

SUBSTANCE OF THE ACTION

1. Plaintiffs are the Estate of the famed singer songwriter John Townes Van Zandt (“Van Zandt”), who died in 1997, and Van Zandt’s former spouse, Jeanene. Together, Plaintiffs are the owners of all copyrights in Van Zandt’s music catalog and in certain of Van Zandt’s performances. In addition, the Estate (and thus, its beneficiaries), has succeeded to all of the recording agreements Van Zandt entered into during his tragically shortened career. Van Zandt’s heirs are his three children: John Townes Van Zandt II (“JT”), William Vincent Van Zandt (“Will”), and Katie Belle Van Zandt (“Katie Belle”).

2. During his life Van Zandt entered into a series of recording agreements with companies controlled by Eggers. Since Van Zandt’s death in 1997, Eggers, through his various companies, has released a slew of albums and licensed other recordings containing Van Zandt’s compositions. Eggers has repeatedly and egregiously infringed Plaintiffs’ copyrights in Van Zandt’s compositions, failing to obtain the “mechanical licenses” required by the Copyright Act of 1976, as amended (17 U.S.C. § 101 *et seq.*) (the “Copyright Act”). In addition, Eggers and his companies have failed to provide an accounting or pay royalties to Van Zandt’s heirs under the various recording agreements, notwithstanding repeated promises to do so.

3. This action is an attempt to obtain for Van Zandt’s children their inheritance, as well as to prevent Eggers, a serial infringer, from ever again exploiting the songs, performances, or memory of Townes Van Zandt.

