

1 **COMP**  
2 **JOSEPH S. SCISCNETO, ESQ.**  
3 **Nevada Bar No: 4380**  
4 **Law Offices of Joseph S. Sciscento, Esq.**  
5 **330 South Third Street**  
6 **Ste. 860**  
7 **Las Vegas, Nevada 89101**  
8 **Attorney of Defendant**  
9 **ERIKO TAMURA**

**FILED**  
MAR 2 5 03 PM '07  
CLERK OF DISTRICT COURT

10 **EIGHTH JUDICIAL DISTRICT COURT**  
11 **COUNTY OF CLARK, STATE OF NEVADA**  
12 **A537049**  
13 **111**

11 **ERIKO TAMURA, an individual,** )  
12 **Plaintiff,** )  
13 **vs.** )  
14 **INTERNET MOVIE DATABASE, INC., a** )  
15 **Nevada corporation.** )  
16 **Defendant.** )  
17 )  
18 )  
19 )  
20 )

Case No.  
Dept No.  
**COMPLAINT** (Invasion of privacy  
(publication of private facts)  
(preliminary injunction)

21 **COMES NOW Eriko Tamura ("Plaintiff") by and through her attorney JOSEPH. SCISCENTO,**  
22 **ESQ., and alleges a cause of action against Defendant as follows:**

23 **GENERAL ALLEGATIONS**

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26 1. Plaintiff resides in the County of Los Angeles, State of California. Plaintiff is a well-  
27 known, professional actress whose given name is Eriko Sakamoto, but who publicly uses only the  
28 name Eriko Tamura.



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9. The disclosure by IMDB of the Private Information is offensive and objectionable to Plaintiff and to a reasonable person of ordinary sensibilities in that it reveals private details about her identity that permits third parties to track down her residence and to harass and intimidate her and her family members.

10. The Private Information is not of legitimate public concern or newsworthy. The Private Information does not bear any logical relationship to the newsworthy subject of Plaintiff's professional career and filmography, which is the purpose of IMDB's database. Disclosure of the Private Information is intrusive and in great disproportion to its relevance, in that Plaintiff uses only the name Eriko Tamura, and the Private Information is irrelevant other than to stalkers attempting to locate her residence.

11. By publishing the Private Information, IMDB has placed Plaintiff in grave danger of aggressive and overzealous fans that can use the information to locate and harass Plaintiff and her family members.

12. As a proximate result of the above disclosure, Plaintiff is informed and believes that based on past incidents of aggressive and overzealous fans locating and threatening Plaintiff and breaking into her apartment and her parents' home, Plaintiff and her family members will continue to be placed in danger of future invasions to their property and person: As a proximate result of the above disclosure, Plaintiff has suffered severe emotional distress, all to her general damage in an amount according to proof.

13. Plaintiff and her attorney have on several occasions requested Defendant to remove the Private Information, specifically advising Defendant of the prior attacks, break-ins, and harassment, and Defendant has acknowledged receipt of these requests but has declined to remove the Private Information. Defendant has thus acted with knowledge of the consequences and should be held liable for punitive damages.

### **SECOND CAUSE OF ACTION**

(Preliminary and permanent injunction)

14. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in Paragraphs 1 and 13 as if fully set forth herein.

