



Epilogue

Kristen Ullom

Lisa M. Barr

T. Sean Hall

Follow this and additional works at: <https://via.library.depaul.edu/jatip>

Recommended Citation

Kristen Ullom, Lisa M. Barr & T. S. Hall, *Epilogue*, 8 DePaul J. Art, Tech. & Intell. Prop. L. 245 (1997)
Available at: <https://via.library.depaul.edu/jatip/vol8/iss1/14>

This Epilogue is brought to you for free and open access by the College of Law at Via Sapientiae. It has been accepted for inclusion in DePaul Journal of Art, Technology & Intellectual Property Law by an authorized editor of Via Sapientiae. For more information, please contact digitalservices@depaul.edu.

EPILOGUE

BARNEY V. THE SAN DIEGO CHICKEN

Lyons Partnership, the owners of the popular purple dinosaur character Barney, took legal action in late October against Ted Giannoulas who performs as the famous chicken mascot of the San Diego Padres. The copyright and trademark infringement lawsuit stems from the use of a Barney-like character by the defendant during his performances in which the purple dinosaur character is ridiculed and assaulted.

As the federal lawsuit filed by Lyons specifically alleges, The Famous Chicken “would punch, flip, stand on and otherwise assault the putative Barney.” This suit follows not only an initial notification by Lyons to Giannoulas that his actions constituted both copyright and trademark infringement, but also numerous cease-and-desist letters. As Barney’s consumer base consists primarily of young children, Barney’s owners are particularly concerned that their young audience is not sophisticated enough to recognize the difference between the abused character in the Famous Chicken performances and the authentic Barney. Lyons is seeking a permanent injunction against the further use of the purple dinosaur character by Giannoulas in addition to \$100,000 for each of the Giannoulas performances that featured the Barney-like character.

Mr. Giannoulas has asserted, in his defense, that his actions constitute nothing more than a parody which is clearly protected under the Copyright Act, the First Amendment and trademark laws. In addition, he claims that his parody featuring the purple dinosaur character is but a small part of his performance. While the dinosaur featured in The Famous Chicken performances clearly resembles the Barney character, Mr. Giannoulas maintains that his creation is substantially different from Barney, “My character has scales, not spots, it has no toenails and its head isn’t quite as big.” Mr. Giannoulas insists that while this lawsuit by Lyons is

disturbing, it will not stand in his way - he plans to continue to take his shots at the purple dinosaur. *One Chicken Loses His Head at Sight of Purple Dinosaur - Barney Owners Take Action Against San Diego Mascot For Beatings in His Skit*, WALL ST. J., November 7, 1997; *Frank Green, Famous Performing Bird Sued By Owner of Barney Character*, SAN DIEGO UNION & TRIB. November 5, 1997.

NO PROTECTION FOR PUBLISHER OF "HIT MAN" BOOK

The U.S. Court of Appeals for the Fourth Circuit recently ruled that the First Amendment does not preclude a finding of civil liability in a wrongful death action brought against a publisher of a hit-man manual. This "unique" case, as described by the court, involved a convicted killer's use of the publisher's hit-man manual in the murders of three people. The convicted hit man, James Perry, was hired by Lawrence Horn to kill his ex-wife, quadriplegic son and his son's nurse in an effort to collect his son's \$2 million settlement which he had received as the result of an accident that left him paralyzed. Paladin Press' *Hit Man: A Technical Manual for Independent Contractors* was relied heavily upon by Perry in the commission of the triple murders as it provided detailed instructions on how to commit murder and how to become a professional killer. As a result, the victims' families brought a wrongful death action against Paladin Press for its involvement in the deaths of their loved ones.

The Fourth Circuit's decision reverses the lower court's findings that Paladin Press was not liable for wrongful death as the book did not reach the level of incitement to "imminent lawless action" and was, therefore, protected under *Brandenburg v. Ohio*. In reversing summary judgment for Paladin and remanding for trial the court looked to two aspects of this particular case - the criminal intent of the defendant publisher and the incitement to murder that the manual constituted.

The court insisted that the First Amendment does not stand in the way of a finding of civil or criminal liability for speech acts by

the plaintiff which can be shown to have been committed with specific and perhaps criminal intent. Essential to the court's finding that the speech in question was outside the protection of the First Amendment, as it constituted criminal aiding and abetting, was a joint stipulation by both parties. In this stipulation, the publisher stated that the book "assisted Perry in the perpetration of the murders," and "that it provided its assistance to Perry with both the knowledge and the intent that the book would immediately be used by criminals and would-be criminals in the solicitation, planning, and commission of murder and murder for hire."

Additionally, the court found that Paladin's manual went far beyond the abstract advocacy theory protected under *Brandenburg*. Rather, the court found that the book in question possessed, "little, if anything, even remotely characterizable as the abstract criticism that *Brandenburg* zealously protects."

The court also addressed the many concerns that a decision such as this would result in widespread liability for publishers, broadcasters and the media industry as a whole. The court found this case to be particularly unique in that it is rare that such a specific intent to aid criminality would exist as it did here. *Rice v. Paladin Enterprises, Inc.*, 128 F.3d 233 (Nov. 10, 1997); *CA 4 Finds "Hit Man" Book Does Not Merit Protection*, MED. L. RPTR. 44 (1997).

FOURTH CIRCUIT TO ADDRESS WHETHER CLAIM IS PREEMPTED UNDER CDA

Plaintiff Zeran recently argued before the Fourth Circuit Court of Appeals that the district court erred when it excused America Online from liability for defamatory messages posted on its electronic bulletin boards. The U.S. District Court for the Eastern District of Virginia's ruling was based on their interpretation of the Communications Decency Act (CDA). The district court agreed with the argument posed by AOL that the suit filed by Zeran was preempted by Section 230 of the CDA which establishes that computer services are not to be treated as

publishers of material posted on their systems by third parties. In finding that the CDA applied retroactively, the district court dismissed Zeran's complaint against AOL.

Zeran's complaint alleging that AOL negligently allowed defamatory messages to remain on its system, even though they were well aware of their offending content, stems from the following circumstances. An unidentified AOL user known only as "Ken Z033" began posting, shortly after the bombing of the Oklahoma City federal building, messages which advertised T-shirts featuring slogans glorifying the tragic bombing. These messages not only listed Mr. Zeran's name but also his telephone number. Consequently, Mr. Zeran began receiving a barrage of threatening and harassing phone calls. Mr. Zeran, however, was unable to change his phone number for business reasons. Instead, Mr. Zeran complained to AOL and insisted that the message be removed. Although the message was removed, numerous similar messages continued to appear. Mr. Zeran, therefore, claims that the CDA does not preclude interactive computer service providers from liability when they did nothing to block, edit or screen offending messages of which they had previously been made aware. *4th Cir. Hears Arguments in Appeal of Preemption Ruling for AOL*, COMPUTER AND ONLINE INDUSTRY LR, p.7, October 7, 1997; *AOL Tells 4th Cir. To Affirm Ruling that Claim Is Preempted Under CDA*, COMPUTER AND ONLINE INDUSTRY LR, p.9, October 21, 1997.

CHILD PORNOGRAPHY PREVENTION ACT IS CONSTITUTIONALLY SOUND

The United States District Court for the Northern District of California decided that the Child Pornography Prevention Act of 1996, 18 USC 2252 ("CPPA") is constitutional. The CPPA prevents the use of computer technology to produce sexually explicit materials which convey the impression that minors were used in the images. The CPPA was challenged by a trade association that defends First Amendment rights against

ensorship, a book publisher, and individual artists whose works include erotic paintings and photographs. The plaintiffs argued that the CPPA was content-based, overbroad, vague and constituted a prior restraint on speech, therefore it was in contravention of the First Amendment.

The court held that the contested provisions of the CPPA were not content-based. It reasoned that due to the nature of the evils that anti-child pornography laws are intended to prevent, the CPPA could easily be interpreted as content-neutral. The CPPA, aimed at the devastating secondary effects of child pornography, was a justified regulation of such speech.

The court also held that the CPPA was neither overbroad nor vague. As to overbreadth, the CPPA specified only materials that do not use adults and that appear to be child pornography, even if they are digitally produced, are prohibited. Thus only those works which promote the secondary pernicious effects of child pornography are prohibited. As to vagueness, the court held that the CPPA gives sufficient guidance to persons of reasonable intelligence about what it prohibits. So long as the person portrayed in the work is an adult, the work is not marketed as child pornography and it does not convey the impression it is child pornography, the CPPA's affirmative defenses protect the work. Finally, the court concluded that because the CPPA does not require advance approval for production or distribution of exempted pornography, and does not effectively ban constitutionally protected material, it is not a prior restraint on speech. *Free Speech Coalition v. Reno*, 25 MED. L. RPTR. 2305 (DC Calif. 1997).

NINTH CIRCUIT MAKES CLINT EASTWOOD'S DAY

The United States Court of Appeals for the Ninth Circuit affirmed a judgment awarding actor/director Clint Eastwood damages for an *Enquirer* article based on an interview which never took place. The jury awarded Eastwood \$150,000 because it determined that Eastwood's fans would think he was: 1) a

hypocrite for giving an exclusive interview to a tabloid newspaper; and 2) essentially washed up as a movie star if he was appearing willingly in a sensationalist tabloid newspaper. The trial court awarded Eastwood \$653,156 in attorney's fees, but declined to award him \$185,163 in costs.

The case stemmed from the *Enquirer's* December 21, 1993 issue, which included a bold headline proclaiming an exclusive interview with Eastwood. In response to the article, which included alleged direct quotes from Eastwood, as well as scene-setting phrases such as "Eastwood said with a chuckle," Eastwood filed a claim against the tabloid for misrepresentation of origin, association, and/or endorsement in violation of the Lanham Act, invasion of privacy, and misappropriation of name, likeness and personality under Calif. Civ. Code Section 3344. In upholding the jury's verdict and finding the actual malice standard to be met, the appellate court determined that the editors of the tabloid intended to convey the impression, which they knew to be false, that Eastwood willfully submitted to an interview with the *Enquirer*. *Eastwood v. National Enquirer Inc.*, 25 MD. L. RPTR. 2198 (CA 9 1997).

NONPROFIT ORGANIZATIONS NOT UNDER THE LANHAM ACT

The United States District Court for the Eastern District of Virginia held that dissemination of information by People for the Ethical Treatment of Animals ("PETA") about a laboratory owned by Huntingdon Life Sciences, Inc. ("Huntingdon") was not commercial speech as defined under the Lanham Act. Therefore, the court dismissed Huntingdon's Lanham Act claims.

The action arose out of PETA employee Michelle Rokke's temporary employment with Huntingdon. Rokke sought employment at Huntingdon as part of an undercover investigation of animal testing practices. After Rokke resigned from Huntingdon, PETA issued press releases, participated in interviews and released videotapes taken by Rokke in an effort to attack Huntingdon's animal testing practices. Huntingdon asserted that

PETA published false and disparaging statements in connection with the disclosure of trade secrets and proprietary information, and that those such statements were advertising or promotion prohibited by the Lanham Act.

The court agreed with PETA that the Lanham Act is not to be used as a means to stifle criticism of a consumer advocate who is not engaged in marketing or promoting a competitive product or service. The court concluded that PETA's intent in publishing the information about Huntingdon's laboratory was to disseminate a political message against cruelty to animals, not to advance economically to the detriment of Huntingdon. *Huntingdon Life Sciences, Inc. v. Rokke*, No. CIV.2:97CV597, 1997 WL 594894 (E.D. Va. Sept. 16, 1997).

INTERNET SERVICE PROVIDERS ARE MERELY INTERMEDIARIES

The Florida Circuit Court in Palm Beach County ruled that an Internet service provider is not liable for violating a Florida law which prohibits the sale or distribution of obscene material, or for negligence based on a convicted child pornographer's use of on of the provider's chat rooms to offer for sale indecent pictures of minors. It relied on the premise that Internet service providers are not to be viewed as traditional publishers or speakers of information. The suit was brought by the father of an eleven-year-old boy who had been videotaped and photographed performing sexual activities, against America Online, Inc. ("AOL") and AOL subscriber Richard Russell. The videos and photographs of the plaintiff's son were never transmitted over defendant AOL's service, rather they were described and then advertised for sale by defendant Russell in an AOL chat room.

The court held that the plaintiff's claims were barred by Section 230 of the Communications Decency Act, 47 U.S.C. § 230, which the court found by the statute's express language to preempt state law. That statute states in pertinent part that "[n]o provider... of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information

content provider,” and that “[n]o cause of action may be brought and no liability imposed under any state or local law that is inconsistent with this section.” Making AOL liable for one of its subscriber’s chat room conversations would, contrary to the express purpose of the statute, treat AOL as a publisher for three reasons. First, it would impose upon AOL the same legal ramifications as the actual speaker of the communication, in this case Russell. Second, it would treat AOL more like a newspaper than a telephone company, who like AOL provides a service over which numerous third parties may communicate. Finally, it would impose on AOL as a matter of law the burden of monitoring and censoring great volumes of information which is transmitted by third parties. *Doe v. America Online, Inc.* 25 MED. L. RPTR. 2112 (Fla. Cir. Ct. Palm Beach Cty. 1997).

ARTIST MAY RECLAIM PAINTINGS

A five-judge panel of New York’s Appellate Division, First Department, reversed a lower court’s grant of summary judgment which would have denied 85-year-old Agnes Martin recovery of dozens of her own paintings. Martin, an artist renowned for her abstract artwork, entered into a bailment agreement for the storage of her paintings in 1967 with Arthur and Lois Blood, acquaintances of Martin. The bailment agreement provided that Martin would allow the Bloods to reside in her Manhattan loft for the balance of her lease, and in exchange the Bloods would store Martin’s paintings until she demanded their return. In 1988, the paintings were allegedly given as a gift by Lois Blood to her daughters, who then consigned the paintings to Sotheby’s.

The question presented to the court was whether Martin, after 28 years, still enjoyed ownership rights in the paintings, now worth an estimated \$1.4 million. The defendants essentially argued that the bailment agreement ended upon the death of Mr. Blood, that Martin’s delay was unreasonable, and that Martin’s claims were barred by both statute of limitations and laches.

In reversing the lower court's order granting summary judgment, the court held that genuine issues of material fact existed: as to whether Mrs. Blood and her daughters acted as bailees; as to the reasonableness of Martin's delay; and as to whether a laches defense could successfully be presented. The court also gave Martin leave to amend her complaint. In coming to its conclusion, the court relied on the fact that the bailment was for an indefinite period of time. The court also noted that the Mr. Blood, Mrs. Blood and the daughters did not act wholly inconsistent with the bailment contract until one daughter consigned the paintings to Sothby's. Arguably, the court contended, Martin made her demands within a reasonable time of this inconsistent act. *Martin v. Briggs*, 663 N.Y.S. 2d 184 (1997).

JAPANESE PHRASE IS A PROTECTED AMERICAN TRADEMARK

A federal judge in New York held that the Japanese phrase "otokoyama" is a valid trademark for the Japanese alcoholic beverage sake, and granted a preliminary injunction against a New York-based wine distributor. Plaintiff Otokoyama Co. has distributed and sold sake under the name "Otokoyama" since 1984. Plaintiff filed suit when it learned that Wine of Japan Import, Inc. was advertising and distributing sake under the brand name "Mutsu Otokoyama." The case was brought for trademark infringement, unfair competition, and false designation of origin, as well as additional state claims.

Defendant first argued that the trademark was invalid, because plaintiff obtained the mark by falsely claiming the phrase could not be translated into English. Literally translated, otokoyama is a combination of the words "man" and "mountain," though in Japan it does refer to an ancient type of dry sake. The court rejected that argument, and then proceeded to examine the eight likelihood of confusion factors: strength of the mark; similarity of the marks; proximity of the products; bridging the gap; actual confusion; defendant's good faith; quality of the products; and sophistication of consumers. The court determined that the eight factors weighed

heavily in plaintiffs favor. Furthermore, the court emphasized that to deny the injunction would cause undue hardship to plaintiff's reputation, a reputation that took thirteen years to establish. *Otokoyama Co. Ltd. v. Wine of Japan Import, Inc.* 45 U.S.P.Q. 1194 (1997).

AVON'S ADVERTISEMENTS ARE NOT FALSE

A New York District Judge held that Avon Products, Inc.'s Skin-So-Soft advertisements were neither false nor misleading under the Lanham Act. This decision brought to a close litigation between plaintiff Avon Products Inc. and defendant S.C. Johnson and Son, Inc. that had been ongoing since 1994. At the heart of this most recent trial was defendant's claim that the plaintiff falsely promoted its Skin-So-Soft bath oil as an insect repellent, so as to deprive defendant of profits. Defendant had sought \$76 million in damages.

The court, after an exhaustive explanation of various consumer surveys and studies, concluded plaintiff was aware consumers used the product as an insect repellent due to a belief that Skin-So-Soft was an insect repellent. However, the court found that while the Avon Products, Inc. may have sought to exploit that belief, it did not expressly market the product as an Environmental Protection Agency approved insect repellent. The court concluded that primary source of the consumer's perception regarding Skin-So-Soft was word of mouth rather than actual marketing efforts by the plaintiff. The court found support in its determination that plaintiff's advertisement's were not false or misleading in studies showing Skin-So-Soft did indeed have some effectiveness as an insect repellent against certain flies and gnats. The court denied the defendant's claim based on the aforementioned reasons, and in the alternative based on the fact that defendant waited too long to assert claims that could have been raised as early as the mid-1980's. *Avon Products, Inc. v. S.C. Johnson & Son, Inc.* 1997 WL 725971 (S.D.N.Y.).

MAYOR LOSES PUBLICITY BATTLE WITH MAGAZINE

The United States District Court for the Southern District of New York declared that Mayor Giuliani's right to control the use of his name for commercial purposes must yield to *New York Magazine's* free-speech claim. Judge Shira A. Scheindlin granted a preliminary injunction sought by the magazine which forced the City and the Metropolitan Transit Authority to fulfill an \$85,000 contract to run an ad on 75 buses reading: *New York Magazine* "Possibly the only good thing in New York Rudy hasn't taken credit for."

Judge Scheindlin granted the injunction based on two preliminary findings which lead to her ultimate determination that the magazine would prevail on its free-speech claim. Initially, she held the ad was combination of commercial speech and political satire, and thus entitled only to limited free-speech protections. Next, she found the outside surfaces of the city buses to be public forums where restrictions on speech, including commercial speech, must pass the four-part test established in *Central Hudson Gas & Elec. Corp. v. Public Serv. Comm'n of New York*, 447 U.S. 557 (1980).

In holding that the City did not meet the *Hudson* test, Judge Scheindlin noted that the magazine prevailed on the first prong because they are not misleading and address lawful activity. Furthermore, she found that the City did not satisfy the remaining three prongs requiring: an asserted substantial governmental interest; restrictions that advance that interest; and restrictions that are narrowly tailored.

The City argued it had met the substantial interest prong for two reasons. First, it asserted there was a need to prevent any possible conflicts of interest arising from a public servant's use of his name to promote a private business. Second, it claimed a need to follow New York Civil Rights Law § 50 which bars the use, without consent, of a person's name or picture for commercial purposes.

Judge Scheindlin rejected both arguments. With respect to the conflict of interests claim, she found that it was clear from the ad

that Mayor Giuliani was not endorsing the product, therefore, no conflict was present. Additionally, she found that the ad not only promoted interest in the for-profit entity, but also contained humor and satire from which all New Yorkers benefit. Judge Scheindlin found the Civil Rights Law inapplicable. She pointed out that a person in Mayor Giuliani's position had a very limited expectation of privacy. Furthermore, she held the *New York Magazine* ads to fit within exceptions of § 50. *New York Magazine v. Metropolitan Transit Authority*, 97 Civ. 8792 (Deborah Pines, *Court Blocks Mayor's Bid to Block Bus Ads*, N.Y.L. JOURNAL, December 2, 1997.

BOOK AND SEXUAL STATUS OF ELVIS' EX-WIFE LEAD TO TWO SUITS

Priscilla Beaulieu has always maintained that she was a virgin when she married Elvis Presley. However, a new book by Suzanne Finstad, "Child Bride: The Untold Story of Priscilla Beaulieu Presley," is now the source of two multimillion-dollar lawsuits set for trial in May.

Ms. Presley is suing Lavern Currie Grant, a former friend of Mr. Presley, for his statements appearing in the book that claim he had sexual relations with her while she was under age and before she met and married Mr. Presley.

In the defamation suit, Ms. Presley is seeking damages in the amount of at least \$10 million for injury to her entertainment career, reputation and peace of mind. She alleges that Mr. Grant was a "groupie" who has stalked and harassed her since 1959. Her suit also claims that Mr. Grant was desperate for money and invented this story of lies and innuendo in the hopes of gaining notoriety and reaping monetary benefits.

Mr. Grant, however, filed his own defamation suit based on statements that Ms. Presley made which appear in the same book. His suit, in which he is seeking at least \$5 million in damages, Mr. Grant disputes Ms. Presley's statements that he tried to rape her repeatedly throughout the 1950's.

Both litigants claim that they were mortified and suffered emotional distress due to the other's statements. Neither lawsuit named the author. *Elvis Pal Claims Mrs. Presley Was Not a Virgin, So She Sues*, NAT'L L. J., October 13, 1997 at A31.

NINTH CIRCUIT SAYS SPIRITS AND HUMANS COLLABORATED TO CREATE COPYRIGHTED WORK

The Urantia Foundation as plaintiff-appellant claimed that defendant-appellee Kristen Maaherra infringed the Foundation's copyright of the Urantia Book when she distributed the full text of the Book on a computer disk. The United States Court of Appeals for the Ninth Circuit reversed the decision of the United States District Court of Arizona which had granted summary judgment to Maaherra on the ground that the Foundation's copyright renewal was invalid.

The Urantia Book was "created" by a small group of humans called the Contact Commission. This group and Maaherra both claim that the Book was "authored" by non-human spiritual beings. Allegedly, these spirits communicated the material for the Book "through" one of the members of the Contact Commission. The Contact Commission, along with a larger group of followers called the Forum, asked the spirits certain questions, the answers to which were transmitted to the humans. The answers were organized by the humans and became a manuscript called the Urantia Papers. The Papers made up the text of the Book and were intentionally destroyed after the creation of 2,000 printing plates.

The Contact Commission created a charitable trust called the Urantia Foundation to preserve and disseminate the teachings of the Papers. The Foundation published the Book in 1955, received the original copyright certificate in 1956 and renewed the copyright in 1983. In 1991, the Foundation filed suit after it discovered that Maaherra had prepared a study aid which included the entire text of the Book on computer disks with the Foundation's trademarks.

For a work to qualify for copyright protection it must be original and possess some minimal level of creativity. Maaherra claimed that the book lacked the obligatory trait of human creativity since it was created by spirits and, therefore, could not be properly copyrighted. The Ninth Circuit agreed with her, noting that an earthly being could only be guilty of copyright infringement if it copied the work of another earthly being. The court, however, held that although the Book may have originated from these spirits, human beings were ultimately responsible for putting it in its final form, resulting in the necessary level of human creativity. Hence, the Ninth Circuit agreed with the district court that the Book fell within common law copyright protection.

The Ninth Circuit disagreed with the district court, however, on the issue of ownership of the copyright at the time of the original publication. The trial court held that the Foundation came to possess the plates for the Book in a serendipitous manner and, therefore, could not show that it was the proprietor of the copyright in the Book. The reviewing court, however, placed emphasis on the Foundation's ability to trace its title back to the humans who owned the original common law copyright. Since the Contact Commission's intent to transfer ownership of the plates to the Foundation was clear and delivery occurred, the court held that there was also intent to transfer the copyright of the Book.

Finally, Maaherra claimed that the copyright renewal certificate that the Foundation obtained in 1983 was invalid. She claimed that the Book was not a work made for hire as the renewal certificate specified and, therefore, was invalid. Maaherra claimed that because the Foundation made an error in describing the nature of its proprietorship, the Book became part of the public domain in 1983. The trial court did not decide this issue, but the Ninth Circuit rejected this argument. Although it agreed with Maaherra that the book was not a work made for hire, it held that this was not sufficient to destroy a valid renewal of the copyright. Referring to 17 U.S.C. § 304(a), the court held that the term "proprietor" was enough to satisfy the legal basis of the renewal claim in 1983. The court also noted the absence of a single case in which a renewal was held invalid because of an inadequate or inaccurate description of the basis of the claim. Therefore, the Ninth Circuit held the Urantia Foundation had a valid copyright renewal and that

1997]

EPILOGUE

259

Maaherra had infringed it. *Urantia Foundation v. Maaherra*, 114 F.3d 955 (9th Cir. 1997). SCOTT G. WARNER ET AL, *Ninth Circuit Holds Book Of "Revelations" From Non-Human Spiritual Beings Entitled To Copyright Protection*, COMPUTER LAW BULLETIN, Volume 12 No. 4, 1997 at 158-9.

*Kristen Ullom
Lisa M. Barr
T. Sean Hall*

LAWYERS FOR THE CREATIVE ARTS

Membership Application

When you become a member of LCA, you'll receive:

- Subscription to LCAAction - LCA's quarterly newsletter;
- Access to LCA's reference library and sample forms;
- Advance notice of LCA conferences, seminars and educational activities;
- Discount admission to LCA events and activities presented by Women in Film/Chicago and Independent Feature Project - Midwest;
- 20% discount on LCA publications and educational materials;
- 25% discount on art-related Allworth Press legal books purchased through LCA;
- Discounts at Chicago-area restaurants and stores, including The Museum Shop at the Art Institute of Chicago.

Please complete this form and return it to:

Lawyers for the Creative Arts
213 W. Institute Place, Suite 411
Chicago, IL 60610-3125

___ Contributing Member \$45

___ Benefactor \$65

___ Sponsor \$100

___ Patron \$250

___ Student Member \$20
(with photocopy of ID)

Name: _____

Firm: _____

Address: _____

City: _____ State: _____ Zip: _____

Telephone: (day) _____ (eve) _____

___ Please send information on becoming a Volunteer Attorney.

