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15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE WESTERN DISTRICT OF WASHINGTON**
17 **SEATTLE DIVISION**

18 TED ENTERTAINMENT, INC., MATT
19 FISHER, and GOLFHOLICS, INC., each
individually and on behalf of all others
20 similarly situated,

21 Plaintiffs,

22 v.

23 AMAZON.COM, INC., a Delaware
Corporation

24 Defendant
25
26
27
28

Case No.:

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

1 Plaintiffs Ted Entertainment, Inc. (“TEI”), Matt Fisher, and Golfholics, Inc. (collectively,
2 where appropriate “Plaintiffs”), each individually and on behalf of all others similarly situated (the
3 “Class,” as defined below), by and through their undersigned counsel, file this Complaint against
4 Amazon.com, Inc. (“Defendant”), and alleges as follows:

5 **NATURE OF THE ACTION**

6 1. This lawsuit arises from Defendant unlawfully circumventing technological
7 protection measures to access and scrape millions of copyrighted videos from the online video
8 viewing platform, YouTube, in order to feed, train, improve, and commercialize Defendant’s large-
9 scale generative artificial intelligence (“AI”) model named “Nova Reel.”

10 2. Nova Reel is a text-to-video AI model conceived and marketed as Amazon's
11 dedicated video generation platform. Amazon Nova Reel is commercially available through
12 Amazon Bedrock, Amazon's managed AI services platform, where Amazon charges enterprise
13 customers per second of video generated. Amazon Nova Reel was developed by Amazon AGI, the
14 artificial general intelligence division of Amazon.com, Inc., and was publicly launched in December
15 2024 as part of the Amazon Nova family of commercial foundation models.

16 3. YouTube allows the public to view audiovisual works only through controlled
17 streaming, keeping its underlying video files locked away behind careful access restrictions.
18 Defendant picked this lock by deploying scraping tools designed to evade and circumvent
19 YouTube's access restrictions. Defendant’s circumvention of YouTube's technological protection
20 measures (“TPMs”) was systematic. On information and belief, Defendant used automated video-
21 downloading programs combined with virtual machines that rotated IP addresses to avoid detection
22 and blocking, enabling the mass unauthorized access and extraction of videos at the scale necessary
23 to train Nova Reel. Defendant then used Plaintiffs' and Class Members' intellectual property for their
24 own commercial gain in developing and commercializing Nova Reel. In doing so, Defendant has
25 violated the law and YouTube's Terms of Service, which were intended to protect Plaintiffs and
26 others similarly situated.

27 4. By accessing, scraping, and downloading those files, Defendant deliberately
28 circumvented YouTube's access controls to obtain the training data necessary to build and

1 commercialize Nova Reel.

2 5. Plaintiffs and the Class Members whom Plaintiffs seek to represent are content
3 creators who upload their audiovisual content to YouTube. In doing so, the content creators are
4 authorizing and instructing YouTube to provide protection to the video content through YouTube's
5 anti-circumvention software and Terms of Service. In fact, YouTube's anti-circumvention software
6 and protective Terms of Service are a driving factor behind many content creators' decision to
7 upload their video content to YouTube.

8 6. Rather than seek permission or pay a fair price for the audiovisual content hosted on
9 YouTube, Defendant harvested content creators' protected and copyrighted videos for commercial
10 use and at scale without consent or compensation to the content creators.

11 7. Defendant's actions were not only unlawful, but an unconscionable attack on the
12 community of content creators whose content is used to fuel the multi-trillion-dollar generative AI
13 industry without any compensation.

14 8. Content creators such as Plaintiffs and the Class Members will never be able to claw
15 back the intellectual property unlawfully copied and used by Defendant to train its generative AI
16 models. Once AI ingests content, that content is stored in its neural network and not capable of
17 deletion or retraction. Defendant's actions constitute abuse and exploitation of content creators'
18 work for Defendant's profit.

19 9. Most YouTube videos are not registered with the U.S. Copyright Office. That lack
20 of registration, however, does not render them valueless or leave them unprotected. Content creators
21 invest time, skill, and resources into producing their works, and they rely on YouTube's TPMs to
22 safeguard their files from unauthorized access. Because copyright registration is not a prerequisite
23 for protection against unlawful circumvention of access controls, this claim is especially critical
24 where Defendant's misconduct lies in breaking through access barriers that prevent anyone from
25 obtaining the underlying files in the first place.

26 10. It is also critical to protect a flourishing internet ecosystem. In a world where
27 Defendant and others can circumvent technological protections to exploit copyrighted works
28 without authorization with impunity, creators will be less likely to make their creations available on

1 YouTube and other similar platforms, for fear of losing all control of them. The world will be poorer
2 for it.

3 11. The Class Members, including Plaintiffs, are content creators who uploaded their
4 audiovisual content to YouTube’s video platform. On information and belief, the audiovisual
5 content of Class Members was among the video content utilized by Defendant to train Nova Reel
6 and related generative AI models.

7 12. An essential component of Defendant’s business model—powering AI features and
8 services with large-scale training data—includes the mass acquisition and ingestion of creators’
9 videos scraped from YouTube.

10 13. Defendant has profited substantially from its infringement of Plaintiffs’ and Class
11 Members’ video content through Defendant’s training of its generative AI products. Defendant’s
12 massive financial success would not have been possible without the video content created by
13 Plaintiffs and Class Members, which was intended for streaming on YouTube.

14 14. Plaintiffs bring this class action on behalf of themselves and on behalf of a
15 nationwide class of YouTube creators whose works were scraped, ingested, and trained on without
16 authorization, seeking statutory damages, injunctive relief, restitution, and all other remedies
17 allowed by law pursuant to the Digital Millennium Copyright Act, 17 U.S.C.A. § 1201(a) seeking
18 an injunction and damages commensurate with the scope of Defendant’s massive and ongoing
19 infringement. More particularly, Defendant’s conduct violates the provisions of the DMCA
20 regarding anti-circumvention (§1201) by bypassing technological protection measures that control
21 access to YouTube videos.

22 **THE PARTIES**

23 15. Plaintiff Ted Entertainment, Inc. (“TEI”), is an independent California based media
24 company and content creator with over 5,800 original videos on YouTube, with a combined total of
25 over 4 billion views. TEI has amassed a substantial following on YouTube with over 2.6 million
26 subscribers to its channels. TEI owns and operates the channels “h3h3 Productions” and “H3 Podcast
27 Highlights.” H3H3 Productions appears with 146 videos in HD-VILA-100M, 83 videos in HD-VG-
28 130M, 155 videos in Panda-70M, and 24 videos in HowTo100M. H3 Podcast Highlights appears

1 with 285 videos in HD-VILA-100M, 209 videos in HD-VG-130M, 283 videos in Panda-70M, and
2 1 video in HowTo100M. Plaintiff invested significant resources – time and money – into producing
3 and publishing this video content and bringing awareness to its content.

4 16. Plaintiff TEI is the creator of the videos identified in Exhibit A, all of which were
5 uploaded exclusively to YouTube by Plaintiff. Plaintiff derives value from the works identified in
6 Exhibit A through viewership, advertising, sponsorships, licensing, and related monetization.

7 17. Plaintiff TEI and its owners – Ethan and Hila Klein – are longtime champions of the
8 rights of YouTube creators. The Kleins helped define what constitutes fair use reaction videos and
9 the good faith belief standard for DMCA counternotifications. TEI has championed online free
10 speech and is currently helping define what reaction content does not constitute fair use to ensure
11 YouTube content creators can enjoy the fruits of their labor.

12 18. Plaintiff Matt Fisher is an individual and resident of the State of California. He is a
13 golf content creator who posts his original videos on YouTube, many of which are instructional.
14 His channel is “MrShortGame Golf” on the YouTube platform. He has over 500,000 subscribers
15 and hundreds of millions of views. Plaintiff has invested substantial time and money into bringing
16 awareness around his content. MrShort Game appears with 2 videos in HD-VILA-100M, 1 video in
17 HD-VG-130M, 8 videos in Panda-70M, and 4 videos in HowTo100M.

18 19. Plaintiff Matt Fisher is the creator of the videos identified in Exhibit B, all of which
19 were uploaded exclusively to YouTube by Plaintiff and all of which were included in datasets used
20 by Defendant to train its generative AI models. Plaintiff derives value from the works identified in
21 Exhibit B through viewership, advertising, sponsorships, licensing, and related monetization.

22 20. Plaintiff Golfholics is a corporate entity organized pursuant to the laws of the State
23 of California. It is a golf content channel that posted its original videos on YouTube. The channel is
24 “Golfholics” on the YouTube platform. It has over 130,000 subscribers and millions of views.
25 Plaintiff invested substantial time and money into bringing awareness around its content. Golfholics
26 appears with 62 videos in HD-VILA-100M, 62 videos in Panda-70M, and 37 video in HD-VG-
27 130M.

28 21. Plaintiff Golfholics is the creator of the videos identified in Exhibit C, all of which

1 were uploaded exclusively to YouTube by Plaintiff and all of which were included in datasets used
2 by Defendant to train its generative AI models. Plaintiff derives value from the works identified in
3 Exhibit C through viewership, advertising, sponsorships, licensing, and related monetization.

4 22. Defendant Amazon.com, Inc. (“Amazon”) is a Delaware corporation with its
5 principal place of business located at 410 Terry Avenue North, Seattle, WA 98109.

6 **JURISDICTION AND VENUE**

7 23. This is a civil action seeking damages and injunctive relief for infringement under
8 the Digital Millennium Copyright Act, 17 U.S.C. §§ 1201–1205. As such, this Court has subject
9 matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), based on federal
10 question jurisdiction.

11 24. The Court has supplemental jurisdiction over related state-law claims, if any, under
12 28 U.S.C. § 1367.

13 25. Personal jurisdiction is proper because Defendant’s principal place of business is in
14 Seattle, Washington, transacts business nationwide, purposefully avails itself of this forum, and a
15 substantial part of the events or omissions giving rise to these claims occurred or were directed here.

16 26. Venue lies in this judicial district pursuant to 28 U.S.C. § 1391(b)(1) and/or 1400(a)
17 because Defendant resides in, is found in, or may be sued in this District, and a substantial part of
18 the events giving rise to the claims occurred here.

19 **FACTUAL BACKGROUND**

20 **A. YouTube’s Terms of Service Prohibit Scraping, Downloading, and**
21 **Unauthorized Access to Video Files, and Employs Technological Measures**
22 **Consistent With This Prohibition**

23 27. As noted above, Plaintiffs and the Class Members are content creators of audiovisual
24 content.

25 28. Plaintiffs and the Class Members create original video content that has been
26 uploaded onto YouTube’s video sharing platform.

27 29. YouTube’s “users”—the individuals who view the digital content available on
28 YouTube—can watch and listen to videos for free on YouTube’s advertising-supported service, but

1 YouTube does not give users access to or allow downloading of the digital files underlying the
2 content viewed by the user through YouTube’s authorized playback mechanism.

3 30. YouTube’s Terms of Service expressly prohibit scraping, unauthorized
4 downloading, bulk extraction, or other forms of data mining of audiovisual content except through
5 expressly permitted features or licensed APIs. These contractual restrictions operate together with
6 YouTube’s TPMs to prevent unlicensed access to creators’ videos.

7 31. According to YouTube’s Terms of Service, content creators such as Plaintiffs who
8 upload content onto YouTube grant license to YouTube for certain uses as well as to other users of
9 YouTube to access content through YouTube’s services; however, the license makes clear that it
10 “does not grant any rights or permissions for a user to make use of [the] Content independent of the
11 Service.”¹

12 32. This language confirms that end users are not given access to the file itself, only the
13 ability to view (*i.e.*, stream) through YouTube’s controlled environment. YouTube’s Terms of
14 Service reflect YouTube’s intent to restrict access to the digital files underlying the videos that
15 YouTube’s users are allowed to stream through YouTube’s platform.

16 33. Streaming through YouTube and downloading permanent copies provide the user
17 with different value propositions—watching and listening for free but seeing ads, versus possessing
18 a permanent digital copy.

19 34. Accordingly, scraping or bulk downloading is not merely copying material already
20 provided; it is an act of unauthorized access to data files that YouTube affirmatively withholds from
21 public download.

22 35. In fact, during a Bloomberg interview about OpenAI (another generative text-to-
23 video artificial intelligence competitor) scraping YouTube’s CEO, Neal Mohan, confirmed that
24 unauthorized scraping constitutes a violation of creators’ rights and YouTube’s Terms of Service
25 stating, **“From a creator's perspective, when a creator uploads their hard work to our platform,**
26 **they have certain expectations. One of those expectations is that the terms of service is going**
27 **to be abided by,”** Mohan said, **“It does not allow for things like transcripts or video bits to be**

28 ¹ “Terms of Service,” YouTube, <https://www.youtube.com/t/terms> (last viewed March 11, 2026).

1 **downloaded, and that is a clear violation of our terms of service. Those are the rules of the**
2 **road in terms of content on our platform.”²**

3 36. The scraping and acquisition processes used by Defendant to circumvent YouTube’s
4 TPMs were inconsistent with, and in violation of, YouTube’s Terms of Service, which forbid
5 scraping and mass downloading of videos.³

6 37. To enforce its prohibitions on downloading content, YouTube does not provide a
7 downloading option that is readily available to users.

8 38. Although YouTube offers downloading options to subscribers who pay for
9 YouTube’s “Premium” plan, YouTube still employs TPMs to restrict access. Specifically, YouTube
10 prohibits all downloading audiovisual content except to the YouTube app. Further, the “download”
11 option only makes audiovisual content available for offline streaming—it does not provide the
12 Premium subscriber with access to the audiovisual files. Accordingly, the audiovisual files cannot
13 be transferred to any other device, but remain only for streaming on the app. Finally, the files are
14 available only for offline streaming for a limited amount of time, at which point they will become
15 available only for online streaming once again.

16 39. For users who do not have a “Premium” plan, the “download” option on YouTube’s
17 player page is non-functional.

18 40. To further enforce its prohibitions on downloading content, YouTube uses
19 technological processes and tools to detect and block access to files for unauthorized downloading.
20 For example, YouTube monitors downloading activity and may block IP addresses that make too
21 many download attempts in a specified period.

22 41. YouTube has employed a variety of TPMs to restrict access to Class Members’
23 audiovisual files. For example, YouTube does not provide users with a readily available
24 downloading option and it has implemented a number of tools, such as the Rolling Cipher and IP

25 ² Davey Alba & Emily Chang, *YouTube Says OpenAI Training Sora With Its Videos Would Break*
26 *Rules*, Bloomberg (Apr. 4, 2024), <https://www.bloomberg.com/news/articles/2024-04-04/youtube-says-openai-training-sora-with-its-videos-would-break-the-rules> (video available at
27 https://www.youtube.com/watch?v=FBZ_BeChRg).

28 ³ *Supra*, note 1 (prohibiting “access, reproduce, download, distribute, transmit, broadcast, display, sell, license, alter, modify or otherwise use any part of the Service or any Content except: (a) as expressly authorized by the Service; or (b) with prior written permission from YouTube and, if applicable, the respective rights holders;”).

1 Blocking, that operate to restrict users' ability to access audiovisual material.

2 42. Content creators, including Plaintiffs and Class Members, rely on the TPMs and
3 YouTube's Terms of Service in deciding to upload their audiovisual content to YouTube. Content
4 creators, including Plaintiffs and Class Members, expect that their works will not be copied at scale
5 without consent.

6 **B. YouTube's Technological Protection Measures Function as Access Controls**
7 **Over Video Files.**

8 43. YouTube deploys multiple technological protection measures ("TPMs") designed
9 to control, restrict, and monitor access to the underlying video files and to deter direct downloading
10 or bulk extraction outside YouTube's controlled playback environment. These TPMs include,
11 among others: (1) an obfuscated signature system commonly referred to as a "rolling cipher," (2)
12 IP-based blocking and rate limiting that restrict high-volume automated access, (3) short-lived,
13 session-bound streaming URLs, (4) CAPTCHA human-verification challenges triggered by
14 automated activity, and (5) proof-of-origin tokens that verify requests originating from authorized
15 client environments. Each TPM independently functions as a gatekeeping mechanism that must be
16 satisfied before the audiovisual file can be retrieved, and circumvention of any one of them enables
17 access to the file in a manner not authorized by YouTube or the content owners.

18 44. **TPM (1) - Rolling cipher (access control):** YouTube controls access to the
19 underlying media file by withholding a usable file location unless the requesting client can transform
20 an obfuscated signature parameter using proprietary logic embedded in the official YouTube player.
21 The playback data delivered to users contains a scrambled signature that must be processed to
22 produce a valid media request URL. Without performing this authorized transformation, the server
23 will not deliver the audiovisual file. Thus, the rolling cipher controls access by requiring application
24 of a specific computational process before the file can be obtained at all.

25 45. YouTube's rolling cipher encryption measure acts as a digital lock, controlling
26 access to content by protecting against unauthorized downloading of underlying media files.
27 YouTube maintains two different URLs for any given video: the page URL, visible to the user, is
28 for the webpage where the video playback occurs, and the file URL, not visible to the user, is for

1 the video file itself that is played within the page. The file URL is encrypted using a complex and
2 periodically changing algorithm – the rolling cipher – that is designed to impede external access to
3 the underlying YouTube files. YouTube’s player software uses a decryption routine to authenticate
4 requests and deliver content only through approved interfaces. This TPM inhibits access to the
5 underlying audiovisual files for the purposes of any downloading, copying or distribution of the
6 audiovisual content. In other words, the rolling cipher controls access to copies of audiovisual
7 content uploaded to the platform and impedes an ordinary user from creating a permanent,
8 unrestricted download of audiovisual content made available on YouTube only for streaming and
9 restricted downloading.

10 46. The rolling cipher is a TPM measure within the meaning of 17 U.S.C. §1201(a)
11 because it “effectively controls access” to copyrighted works by preventing users access to the files
12 of video streams without first executing YouTube’s proprietary decryption code.

13 47. **TPM (2) - IP blocking and rate limiting (access control):** YouTube monitors
14 network behavior and restricts access when excessive or abusive request patterns are detected.
15 Requests from an IP address that exceeds defined thresholds may be throttled, denied, or blocked
16 entirely, preventing further retrieval of audiovisual data from that source. This mechanism controls
17 access by limiting how frequently and at what scale a particular requester may obtain the file and by
18 cutting off access altogether when abuse is detected.

19 48. YouTube’s infrastructure monitors the number and frequency of video requests
20 originating from individual IP addresses. This system serves an important function. Even if a user
21 were able to generate a valid media request for an individual video, YouTube’s infrastructure is
22 designed to prevent automated systems from retrieving large numbers of videos at scale.

23 49. Once YouTube detects abnormal volume of access to files, the system can block the
24 offending IP address from accessing YouTube’s servers. This prevents automated scraping systems
25 from accessing large volumes of copyrighted audiovisual content.

26 50. This IP-based monitoring and blocking system therefore also functions as a TPM
27 measure within the meaning of 17 U.S.C. §1201(a) because it “effectively controls access” to
28 copyrighted works by restricting automated access to YouTube’s underlying video files.

1 51. **TPM (3) - Session-bound, short-lived URLs (access control):** Even after a valid
2 media URL is generated, YouTube restricts access by issuing URLs that are temporary,
3 cryptographically signed, and tied to a particular playback session and client context. These URLs
4 include authorization parameters such as expiration timestamps and client identifiers. Once the
5 authorization window expires or the session ends, the server will refuse to deliver the audiovisual
6 file in response to that URL. Accordingly, possession of a previously valid link does not provide
7 continuing access to the file, and new authorization must be obtained to retrieve it. This mechanism
8 therefore controls access by limiting when and from where the file may be requested.

9 52. Because session-bound URLs expire automatically, any automated system
10 attempting to access videos outside ordinary playback cannot rely on a static link and must instead
11 repeatedly obtain fresh authorization parameters and regenerate valid media URLs. By
12 programmatically renewing expired credentials and initiating new authorized sessions at machine
13 speed, automated scraping tools can maintain continuous access to audiovisual files that would
14 otherwise become unavailable once the original authorization lapses. This conduct circumvents the
15 temporal and session-based restrictions imposed by YouTube and allows persistent retrieval of files
16 in a manner not available to ordinary users. Circumventing this measure constitutes circumvention
17 of a technological measure that effectively controls access to a copyrighted work in violation of 17
18 U.S.C. § 1201(a).

19 53. **TPM (4) - CAPTCHA challenges (access control):** When traffic patterns indicate
20 automated or suspicious activity, YouTube may require completion of a CAPTCHA challenge
21 before allowing further requests to proceed. Until the challenge is successfully completed, the
22 requesting client cannot obtain the data necessary to retrieve the audiovisual file. CAPTCHAs
23 therefore function as an access control by conditioning continued access to content on proof that the
24 requester is a human user rather than an automated system.

25 54. Large-scale scraping operations necessarily generate request patterns that would
26 ordinarily trigger such human-verification challenges. To continue accessing without interruption,
27 automated systems must be configured either to evade detection, distribute requests across multiple
28 machines, or otherwise prevent CAPTCHA enforcement from halting access. By avoiding or

1 neutralizing these verification gates, such systems obtain audiovisual data without demonstrating
2 the human interaction that YouTube requires for continued access. Defeating or bypassing this
3 human-verification mechanism constitutes circumvention of a technological measure that
4 effectively controls access to copyrighted works in violation of 17 U.S.C. § 1201(a).

5 55. **TPM (5) - Proof-of-origin tokens (access control):** YouTube further restricts
6 access by requiring that requests for video segments include cryptographic tokens demonstrating
7 that the request originates from an authorized client environment operating within the intended
8 playback context. These tokens are generated during playback and validated by YouTube's servers
9 before data is delivered. Requests lacking valid tokens, or presenting forged or replayed tokens, are
10 denied or degraded. This mechanism controls access by preventing unauthorized software from
11 directly requesting the audiovisual file unless it can present credentials proving it is an approved
12 client.

13 56. Automated tools operate outside YouTube's authorized player environment and
14 therefore must extract, replicate, or reuse the necessary request parameters in order to obtain access
15 to video data. By presenting such credentials outside their intended context, these tools can retrieve
16 audiovisual files without operating as approved clients. This conduct bypasses the origin-
17 verification function of the token system and enables direct access to media files that would
18 otherwise be delivered only to authorized playback software. Such bypassing constitutes
19 circumvention of a technological measure that effectively controls access to copyrighted works in
20 violation of 17 U.S.C. § 1201(a).

21 **C. Defendant Improperly Circumvented YouTube's Technological Protection**
22 **Measures to Obtain Millions of YouTube Videos to Train Its Foundational AI**
23 **Model.**

24 57. As noted above, Defendant require significant amounts of data to feed, train,
25 improve, and commercialize Nova Reel.

26 58. The full extent of Defendant's unauthorized access and extraction of video content
27 to train Nova Reel is not yet known and will be the subject of discovery. Defendant has compounded
28 this uncertainty by deliberately concealing the origins of Nova Reel's training data behind the vague

1 label of “publicly available” data.

2 59. The label “publicly available” does not mean lawfully obtained. The fact that a video
3 can be accessed and viewed by the public through a web browser does not mean it can be accessed,
4 downloaded, extracted, and fed into a commercial AI training pipeline. YouTube's content is
5 publicly viewable precisely because YouTube streams it under strict access controls that prohibit
6 downloading. YouTube CEO Neal Mohan made this distinction explicit, stating that YouTube's
7 terms of service “does not allow for things like transcripts or video bits to be downloaded, and that
8 is a clear violation of our terms of service.”⁴ Defendant cannot hide behind the word “public” to
9 launder what was in reality an unauthorized mass unauthorized access and extraction of protected
10 content.

11 60. Nova Reel is not a research tool. It is Defendant’s commercialized text-to-video
12 generative frontier AI model.

13 61. Although Defendant has refused to identify their training data sources with
14 specificity, their own Nova Reel System Card provides a critical admission. As Defendant stated: “
15 we pre-train the FM using curated data from a variety of sources, including licensed and proprietary
16 data, open source datasets, and publicly available data where appropriate... Our development testing
17 involves automated testing against publicly available and proprietary datasets, benchmarking
18 against proxies for anticipated customer use cases, human evaluation of outputs against proprietary
19 datasets, manual red teaming, and more.”⁵ Defendant thus admits that Nova Reel was trained on what
20 the AI industry recognizes as “open source” and “publicly available datasets.”

21 62. That admission is significant because the field of video-based AI model training has
22 a well-established set of industry-standard datasets. On information and belief, among the industry-
23 standard machine learning datasets on which Defendant trained Nova Reel were HD-VG-130M,
24 HD-VILA-100M, Panda-70M, and HowTo100M. Each of these datasets consists entirely of

25 ⁴ Davey Alba & Emily Chang, *YouTube Says OpenAI Training Sora With Its Videos Would Break*
26 *Rules*, Bloomberg (Apr. 4, 2024), [https://www.bloomberg.com/news/articles/2024-04-04/youtube-](https://www.bloomberg.com/news/articles/2024-04-04/youtube-says-openai-training-sora-with-its-videos-would-break-the-rules)
[says-openai-training-sora-with-its-videos-would-break-the-rules](https://www.youtube.com/watch?v=FBZ__BeChRg) (video available at
https://www.youtube.com/watch?v=FBZ__BeChRg).

27 ⁵ *Amazon Nova Reel AI Service Card*, AWS AI Service Cards, Amazon Web Services,
28 <https://docs.aws.amazon.com/ai/responsible-ai/nova-reel/overview.html> (last visited March 31,
2026)

1 references and location identifiers pointing to millions of YouTube videos. None contains the
2 underlying audiovisual files themselves. Each therefore required Defendant to access and download
3 the referenced videos directly from YouTube. Meaning that using these datasets for commercial AI
4 training necessarily required the mass circumvention of YouTube's TPMs.

5 63. HD-VG-130M, HD-VILA-100M, Panda-70M, and HowTo100M are not obscure or
6 experimental datasets. They are among the most widely cited and broadly adopted video datasets in
7 the field of AI model development. HowTo100M, published by Miech et al., introduced a large-
8 scale dataset of 136 million video clips sourced from 1.22 million narrated instructional YouTube
9 videos and demonstrated that text-video embeddings trained on this data produced state-of-the-art
10 results across multiple AI benchmarks.⁶ HD-VILA-100M, published by researchers at Microsoft
11 Research Asia, described itself as the largest and most diversified high-resolution video-language
12 dataset available, comprising 100 million clip-sentence pairs drawn from 3.3 million YouTube
13 videos across 15 popular content categories.⁷ HD-VG-130M followed as a large-scale dataset
14 compiled specifically for text-to-video generation research and released publicly on GitHub.⁸ Panda-
15 70M is a collection of 3.8 million videos from YouTube split into approximately 70.7 million clips
16 and paired with text captions. It was compiled by Snap and released in 2024.⁹ All four datasets are
17 routinely cited across the AI research literature as foundational resources for training video
18 generation models, and all three are built substantially from YouTube content.

19 64. The centrality of these four datasets to the field of video AI is not a matter of dispute.
20 Independent researchers, academic institutions, and AI companies around the world have cited and
21 built upon HowTo100M, HD-VILA-100M, Panda-70M, and HD-VG-130M as standard reference

22 ⁶ Antoine Miech et al., *HowTo100M: Learning a Text-Video Embedding by Watching Hundred*
23 *Million Narrated Video Clips*, arXiv:1906.03327 (June 7, 2019), <https://arxiv.org/abs/1906.03327>
(introducing a large-scale dataset of 136 million video clips sourced from 1.22 million narrated
instructional YouTube videos spanning over 23,000 visual tasks).

24 ⁷ Hongwei Xue et al., *Advancing High-Resolution Video-Language Representation with Large-*
25 *Scale Video Transcriptions*, arXiv:2111.10337 (Nov. 19, 2021), <https://arxiv.org/abs/2111.10337>.

26 ⁸ Wenjing Wang et al., *VideoFactory: Swap Attention in Spatiotemporal Diffusions for Text-to-*
27 *Video Generation*, arXiv:2305.10874 (May 2023), <https://arxiv.org/abs/2305.10874> (introducing
the HD-VG-130M dataset, consisting of 130 million text-video pairs collected from YouTube in
high-definition, widescreen, and watermark-free formats for text-to-video generation research).

28 ⁹ Tsai-Shien Chen et al., *Panda-70M: Captioning 70M Videos with Multiple Cross-Modality*
Teachers, arXiv:2402.19479 (Feb. 29, 2024), <https://arxiv.org/abs/2402.19479>.

1 points for years. They are, in the plain meaning of the term Defendant used in their Nova Reel
2 System Card, “open source” and “publicly available” datasets. When Defendant admitted that Nova
3 Reel was trained on industry-standard machine learning datasets collected from the web, they
4 admitted that Nova Reel was trained on datasets of precisely this kind. The logical inference is direct
5 and supported by the evidence: Defendant used these datasets, built from millions of YouTube
6 videos belonging to Plaintiffs and Class Members, to train Nova Reel commercially, in violation of
7 the express restrictions governing each dataset and in circumvention of YouTube's TPMs.

8 65. YouTube allows users to stream content but prohibits, through contractual terms and
9 TPMs, accessing the underlying video file of the content it streams. Defendant obtained
10 unauthorized access to audiovisual content by unlawfully accessing and stream ripping, converting
11 streaming content into permanent, locally stored files, and by circumventing the TPMs specifically
12 designed to prevent such access.

13 66. Each of the four datasets functions as a map or index file identifying specific
14 YouTube videos and clips by URL, video identifier, and timestamp. A single YouTube video may
15 be divided into numerous clips, each treated as a separate training sample. Extracting any clip
16 requires independently accessing the source video on YouTube and isolating the designated
17 segment, a process that constitutes a separate act of circumvention for each clip retrieved.

18 67. Defendant obtained unauthorized access to audiovisual content to train its AI models
19 by unlawfully “stream ripping” them—*i.e.*, converting the audiovisual streaming content into
20 permanent, locally-stored files—from YouTube and circumventing TPMs specifically designed to
21 prevent access for such use.

22 68. The HD-VG-130M dataset contains references to more than 130 million video clips
23 derived from 1,549,408 YouTube videos. The dataset was created by partitioning approximately
24 1,549,408 YouTube videos into short high-definition segments intended for machine learning
25 research. Each listed clip corresponds to a specific portion of a source video that must be
26 independently retrieved in order to obtain usable audiovisual data.

27 69. The compilers of HD-VG-130M selected videos based on automated criteria,
28 including aesthetic scoring, and excluded videos displaying creator names or visible watermarks.

1 The dataset was released for research purposes and does not itself distribute the underlying videos
2 or grant any license to use those works commercially.

3 70. Defendant used HD-VG-130M to retrieve every clip and incorporate those files into
4 its commercial training pipeline. Because each clip corresponds to a separate act of circumvention,
5 the ingestion of HD-VG-130M required roughly 130 million unauthorized downloads, each
6 constituting a separate circumvention event.

7 71. Microsoft created a document identifying the content of the HD-VG-130M dataset.
8 Microsoft then released this list into the broader AI ecosystem. Not only did Microsoft assemble the
9 HD-VG-130M dataset internally, but it also posted the dataset publicly on GitHub—a code-sharing
10 platform owned by Microsoft—at <https://github.com/daoshee/HD-VG-130M>.

11 72. The GitHub repository includes a license agreement that restricts the dataset to
12 “academic use only,” acknowledging that any use for commercial purposes would be unauthorized.

13 73. In addition, the GitHub license agreement prohibits distribution, reproduction,
14 modification, or exploitation of the dataset content without the permission of the copyright owner,
15 thus recognizing that copyright ownership resides with the original creators of the source material,
16 including YouTube content creators such as Plaintiffs and the Class Members.

17 74. By including these limitations on its GitHub repository, Microsoft implicitly
18 acknowledged that the HD-VG-130M dataset is comprised of protected, copyrighted works obtained
19 without license, permission, or authorization.

20 75. On information and belief, Defendant obtained the dataset that was earmarked for
21 academic use only, including the HD-VG-130M dataset. Defendant was aware that the datasets were
22 for research purposes only but used the datasets for commercial development (*i.e.*, “training”) of its
23 generative AI model.

24 76. Further, Defendant used the HD-VG-130M dataset to scrape audiovisual content
25 from YouTube without the consent of YouTube or the content creators.

26 77. The HD-VILA-100M dataset is comprised of references to roughly 100 million clips
27 that were derived from 3,098,462 YouTube videos. Each clip represents a distinct segment of the
28 original work. The dataset was compiled by Microsoft Research Asia and published in 2021 for

1 research involving video-based AI models. It lists pointers to YouTube videos and includes subtitle
2 information extracted from YouTube’s closed captioning system.

3 78. The usage license on the dataset states it was created “solely for Computational Use
4 for non-commercial research. This restriction means that you may engage in non-commercial
5 research activities (including non-commercial research undertaken by or funded via a commercial
6 entity), but you may not use the Data or any Results in any commercial offering, including as part
7 of a product or service (or to improve any product or service) you use or provide to others.”

8 79. HD-VILA-100M does not contain the video files themselves. Any user of the dataset
9 must download each referenced clip directly from YouTube. Defendant did so at scale, which
10 triggered roughly 100 million separate acts of unauthorized access and copying.

11 80. By including these limitations on its usage license, Microsoft implicitly
12 acknowledged that the HD-VILA-100M dataset is comprised of protected, copyrighted works
13 obtained without license, permission, or authorization.

14 81. Defendant obtained the dataset that was earmarked for non-commercial use only,
15 including the HD-VILA-100M dataset. Defendant was aware that the datasets were for research
16 purposes only but used the datasets for commercial development (*i.e.*, “training”) of its generative
17 AI model. Further, Defendant used the HD-VILA-100M dataset to scrape audiovisual content from
18 YouTube without the consent of YouTube or the creators of the audiovisual content.

19 82. The HowTo100M dataset consists of references to more than 100 million clips that
20 were derived from 1,238,911 YouTube videos. The clips depict 23,611 different tasks related to
21 cooking, handcrafting, personal care, gardening, and other activities. The task labels and
22 descriptions were generated using the taxonomy developed by WikiHow. The dataset is hosted by
23 the European research institutions that created it. Like the others, it contains only identifiers and
24 metadata, not any audiovisual material. To use HowTo100M in training, a company must download
25 each clip directly from YouTube. Defendant carried out these downloads as part of its Nova Reel
26 training pipeline, resulting in more than 100 million additional unauthorized copying events.

27 83. Although the HowTo100M dataset is posted online with what its creators label as a
28 “commercial license,” that license has no effect on the legal rights associated with the underlying

1 YouTube videos. The dataset creators do not own the videos and therefore cannot grant any license
2 that authorizes the reproduction, downloading, or commercial use of those works. The dataset
3 license applies only to the dataset itself, meaning the text files, identifiers, and metadata created by
4 the researchers. It does not and cannot confer any right to copy, download, or redistribute the
5 millions of YouTube videos identified in the dataset. Each of those videos remains protected by
6 YouTube’s Terms of Service and by technological access restrictions. As a result, every act of
7 downloading a HowTo100M clip from YouTube is a separate unauthorized accessing and copying
8 event and a separate circumvention violation, regardless of any license attached to the dataset file.

9 84. Panda-70M is a derivative dataset created by Snap that used the HD-VILA-100M
10 dataset as the foundation for its own refined dataset. Panda-70M is a collection of 3.8 million videos
11 from YouTube split into approximately 70.7 million clips and paired with text captions. It was
12 compiled by Snap and released in 2024. Developers used AI to create a new set of captions
13 describing what is pictured in each clip.

14 85. The HDVILA-100M, HD-VG-130M, Panda 70M, and HowTo100M datasets
15 consist of location identifiers that point to millions of YouTube videos or clips. None of them
16 contains the underlying audiovisual files. To use them in training, a company must access, retrieve
17 and download every referenced video directly from YouTube. Defendant used these datasets to
18 initiate millions of individual downloads of protected YouTube content, all without authorization or
19 compensation, all in violation of YouTube’s TPMs, and all for the commercial purpose of building
20 its foundational video model.

21 **D. Defendant’s Automated Scraping Required Circumvention of YouTube’s**
22 **Technological Protection Measures.**

23 86. Bulk extraction of YouTube videos at the scale alleged here cannot occur without
24 circumventing YouTube’s layered technological protection measures (“TPMs”), each of which
25 independently controls access to the underlying audiovisual files. Illicit tools and services are
26 specifically designed to defeat these protections, enabling automated systems to retrieve permanent
27 copies of content that YouTube makes available only for streaming. This process is commonly
28 known as “scraping” or “stream ripping.” Under 17 U.S.C. § 1201(a), circumvention of any single

1 technological measure that effectively controls access to a copyrighted work is sufficient to establish
2 liability; YouTube’s protections are layered and overlapping, and the circumvention of one does not
3 negate the effectiveness or legal significance of the others.

4 87. “Scraping” or “stream ripping” content involves the automated accessing and
5 downloading of audio and video files directly from a website’s servers rather than viewing the
6 content through the provider’s authorized playback environment.

7 88. Upon information and belief, in order to acquire “high-quality text-to-video
8 generation,” Defendant, directly and through agents, contractors, and affiliates, intentionally
9 accessed large volumes of YouTube videos by scraping and/or using tools and workflows that
10 bypass or evade YouTube’s TPMs and usage restrictions, and then reproduced those videos to
11 assemble training corpora for Defendant’s AI models and services.

12 89. When Defendant scraped audio and video files from YouTube, Defendant did not
13 simply access and download those files onto the YouTube app for offline streaming, as envisioned
14 by YouTube’s Premium plan. Instead, Defendant improperly accessed the underlying audio and
15 video files and downloaded those files into Defendant’s own system, where Defendant had access
16 over the files and where Defendant could store them indefinitely. These actions circumvented
17 YouTube’s TPMs, violated YouTube’s Terms of Service, and are inconsistent with the access
18 provided by YouTube’s Premium plan.

19 90. To retrieve audiovisual files at scale, Defendant was required to defeat TPM (1), the
20 rolling cipher that protects the true media file URL. On information and belief, Defendant used one
21 or more descrambling tools designed to defeat YouTube's proprietary signature-transformation
22 logic, allowing automated systems to generate valid file requests outside the authorized player
23 environment and thereby obtain the underlying media files directly. Such tools include, for example,
24 the open-source program yt-dlp, which is specifically engineered to descramble, replicate, or extract
25 YouTube's proprietary signature-transformation logic and circumvent the access controls YouTube
26 uses to prevent unauthorized downloading.

27 91. A descrambling tool such as yt-dlp works by replicating or extracting the signature-
28 transformation process that YouTube uses to protect its media URLs, allowing a user to bypass the

1 authorized streaming environment entirely and retrieve the underlying video and audio files directly
2 from YouTube's servers. Tools of this kind can be used to automatically merge separate audio and
3 video streams and to download entire playlists at scale. On information and belief, Defendant used
4 yt-dlp or a substantially similar descrambling tool for precisely this purpose.

5 92. To deploy a descrambling tool such as yt-dlp, a user must first obtain and configure
6 the program, along with ancillary software necessary to merge video and audio streams into
7 complete audiovisual files. Once configured, the tool can be directed at individual videos or entire
8 playlists by supplying the Uniform Resource Locator ("URL") for each target video. The result is a
9 complete audiovisual file retrieved outside of and in circumvention of YouTube's authorized
10 playback environment.

11 93. In simpler terms, a descrambling tool such as yt-dlp acts as a bootleg key for the
12 lock imposed by YouTube's rolling cipher. On information and belief, Defendant used yt-dlp or a
13 substantially similar tool to improperly access and download audiovisual files from YouTube and
14 merge them into complete audiovisual packages for ingestion into their generative AI training
15 pipeline.

16 94. Defendant also defeated TPM (2), YouTube's IP-based monitoring and blocking
17 system, which restricts high-volume accessing and downloading from a single source. On
18 information and belief, Defendant implemented an IP-rotation scheme so that when YouTube
19 detected automated activity and blocked one address, accessing and downloading could immediately
20 resume from another. This allowed continuous access to audiovisual files despite YouTube's efforts
21 to detect and terminate abusive activity.

22 95. YouTube uses automated programs to monitor activity from IP addresses, detect
23 high-volume accessing and downloading behavior, and block those IP addresses from further access
24 to audiovisual content on the platform. An IP-rotation scheme is specifically designed to defeat this
25 monitoring system by cycling through different IP addresses to avoid detection and blocking.

26 96. Executing an IP-rotation scheme at the scale necessary to download the volume of
27 files indexed in any one of the datasets and required to train Nova Reel necessarily required the use
28 of virtual machines or substantially similar infrastructure. A single physical machine with a fixed IP

1 address would have been detected and blocked almost immediately given the volume of requests
2 involved. On information and belief, Defendant deployed virtual machines, cloud computing
3 infrastructure, or substantially similar technology to rotate IP addresses at scale, ensuring that when
4 YouTube detected and blocked one address, Defendant's downloading operation could immediately
5 resume from another.

6 97. On information and belief, by repeatedly cycling through IP addresses in this
7 manner, Defendant ensured that their automated downloading operation could continue
8 uninterrupted even after YouTube detected and blocked individual addresses. The sheer volume of
9 videos necessary to train Nova Reel makes any alternative explanation implausible. The full details
10 of the specific infrastructure Defendant used to execute this scheme will be the subject of discovery.

11 98. Processes such as these allowed Defendant to bypass YouTube's player page and
12 avoid YouTube's monitoring systems in order to access and scrape content from YouTube.

13 99. Defendant's conduct necessarily circumvented TPM (3), the use of session-bound,
14 short-lived media URLs. Because these URLs expire and cannot be reused, automated tools must
15 repeatedly obtain fresh authorization parameters and regenerate valid links in order to continue
16 downloading. By programmatically renewing access credentials outside ordinary playback sessions,
17 Defendant maintained uninterrupted access to files that would otherwise become unavailable once
18 the original authorization lapsed.

19 100. At scale, Defendant's automated activity would also trigger TPM (4), CAPTCHA
20 challenges intended to distinguish human users from automated systems. To continue retrieving
21 videos without interruption, Defendant's infrastructure distributed requests across numerous
22 machines and operated in a manner designed to avoid or neutralize such verification barriers, thereby
23 obtaining audiovisual data without the human interaction required for continued access.

24 101. Defendant further circumvented TPM (5), YouTube's proof-of-origin token system,
25 which requires requests for video segments to present credentials demonstrating that they originate
26 from an authorized playback environment. Automated downloading tools operate outside that
27 environment and therefore must extract, replicate, or reuse the necessary request parameters in order
28 to retrieve video data directly, allowing Defendant to access and obtain files that would otherwise

1 be delivered only to approved clients.

2 102. Defendant did not obtain the consent of YouTube, Plaintiffs or other Class Members
3 to conduct its scraping activities.

4 103. On information and belief, and based on the sheer volume of video data included,
5 the datasets of videos that included YouTube videos were scraped without permission from
6 YouTube and in violation of YouTube's Terms and Services.

7 104. The automated system used by Defendant to access video content from YouTube
8 was intentionally designed and utilized to circumvent YouTube's TPMs.

9 105. To be clear, Defendant's generative AI models are not "watching" YouTube in order
10 to be trained. Rather, data improperly accessed and downloaded from YouTube is being uploaded
11 into Defendant's generative AI models to develop and improve Defendant's products.

12 106. Defendant knew or should have known its conduct contravened YouTube's rules
13 and the TPMs that enforce them.¹⁰

14 107. Defendant's actions constitute a breach of the Copyright Act's anti-circumvention
15 provisions, which state, among other things, that "[n]o person shall circumvent a technological
16 measure that effectively controls access to a work protected under this title." 17 U.S.C. §
17 1201(a)(1)(a).

18 **E. Defendant's Actions Caused Harm to Plaintiffs and Class Members**

19 108. At no time did Defendant seek or obtain Plaintiffs' or Class Members' authorization
20 to access and use the videos Defendant used to train its generative AI models.

21 109. At no time did Defendant seek or obtain Plaintiffs' or Class Members' authorization,
22 nor did Defendant compensate Plaintiffs or the Class Members for the access, copying, ingestion,
23 and use of their YouTube videos in AI training and related workflows.

24 110. Plaintiffs and Class Members used YouTube as their platform of choice to upload
25 their video content in substantial part due to YouTube's Terms of Service that prohibit the type of
26 scraping, unauthorized accessing and downloading, bulk extraction, and other forms of data mining

27 ¹⁰ YouTube's Terms of Service specifically state that users "may access and use the Service as
28 made available to you, *as long as you comply with this Agreement* and applicable law." "Terms of
Service," YouTube, <https://www.youtube.com/t/terms> (last viewed March 12, 2026).

1 of audiovisual content utilized by Defendant to obtain Plaintiffs' video content.

2 111.

3 112. The harm Defendant is causing goes beyond the immediate economic consequences
4 of unauthorized and uncompensated extraction and use of Plaintiffs' and Class Members' works. It
5 degrades the rights of creators to control their works, determine whether future uses of their work
6 align with their values, and decide the products or services with which they wish to be associated.

7 **CLASS ACTION ALLEGATIONS**

8 113. Plaintiffs bring this action on behalf of themselves and on behalf of all other persons
9 similarly situated.

10 114. Plaintiffs propose the following Class definition, subject to amendment as
11 appropriate:

12 **All individuals and entities in the United States whose videos were posted on**
13 **YouTube and were accessed by Defendant.**

14 115. Excluded from the Class are Defendant's officers and directors, and any entity in
15 which Defendant has a controlling interest; and the affiliates, legal representatives, attorneys,
16 successors, heirs, and assigns of Defendant. Excluded also from the Class are Members of the
17 judiciary to whom this case is assigned, their families and Members of their staff.

18 116. Plaintiffs reserve the right to amend or modify the class definition with greater
19 specificity or division after having an opportunity to conduct discovery. The proposed Class meets
20 the criteria for certification under Rule 23 of the Federal Rules of Civil Procedure.

21 117. Plaintiffs also reserve the right to seek certification of subclasses, or alternative
22 classes as shall become necessary in the course of litigation.

23 118. Numerosity. The Members of the Class are so numerous that joinder of all of them
24 is impracticable. The exact number of Class Members is unknown to Plaintiffs now, but Plaintiffs
25 estimates that there are thousands of Class Members.

26 119. Commonality. There are questions of law and fact common to the Class, which
27 predominate over any questions affecting only individual Class Members. These common questions
28 of law and fact include, without limitation:

1 a. Whether Defendant used an automated tool to download or otherwise obtain
2 unauthorized access to the Plaintiffs' and Class Members' copyrighted content on YouTube;

3 b. Whether Defendant's downloading of the video content was intended to bypass the
4 TPMs put in place by YouTube at the authorization of Plaintiffs and Class Members;

5 c. Whether Defendant used Plaintiffs' and Class Members' original content for
6 purposes of training its generative AI models;

7 d. Whether Plaintiffs and Class Members suffered damages from Defendant's
8 misconduct;

9 e. Whether Plaintiffs and Class Members are entitled to actual damages, statutory
10 damages and/or injunctive relief.

11 120. These issues are common to the Class, and their resolution would advance this
12 matter and the parties' interests therein.

13 121. Typicality. Plaintiffs' claims are typical of those of other Class Members because
14 Plaintiffs' video content, like that of every other Class Member, was made available on YouTube
15 and improperly altered and used by Defendant to train Defendant's generative AI models for
16 commercial purposes. Plaintiffs' claims are typical of those of the other Class Members because,
17 among other things, all Class Members were injured through the common misconduct of Defendant.
18 Plaintiffs are advancing the same claims and legal theories on behalf of themselves and all other
19 Class Members, and no defenses are unique to Plaintiffs. Plaintiffs' claims and those of Class
20 Members arise from the same operative facts and are based on the same legal theories.

21 122. Adequacy of Representation. Plaintiffs will fairly and adequately represent and
22 protect the interests of the Members of the Class. Plaintiffs' Counsel is competent and experienced
23 in litigating class actions.

24 123. Predominance. Defendant has engaged in a common course of conduct toward
25 Plaintiffs and Class Members, in that Plaintiffs' and Class Members' video content was unlawfully
26 downloaded, altered and used by Defendant in the same way. The fact that Nova Reel was a
27 foundational model underscores that Defendant's conduct was uniform across the Class: every video
28 unlawfully accessed from YouTube was ingested into the same core model that underpins

1 Defendant's product ecosystem. This commonality further demonstrates the predominance of shared
2 legal and factual issues among Class Members. The common issues arising from Defendant's
3 conduct affecting Class Members set out above predominate over any individualized issues.
4 Adjudication of these common issues in a single action has important and desirable advantages of
5 judicial economy.

6 124. Superiority. A Class action is superior to other available methods for the fair and
7 efficient adjudication of the controversy. Class treatment of common questions of law and fact is
8 superior to multiple individual actions or piecemeal litigation. Absent a class action, most Class
9 Members would likely find that the cost of litigating their individual claims is prohibitively high and
10 would therefore have no effective remedy. The prosecution of separate actions by individual Class
11 Members would create a risk of inconsistent or varying adjudications with respect to individual
12 Class Members, which would establish incompatible standards of conduct for Defendant. In
13 contrast, the conduct of this action as a class action presents far fewer management difficulties,
14 conserves judicial resources and the parties' resources, and protects the rights of each Class member.

15 125. Defendant has acted on grounds that apply generally to the Class as a whole, so that
16 class certification, injunctive relief, and corresponding declaratory relief are appropriate on a Class-
17 wide basis.

18 126. Ascertainability. Finally, all members of the proposed Class are readily
19 ascertainable. Defendant used datasets that contain the full lists of URLs and video identifiers for
20 every YouTube video incorporated into the training pipeline. Those identifiers allow the parties to
21 determine exactly which videos were used and to match each video to its creator through YouTube's
22 public channel and authorship information. Because the datasets provide a complete map of the
23 videos Defendant downloaded, the identities of the affected creators are identifiable through
24 straightforward reference to the URLs and corresponding channel data.

CLAIM FOR RELIEF

Violation of the DMCA (Anti-Circumvention) 17 U.S.C. § 1201(a)

127. Plaintiffs repeat, reallege, and incorporates the allegations contained in the previous paragraphs as if fully set forth herein.

128. YouTube’s Terms of Service prohibit scraping, unauthorized downloading, bulk extraction, or other forms of data mining of audiovisual content. These restrictions operate together with TPMs to prevent unlicensed access to the underlying video files, not simply reproduction of content.

129. Plaintiffs and Class Members uploaded their original video content to YouTube’s video sharing platform due in substantial part to YouTube’s Terms of Service and TPMs prohibiting bulk downloading of creators’ videos.

130. Content creators, including Plaintiffs and Class Members, expect that their works will not be accessed at the file level and copied at scale without consent. Plaintiffs and Class Members own all rights, title, and interest in and to the claims asserted in this action, including all claims for violation of 17 U.S.C. § 1201.

131. Each of Plaintiffs’ and Class Members works were uploaded to YouTube. When published, YouTube automatically applied TPMs that control access to and prevent unauthorized copying or downloading of these audiovisual files.

132. YouTube’s Terms of Service and associated access controls constitute “effective technological measures” within the meaning of 17 U.S.C. §1201.

133. Defendant used automated tools for the sole purpose of circumventing YouTube’s technological barriers that effectively control access to extracted files never made available to the public. Specifically, Defendant employed measures to access, extract, copy, and download Plaintiffs’ and Class Members’ content from YouTube without authorization. In doing so, Defendant improperly obtained millions of videos from YouTube’s platform.

134. This distinction is critical: viewing a YouTube video through YouTube’s authorized and advertising-supported playback mechanisms does not provide access to the underlying file. Defendant’s circumvention tools broke through that access barrier, triggering liability under §1201.

1 135. Plaintiffs and Class Members have been harmed by Defendant's violations of 17
2 U.S.C. §1201(a) because Defendant has taken their content without authorization or compensation.
3 Defendant's circumvention of YouTube's technological measures has facilitated Defendant's
4 ongoing and mass-scale copyright infringement through its unauthorized and uncompensated use of
5 the content in its training data.

6 136. Defendant accessed, downloaded, stored and utilized those videos to assemble
7 training corpora for Defendant's AI models and services.

8 137. By using circumvention software and disabling or bypassing YouTube's TPMs,
9 Defendant violated 17 U.S.C. § 1201(a), which prohibits the circumvention of a technological
10 measure that effectively controls access to a copyrighted work.

11 138. Each act of circumvention constitutes a separate violation of §1201. Plaintiffs and
12 the Class Members are entitled to statutory damages, injunctive relief, impoundment, and attorneys'
13 fees and costs under 17 U.S.C. §1203.

14 139. Each of Defendant's acts of infringement is a willful violation as Defendant
15 specifically utilized automated tools designed to evade YouTube's TPMs.

16 **PRAYER FOR RELIEF**

17 WHEREFORE, Plaintiffs respectfully request a judgment in their favor and against
18 Defendant as follows:

19 A. For a declaration that Defendant has willfully circumvented the copyright
20 protection systems of YouTube intended to protect Plaintiffs' and the Class Members's
21 audiovisual content.

22 B. For statutory damages (up to the maximum allowed by law per violation),
23 injunctive relief, and attorneys' fees and costs under 17 U.S.C. §1203;

24 C. For such equitable relief under Title 17, Title 28, and/or the Court's inherent
25 authority as is necessary to prevent or restrain infringement of Plaintiffs' and the Class
26 Members' copyright-protected content, including a preliminary and permanent injunction
27 requiring that Defendant and its officers, agents, servants, employees, attorneys, directors,
28 successors, assigns, licensees, and all others in active concert or participation with any of them,

1 cease infringing, or causing, aiding, enabling, facilitating, encouraging, promoting, inducing,
2 or materially contributing to or participating in the infringement of any of Plaintiff's or the
3 Class Members' exclusive rights under federal law, including without limitation in the content
4 identified in Exhibits A, B, and C;

5 D. For an award of pre-judgment and post-judgment interest, to the fullest extent
6 available, on any monetary award made part of the judgment against Defendant; and

7 E. For such other and further relief as the Court may deem just and proper.

8 ///

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14 **JURY DEMAND**

15 Plaintiffs demand a trial by jury on all claims for which trial by jury is proper.

16 Dated: April 3, 2026

WASHINGTON INJURY LAW

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By /s/ JANELLE BAILEY

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EXHIBIT A

h3h3 Productions' Videos In the HDVILA-100M Data Set:

- Pepsi Saves the World
- Making Music with Post Malone
- Shootin' With iDubbz
- jerk that meat boy - ft. ainsley harriott
- The Human Mail Challenge is Stupid
- This Weird Toy Channel is Freaky
- We're Being Sued
- Prank Invasion Starts WW3
- WE WON THE LAWSUIT!
- YouTube Might Make Your Favorite Channel Disappear
- Is PewDiePie a Racist?
- EXPERIMENT Glowing 1000 degree KNIFE ft iDubbzTV
- Don't Go to VidCon (Ft. Logan Paul & Instagram Model)
- Healthy at Every Size
- Trying Weird Gold Products
- Pranks in the Hood
- h3h3productions Reacts to Mean Comments on Reddit
- Zucc Gets Roasted
- Beach Pranks with Ethan Slamberry
- Feeding the Homeless h3h3 reaction video
- The Real Life 34 Year Old Virgin
- We're at an Important Crossroad in our Lives
- YouTube's New Program is Horrible
- hiphop exe has stopped working
- Jake Paul Ruins Los Angeles
- WE'RE IN PAYDAY 2!!
- Hila's Biggest Regret (#askh3)
- What is this AMAZING Tech Product?
- Sold to the Highest Bidder
- Meme Themed Disser Slam Dunks Ex
- CNN reports
- MY GIRL IS LEAVING ME FOR THIS GUY
- Wiping
- IN RESPONSE TO SOFLO
- Alison Gold - Chinese Food
- THE SOFLO FACEBOOK RANT
- Become a Living God
- VitalyZdTv
- We Meet DJ Khaled
- Steve Harvey Pranks Miss Universe
- We Used to be Drug Dealers
- Who I'm Voting for President re: Casey Neistat
- Ubuntu causes girl to drop out of college
- Why Doesn't YouTube Explain Anything?!

- THE PEWDIEPIE ROAST
- Punk Rocker
- .exe teaser trailer
- THE FINE BROS RANT
- Your Privacy is at Risk
- h3h3productions Q&A 2015 (appreciate ya!)
- YouTube is Not Being Honest with Us
- Ethan Joins a 90s Boy Band
- Why is this Video on the TRENDING Tab???
- CNN Broadcasts Hardcore Porn for 30 Minutes Straight
- HOW TO MAKE MODERN ART
- Lube Up
- When Texting turns to Sexting
- A News Report
- Toy Channels are Ruining Society
- Cameron Carpenter, the Organ God
- Deception, Lies, and CSGO
- It's Time to Stop
- How Does A Homeless Man Spend \$100?
- Save Marina Joyce Parody
- The Dangers of Social Media (Boys Edition!)
- 100 LAYERS OF SHIRTS
- Eviction I (Part 2 of 3)
- Fat Idiot Gains 100 Pounds At Costco
- VAPE NAYSH YALL
- Reading Mean Comments with my Parents
- We Take a DNA Test
- Ethan's Corner - Facebook
- First Asian Kiss (Hila Reaction)
- This Baby Syringe Channel is DISTURBING
- JonTron Ruins our Day
- The High Life (Monetized)
- How to get a Date on Tinder
- WHAT ARE THESE PRANKSTERS DOING?!
- A New Chapter for Fair Use on YouTube
- The Return of Patrice Wilson
- h3h3 prank call: Flowers.com helps me pick out flowers
- THESE GLASSES CURED OUR COLOR BLINDNESS! FT. iDubbbzTV
- Eviction I (Part 3 of 3)
- Enema Tutorial
- done with that exe
- THE TAI LOPEZ CONSPIRACY
- Driving 450 mph in a Lamborghini
- In Love With A Car
- Everyone Needs to Stop Getting TRIGGERED
- The Power of Diamond Water

- Let's Get Social 2014
- Eviction I (Part 1 of 3)
- The Greatest YouTuber of ALL TIME
- THE DJ KHALED DOCUMENTARY
- Hila Gets ROASTED
- america.exe
- FUNNIEST MOMENTS
- Fat Idiot Gets Lost in the Mojave Desert
- Backstage with Post Malone
- DJ Khaled - How Many Times ft. Chris Brown, Lil Wayne
- jesus.exe
- Here in My Garage with Tai Lopez
- Nuclear Fallout - Keemstar
- forever.rekt
- The God of Cringe
- WEARING 200 SHIRTS IN THE GROCERY STORE
- will.i.am
- 100 LAYERS OF BEANIES
- Shrek
- Let's Talk About It
- How to pick up girls
- The Dangers of Social Media
- The Worst Movie Ever Made (Part 1)
- Dr. Klein
- The Return of SOFLO
- Two Handed Great Sword
- How to Dispute a Strike -- DMCA Process Explained
- The Worst Movie Ever Made (Part 2)
- sand that wood boy (edgy)
- Fitness Crunch Time
- .exe teaser trailer #2
- Goodbye New York
- Papa John
- SoFloAntonio's Facebook Page
- True Animal Love
- Coughs 'n Flops
- Best Cure for Hemorrhoids
- My Horrifying Proposal Story
- How To Lose Your Life's Savings w Cryptocurrency
- Interview with Casey Neistat
- ExpertVillage
- Doctor Who - Season 86 Recap - Spoiler Alert
- H3H3 BALL RIDER
- Nature Valley Rediscover Nature
- I'm the Best. PERIOD.
- Jake Paul & RiceGum Promote Gambling To Kids

- Lube Up 2 - 2 lubed 4 u
- The Return of Prank Invasion
- Ethan Fights a Blind Guy
- Newt Gingrich is really puzzled
- Girl virtually assaulted in GTA V
- Best of 2014
- Leave Ken Bone Alone!
- PrankInvasion
- We Owe you Guys an Explanation...
- My Epic Collab With Pewdiepie!!
- The Sea Monsters of YouTube - H3H3
- Jontron and Ethan share a Papa John Pizza

h3h3 Productions' Videos In the HD-VG-130M Data Set:

- Beach Pranks with Ethan Slamberry
- hiphop exe has stopped working
- This Weird Toy Channel is Freaky
- Shootin' With iDubbbz
- Beach Pranks with Ethan Slamberry
- Pranks in the Hood
- Pepsi Saves the World
- Sold to the Highest Bidder
- Don't Go To VidCon (Ft. Logan Paul & Instagram Model)
- Prank Invasion Starts WW3
- What is this AMAZING Tech Product?
- EXPERIMENT Glowing 1000 degree KNIFE ft iDubbbzTV
- hiphop exe has stopped
- Is PewDiePie a Racist?
- Zucc Gets Roasted
- The Human Mail Challenge is Stupid
- We Used to be Drug Dealers
- Zucc Gets Roasted
- Hila Gets ROASTED
- My Epic Collab With Pewdiepie!!
- I'm the Best. PERIOD.
- forever rekt
- The High Life (Monetized)
- 100 LAYERS OF SHIRTS
- Meme Themed Disser Slam Dunks Ex
- CNN reports
- done with that exe
- Eviction I (Part 3 of 3)
- Driving 450 mph in a Lamborghini
- Fat Idiot Gains 100 Pounds At Costco
- This Baby Syringe Channel is DISTURBING

- Wiping
- Nature Valley Rediscover Nature
- How to pick up girls
- Alison Gold - Chinese Food -
- Who I'm Voting for President re: Casey Neistat
- Ethan Joins a 90s Boy Band
- VAPE NAYSH YALL
- DJ Khaled - How Many Times ft. Chris Brown, Lil Wayne -- h3h3 reaction video
- MY GIRL IS LEAVING ME FOR THIS GUY
- Lube Up
- Punk Rocker
- Fitness Crunch Time
- We Owe you Guys an Explanation...
- Reading Mean Comments with my Parents
- Leave Ken Bone Alone!
- THE SOFLO FACEBOOK RANT
- Newt Gingrich is really puzzled
- THE TAI LOPEZ CONSPIRACY
- Ubuntu causes girl to drop out of college
- I'm the Best. PERIOD.
- The Return of SOFLO
- Shrek
- Ethan Fights a Blind Guy
- The Dangers of Social Media
- DJ Khaled - How Many Times ft. Chris Brown, Lil Wayne
- Enema Tutorial
- How To Lose Your Life's Savings w Cryptocurrency
- How to get a Date on Tinder
- CNN Broadcasts Hardcore Porn for 30 Minutes Straight
- VitalyZdTv
- WEARING 200 SHIRTS IN THE GROCERY STORE
- When Texting turns to Sexting
- A News Report
- Why Doesn't YouTube Explain Anything?!
- How to Dispute a Strike -- DMCA Process Explained
- sand that wood boy (edgy)
- Steve Harvey Pranks Miss Universe
- .exe teaser trailer #2 [Monetized]
- 100 LAYERS OF BEANIES
- .exe teaser trailer
- THE DJ KHALED DOCUMENTARY
- The Dangers of Social Media (Boys Edition!)
- Hila Gets ROASTED
- Papa John
- Papa John
- VitalyZdTv

- 100 LAYERS OF SHIRTS
- THE DJ KHALED DOCUMENTARY
- Alison Gold - Chinese Food
- How To Lose Your Life's Savings w Cryptocurrency
- THE SOFLO FACEBOOK RANT
- Ethan Fights a Blind Guy
- The Dangers of Social Media

h3h3 Productions' Videos In the Panda-70M Data Set:

- It's Time to Stop Lance Stewart
- Shootin' With iDubbbz
- This Weird Toy Channel is Freaky
- Pranks in the Hood (reaction)
- Prank Invasion Starts WW3
- How to Clean Your Gamer Gear (reaction)
- We Meet Tai Lopez
- Reacting to Mean Comments on Reddit
- EXPERIMENT Glowing 1000 Degree Knife ft. iDubbbzTV
- Pepsi Saves the World
- "Educational" Videos on YouTube
- Hila's Biggest Regret (#askh3)
- Healthy at Every Size
- The Real Life 34 Year Old Virgin
- Feeding the Homeless (reaction)
- Making Music with Post Malone
- What is this AMAZING Tech Product?
- 4 Looks You Need This Summer
- jerk that meat boy (ft. Ainsley Harriott)
- Trying Weird Gold Products
- We Used to be Drug Dealers
- YouTube Might Make Your Favorite Channel Disappear
- WE'RE IN PAYDAY 2!!
- hiphop exe has stopped working
- YouTube's New Program is Horrible
- Is PewDiePie a Racist?
- Beach Pranks with Ethan Slamberry (reaction)
- WE WON THE LAWSUIT!
- Zucc Gets Roasted
- The Human Mail Challenge is Stupid

- Jake Paul Ruins Los Angeles
- Don't Go To VidCon (ft. Logan Paul & Instagram Model)
- We're Being Sued
- Sold to the Highest Bidder
- We're at an Important Crossroad in our Lives
- Newt Gingrich is Really Puzzled (reaction)
- The Sea Monsters of YouTube
- The Dangers of Social Media (reaction)
- Fat Idiot Gains 100 Pounds at Costco
- It's Time to Stop
- JonTron and Ethan Share a Papa John Pizza
- Wearing 200 Shirts in the Grocery Store
- Who I'm Voting for President (re: Casey Neistat)
- VAPE NAYSH YALL
- .exe Teaser Trailer
- How to Make a YouTube Vlog (ft. iDubbbz)
- Leave Ken Bone Alone!
- VitalyzdTv (reaction)
- jesus exe
- Nuclear Fallout - Keemstar
- Goodbye New York
- Eviction I (Part 1 of 3)
- True Animal Love (reaction)
- Jake Paul & RiceGum Promote Gambling to Kids
- 100 Layers of Shirts
- SoFloAntonio's Facebook Page (reaction)
- Coughs 'n Flops
- Doctor Who - Season 86 Recap
- Cameron Carpenter, the Organ God (reaction)
- We Take a DNA Test
- PrankInvasion (reaction)
- When Texting Turns to Sexting (reaction)
- Steve Harvey Pranks Miss Universe (reaction)
- Shrek
- This Baby Syringe Channel is Disturbing
- My Girl Is Leaving Me for This Guy
- First Asian Kiss (Hila Reaction)
- Fortnite Is Ruining Society

- We Owe You Guys an Explanation
- In Love With a Car
- Enema Tutorial (reaction)
- How Does a Homeless Man Spend \$100? (reaction)
- Wiping
- Eviction I (Part 2 of 3)
- Lube Up 2
- Toy Channels Are Ruining Society
- The Return of Prank Invasion
- The Power of Diamond Water (reaction)
- WHAT ARE THESE PRANKSTERS DOING?!
- A New Chapter for Fair Use on YouTube
- JonTron Ruins Our Day
- THE PEWDIEPIE ROAST
- CNN Broadcasts Hardcore Porn for 30 Minutes Straight
- Ubuntu Causes Girl to Drop Out of College (reaction)
- Deception, Lies, and CSGO
- THE DJ KHALED DOCUMENTARY
- The Dangers of Social Media (Boys Edition)
- THE FINE BROS RANT
- My Epic Collab With PewDiePie!!
- Meme Themed Disser Slam Dunks Ex (reaction)
- Ethan Fights a Blind Guy
- Papa John (reaction)
- The Worst Movie Ever Made (Part 1)
- We're Pregnant
- ExpertVillage (reaction)
- Let's Get Social 2014 (reaction)
- will.i.am (reaction)
- SoFloAntonio (reaction)
- sand that wood boy (edgy)
- Why Doesn't YouTube Explain Anything?!
- Save Marina Joyce Parody
- Alison Gold - Chinese Food (reaction)
- THE SOFLO FACEBOOK RANT
- Backstage with Post Malone
- My Horrifying Proposal Story
- Let's Talk About It

- How to Pick Up Girls (reaction)
- How to Dispute a Strike (DMCA Process Explained)
- Ethan Joins a 90s Boy Band
- The Return of SOFLO
- Dr. Klein
- forever rekt
- IN RESPONSE TO SOFLO
- Lube Up
- Fitness Crunch Time
- The Greatest YouTuber of All Time (reaction)
- The God of Cringe
- done with that exe
- Hila Gets ROASTED
- Here in My Garage with Tai Lopez (reaction)
- YouTube Is Not Being Honest with Us
- Fat Idiot Gets Lost in the Mojave Desert
- Two Handed Great Sword (reaction)
- H3H3 BALL RIDER
- Girl Virtually Assaulted in GTA V (reaction)
- Punk Rocker
- The Worst Movie Ever Made (Part 2)
- Best of 2014
- I'm the Best. PERIOD.
- How To Lose Your Life's Savings with Cryptocurrency
- DJ Khaled - How Many Times (reaction)
- We Meet DJ Khaled
- FUNNIEST MOMENTS
- The Return of Patrice Wilson (reaction)
- 100 Layers of Beanies
- Reading Mean Comments with My Parents
- Eviction I (Part 3 of 3)
- How to Get a Date on Tinder
- Driving 450 mph in a Lamborghini
- h3h3 prank call: Flowers.com
- Everyone Needs to Stop Getting Triggered
- The High Life (Monetized)
- h3h3productions Q&A 2015
- Your Privacy Is at Risk

- Best Cure for Hemorrhoids
- How to Make Modern Art
- Why Is This Video on the Trending Tab???
- These Glasses Cured Our Color Blindness (ft. iDubbbzTV)
- Interview with Casey Neistat
- Become a Living God (reaction)
- .exe Teaser Trailer #2
- THE TAI LOPEZ CONSPIRACY
- Nature Valley Rediscover Nature (reaction)
- america exe
- Ethan's Corner - Facebook

h3h3 Productions' Videos In the HOWTO100M Data Set:

- Pranks in the Hood
- This Weird Toy Channel is Freaky
- Feeding the Homeless
- It's Time to Stop Lance Stewart
- EXPERIMENT Glowing 1000 degree KNIFE ft iDubbbzTV
- How to Clean Your Gamer Gear
- We Meet Tai Lopez
- "Educational" Videos on YouTube
- The Real Life 34 Year Old Virgin
- The Human Mail Challenge is Stupid
- Shootin' With iDubbbz
- 4 Looks You Need This Summer
- THE TAI LOPEZ CONSPIRACY
- Enema Tutorial
- THESE GLASSES CURED OUR COLOR BLINDNESS! FT. iDubbbzTV
- HOW TO MAKE MODERN ART
- Jontron and Ethan share a Papa John Pizza
- Fortnite Is Ruining Society
- SoFloAntonio
- How to Make a YouTube Vlog (ft. iDubbbz)
- we're pregnant
- This Baby Syringe Channel is DISTURBING
- 100 LAYERS OF SHIRTS
- True Animal Love

H3 Podcast Highlights' Videos In the HDVILA-100M set:

- KFC Needs To Chill
- Jake Paul Is Spreading Covid & Doesn't Care
- Defending John McCain

- LA Mayor Turns Off Power To TikTok House & Arrests
- Vsauce3 On True Happiness
- Ethan Klein Reviews ProJared Memes
- H3H3 On Creepy Children's PSA
- How Much Money to Retire? w/ Chris D'Elia
- Skippy the Virgin & His Bellybutton Lint Collection
- Tai Lopez Gets Pranked On the H3 Podcast
- Papa John Is Coming On The H3 Podcast!
- Bill Wurtz On Editing His Videos
- R. Kelly Has "Hands-On" Experience with Fans
- Hila Returns Her Green Card & Rises From The Ashes Like A Phoenix
- Is Steve-O Scared of Death?
- Shoenicely Nearly Chokes & Passes Out On Live Interview
- Ethan Klein On the Joe Rogan/Bernie Sanders Controversy
- What Is The Greatest Meme Of The Decade?
- The Reporter Slip Up Of The Century
- Post Malone shares release date of 'Beerbongs & Bentleys'
- President Trump Calls Into the H3 Podcast
- H3H3 On Ethan Bradberry
- Will Smith's Family Ends Shane Dawson's Whole Career On Twitter
- Logan Paul Fan Calls In to Demand Apology
- Jordan Peterson On Importance Of Reading
- How Much Does Casey Neistat Make For a Sponsor?
- Grandma Slammed By Police
- Vsauce3 On Leaving Beme
- The One Thing That Made All The Difference In My Life
- Hila Demands iDubbzbz Shave His Mustache
- Ethan's Harrowing Bathroom Story
- Newspeople Try to Talk like Kids
- Jordan Peterson Takes a Fat Vape Hit On the H3 Podcast
- Parents Stealing Candy On Halloween
- Ethan Klein On Trisha Paytas' Wedding
- Gus Johnson Takes Romantic Baths By Himself
- Dr Disrespect Banned From Twitch
- The Greatest Show On TV Right Now (Ft. Ethan Klein, Jacksfilms, Commentetiquette)
- H3H3 Negotiates Peace Between SoFlo and Joey Salads
- Is the Prince Family Actually Family-Friendly?
- Ethan & Hila On Pete Davidson
- Is Being with a Robot Cheating?
- Videogames Are Destroying Society
- Papa John On His Obamacare Controversy
- New Half-Life Announced And Ethan Is Euphoric
- Ethan Klein Reviews James Charles Memes
- Twitch Streamer with "God Complex"
- World Records That Shouldn't Exist
- iDubbzbzTV On the Process of Preparing a Content Cop

- MKBHD On AI Singularity
- Sean Evans Talks "Hot Ones The Game Show" on TruTV
- H3H3 Reacts to Logan Paul's Song 'Hero'
- She Dumped In The Garden
- Is Oliver Tree Retiring?
- H3H3 On Kevlar Backpacks
- Sean Evans' Philosophy On Interviewing
- Tattoos So Bad You'll Wonder If Humanity Was A Mistake
- Whitney Cummings is a Horse Lady
- Manipulative Google Superbowl Ad Can Suck It
- We Throw An H3H3 Is Over Party!
- Dr Films & Dances with Passed Out Patients
- H3 Vs Goop
- H3H3 Declares War On James Charles
- Tim Dillon Rants About Ellen Degenerate
- Terrible Kickstarter: Portable Bidet
- Who is the Green Shirt Guy?
- Should We Let The Airlines Go Out Of Business?
- I Waited 10 Hours to Play WoW & Got Disconnected
- Joe Biden's Brain is Melting
- Begging For Twitch Subs Goes Wrong
- Ethan Klein On The Hype House
- Logic On Forcing Positivity
- Is MrBeast's 20mil Tree Project A Scam?
- Whoopi Goldberg Victim Shames Bella Thorne
- Kavanaugh's Boof
- The Amazon Rainforest is On Fire & Nobody Cares
- Ethan Fires Ian The Intern Over Gift Card Scandal
- H3 On Gucci Blackface Sweater
- Area 51 & Aliens Debunked
- Can Someone Explain This Meme To Us?
- Celebrity ASMR ft Gibi ASMR
- Jordan Peterson On The Channel 4 Interview
- Where In the World Has Belle Delphine Gone?
- Ninja Breaks World Record at Vegas Event
- Hila Sends the News: Baby Wipes Banned
- Papa John Sues Papa John's
- Joey Salads Recalls the Time He Peed In His Own Mouth On Camera
- Trisha Paytas On How Much She Makes From "Premium" Content
- James Charles' \$500 Meet & Greet is Absurd
- Tom Segura Worked With Jared Fogle
- Ethan & William Need Their Carers
- 1000's Of Penises Wash Up On California Shore
- Post Malone and H3H3 React To Sad YouTube Videos
- Dunkey and Leah's Engagement Story
- Tim Heidecker On Influencing Comedians

- Lance Stewart Breakup Cringe
- Jordan Peterson Analyzes H3H3
- What Does It Mean to Be A Vsauce?
- Gus Johnson Has His First Anxiety Attack
- Bernie Sanders Twitch Streaming Disaster
- The Most Wholesome Show On Netflix
- Ninja On the Future of E-Sports
- PewDiePie Hits 100 Million & We're All Doomed
- KFC Ruins the H3 Podcast
- Why Is Shaq In Every Commercial?
- Ethan Bradberry Revisits His Signature Catchphrase
- Creepy Army Recruitment Tactics On Twitch
- Papa John Must Sponsor H3H3 Or Else
- Burning Man Is A Nightmare - Ethan Klein & All Gas No Brakes
- Lil Nas X Accused of Being a Satanist
- Bill Burr On the Vegan Cookie Monster
- Harley Morenstein Takes a Fat Vape Hit On the H3 Podcast
- Millionaire Preacher Gets Called Out
- Teddy Fresh Summer Collection
- UMG is Ruining Youtube
- Will Wal-Mart Buy TikTok? - Ethan Klein & Danny Gonzalez
- Would You Help A Friend Bury A Body?
- H3H3 on Garth Brooks the Cringe God
- Shane vs Logan Paul
- Oliver Tree Brings Gifts For Ethan & Hila
- The Greatest YouTuber You've Never Heard Of
- Old Creepy Bill Cosby Clip
- WoW Classic Almost Ruined Our Marriage
- Why Bo Burnham Made Eighth Grade
- H3H3 On Post Malone Airplane Incident/VMAs
- H3H3 On Devastation of Wild Fires
- Baby Theodore Update
- H3H3 Watches The Worst Opening Pitch Ever Thrown
- Tenacious D On Their Big Break
- Trisha Paytas is a Man
- Fox News Plays H3H3 Clip
- Bobby Lee On Having To Tone Down His Behavior
- The Quartering Thinks Cartoons Aren't Hot Enough
- Is Chloroquine A Good Treatment For Coronavirus? Dr. Eric Ding Explains
- Tenacious D On the Impending Apocalypse
- Papa John's Is A House Of Cards According To Founder Papa John
- H3 Reviews "The Mandalorian" On Disney+
- The All Powerful Feeding-Window Results In Mega Weightloss
- Handing Out Free Masks Makes People Very Angry
- Do You Smell Your Own Farts?
- Hila's Dad Disowns Ethan For Wearing Socks and Sandals

- Celebrities Trolled By Moronic Instagram Prank
- H3 Podcast Hits 2,000,000 Subscribers
- H3H3 On Tana Mongeau
- Cathy Newman Thought She Won The Debate
- Tim Heidecker's Proudest Moment
- Justin Roiland Calls a Psychic
- Ethan Defends Mobility Mary (Trigger Warning)
- H3H3 On Michael Cohen GoFundMe
- Ethan Klein On Billie Eilish
- Jack Black On Eric Andre Show Appearance
- Bobby Lee Exposed For Intentionally Crashing Our Gatsby
- Ethan Klein On Tyler the Creator's Grammy Speech
- Gal Gadot Cringefest
- Jordan Peterson On His Soviet Art Collection
- Onision Striked Down Our Segment About Him
- This Video Has 27,000,000 Views
- Thank you YouTube - H3 Podcast | Ethan Klein
- Marc Rebillet - Keemstar Freestyle - H3 PODCAST LIVE!
- Papa John Blows Ethan's Mind With His Pizza Eating Skills
- Ethan Klein On Justin Trudeau Blackface Scandal
- How To Take A Compliment Ft. Theo Von
- Know Your Meme ft. RunForTheCube
- Steve Harvey Ruins Ms. Universe AGAIN
- H3H3 On GayGod "Tasting Himself"
- Ghost Stories with Oliver Tree
- Why Does Danny Gonzalez Call His Fans Greg? - H3 Podcast
- Philip DeFranco On Getting a Vasectomy
- Ethan Klein On The New Star Wars Sneak Peak
- Hila Klein On Feminism
- H3H3 On No Nut November
- We May Be Entering Another Copyright Lawsuit
- Ethan Klein On The Tesla Cybertruck
- Steve-O Almost Went to Jail For 8 Years
- Is James Charles Guilty of TikTok Cringe?
- Ethan Responds to the Worst YouTube Apology
- TI Tries To Correct The Record On Being The Worst Dad Ever
- Kanye Handing Out Yeezys In Uganda
- New Subway Ad Ruined My Life
- Ethan Klein On Dr DisRespect's Massive Return Stream
- Arnold Schwarzenegger's Cringetastic Rap Career
- Bobby Lee Destroys Our \$3500 Mobility Scooter
- This Banana Sold For \$120,000 As Art
- Salt Bae Can't Cook
- H3H3 On Logan Paul vs KSI
- Shoenice Eats Raw Bacon & Survives
- Wendy Williams Rips Ass On Live TV

- H3H3 On Hack Journalist
- Banksy Shreds Art After \$1M Sale
- Sean Evans Shares Wisdom On Online Hate
- Ethan Makes Contact With Papa John
- Ghost Stories with Dr DisRespect
- Zach did WHAT on a hike?
- #MAGACHallenge Is A Loss For Humanity
- Ethan No Longer Wipes Himself
- DJ Khaled Bombs at Overwatch League
- Women Who Loves Horses Have Issues
- Salt Bae Needs Cooking Lessons
- Bert Kreischer On Quicksand Sinkers
- Mr Beast On Working with the Right People
- Kim Kardashian Promotes James Charles' Controversial Merch
- Tim Dillon Rants About Hillary Clinton
- Reviewing Joe Biden Memes
- Origins Of The Papa John's Name
- Tom Segura On Losing Weight
- Ethan Dons the Coughing Beanie
- Ethan Bradberry Checks Into an Insane Asylum
- H3H3 Reacts to Woman Faceplanting During Proposal
- Cody Ko on Jake Paul
- Can You Pass A U.S. Citizenship Test?
- This Preacher May Actually Be A Goblin
- Cody Ko On Girl Defined
- H3H3 Gets A Strike During Alex Jones Segment
- Ethan Klein Eats A Putrid Mayo Cake
- Wendy Williams Gives Me The Creeps
- Johnny Depp Cringe Overdose
- Scooter People Are a Danger to Our Children
- Trisha On Her Marriage To Brad Pitt Cut-Out
- Security Guard Caught Sniffing Ass At The Gym
- H3H3 Reacts To Logan Paul's Santa Diss Track
- Alligator Mukbang Extinguishes the Last Light of My Soul
- Belle Delphine Wins Most Clickbaited Award
- The Hot Ones Hall Of Shame - Who Failed To Finish?
- This Man Gave The Pope Pizza
- PUBG Creator On Why It Took 3 Months To Add Vaulting
- Know Your Meme Ft. Joey Salads
- Pope Brutally Shuts Down Ring Kissers
- What Is Logan Paul Up To?
- Reacting to the Basement Family Story
- H3H3 Reacts To A Deaf Ninja Warrior Cringe
- All Gas No Brakes on Septic Tank Explosion & Spraying Poop On Other Cars
- Parents Evict 30 Year Old Mall Ninja
- Ethan Klein On My 600 Pound Life

- Papa John's Hilarious Instagram Stories
- People Who Wear This Should Be Banished From Society
- Did Logic REALLY Retire?
- Deadmau5 Catches Fan Flying Drone Over His House
- Frick One, Marry One, End One (Michael Jackson, Chris Brown, R Kelly)
- Sean Evans On Interviewing Ricky Gervais
- Cameraman Ruins Movie Premiere at Cannes
- Guess Who Is Going To Jail...
- Crocs x KFC Is The Worst Shoe Ever Made
- Tim Heidecker On Alex Jones
- Is Takeout Food Safe During Quarantine? Dr. Eric Ding Explains
- FBI Agent Drops His Piece While Dancing
- We Must Stop These Robots
- Jacksfilms On Youtube Burnout
- YouTube Declares War On Copyright Trolls
- H3 On Logan Paul vs KSI Part 2
- Breaking Down the Appeal of Pitbull
- Papa John On The New Papadia
- Trisha Paytas Thinks Egypt Doesn't Exist
- Are Humans Inherently Evil? Ft. Vsauce
- Logic On Meeting Eminem
- Pickup Artist Gets Slammed On H3 Podcast
- Bill Burr On Podcasting
- Will TikTok Succeed Where Vine Failed? - Cody Ko & Ethan Klein
- Jacksepticeye On Fan Fiction
- Ethan Klein on Australian Fires (ft. jacksfilms & commentetiquette)
- California Frees Pot Smokers
- Tom Segura Loves Bidets
- H3H3 Had His Face Shoved In A Cake
- We Spent \$3500 On a Scooter
- Trisha Paytas Doesn't Know Where Antarctica Is
- Hila's Epic Post Office Story
- OJ Simpson Kills It On Twitter
- Terrifying Fire Escape Caught On Video
- H3H3 On X-Factor Groping
- Know Your Meme Ft. VideoGameDunkey
- Interview With The Legendary Roll Patrol
- Is the New Sonic CGI Better Or Worse?
- R. Kelly- Do You Have Your Passport (Remix)
- Ethan Klein is Joining the Area 51 Invasion
- Should Keemstar Be Deplatformed?
- Ethan Klein Meets Eric Andre & Nathan Fielder
- Dunkey Describes His Vision For An Adult Swim Show
- Ethan Klein & Gus Johnson On Reddit
- Ethan Klein On Faze Jarvis Lifetime Ban

- Kevin Spacey's Terrifying Christmas Video - (Ft. Ethan Klein, Jacksfilms, Comment Etiquette)
- Eric Andre Predicted The End Of COPS TV
- The Green Goblin Joins the French Army
- Andrew Yang Was Right; Trump Considering Giving All Americans \$1000
- Ethan Klein On Count Dankula Going to Prison
- Dunkey and Leah Describe Working with a Significant Other
- Taylor Swift Travels Inside Suitcase to Avoid Paparazzi
- Kyle the Cougar Champ Writes H3H3 a Letter

H3 Podcast Highlights' Videos In the HD-VG-130M Data Set:

- PUBG Creator On Why It Took 3 Months To Add Vaulting
- The All Powerful Feeding-Window Results In Mega Weightloss
- Trisha Paytas Thinks Egypt Doesn't Exist
- H3H3 Negotiates Peace Between SoFlo and Joey Salads
- The Green Goblin Joins the French Army
- Ghost Stories with Oliver Tree
- Dr Films & Dances with Passed Out Patients
- Know Your Meme ft. RunForTheCube
- Parents Evict 30 Year Old Mall Ninja
- H3H3 Reacts To A Deaf Ninja Warrior Cringe
- Philip DeFranco On Getting a Vasectomy
- Why Does Danny Gonzalez Call His Fans Greg? - H3 Podcast
- Kyle the Cougar Champ Writes H3H3 a Letter
- Kim Kardashian Promotes James Charles' Controversial Merch
- Wendy Williams Rips Ass On Live TV
- How To Take A Compliment Ft. Theo Von
- Tim Heidecker On Alex Jones
- Ethan Klein On Billie Eilish
- Cathy Newman Thought She Won The Debate
- Will Wal-Mart Buy TikTok? - Ethan Klein & Danny Gonzalez
- H3H3 On X-Factor Groping
- Trisha Paytas On How Much She Makes From "Premium" Content
- How Much Does Casey Neistat Make For a Sponsor?
- Who is the Green Shirt Guy?
- Parents Stealing Candy On Halloween
- KFC Ruins the H3 Podcast
- Ethan & Hila On Pete Davidson
- What Does It Mean to Be A Vsauce?
- H3H3 Had His Face Shoved In A Cake
- YouTube Declares War On Copyright Trolls
- Ethan Bradberry Revisits His Signature Catchphrase
- Ethan Klein On Faze Jarvis Lifetime Ban
- Eric Andre Predicted The End Of COPS TV

- Did Logic REALLY Retire?
- Joe Biden's Brain is Melting
- We Throw An H3H3 Is Over Party!
- Papa John Is Coming On The H3 Podcast!
- Wendy Williams Gives Me The Creeps
- What Is The Greatest Meme Of The Decade?
- Bert Kreischer On Quicksand Sinkers
- H3H3 Gets A Strike During Alex Jones Segment
- Why Bo Burnham Made Eighth Grade
- Jordan Peterson On The Channel 4 Interview
- Salt Bae Needs Cooking Lessons
- Tom Segura On Losing Weight
- All Gas No Brakes on Septic Tank Explosion & Spraying Poop On Other Cars
- Pope Brutally Shuts Down Ring Kissers
- 1000's Of Penises Wash Up On California Shore
- Know Your Meme ft. RunForTheCube
- H3H3 Declares War On James Charles
- Zach did WHAT on a hike?
- New Subway Ad Ruined My Life
- The Greatest YouTuber You've Never Heard Of
- Jordan Peterson Analyzes H3H3
- Kevin Spacey's Terrifying Christmas Video - (Ft. Ethan Klein, Jacksfilms, Comment Etiquette)
- Ethan Klein & Gus Johnson On Reddit
- Jordan Peterson On His Soviet Art Collection
- WoW Classic Almost Ruined Our Marriage
- Can Someone Explain This Meme To Us?
- Grandma Slammed By Police
- Celebrities Trolled By Moronic Instagram Prank
- H3H3 On Tana Mongeau
- UMG is Ruining Youtube
- H3H3 On Ethan Bradberry
- Ethan Klein On Tyler the Creator's Grammy Speech
- Ethan Dons the Coughing Beanie
- Onision Striked Down Our Segment About Him
- Is MrBeast's 20mil Tree Project A Scam?
- Ethan Klein Reviews James Charles Memes
- Ethan Klein On The Hype House
- This Man Gave The Pope Pizza
- Cody Ko on Jake Paul
- Tim Dillon Rants About Ellen Degenerate
- TI Tries To Correct The Record On Being The Worst Dad Ever
- H3H3 Declares War On James Charles
- Is the New Sonic CGI Better Or Worse?

- FBI Agent Drops His Piece While Dancing
- R. Kelly Has "Hands-On" Experience with Fans
- Post Malone and H3H3 React To Sad YouTube Videos
- Jacksepticeye On Fan Fiction
- Celebrity ASMR ft Gibi ASMR
- Tom Segura Loves Bidets
- Jordan Peterson Takes a Fat Vape Hit On the H3 Podcast
- H3 Reviews "The Mandalorian" On Disney+
- Bobby Lee On Having To Tone Down His Behavior
- The One Thing That Made All The Difference In My Life
- H3H3 On No Nut November
- Scooter People Are a Danger to Our Children
- Ethan No Longer Wipes Himself
- Breaking Down the Appeal of Pitbull
- Lance Stewart Breakup Cringe
- Ethan Klein Eats A Putrid Mayo Cake
- Will Smith's Family Ends Shane Dawson's Whole Career On Twitter
- Trisha Paytas is a Man
- Tenacious D On the Impending Apocalypse
- Bobby Lee Exposed For Intentionally Crashing Our Gatsby
- President Trump Calls Into the H3 Podcast
- Vsauce3 On True Happiness
- Pickup Artist Gets Slammed On H3 Podcast
- Gal Gadot Cringefest
- Area 51 & Aliens Debunked
- Frick One, Marry One, End One (Michael Jackson, Chris Brown, R Kelly)
- Hila Klein On Feminism
- Skippy the Virgin & His Bellybutton Lint Collection
- Tai Lopez Gets Pranked On the H3 Podcast
- All Gas No Brakes on Septic Tank Explosion & Spraying Poop On Other Cars
- Bill Burr On the Vegan Cookie Monster
- Sean Evans Shares Wisdom On Online Hate
- Marc Rebillet - Keemstar Freestyle - H3 PODCAST LIVE!
- Whitney Cummings is a Horse Lady
- Manipulative Google Superbowl Ad Can Suck It
- Crocs x KFC Is The Worst Shoe Ever Made
- Papa John Is Coming On The H3 Podcast!
- What Is Logan Paul Up To?
- Did Logic REALLY Retire?
- Kanye Handing Out Yeezys In Uganda
- Ethan Klein On Trisha Paytas' Wedding
- TI Tries To Correct The Record On Being The Worst Dad Ever
- Reviewing Joe Biden Memes
- Tim Heidecker On Alex Jones

- Deadmau5 Catches Fan Flying Drone Over His House
- Millionaire Preacher Gets Called Out
- Cameraman Ruins Movie Premiere at Cannes
- Kanye Handing Out Yeezys In Uganda
- Ghost Stories with Oliver Tree
- Why Does Danny Gonzalez Call His Fans Greg? - H3 Podcast
- Ethan Klein On My 600 Pound Life
- H3H3 Reacts To A Deaf Ninja Warrior Cringe
- Pope Brutally Shuts Down Ring Kissers
- H3H3 Reacts to Woman Faceplanting During Proposal
- Wendy Williams Gives Me The Creeps
- Papa John's Hilarious Instagram Stories
- Can You Pass A U.S. Citizenship Test?
- Cody Ko On Girl Defined
- Tim Dillon Rants About Ellen Degenerate
- We Throw An H3H3 Is Over Party!
- FBI Agent Drops His Piece While Dancing
- Papa John's Hilarious Instagram Stories
- Philip DeFranco On Getting a Vasectomy
- James Charles' \$500 Meet & Greet is Absurd
- Harley Morenstein Takes a Fat Vape Hit On the H3 Podcast
- How To Take A Compliment Ft. Theo Von
- Tim Heidecker On Influencing Comedians
- R. Kelly Has "Hands-On" Experience with Fans
- This Banana Sold For \$120,000 As Art
- Joe Biden's Brain is Melting

H3 Podcast Highlights' Videos In the Panda-70M set:

- Lil Nas X Accused of Being a Satanist
- Burning Man Is A Nightmare – Ethan Klein & All Gas No Brakes
- Do You Smell Your Own Farts?
- California Frees Pot Smokers
- Papa John On His Obamacare Controversy
- Trisha Paytas is a Man
- Where In the World Has Belle Delphine Gone?
- H3H3 Had His Face Shoved In A Cake
- Cathy Newman Thought She Won The Debate
- MKBHD On AI Singularity
- Ethan Klein Reviews ProJared Memes
- Ethan Bradberry Revisits His Signature Catchphrase
- Why Is Shaq In Every Commercial?
- We Must Stop These Robots
- Would You Help A Friend Bury A Body?

- Eric Andre Predicted The End Of COPS TV
- Hila Demands iDubbbz Shave His Mustache
- Handing Out Free Masks Makes People Very Angry
- Origins Of The Papa John's Name
- Belle Delphine Wins Most Clickbaited Award
- Defending John McCain
- Women Who Loves Horses Have Issues
- Is James Charles Guilty of TikTok Cringe?
- Onision Striked Down Our Segment About Him
- Andrew Yang Was Right; Trump Considering Giving All Americans \$1000
- Tim Heidecker's Proudest Moment
- H3H3 On Michael Cohen GoFundMe
- KFC Ruins the H3 Podcast
- Papa John Blows Ethan's Mind With His Pizza Eating Skills
- Vsauce3 On Leaving Beme
- H3H3 On Devastation of Wild Fires
- Ethan & William Need Their Carers
- Post Malone and H3H3 React To Sad YouTube Videos
- Begging For Twitch Subs Goes Wrong
- Hila Sends the News: Baby Wipes Banned
- What Is The Greatest Meme Of The Decade?
- R. Kelly – Do You Have Your Passport (Remix)
- Ethan Klein Meets Eric Andre & Nathan Fielder
- Gal Gadot Cringefest
- Ethan Dons the Coughing Beanie
- Alligator Mukbang Extinguishes the Last Light of My Soul
- This Man Gave The Pope Pizza
- Tenacious D On the Impending Apocalypse
- H3H3 Reacts To Logan Paul's Santa Diss Track
- H3H3 On Ethan Bradberry
- Tim Dillon Rants About Ellen Degenerate
- H3H3 Reacts to Woman Faceplanting During Proposal
- H3H3 On Logan Paul vs KSI
- Shoenice Eats Raw Bacon & Survives
- All Gas No Brakes on Septic Tank Explosion & Spraying Poop On Other Cars
- Why Does Danny Gonzalez Call His Fans Greg?
- Area 51 & Aliens Debunked
- James Charles' \$500 Meet & Greet is Absurd
- Ghost Stories with Oliver Tree
- Kyle the Cougar Champ Writes H3H3 a Letter
- What Is Logan Paul Up To?
- Oliver Tree Brings Gifts For Ethan & Hila
- H3H3 Negotiates Peace Between SoFlo and Joey Salads
- YouTube Declares War On Copyright Trolls

- Teddy Fresh Summer Collection
- Fox News Plays H3H3 Clip
- The Quartering Thinks Cartoons Aren't Hot Enough
- LA Mayor Turns Off Power To TikTok House & Arrests
- Ethan Klein On My 600 Pound Life
- Harley Morenstein Takes a Fat Vape Hit On the H3 Podcast
- Did Logic REALLY Retire?
- Sean Evans On Interviewing Ricky Gervais
- H3 Vs Goop
- Joey Salads Recalls the Time He Peed In His Own Mouth On Camera
- Ethan Klein On Justin Trudeau Blackface Scandal
- Baby Theodore Update
- H3 Podcast Hits 2,000,000 Subscribers
- Dr Disrespect Banned From Twitch
- Tom Segura Loves Bidets
- Ethan Bradberry Checks Into an Insane Asylum
- Scooter People Are a Danger to Our Children
- 1000's Of Penises Wash Up On California Shore
- How To Take A Compliment Ft. Theo Von
- Bill Burr On Podcasting
- Salt Bae Needs Cooking Lessons
- Tim Dillon Rants About Hillary Clinton
- Ethan Klein is Joining the Area 51 Invasion
- Ethan No Longer Wipes Himself
- The Greatest Show On TV Right Now (Ft. Ethan Klein, Jacksfilms, Commentetiquette)
- Papa John's Is A House Of Cards According To Founder Papa John
- Creepy Army Recruitment Tactics On Twitch
- Whoopi Goldberg Victim Shames Bella Thorne
- Can Someone Explain This Meme To Us?
- Is MrBeast's 20mil Tree Project A Scam?
- Marc Rebillet - Keemstar Freestyle - H3 PODCAST LIVE!
- Bobby Lee On Having To Tone Down His Behavior
- Hila's Epic Post Office Story
- Papa John Must Sponsor H3H3 Or Else
- Ethan Klein On The Tesla Cybertruck
- Logic On Meeting Eminem
- Vsauce3 On True Happiness
- Ethan Klein On Trisha Paytas' Wedding
- Manipulative Google Superbowl Ad Can Suck It
- How Much Does Casey Neistat Make For a Sponsor?
- Logic On Forcing Positivity
- Should We Let The Airlines Go Out Of Business?
- Ethan's Harrowing Bathroom Story
- Hila's Dad Disowns Ethan For Wearing Socks and Sandals

- Jordan Peterson Takes a Fat Vape Hit On the H3 Podcast
- Interview With The Legendary Roll Patrol
- Ninja Breaks World Record at Vegas Event
- Ethan Klein & Gus Johnson On Reddit
- Ethan & Hila On Pete Davidson
- H3H3 On Tana Mongeau
- Shane vs Logan Paul
- Will TikTok Succeed Where Vine Failed? – Cody Ko & Ethan Klein
- New Half-Life Announced And Ethan Is Euphoric
- She Dumped In The Garden
- Jacksepticeye On Fan Fiction
- Videogames Are Destroying Society
- Tom Segura On Losing Weight
- World Records That Shouldn't Exist
- iDubbbzTV On the Process of Preparing a Content Cop
- Post Malone Shares Release Date of 'Beerbongs & Bentleys'
- Ethan Klein On Tyler the Creator's Grammy Speech
- H3H3 Watches The Worst Opening Pitch Ever Thrown
- Why Bo Burnham Made Eighth Grade
- The One Thing That Made All The Difference In My Life
- Ethan Klein On The Hype House
- Trisha Paytas Doesn't Know Where Antarctica Is
- The Green Goblin Joins the French Army
- The Greatest YouTuber You've Never Heard Of
- Grandma Slammed By Police
- Parents Stealing Candy On Halloween
- H3 Reviews "The Mandalorian" On Disney+
- Who is the Green Shirt Guy?
- Terrifying Fire Escape Caught On Video
- Tattoos So Bad You'll Wonder If Humanity Was A Mistake
- Newspeople Try to Talk like Kids
- Papa John Sues Papa John's
- Deadmau5 Catches Fan Flying Drone Over His House
- People Who Wear This Should Be Banished From Society
- Trisha Paytas On How Much She Makes From "Premium" Content
- WoW Classic Almost Ruined Our Marriage
- Frick One, Marry One, End One (Michael Jackson, Chris Brown, R Kelly)
- Is the New Sonic CGI Better Or Worse?
- H3H3 On X-Factor Groping
- Know Your Meme Ft. VideoGameDunkey
- Dunkey and Leah Describe Working with a Significant Other
- The Most Wholesome Show On Netflix
- Jordan Peterson Analyzes H3H3
- Gus Johnson Has His First Anxiety Attack

- Ethan Defends Mobility Mary (Trigger Warning)
- Ethan Klein On Billie Eilish
- Will Wal-Mart Buy TikTok? – Ethan Klein & Danny Gonzalez
- Parents Evict 30 Year Old Mall Ninja
- Reacting to the Basement Family Story
- Pope Brutally Shuts Down Ring Kissers
- H3H3 On GayGod "Tasting Himself"
- Tim Heidecker On Influencing Comedians
- DJ Khaled Bombs at Overwatch League
- Philip DeFranco On Getting a Vasectomy
- Cameraman Ruins Movie Premiere at Cannes
- How Much Money to Retire? w/ Chris D'Elia
- Ethan Makes Contact With Papa John
- Is Chloroquine A Good Treatment For Coronavirus? Dr. Eric Ding Explains
- Salt Bae Can't Cook
- Papa John On The New Papadia
- Gus Johnson Takes Romantic Baths By Himself
- H3H3 On No Nut November
- Security Guard Caught Sniffing Ass At The Gym
- The Amazon Rainforest is On Fire & Nobody Cares
- Pickup Artist Gets Slammed On H3 Podcast
- Ethan Klein On the Joe Rogan/Bernie Sanders Controversy
- KFC Needs To Chill
- Justin Roiland Calls a Psychic
- Ethan Klein Eats A Putrid Mayo Cake
- Is Steve-O Scared of Death?
- Bobby Lee Exposed For Intentionally Crashing Our Gatsby
- Jordan Peterson On Importance Of Reading
- Steve-O Almost Went to Jail For 8 Years
- PUBG Creator On Why It Took 3 Months To Add Vaulting
- President Trump Calls Into the H3 Podcast
- Is Oliver Tree Retiring?
- Lance Stewart Breakup Cringe
- This Video Has 27,000,000 Views, Thank You YouTube – H3 Podcast | Ethan Klein
- Terrible Kickstarter: Portable Bidet
- Papa John Is Coming On The H3 Podcast!
- Banksy Shreds Art After \$1M Sale
- Dr Films & Dances with Passed Out Patients
- H3H3 Reacts To A Deaf Ninja Warrior Cringe
- Bill Burr On the Vegan Cookie Monster
- #MAGACHallenge Is A Loss For Humanity
- Arnold Schwarzenegger's Cringetastic Rap Career
- This Banana Sold For \$120,000 As Art
- Wendy Williams Gives Me The Creeps

- This Preacher May Actually Be A Goblin
- H3H3 Gets A Strike During Alex Jones Segment
- Sean Evans Talks "Hot Ones The Game Show" on TruTv
- Hila Returns Her Green Card & Rises From The Ashes Like A Phoenix
- Know Your Meme Ft. Joey Salads
- Trisha On Her Marriage To Brad Pitt Cut-Out
- Are Humans Inherently Evil? Ft. Vsauce
- Trisha Paytas Thinks Egypt Doesn't Exist
- Ethan Fires Ian The Intern Over Gift Card Scandal
- Bert Kreischer On Quicksand Sinkers
- We May Be Entering Another Copyright Lawsuit
- Shoence Nearly Chokes & Passes Out On Live Interview
- OJ Simpson Kills It On Twitter
- TI Tries To Correct The Record On Being The Worst Dad Ever
- Ghost Stories with Dr DisRespect
- Taylor Swift Travels Inside Suitcase to Avoid Paparazzi
- R. Kelly Has "Hands-On" Experience with Fans
- Reviewing Joe Biden Memes
- FBI Agent Drops His Piece While Dancing
- Papa John's Hilarious Instagram Stories
- H3H3 on Garth Brooks the Cringe God
- Whitney Cummings is a Horse Lady
- Ethan Klein On The New Star Wars Sneak Peak
- Kevin Spacey's Terrifying Christmas Video (Ft. Ethan Klein, Jacksfilms, Comment Etiquette)
- Breaking Down the Appeal of Pitbull
- Johnny Depp Cringe Overdose
- The Reporter Slip Up Of The Century
- Should Keemstar Be Deplatformed?
- Jack Black On Eric Andre Show Appearance
- H3H3 On Kevlar Backpacks
- Mr Beast On Working with the Right People
- H3H3 On Post Malone Airplane Incident/VMAs
- Jordan Peterson On The Channel 4 Interview
- Kavanaugh's Boof
- Tim Heidecker On Alex Jones
- H3H3 On Hack Journalist
- H3H3 Declares War On James Charles
- Crocs x KFC Is The Worst Shoe Ever Made
- Zach did WHAT on a hike?
- Guess Who Is Going To Jail...
- Kanye Handing Out Yeezys In Uganda
- New Subway Ad Ruined My Life
- Ethan Klein On Faze Jarvis Lifetime Ban

- Ninja On the Future of E-Sports
- Tai Lopez Gets Pranked On the H3 Podcast
- Know Your Meme ft. RunForTheCube
- Ethan Klein Reviews James Charles Memes
- Jordan Peterson On His Soviet Art Collection
- H3 On Gucci Blackface Sweater
- Is Being with a Robot Cheating?
- Ethan Klein on Australian Fires (ft. jacksfilms & commentetiquette)
- Tenacious D On Their Big Break
- Twitch Streamer with "God Complex"
- We Spent \$3500 On a Scooter
- Millionaire Preacher Gets Called Out
- The All Powerful Feeding-Window Results In Mega Weightloss
- Hila Klein On Feminism
- Dunkey Describes His Vision For An Adult Swim Show
- Dunkey and Leah's Engagement Story
- Skippy the Virgin & His Bellybutton Lint Collection
- H3H3 Reacts to Logan Paul's Song 'Hero'
- Wendy Williams Rips Ass On Live TV
- Ethan Klein On Count Dankula Going to Prison
- What Does It Mean to Be A Vsauce?
- Bernie Sanders Twitch Streaming Disaster
- Ethan Klein On Dr DisRespect's Massive Return Stream
- Bill Wurtz On Editing His Videos
- Bobby Lee Destroys Our \$3500 Mobility Scooter
- Jacksfilms On Youtube Burnout
- H3 On Logan Paul vs KSI Part 2
- Cody Ko On Girl Defined
- Joe Biden's Brain is Melting
- H3H3 On Creepy Children's PSA
- Old Creepy Bill Cosby Clip
- Sean Evans' Philosophy On Interviewing
- Sean Evans Shares Wisdom On Online Hate
- Can You Pass A U.S. Citizenship Test?
- Ethan Responds to the Worst YouTube Apology
- Cody Ko on Jake Paul
- Is Takeout Food Safe During Quarantine? Dr. Eric Ding Explains
- Celebrities Trolled By Moronic Instagram Prank
- Is the Prince Family Actually Family-Friendly?
- PewDiePie Hits 100 Million & We're All Doomed
- UMG is Ruining YouTube
- Will Smith's Family Ends Shane Dawson's Whole Career On Twitter
- Logan Paul Fan Calls In to Demand Apology
- Celebrity ASMR ft Gibi ASMR

- The Hot Ones Hall Of Shame - Who Failed To Finish?
- We Throw An H3H3 Is Over Party!
- Kim Kardashian Promotes James Charles' Controversial Merch
- Jake Paul Is Spreading Covid & Doesn't Care
- I Waited 10 Hours to Play WoW & Got Disconnected

H3 Podcast Highlights' Videos In the HOWTO100M Data Set:

- Terrifying Fire Escape Caught on Video.

EXHIBIT B

Mr. ShortGame Golf's Videos In the HDVILA-100M Data Set:

- How To Build a Golf Hitting Net Golf Swing Net
- The Golf Swing You Must Have for the Sand!

Mr. ShortGame Golf's Video In the HD-VG-130M Data Set:

- How To Build a Golf Hitting Net Golf Swing Net

Mr. ShortGame Golf's Video In the PANDA- 70M Data Set:

- Golf Drill To Help Shorten Your Swing
- The Golf Swing You Must Have for the Sand!
- The Top 2 Short Game Golf Tips.
- How To Build a Golf Hitting Net || Golf Swing Net
- Golf Drill To Help Shorten Your Swing
- The Golf Swing You Must Have for the Sand!
- The Top 2 Short Game Golf Tips.
- How To Build a Golf Hitting Net || Golf Swing Net

Mr. ShortGame Golf's Videos In the HowTo100M Data Set:

- How To Build a Golf Hitting Net Golf Swing Net
- The Golf Swing You Must Have for the Sand!
- Golf Drill To Help Shorten Your Swing
- The Top 2 Short Game Golf Tips

EXHIBIT C

Golfholics' Videos In the HDVILA-100M Data Set:

- CAME DOWN TO THE LAST HOLE! - OAKS NORTH GOLF COURSE PART 2
- 3 CLUB CHALLENGE! - OAKS NORTH GOLF COURSE PART 1
- BATTLE GOLF VS THE DEL NORTE GOLF TEAM! RANCHO BERNARDO INN
- TWO PAR SAVES FROM POSITION F! PART 2
- THIS COURSE BRINGS US TO OUR KNEES - TORREY PINES PART 2
- WELCOME TO GOLF HEAVEN! - OLYMPIC CLUB PART 1
- WELCOME TO THE KINGDOM AT TAYLORMADE
- IT'S TIME TO MAKE A COMEBACK!
- THE EXTRAVAGANT BIG HORN GOLF CLUB PART 1
- BEST ROUND OF MY LIFE! / VERRADO GOLF CLUB PART 3
- THE EXTRAVAGANT BIG HORN GOLF CLUB ADD THAT TO THE HIGHLIGHT REEL PART 2
- GOLF PRACTICE TIMELAPSE GOLF COURSE DRONE SHOTS GOLF VLOG 5
- COACH IS GOING FOR THE PAR 5 IN TWO! PART 2
- CAN'T MISS ON THIS PAR 3! - TORREY PINES NORTH PART 3
- GOLF COURSE VLOG WITH TAYLOR CUSACK PART 1
- HOW TO THROW A GOLF CLUB TO PERFECTION! - TORREY PINES NORTH PART 2
- MAKING PUTTS FROM EVERYWHERE! - SAN DIEGO COUNTRY CLUB PART 2
- TIME FOR SOME BIRDIES! - CALABASAS COUNTRY CLUB PART 2
- GRINDING OUT THE LAST 6 HOLES - SAN DIEGO COUNTRY CLUB PART 3
- CADDIES ALWAYS HAVE THE BEST STORIES GRAND DEL MAR²
- LEFTY DRIVER FITTING AT FUJIKURA GOLF / MARKO
- MIKE CHIPS IN FOR BIRDIE! - THE GRAND GOLF CLUB // PART 2
- SCGA PRACTICE ROUND / LAKESIDE GOLF CLUB / PART 1
- FIVE SHOTS YOU'LL FOREVER REMEMBER AT PEBBLE BEACH!
- OCEAN VIEWS ON EVERY HOLE AT GRAND WAILEA! / PART 1
- GOLF CLUB OF CALIFORNIA / GUYS VS GIRLS / PART 1
- SLOW MO BUNKER SHOTS ARE THE BEST! - LOMAS SANTA FE // PART 1
- THE PUTTS START DROPPING! - MADERAS GOLF CLUB // PART 2
- PUTTING IS THE KEY TO GOING LOW!
- SPYGLASS HILL IS A SPECIAL PLACE! / MY FAVORITE COURSE FOR SURE!
- GUYS VS GIRLS // PARIS & HALEY CAMERA TAKEOVER!
- STRIPE SHOW AT SHADOWRIDGE GOLF CLUB
- EVERY MISS WILL COST YOU HERE - THE GRAND GOLF CLUB // PART 1
- SCAREDY CAT DON'T GET FAT - SPYGLASS HILL PART 2
- MY TURN TO DOMINATE! - MADERAS GOLF CLUB PART 1
- PLAYING ONE OF OUR FAVORITE GOLF GAMES!
- PLAYING WITH PETER FINCH BAY HILL CHARGER
- FINALLY SOME BIRDIES! - VIRGINIA COUNTRY CLUB PART 4
- MARKO HITS THE PAR 5 IN TWO! ALISO VIEJO COUNTRY CLUB
- I'LL GIVE YOU \$1000 IF YOU MAKE THIS PUTT!

- THE MOMENTUM CHANGES! - THE FARMS GOLF CLUB PART 3
- VERRADO GOLF CLUB FOUNDERS COURSE BEST COURSE IN THE WEST VALLEY?
- WHO IS THE NEW GUEST ON THE CHANNEL? PARIS BRINGS A RINGER!
- THIS GOLF COURSE ROCKS! SO DOES ALISA DIOMIN!
- LAYING UP IS NOT AN OPTION! GUYS VS GIRLS
- JC IS USING POWER AND FINESSE TO GO LOW! PART 2
- HOW TO HIT A BUNKER SHOT PART 3
- FINALLY, THE PUTTS ARE GOING IN! - PASATIEMPO PART 2
- PREPPING FOR THE SCGA AMATEUR
- WITB WITH COACH & PARIS TOP PUTTING TIPS FROM PARIS!
- DRIVER OFF THE DECK! - BEAR CREEK PART 2
- WE ARE LOVING THE BACK 9 AT PACIFIC DUNES!
- OUCH, THAT HURT! - SANTALUZ CLUB // PART 2
- COACH LIKES THIS COURSE MORE THAN PEBBLE BEACH! / HALF MOON BAY / PART 1
- MIKE TRIED THE TAYLORMADE TP5'S AND... PART 1
- MIKE HOLES OUT FROM 50 YARDS! - ALISO VIEJO COUNTRY CLUB // PART 3
- 10 BEST GOLF SHOTS FOR NOVEMBER 2018!
- ANDREW & B MAKE A LITTLE COMEBACK! PART 2
- SINKING TWO BOMBS FROM DISTANCE! PART 2
- CAN COACH QUALIFY FOR THE CAL STATE AMATEUR?
- THIS GOLF COURSE IS NO WALK IN THE PARK! COURSE VLOG 2/3
- WELCOME TO CAPITAL CITY CLUB CRABAPPLE COURSE PART 1

Golfholics' Videos In the HD-VG-130M Data Set:

- COACH LIKES THIS COURSE MORE THAN PEBBLE BEACH! HALF MOON BAY/PART 1
- PLAYING ONE OF OUR FAVORITE GOLF GAMES!
- SLOW MO BUNKER SHOTS ARE THE BEST! - LOMAS SANTA FE PART 1
- THE EXTRAVAGANT BIG HORN GOLF CLUB ADD THAT TO THE HIGHLIGHT REEL PART 2
- THE PUTTS START DROPPING! - MADERAS GOLF CLUB PART 2
- TWO PAR SAVES FROM POSITION F! PART 2
- THIS COURSE BRINGS US TO OUR KNEES - TORREY PINES PART 2
- LAYING UP IS NOT AN OPTION! GUYS VS GIRLS
- JC IS USING POWER AND FINESSE TO GO LOW! Part 2
- SINKING TWO BOMBS FROM DISTANCE! PART 2
- COACH IS GOING FOR THE PAR 5 IN TWO! PART 2
- TIME FOR SOME BIRDIES! - CALABASAS COUNTRY CLUB PART 2
- LEFTY DRIVER FITTING AT FUJIKURA GOLF MARKO
- SPYGLASS HILL IS A SPECIAL PLACE! MY FAVORITE COURSE FOR SURE!
- MIKE HOLES OUT FROM 50 YARDS! - ALISO VIEJO COUNTRY CLUB PART 3

- 10 BEST GOLF SHOTS FOR NOVEMBER 2018!
- COACH IS GOING FOR THE PAR 5 IN TWO! PART 2
- OUCH, THAT HURT! - SANTALUZ CLUB PART 2
- THE EXTRAVAGANT BIG HORN GOLF CLUB PART 1
- GUYS VS GIRLS//PARIS & HALEY CAMERA TAKEOVER!
- MY TURN TO DOMINATE! - MADERAS GOLF CLUB PART 1
- FINALLY SOME BIRDIES! - VIRGINIA COUNTRY CLUB PART 4
- OCEAN VIEWS ON EVERY HOLE AT GRAND WAILEA! PART 1
- GOLF CLUB OF CALIFORNIA/GUYS VS GIRLS PART 1
- PLAYING WITH PETER FINCH/BAY HILL CHARGER
- GOLF PRACTICE TIMELAPSE + GOLF COURSE DRONE SHOTS GOLF VLOG 5
- IT'S TIME TO MAKE A COMEBACK!
- SCGA PRACTICE ROUND LAKESIDE GOLF CLUB/ PART 1
- MY TURN TO DOMINATE! - MADERAS GOLF CLUB PART 1
- PLAYING WITH PETER FINCH/BAY HILL CHARGER
- JC IS USING POWER AND FINESSE TO GO LOW! Part 2
- SINKING TWO BOMBS FROM DISTANCE! PART 2
- IT'S TIME TO MAKE A COMEBACK!
- GOLF PRACTICE TIMELAPSE GOLF COURSE DRONE SHOTS GOLF VLOG 5
- THIS COURSE BRINGS US TO OUR KNEES - TORREY PINES PART 2
- FINALLY SOME BIRDIES! - VIRGINIA COUNTRY CLUB PART 4
- TWO PAR SAVES FROM POSITION F! PART 2

Golfholics' Videos In the PANDA-70M Data Set:

- MAKING PUTTS FROM EVERYWHERE! - SAN DIEGO COUNTRY CLUB // PART 2 (4K)
- DRIVER OFF THE DECK! - BEAR CREEK // PART 2 (4K)
- STRIPE SHOW AT SHADOWRIDGE GOLF CLUB
- ANDREW & B MAKE A LITTLE COMEBACK! // PART 2
- IT'S TIME TO MAKE A COMEBACK!
- THIS GOLF COURSE ROCKS! SO DOES ALISA DIOMIN!
- BEST ROUND OF MY LIFE! / VERRADO GOLF CLUB / PART 3
- OUCH, THAT HURT! - SANTALUZ CLUB // PART 2
- WELCOME TO GOLF HEAVEN! - OLYMPIC CLUB // PART 1
- LAYING UP IS NOT AN OPTION! / GUYS VS GIRLS
- CAME DOWN TO THE LAST HOLE! - OAKS NORTH GOLF COURSE // PART 2 (4K)
- MY TURN TO DOMINATE! - MADERAS GOLF CLUB // PART 1 (4K)
- SINKING TWO BOMBS FROM DISTANCE! / PART 2
- GRINDING OUT THE LAST 6 HOLES - SAN DIEGO COUNTRY CLUB // PART 3 (4K)
- THE EXTRAVAGANT BIG HORN GOLF CLUB // PART 1

- HOW TO THROW A GOLF CLUB TO PERFECTION! - TORREY PINES NORTH // PART 2 (4K)
- MIKE CHIPS IN FOR BIRDIE! - THE GRAND GOLF CLUB // PART 2 (4K)
- THE PUTTS START DROPPING! - MADERAS GOLF CLUB // PART 2 (4K)
- PREPPING FOR THE SCGA AMATEUR
- SCAREDY CAT DON'T GET FAT - SPYGLASS HILL // PART 2 (4K)
- GOLF COURSE VLOG WITH TAYLOR CUSACK // PART 1
- GOLF CLUB OF CALIFORNIA / GUYS VS GIRLS / PART 1
- 10 BEST GOLF SHOTS FOR NOVEMBER 2018!
- MIKE TRIED THE TAYLORMADE TP5'S AND... // PART 1
- GUYS VS GIRLS // PARIS & HALEY CAMERA TAKEOVER!
- THE EXTRAVAGANT BIG HORN GOLF CLUB // ADD THAT TO THE HIGHLIGHT REEL // PART 2
- I'LL GIVE YOU \$1000 IF YOU MAKE THIS PUTT!
- WE ARE LOVING THE BACK 9 at PACIFIC DUNES!
- BATTLE GOLF VS THE DEL NORTE GOLF TEAM! / RANCHO BERNARDO INN
- SLOW MO BUNKER SHOTS ARE THE BEST! - LOMAS SANTA FE // PART 1 (4K)
- SPYGLASS HILL IS A SPECIAL PLACE! / MY FAVORITE COURSE FOR SURE!
- TIME FOR SOME BIRDIES! - CALABASAS COUNTRY CLUB // PART 2 (4K)
- COACH LIKES THIS COURSE MORE THAN PEBBLE BEACH! / HALF MOON BAY / PART 1
- PUTTING IS THE KEY TO GOING LOW!
- FIVE SHOTS YOU'LL FOREVER REMEMBER AT PEBBLE BEACH!
- CAN'T MISS ON THIS PAR 3! - TORREY PINES NORTH // PART 3 (4K)
- MIKE HOLES OUT FROM 50 YARDS! - ALISO VIEJO COUNTRY CLUB // PART 3
- PLAYING WITH PETER FINCH / BAY HILL CHARGER
- WHO IS THE NEW GUEST ON THE CHANNEL? / PARIS BRINGS A RINGER!
- EVERY MISS WILL COST YOU HERE - THE GRAND GOLF CLUB // PART 1 (4K)
- THE MOMENTUM CHANGES! - THE FARMS GOLF CLUB / PART 3
- MARKO HITS THE PAR 5 IN TWO! - ALISO VIEJO COUNTRY CLUB // PART 2
- PLAYING ONE OF OUR FAVORITE GOLF GAMES!
- VERRADO GOLF CLUB FOUNDERS COURSE / BEST COURSE IN THE WEST VALLEY?
- 3 CLUB CHALLENGE! - OAKS NORTH GOLF COURSE // PART 1 (4K)
- GOLF PRACTICE TIMELAPSE + GOLF COURSE DRONE SHOTS | GOLF VLOG 5
- JC IS USING POWER AND FINESSE TO GO LOW! / PART 2
- CADDIES ALWAYS HAVE THE BEST STORIES / GRAND DEL MAR
- FINALLY, THE PUTTS ARE GOING IN! - PASATIEMPO // PART 2 (4K)
- WITB with COACH & PARIS + TOP PUTTING TIPS FROM PARIS!

- WELCOME TO THE KINGDOM AT TAYLORMADE
- SCGA PRACTICE ROUND / LAKESIDE GOLF CLUB / PART 1
- TWO PAR SAVES FROM POSITION F! // PART 2
- COACH IS GOING FOR THE PAR 5 IN TWO! / PART 2
- HOW TO HIT A BUNKER SHOT // PART 3
- FINALLY SOME BIRDIES! - VIRGINIA COUNTRY CLUB // PART 4 (4K)
- OCEAN VIEWS ON EVERY HOLE AT GRAND WAILEA! / PART 1
- LEFTY DRIVER FITTING AT FUJIKURA GOLF / MARKO
- THIS COURSE BRINGS US TO OUR KNEES - TORREY PINES // PART 2 (4K)
- THIS GOLF COURSE IS NO WALK IN THE PARK! / COURSE VLOG 2/3
- WELCOME TO CAPITAL CITY CLUB CRABAPPLE COURSE / PART 1
- CAN COACH QUALIFY FOR THE CAL STATE AMATEUR?