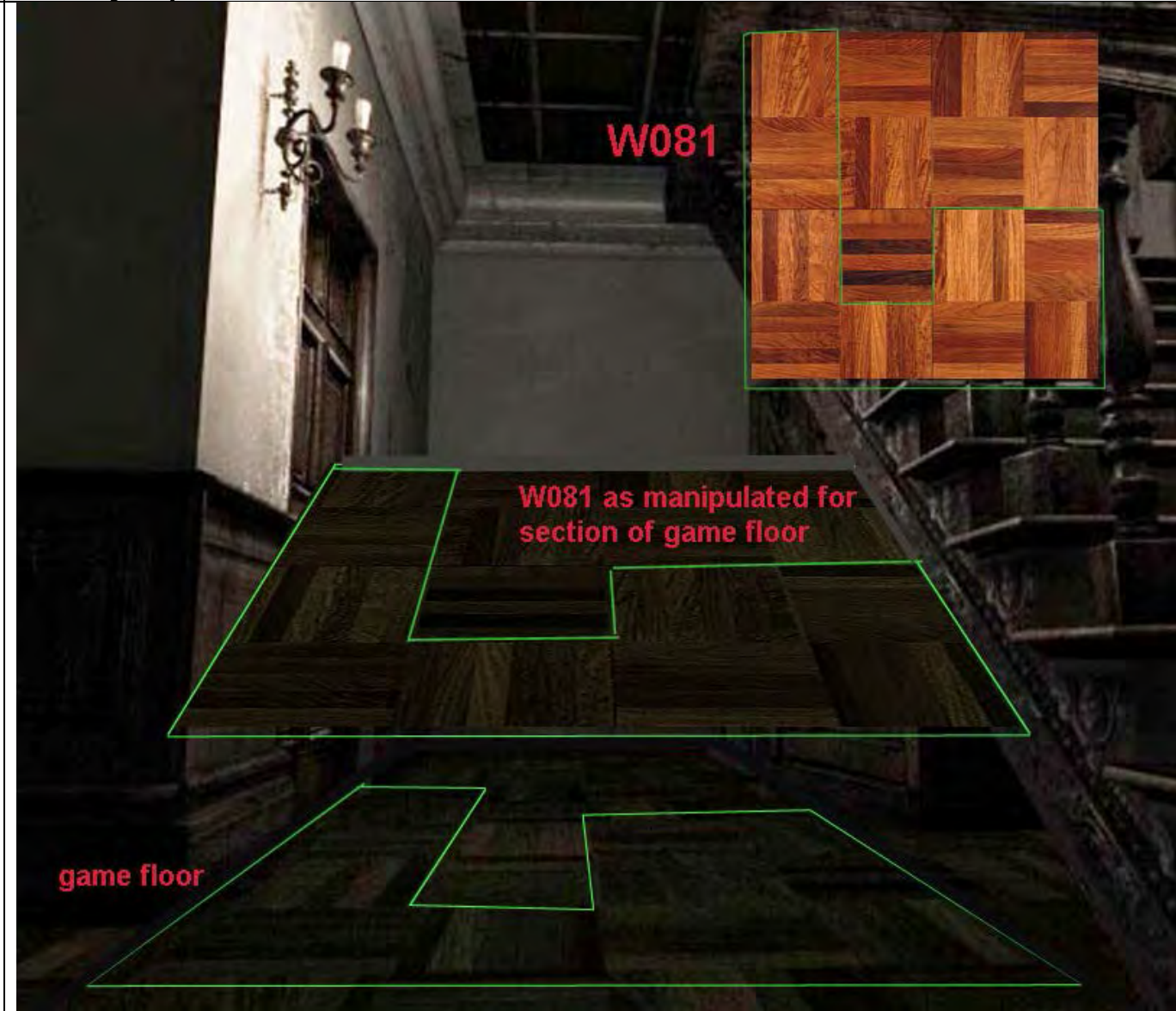


EXHIBIT "A"


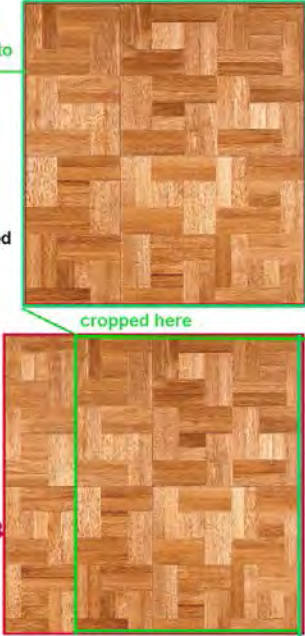
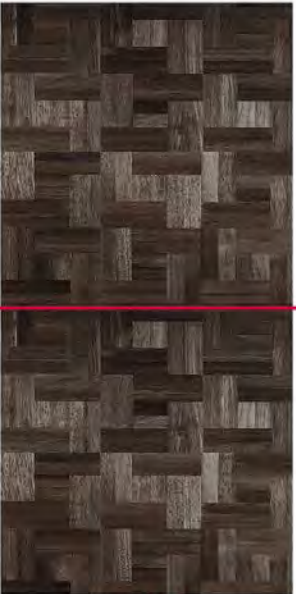
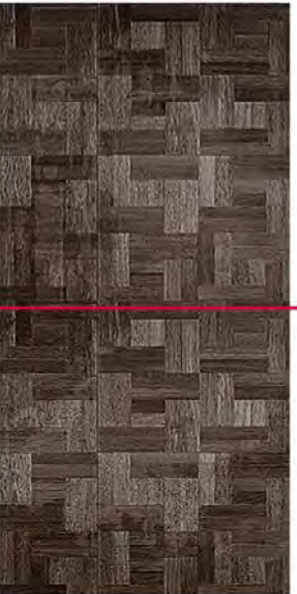
Surfaces Original	Used by Capcom – Resident Evil UC
 <p data-bbox="814 1182 1077 1263">W083</p>	<p data-bbox="1419 272 1526 313">stretched to here</p> <p data-bbox="1311 418 1526 565">Area of W083 was selected along lower green box, and stretched to upper green box. Stretched image was repeated to construct floor.</p> <p data-bbox="1588 540 1709 565">cropped here</p> <p data-bbox="1454 748 1521 773">W083</p>   <p data-bbox="1903 829 2153 870">manipulated W083 repeated with color adjusted</p>  <p data-bbox="2314 829 2413 846">REUC floor</p> <p data-bbox="2561 240 2682 305">Resident Evil Umbrella Chronicles</p> <p data-bbox="2561 521 2628 561">line of repeat</p>

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil 4, Remake, HD

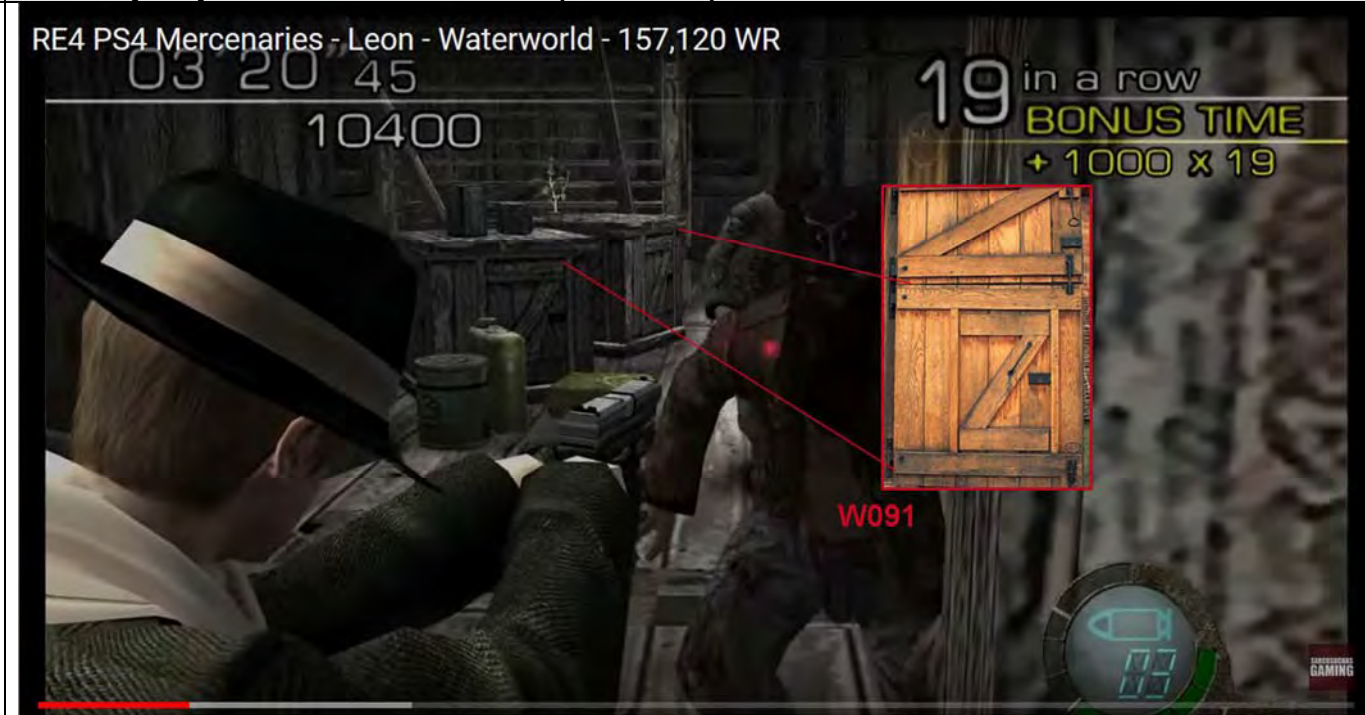


EXHIBIT "A"

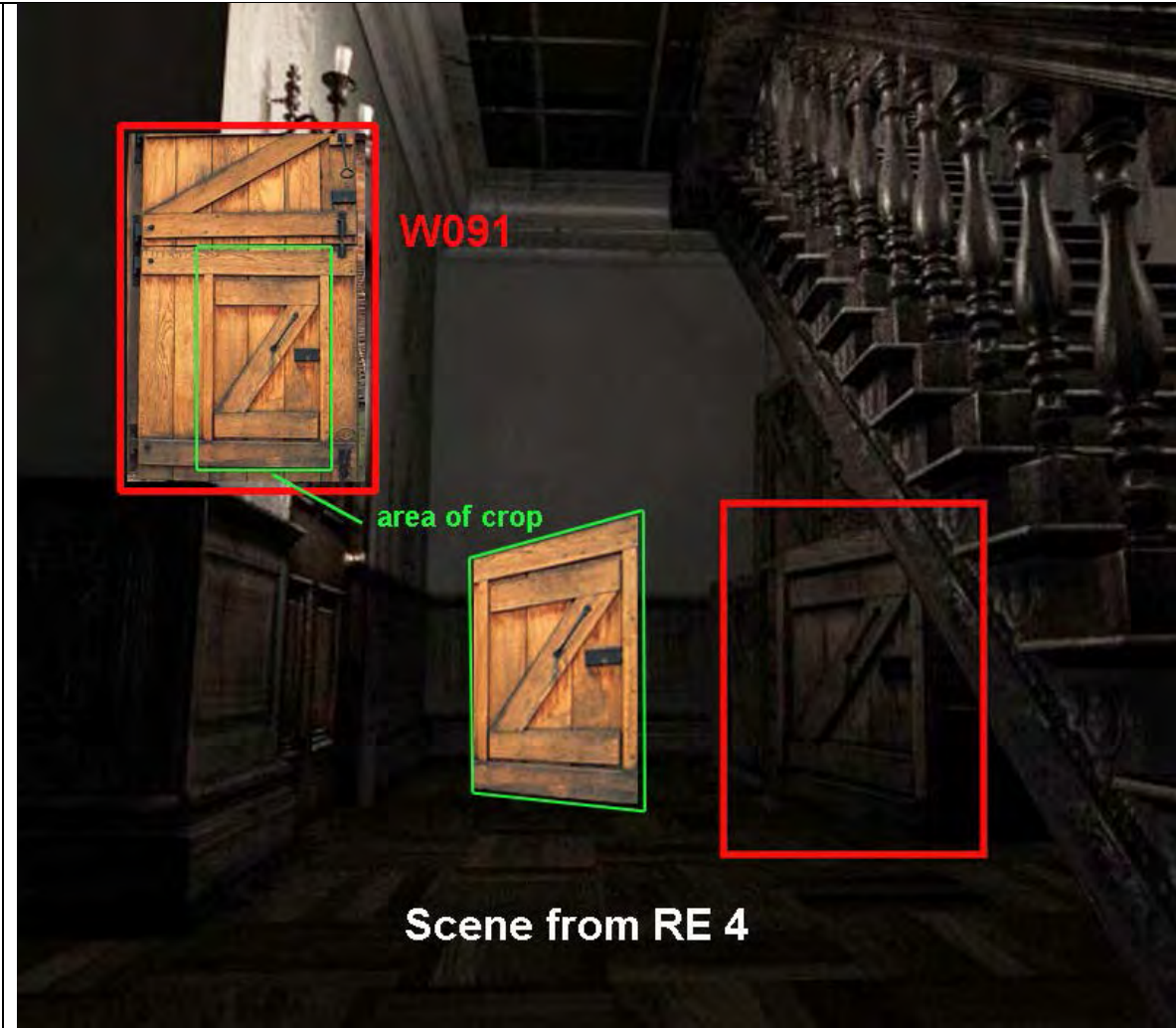


EXHIBIT "A"

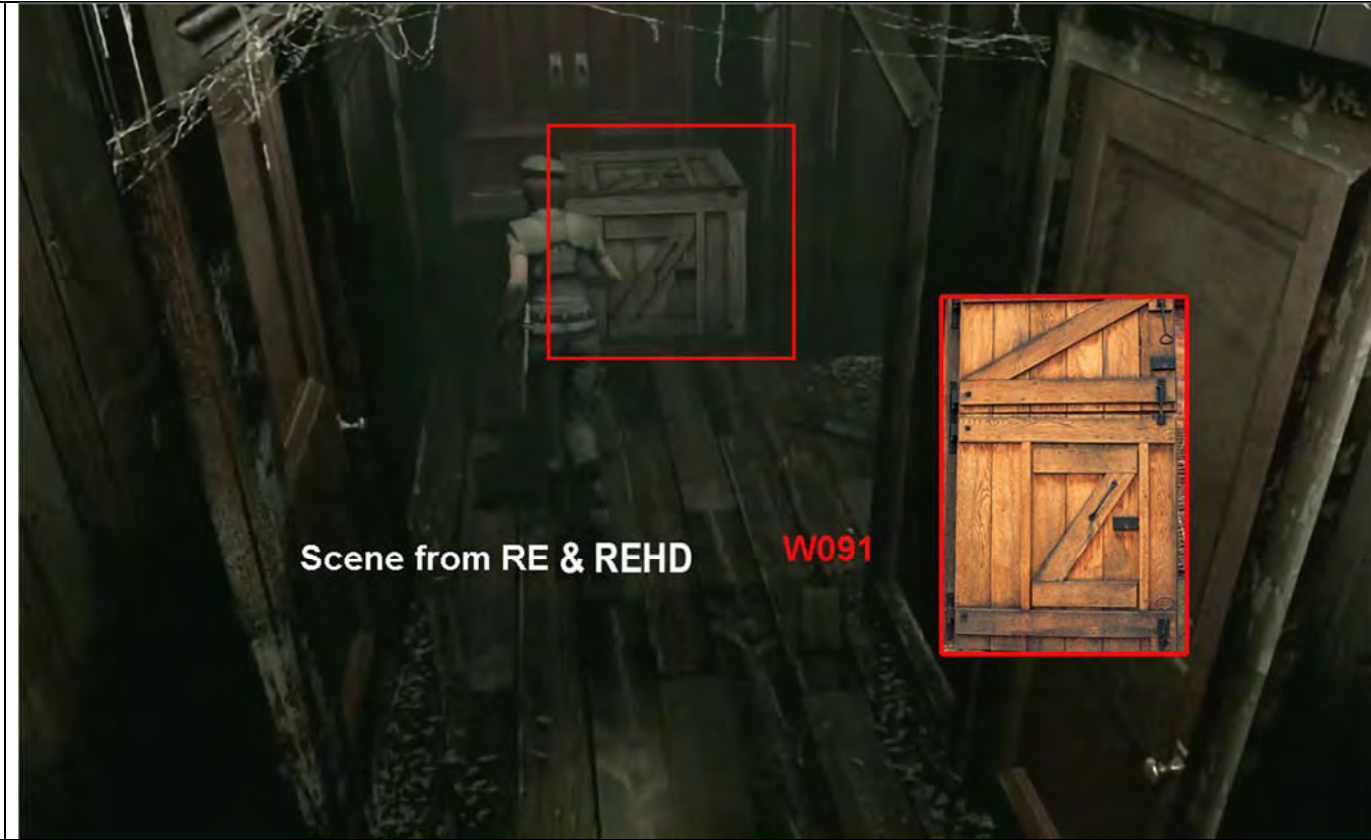
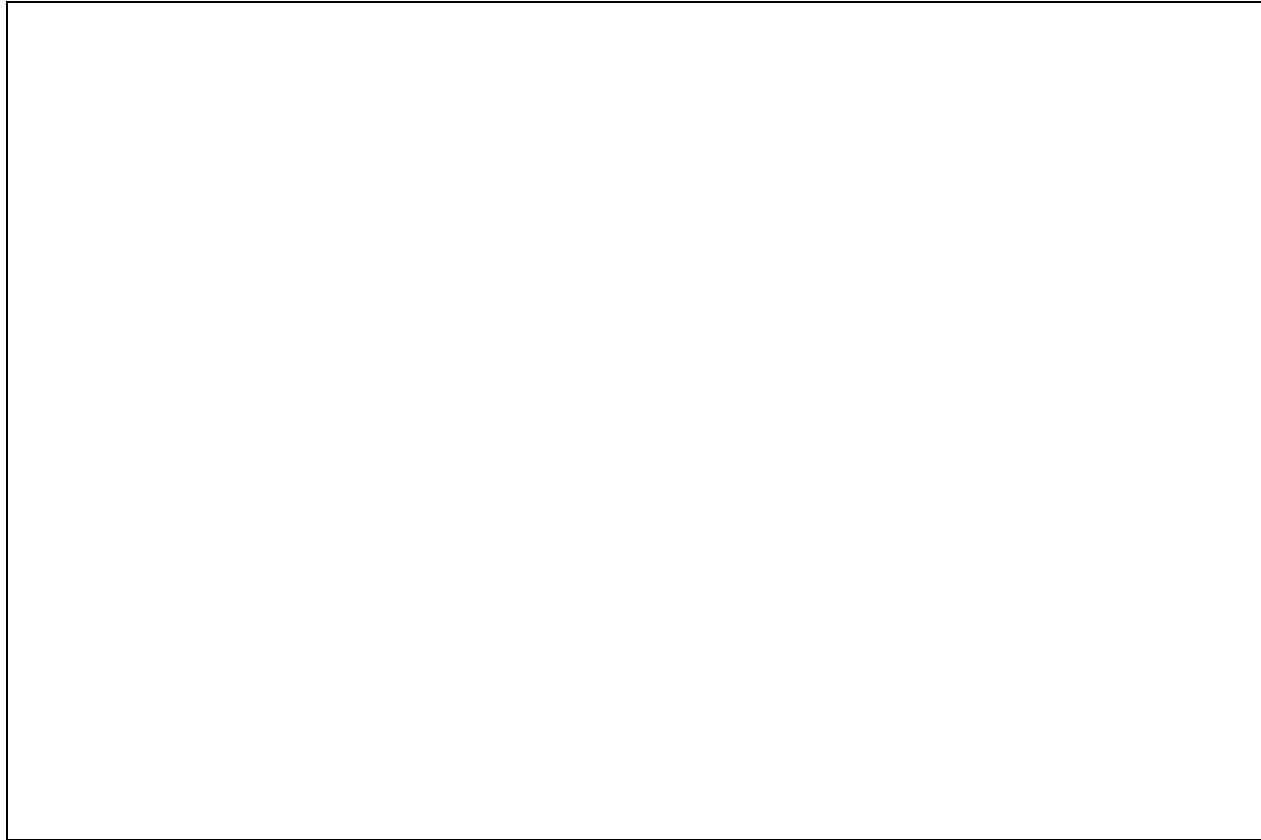


EXHIBIT "A"

ME067

Resident Evil library balcony guard rail as adapted from ME067

W091

Surfaces image superimposed over Capcom texture at 50% transparency

Capcom texture

Resident Evil library detail from another angle

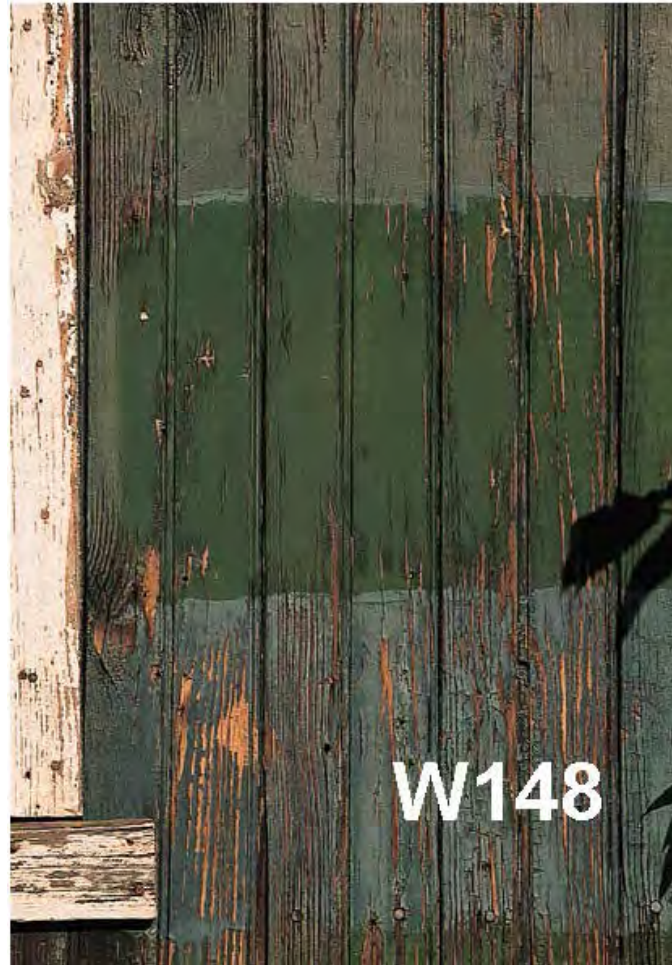
Resident Evil: The Umbrella Chronicles The Mansion Incident 1 Boss: Yawn (Part 4)
Chris
10025 4
Shotgun (Lv. 4)

ENEMY
15:37 / 17:08
Scroll for details

Resident Evil library and RE Umbrella Corps

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil UC



W148

**REUC box as constructed
from W148**



REUC



EXHIBIT "A"



REUC element constructed from W148 in game scene

EXHIBIT "A"

Surfaces Original



Used by Capcom – Resident Evil Remake, 4

RE Remake shutter was built by repeating cropped area of W149 twice, rotating cropped section for top section of RE4 shutter, and manipulating scale.

W149



area of crop



RE4