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Attorneys for Plaintiff Riot Games, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

)	CASE NO. 2:22-cv-3107
RIOT GAMES, INC.,)	
)	COMPLAINT FOR
Plaintiff,)	INJUNCTIVE RELIEF AND
)	DAMAGES FOR COPYRIGHT
v.)	INFRINGEMENT
)	
SHANGHAI MOONTON)	DEMAND FOR JURY TRIAL
TECHNOLOGY CO., LTD.,)	
)	Complaint Filed Date: May 9, 2022
Defendant.)	
)	

1 Plaintiff Riot Games, Inc. (“Plaintiff” or “Riot”), by and through its attorneys,
2 Kirkland & Ellis LLP, for its Complaint, hereby alleges against Defendant Shanghai
3 Moonton Technology Co., Ltd. (“Moonton”) as follows:

4 **NATURE OF THE ACTION**

5 1. This action seeks to stop Moonton from continuing its deliberate and
6 sustained campaign to free ride on Riot’s highly valuable rights in the mobile video
7 game *League of Legends: Wild Rift* (“*Wild Rift*”) and related content. Moonton’s
8 strategy is blatant copying. As discussed below, over the years, as Riot updated its
9 video game, Moonton would copy it. When Riot updated the game’s promotional
10 materials, Moonton copied them. And when Riot released a new trailer, Moonton
11 copied it. This is a critical issue for Riot. Moonton has used its copyist tactics to
12 create and market its mobile video game, *Mobile Legends: Bang Bang* (“*MLBB*”),
13 which competes with *Wild Rift* using Riot’s own extensive, expressive content in *Wild*
14 *Rift* itself as well as its trailers, promotional materials, and other content. Moonton’s
15 actions constitute copyright infringement for the reasons set forth below.

16 2. *Wild Rift*, first released in the Americas in 2021, is the mobile version of
17 *League of Legends* (“*LoL*”), a sensationally popular video game enjoyed by fans in the
18 United States and around the world. Since 2009, *LoL* has amassed an enormous fan
19 base of amateur and professional gamers from around the world, attracting millions of
20 players per month. The prevalence of *LoL* professional tournaments, events, clubs,
21 and college leagues evinces the game’s massive popularity.

22 3. Riot continuously updates *Wild Rift* to include new features and
23 characters. Like *LoL*, it has become a runaway success, with millions of players
24 logging on each month to play. Riot recently announced that its first official global
25 tournament, the Wild Rift Icons Global Championship, will take place this summer in
26 Europe.

27 4. Eager to mimic Riot’s massive success, Moonton unfairly trades on the
28 creativity of Riot’s highly imaginative *LoL* and *Wild Rift* games and the goodwill

1 associated therewith. Moonton deploys a bad faith business strategy, such that when
2 specific copied content is identified by Riot or the community of players of the
3 parties' games, Moonton removes or revises the content, only to subsequently
4 introduce additional infringing content into its game later on.

5 5. For example, after Riot discovered that one of Moonton's video games,
6 *Mobile Legends: 5v5 MOBA* ("*Mobile Legends*") infringed its rights in *LoL*, it notified
7 Google of the infringement, and Moonton subsequently removed *Mobile Legends*
8 from the Google Play store. Soon thereafter, however, and without notifying Riot,
9 Moonton released *MLBB*, a minimally tweaked version of *Mobile Legends* that also
10 infringed *LoL*. Similarly, since Riot did alpha and beta tests of *Wild Rift* in 2020, and
11 subsequently released *Wild Rift* in the Americas in 2021, Moonton has updated *MLBB*
12 to copy extensive expressive elements from *Wild Rift*, continuing its cycle of knowing
13 appropriation of Riot's intellectual property. New characters, settings, and objects are
14 regularly copied from *Wild Rift* into *MLBB*. When *Wild Rift* is modified or updated,
15 Moonton often copies the modifications and updates, such that both games look and
16 feel highly similar to gamers.

17 6. Players of both games have widely recognized Moonton's flagrant
18 copying, dedicating countless threads, videos, and forums to discussing the topic.
19 Videos showing game footage from *MLBB* have called it a "copy-cat," "knock off,"
20 and "shameless" "rip-off." Comments on these videos similarly point out *MLBB*'s
21 similarities to *Wild Rift*, noting "Moonton is now slowly copying the things they had
22 missed" in *Wild Rift*. Countless blogs and articles are dedicated to comparing the
23 myriad ways Moonton has copied from Riot. Many Google Play reviews have agreed,
24 calling *MLBB* "a copy of LoL," a "League of Legends clone," "stolen from League of
25 Legends," and a "rip off."

26 7. Moonton's mimicry is not limited to copying Riot's games, but also
27 includes copying of promotional materials, trailers and even esports content. For
28 example, on April 25, 2022, Moonton released an "All Star 2022" esports video on its

1 official YouTube channel (<https://www.youtube.com/watch?v=1LLqNO5M56g>)
2 which copies original music from Riot's "Welcome to Planet Urf" video
3 (<https://www.youtube.com/watch?v=qYIiy03eGE0>) almost exactly. Similarly,
4 Moonton has released cinematic trailers and hero trailers that look nearly identical to
5 those released by Riot. And Moonton has even copied Riot's marketing materials,
6 using similar typeface, backgrounds, and colors, and sending highly similar
7 promotional products to *MLBB* users. These tactics indicate that Moonton is watching
8 Riot carefully, waiting for Riot to make its next move, and then intentionally and
9 overtly copying Riot to trade on Riot's creativity. While many recent instances of
10 Moonton's copying have gotten more sophisticated, examples like the "All Star 2022"
11 video, above, remain particularly egregious and telling of Moonton's ongoing strategy
12 of copying Riot.

13 8. Upon information and belief, there is no part of Riot's creative output
14 that Moonton is not willing to copy. For example, Riot has invested significant time,
15 money, and resources promoting *LoL* since 2009, such that consumers have come to
16 know the name "League of Legends" as synonymous with high quality, imaginative
17 video games. True to form, seeing this success, Moonton has decided to copy it, using
18 the term "Legends" in its own game name. But Moonton's copying has gone further.
19 In April 2019, Riot announced that it was transitioning from its old logo, shown below
20 at top left, to a new logo for *LoL*, shown below at top right. In September 2020,
21 Moonton copied Riot, and changed its own logo from a design that looks highly
22 similar to Riot's *old* logo, shown below bottom left, to a design that looks highly
23 similar to Riot's new logo, including the same layout, prominent use of the word
24 "Legends," and gold font, as shown below bottom right.





9. Riot has invested and continues to invest significant time, money, resources, and creativity in developing, designing, promoting, and updating *LoL*, *Wild Rift*, and related content. Meanwhile, Moonton freely capitalizes on Riot's investment. And Moonton is not incentivized to innovate and create original material, so long as it continues to be able to copy from Riot. Allowing Moonton to continue to freely and unfairly profit from Riot's creativity directly contravenes the goals of the Copyright Act and will undoubtedly deter others from making a similar creative investment in the future.

10. Accordingly, due to Moonton's blatant and willful infringement, Riot has no choice but to file this lawsuit. Moonton's conduct has significantly and irreparably harmed Riot, its reputation, and the goodwill that it has scrupulously built over many years. Moonton's unlawful activities must come to an end.

PARTIES

11. Plaintiff Riot Games, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Los Angeles, California.

12. Upon information and belief, Defendant Shanghai Moonton Technology Co., Ltd. is a company organized and existing under the laws of the People's Republic of China, with its principal place of business in the Huangpu district of Shanghai, China.

JURISDICTION AND VENUE

13. This is an action seeking injunctive relief and other equitable relief under the Copyright Act of 1976, 17 U.S.C. § 101 *et seq.* This Court has jurisdiction

1 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

2 14. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.
3 Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400.

4 15. The audiovisual elements of *Wild Rift* and *LoL* were primarily developed
5 in this District by Riot's employees. All of the information and documents about the
6 creation of those elements of *Wild Rift* and *LoL* described herein are located here. The
7 marketing and promotional materials for *Wild Rift* and *LoL* were also primarily
8 developed by Riot's employees in this District. All of the information and documents
9 about the creation of the marketing and promotional materials described herein are
10 located here.

11 16. Moonton also has significant connections to California. Upon
12 information and belief, Moonton has a United States division, Moonton Games US,
13 with its principal place of business in the State of California. A LinkedIn page for
14 Moonton Games US, places its location in Culver City, California. And at least two
15 job listings by Moonton on Glassdoor purported to seek character artists for
16 Moonton's "US studio" in the Los Angeles area.

17 17. Upon information and belief, Moonton also has contracted with Akamai
18 Technologies, Inc., a United States company, to host servers or other website network
19 services for Moonton's U.S.-facing website for *MLBB*. Those servers exist in the
20 United States, revealing Moonton's intention to target *MLBB* at the United States
21 market. Notably, Moonton's general company website is hosted by different servers.

22 18. To offer *MLBB* on the Apple App Store and Google Play Store, Moonton
23 was required to contract with both Apple, Inc. and Google, Inc., each of which has its
24 principal place of business in the State of California. Upon information and belief,
25 those agreements set the jurisdiction and venue for any disputes in California.

26 19. Thanks to its agreements with Apple and Google, upon information and
27 belief, Moonton sells and distributes *MLBB* in this District, as well as in-game items,
28 accessories, and characters that are available as part of the game. As a result, it has

1 contracted with customers in this District who have downloaded *MLBB* and made in-
2 game purchases of items, accessories, and characters in the game, because it requires
3 them to agree to its user agreement.

4 20. Upon information and belief, Moonton has earned millions of dollars in
5 revenues from sales related to *MLBB* in the United States, a portion of which it
6 collects from sales to customers in the Central District of California.

7 21. Upon information and belief, Moonton has advertised and marketed
8 *MLBB* to customers in the United States, including in this District.

9 22. In addition to the significant transactions discussed above, upon
10 information and belief, Moonton continually transacts other business in this District,
11 whether with consumers or other entities. Indeed, Moonton's Privacy Policy for
12 *MLBB*, dated July 28, 2020, includes specific provisions for California residents.
13 Upon information and belief, those provisions were included because *MLBB* is
14 marketed to and played by California residents, and Moonton has customers in this
15 District and in other California Districts who are bound by the Privacy Policy.

16 23. Moonton also was well aware when it was copying Riot's game that Riot
17 has its principal place of business of California. Moonton even, upon information and
18 belief, agreed to Riot's Terms of Service, placing it on actual notice that *Wild Rift*, and
19 all of the content therein, was protected by United States intellectual property laws.
20 The Terms of Service make clear that Riot is located in Los Angeles and provides
21 California as its selected forum for certain claims in certain scenarios. As a result,
22 Moonton carried out its unlawful activities knowing and intending that Riot would be
23 harmed by Moonton's conduct in this District.

24 24. A substantial part of the events giving rise to the claims occurred in this
25 District, relevant documents and information are located in this District, and upon
26 information and belief, Moonton is purposefully doing business in this District that
27 causes injury therein.
28

FACTS APPLICABLE TO ALL CLAIMS

Riot and its Creative Works

25. Riot is a game developer and publisher best known for the wildly popular video game, *League of Legends* and the related mobile game *League of Legends: Wild Rift*. *Wild Rift* and *LoL* are highly competitive, multi-player online battle arena (“MOBA”) video games. MOBA video games are a subgenre of games in which teams of players compete against each other on a shared battlefield. Each player can control a single character with specific capabilities that contribute to the team’s overall strategy. *Wild Rift* and *LoL* uniquely combine the strategic elements of a MOBA game with original fantasy elements, including fantasy settings, characters, skills, and accessories.

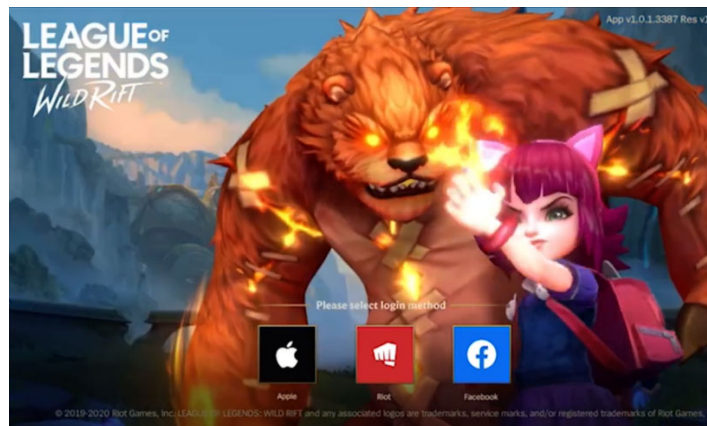
26. *Wild Rift* was released in the Americas on March 29, 2021, for iOS and Android. It is distributed in the United States through the Apple App Store and Google Play Store, where it is free to download. Players of *Wild Rift* can make in-game purchases of items, accessories, characters, and more using either money or earned in-game currency. *Wild Rift* is very popular, attracting a wide range of players, from casual new gamers to committed professional competitors.

27. *LoL* is similarly popular. Released on October 27, 2009, *LoL* quickly became one of the most played video games in the world. Both *LoL* and *Wild Rift* are played competitively at esports tournaments worldwide. Like a traditional sporting event, those tournaments involve professional teams of players, who compete live in front of cheering fans. The tournaments also are often streamed online to huge audiences watching from around the world, including at epic, sold-out venues like Madison Square Garden, as pictured below. Riot is planning *Wild Rift*’s first official global tournament for 2022, which will feature eight regional leagues from around the world.



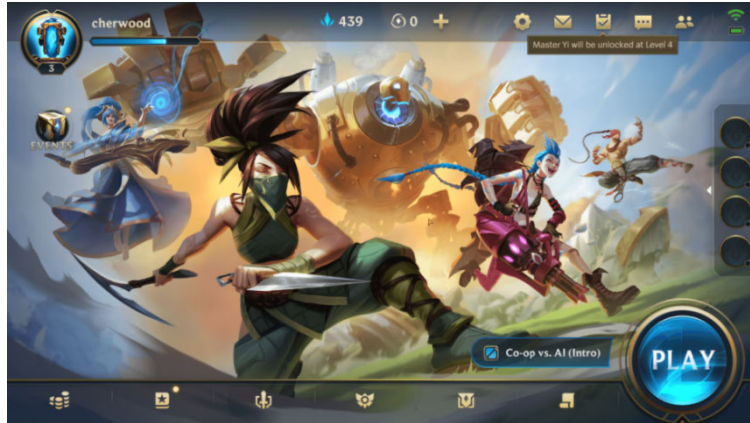
28. In 2021, Riot released an animated television series called *Arcane*, which centers on characters from *LoL*. The television series received glowing reviews and praise from critics and fans alike.

29. From the moment a user clicks on the *Wild Rift* mobile application, the game is full of exciting, original artwork. When a player runs the application, the player first encounters a “load screen,” where the player chooses his or her log-in method. The load screen in *Wild Rift* features animated scenes showing an assortment of different playable characters, called “champions.” The champions gear up for the start of the game, displaying their weapons and showing off their skills. A still image of a load screen in *Wild Rift* is shown below.



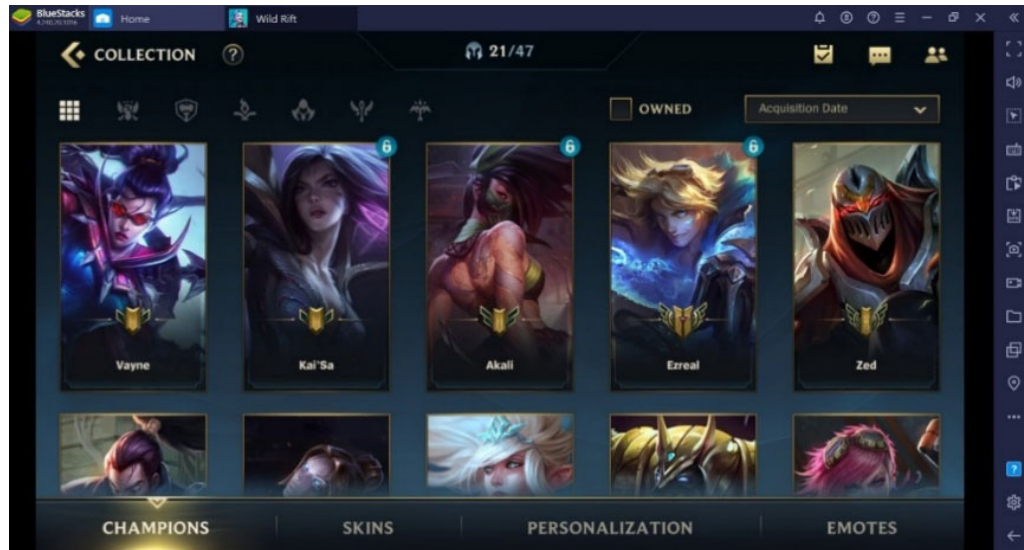
30. Once the player logs into a game of *Wild Rift*, he or she encounters the main pre-game interface, from which the player can access other parts of *Wild Rift*, like the mobile store, or start a new game. The main pre-game interface features

1 original “splash art.” Splash art is a two-dimensional piece of art that covers the
2 whole screen, or a panel of the screen, and is generally used for the introduction of
3 characters, stories, or events. An image of the main pre-game interface, featuring
4 Riot’s original splash art, is shown below.



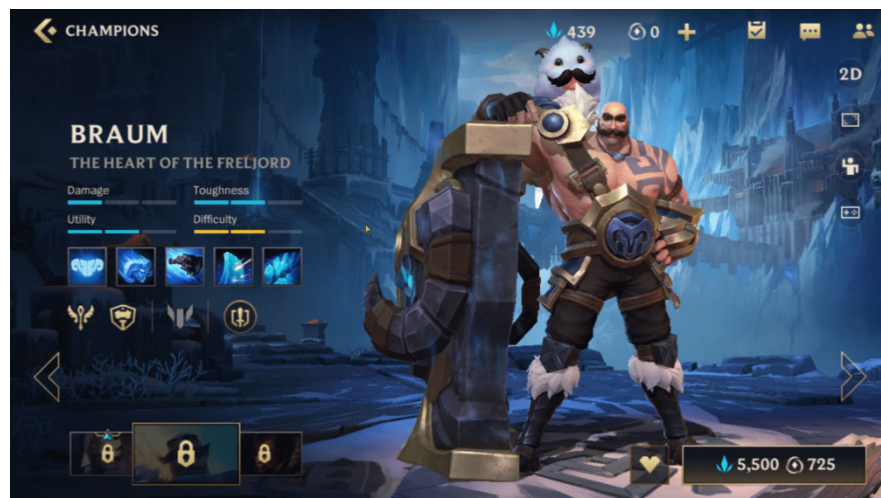
12 31. *Wild Rift*’s playable champions are central to the game’s originality and
13 success. Players of *Wild Rift* can select from more than 80 original champions, each
14 with a unique name, character design, and backstory, as well as a specific set of skills
15 and abilities that can be deployed during gameplay. Each champion’s unique skills
16 are a core part of game strategy, as different champions have different strengths and
17 weaknesses that they bring to the overall team. Alternate original artworks for each
18 champion, called “skins,” also are available for in-game purchase and allow players to
19 change the design of the champion’s avatar as it appears in the gameplay.

20 32. Prior to entering a game, players can browse through the different
21 available champions that they can add to their collection. On the collection screen
22 where the champions are presented, each is represented by an original piece of
23 artwork, as shown below.



33. By clicking on a champion, players are brought to another screen, where details about the champion's skills and characteristics are displayed. In this view, players can toggle between showing the champion as an animated, three-dimensional character and a two-dimensional piece of splash art. Players can also choose different skins for their champion, which are accompanied by original animations and artwork. The game is so detailed that players can even customize their champion's "stance" (i.e., how the champion stands when it appears onscreen). *LoL* features similar selectable champions and accompanying character artwork.

34. A still image from *Wild Rift* depicting the screen where the champion "Braum" can be customized is shown below.



1 35. Each champion in *Wild Rift* and *LoL*, including the character artworks,
2 skins, and avatars, is highly creative and original to Riot. Riot periodically adds new
3 champions and skins to *Wild Rift* and *LoL*, expending significant resources designing
4 and developing them. New champions and skins are often highly anticipated by fans
5 and critics, and are thus a key part of the excitement of playing *Wild Rift* and *LoL*.

6 36. For instance, Riot marketed *Wild Rift* and *LoL*, including the release of
7 new champions and skins, with action-packed cinematic trailers that hype up the
8 games and related products. These exciting trailers are full of cut scenes showing
9 champions battling opponents, dominating minions, and showing off their skills. Riot
10 usually release these trailers on YouTube, where they garner millions of views and
11 thousands of comments.

12 37. Riot also released a thrilling cinematic trailer to promote *Legends of*
13 *Runeterra*, a *LoL* digital card game (the “Runeterra Trailer”) featuring many of the
14 champions in *Wild Rift*. The Runeterra Trailer opens with the champion Darius
15 charging at his enemies, who quickly overwhelm him. After his apparent defeat,
16 Darius overcomes his opponents with a powerful skill, sending them flying. The
17 trailer emphasizes the exciting way in which a player’s advantage in Runeterra can
18 change on a dime. Since its release on April 4, 2020, the trailer has been viewed over
19 4 million times. A true and correct copy of the trailer is attached as **Exhibit 1**.

20 38. The Legends of Runeterra Trailer was registered with the Copyright
21 Office on April 4, 2020. A true and correct copy of the certificate of registration
22 issued by the Copyright Office is attached as **Exhibit 2**.

23 39. Similarly, Riot released a trailer promoting Sylas “the Unshackled,” a
24 champion in *LoL* (the “Sylas Trailer”). The Sylas Trailer begins with the champion
25 Sylas chained in a dungeon. Sylas breaks free of his chains and storms out into the
26 world of *LoL*, where he is shown battling opponents and using an assortment of skills.
27 The trailer ends with Sylas back in the dungeon. His hand lights up with a ball of fire
28 as someone approaches the door to his cell, signaling to the viewer that his escape is

1 imminent. Since its release on January 8, 2019, the Syllas trailer has been viewed over
2 5 million times. A true and correct copy of the Syllas Trailer is attached as **Exhibit 3**.

3 40. The Syllas Trailer was registered with the Copyright Office on September
4 14, 2020. A true and correct copy of the certificate of registration issued by the
5 Copyright Office is attached as **Exhibit 4**.

6 41. In addition, each summer, Riot releases a set of “Pool Party” skins for
7 champions in *LoL*. The seasonal skins feature champions donning a set of
8 summertime clothing and accessories. The “Pool Party” skins release also includes
9 new splash art depicting champions enjoying a summer by the pool. To promote the
10 Pool Party skins, Riot released a trailer called “Unwind from the Grind,” (the “Pool
11 Party Trailer”) featuring champions taking a break from combat to barbeque,
12 sunbathe, and dip into the pool. Since its release on August 2, 2018, the Pool Party
13 Trailer has been viewed 628,000 times. A true and correct copy of the Pool Party
14 Trailer is attached as **Exhibit 5**.

15 42. The Pool Party Trailer was registered with the Copyright Office on June
16 7, 2021. A true and correct copy of the certificate of registration issued by the
17 Copyright Office is attached as **Exhibit 6**.

18 43. Riot also uses original music in connection with *LoL* and *Wild Rift*. In
19 particular, Riot uses an original song, “Welcome to Planet Urf” in *LoL* (the “Welcome
20 to Planet Urf Music”). A true and correct copy of a video containing the Welcome to
21 Planet Urf Music is attached as **Exhibit 7**.

22 44. The Welcome to Planet Urf Music was registered with the Copyright
23 Office on May 28, 2015. A true and correct copy of the registration issued by the
24 Copyright Office is attached hereto as **Exhibit 8**.

25 45. Although *Wild Rift*’s imaginative champions and skins are original and
26 highly anticipated by fans, *Wild Rift*’s thrilling and competitive gameplay also is
27 critical to the game’s success, and key to its popularity as an esport. *Wild Rift* players
28 compete on two teams of five champions each. In gameplay, champions appear as

1 playable avatars, who fight and execute different skills to help their team. Skills are
2 performed using an original control pattern. A champion's skills are depicted by
3 exciting original animations.

4 **Riot's Valuable Intellectual Property Rights**

5 46. As discussed above, Riot has invested vast resources, including time,
6 effort, talent, creativity, and money, to produce *Wild Rift*, as well as *LoL* and related
7 promotional materials. Thanks to that ingenuity, the game has a large following of
8 fans throughout the world, making it one of the most popular mobile games today.
9 This is a recognition of the creative and expressive choices that Riot made in creating
10 the game—including myriad characters, settings, sounds, artwork and other graphics,
11 animations, accessories, and items. It also is a reflection of the fact that *Wild Rift* and
12 *LoL* comprise an original combination of these elements. As a result, *Wild Rift* and
13 *LoL* are original to Riot and constitute copyrightable subject matter under the laws of
14 the United States.

15 47. Riot owns all right, title, and interest in and to the copyrights in *Wild Rift*
16 and *LoL*, and those copyrights have been registered by the Copyright Office. True and
17 correct copies of the certificates of registration issued by the Copyright Office are
18 attached as **Exhibit 9**. They reflect the date upon which Riot applied to register the
19 works, the date on which the certificate was issued, and the registration number
20 assigned.

21 48. Riot has spent significant money, time, and resources in developing,
22 publishing, marketing, distributing, maintaining, and servicing *Wild Rift* and *LoL* in
23 the United States. Riot has poured an extensive amount of creativity and attention
24 into *Wild Rift* and *LoL*, resulting in highly expressive video games that are enjoyed
25 and praised by fans and critics around the world.

26 **Moonton's Infringing Conduct**

27 49. Moonton's pattern of infringement began at least as early as 2015, when
28 it released *Magic Rush: Heroes* ("*Magic Rush*"), a MOBA game available on Android

1 and iOS. Upon information and belief, Moonton developed and published *Magic*
2 *Rush* and contracted with Elex Technology Co. Ltd. (“Elex”) to distribute the game in
3 the United States. Since its release, *Magic Rush* was sold in the iTunes Apple Store
4 and Google Play Store, where it could be purchased and downloaded by players in the
5 United States. Upon learning of the infringement in 2016, Riot notified Apple and
6 Google that *Magic Rush* infringed its rights in *LoL* and demanded that the game be
7 removed from the Apple Store and Google Play Store. Riot also worked with Elex to
8 find ways to resolve the dispute and prevent continued infringement.

9 50. As initially released, *Magic Rush* contained highly similar copies of
10 numerous *LoL* champions. For each champion that Moonton copied, it appropriated
11 not only the champion’s overall look and appearance, including the original character
12 artwork, but also the champion’s suite of unique skills and abilities. Upon
13 information and belief, because of Riot’s negotiations with Elex, Elex caused
14 Moonton to make changes to *Magic Rush*, including changes to appearances and
15 attributes of characters in *Magic Rush*. As a result of this dispute, Moonton is fully
16 aware of Riot’s intellectual property rights in *LoL*.

17 51. Still, with full knowledge of Riot’s intellectual property rights, Moonton
18 developed and published yet another infringing game, *Mobile Legends*, which it
19 released on July 14, 2016. Riot again learned of the new infringement and advised
20 Google thereof. Riot demanded that Google remove *Mobile Legends* from the Google
21 Play store. A copy of the letter that Riot sent to Google is attached hereto as **Exhibit**
22 **10**. Upon information and belief, Google provided Moonton with a copy of this letter.

23 52. After Riot wrote to Google describing the infringement, Moonton again
24 removed *Mobile Legends* from the Google Play store without explanation. Thereafter,
25 with full knowledge of Riot’s intellectual property rights and claims regarding *Mobile*
26 *Legends*, Moonton developed and published yet another version of *Mobile Legends*
27 titled *Mobile Legends: Bang Bang* (“*MLBB*”).

28 53. *MLBB* is a mobile MOBA video game in which, just like in *Wild Rift*,

1 two teams of players fight to reach and destroy an opposing team's base. As in *Wild*
2 *Rift*, "minions," computer-controlled battling units, periodically spawn from a team's
3 base to attack the opposing team. Players of *MLBB* choose to control a playable
4 character, called a "hero." Each hero has a set of skills and abilities that can be
5 deployed during gameplay. Moonton periodically releases character "skins" which
6 allow players to change the character art for their chosen hero.

7 54. As recently as April 2022, Moonton has continued to develop and update
8 *MLBB*, including by releasing additions and updates to the game, along with new
9 promotional materials. Upon information and belief, *MLBB* was last updated on April
10 29, 2022. In *MLBB*, including its recent releases, Moonton has copied extensively
11 from *Wild Rift* and *LoL*, including by copying original characters, accessories,
12 artworks, splash art, avatars, skills, and other expressive elements.

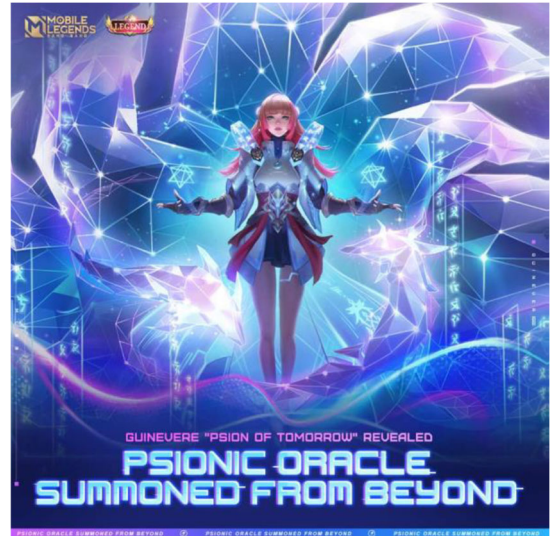
13 55. As just an example of the many characters that have been copied by
14 Moonton, Riot's original champion Ahri in both *Wild Rift* and *LoL*, which was
15 released in November 2018 for *LoL* and October 2020 for *Wild Rift*, and is shown
16 below, is highly similar to Moonton's artwork for the hero Guinevere's "Psion of
17 Tomorrow" skin, released in April 2022 for *MLBB*. The two characters feature
18 similar bright blue and purple color schemes, and nearly identical geometric purple
19 crystal fox tails. Both characters also share highly similar abilities and attributes in
20 the two games.
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Wild Rift's K/DA All Out Ahri

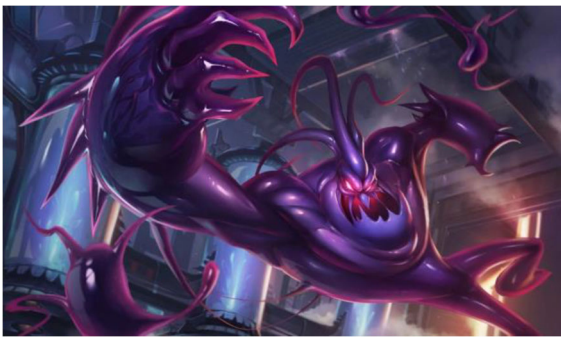


LoL's K/DA Ahri



MLBB's Guinevere

56. Numerous other characters and character artworks have been copied by Moonton as well. For example, Riot's original champion, Zac, which was released in March 2013 for *LoL* and is shown below left, is highly similar to Moonton's hero, Gloo, which was released in 2021 for *MLBB*. Both feature the same magenta, purple, and black color scheme, distinctive clawed hands, and similar body shapes. The two characters also share similar walks, attacks, attributes, and abilities in the games.



LoL's Zac



MLBB's Gloo

57. Similarly, Riot's original splash art for the champion Jhin's "Dark Cosmic" skin, which was released in June 2019 for *LoL* and October 2020 for *Wild Rift* and is shown below left, is highly similar to Moonton's splash art for the hero Yve's "Astrowarden" skin, which was released in February 2021 for *MLBB*. The

1 purple and black color scheme, shoulder and chest armor, hood, facemask, pointed
2 purple gloves, capes, and dark stormy backgrounds are highly similar.



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8 ***Wild Rift's Dark Cosmic Jhin***

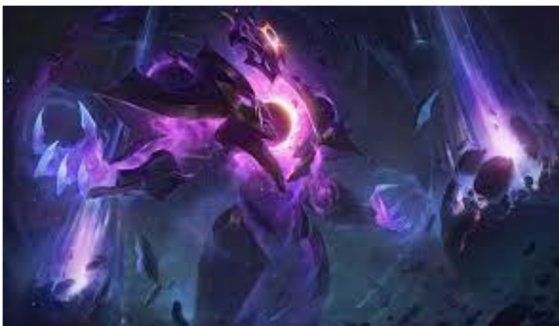


9 ***MLBB's Yve***

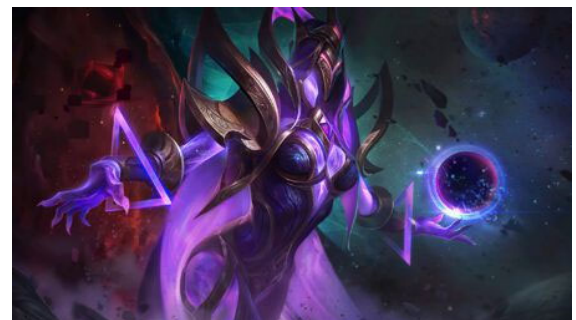
10 58. Riot's original splash art for the "Dark Star Thresh" and "Dark Star
11 Xerath" champions, which were released in June 2016 and March 2020 for *LoL* and
12 are shown below top and bottom left respectively, are also highly similar to
13 Moonton's splash art for Yve, which was released in February 2021 for *MLBB*. These
14 characters feature the same black orb, posing of the characters, purple and black color
15 scheme, and dark and stormy backgrounds.



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20 ***LoL's Dark Star Thresh***



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26 ***LoL's Dark Star Xerath***



27
28 ***MLBB's Yve***

59. Likewise, Riot's original splash art for the champion Braum's "Crime

City” skin in *Wild Rift*, shown below left, is nearly identical to Moonton’s hero Baxia’s “Ba-Tender” skin. These characters have the same face shape, physiognomy, hair and facial hair, stature, clothing, colors, and shapes. Both are equipped with shields as their weapons, which renders them even more similar, as shown in the splash art below. Indeed, while the in-game avatar for Baxia uses two shields, the promotional art for Baxia uses a single shield, which makes him appear more similar to Braum, who also uses a single shield.



Wild Rift's Braum

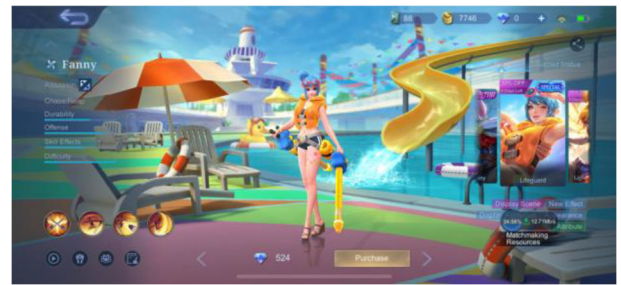


MLBB's Baxia

60. Moonton also copied Riot’s original line of “Pool Party” skins for *LoL*, which Riot began releasing as early as 2013, into *MLBB*. As shown below, these skins feature similar outfits, including similar clothing, swords, foam weapons, hair, and poses. The color schemes and backgrounds in the splash art for both lines are also nearly identical, featuring similar palm trees, scenery, and colors.



LoL's Pool Party Fiora



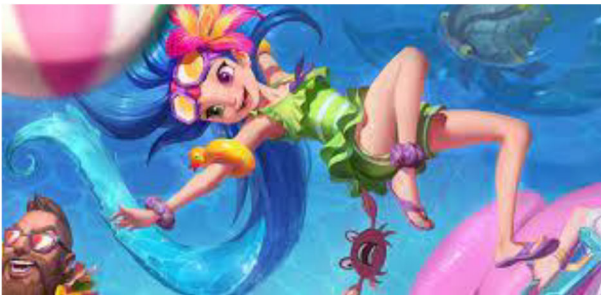
MLBB's Lifeguard Fanny



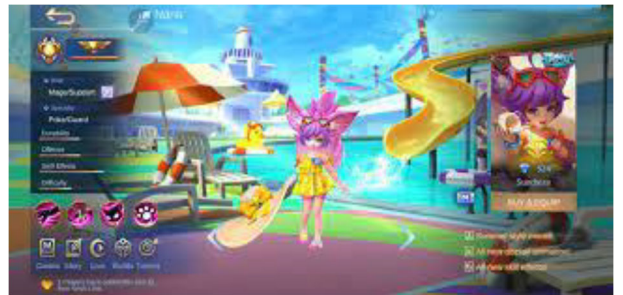
LoL's Pool Party Graves



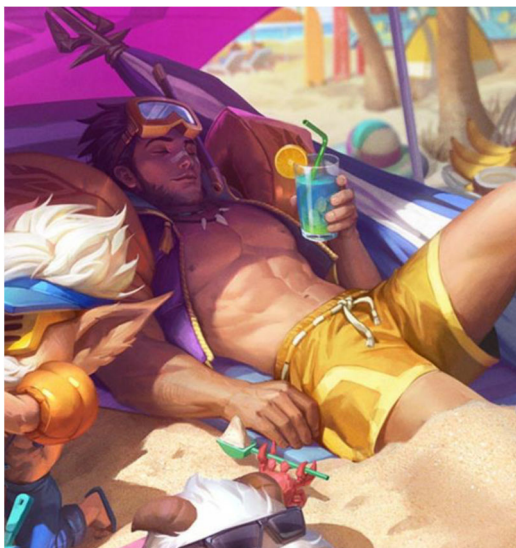
MLBB's Sun n Sand Clint



LoL's Pool Party Zoe



MLBB's Sundress Nana



LoL's Pool Party Jarvan IV



MLBB's Summer Waves Zilong

61. *MLBB* also includes characters with highly similar armor and weapons to characters in both *LoL* and *Wild Rift*. For example, Riot's original artwork and design for the champion Leona's "Project" skin, which was released in September 2015 for *LoL* and is shown below left, features gunmetal and yellow coloring, and a yellow inverted triangle in the center of the armor. Moonton's artwork and design for the

1 hero Irithel's "Astral Wanderer" skin, released in November 2019 for *MLBB*, is highly
 2 similar, including the same yellow inverted triangle in the center of the armor, and
 3 similar coloring and helmet design to Leona.

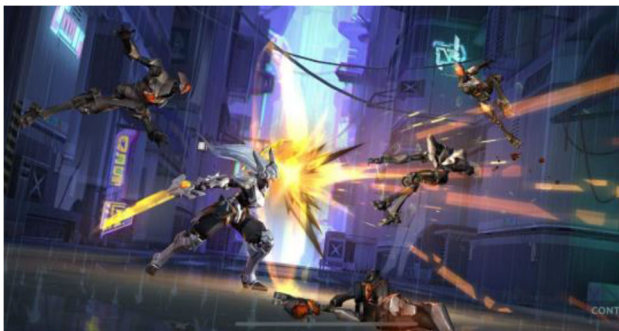


4 ***LoL's Leona***

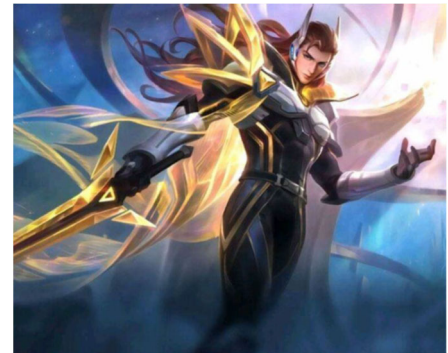


5 ***MLBB's Irithel***

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 10 62. Likewise, Riot's original Project skin for Leona as it appears in *Wild Rift*,
 11 which was released in March 2021 and is shown below left, is highly similar to
 12 Moonton's Lancelot M2 skin, which was released in August 2021. The characters
 13 include highly similar swords, as well as the same blue and yellow color scheme.



14 ***Wild Rift's Leona***



15 ***MLBB's Irithel***

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 20 63. Moreover, Riot's original splash art and design for the champion Garen
 21 in *LoL* including the Demacia crest, which was released in June 2018 for *LoL* and is
 22 shown below left, are highly similar to Moonton's hero Alucard's "Lightborn Striker"
 23 skin, released in December 2019 for *MLBB*. The characters include the same color
 24 scheme and similar winged crest (visible in the background immediately behind the
 25 character). The swords look highly similar, including the shape and outline.
 26
 27
 28



LoL's Garen



MLBB's Alucard

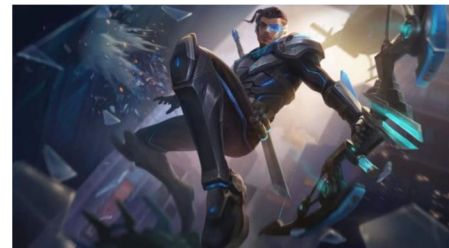


Wild Rift's and LoL's Crest

64. Similarly, Riot's original "Project: Ashe" skin in *Wild Rift*, shown below left, which features gunmetal contrasted with bright blue coloring, is highly similar to Moonton's "Yi Sun-Shin Azure Sentry" skin, which has the same coloring and design.



Wild Rift's Ashe



MLBB's Yi Sun-Shin

65. Moreover, Riot's original base skin for its champion Singed in *Wild Rift*, shown below left, which features a backpack equipped with neon-green liquid, is highly similar to Moonton's "Dr. Beast" skin for its hero Roger in *MLBB*.



Wild Rift's Singed

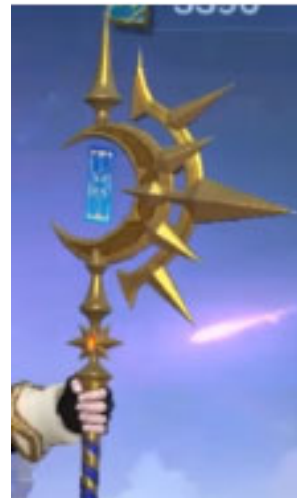


MLBB's Roger

66. In addition, Riot created the “Stargazer” skin line for *Wild Rift*, which Moonton copied with their own “Stargazer Cecilion” skin. In addition to the similar themes and colors used for these lines, one of the original staff designs that is part of *Wild Rift's* “Stargazer” skin line is nearly identical to a staff that appears in *MLBB*, as shown in the images below.



Wild Rift



MLBB

67. Elements of the user interface of *Wild Rift* and *MLBB* are also highly similar because, as Riot updated its user interface, Moonton copied those updates. As just an example of the many similarities between the user interfaces, *Wild Rift* includes a focus point aiming feature that allows a user to choose a target to hit with an attack by holding and dragging the attack button, as shown on the left below. After Riot added this feature, Moonton added the feature to *MLBB* and called it “smart targeting,” shown on the right below, which is activated using similar controls and looks highly similar. Moonton subsequently removed this feature from *MLBB* but

kept in other infringing elements as detailed above.



Wild Rift



MLBB

68. Similarly, *Wild Rift* has a feature that gives players two methods for cancelling an ability in the game, which can be set to “Default” or “Alternative.” The default method allows the player to cancel the ability by dragging it to the X button on the right corner of the screen. The alternative method allows the player to cancel the ability by targeting an area outside its range of effect. Moonton added this cancelling technique in *MLBB* after it was included in *Wild Rift*.

69. Any one of the foregoing similarities is concerning; the combination of all Moonton’s copying is copyright infringement.

70. Fans have readily noticed the enumerable similarities between *MLBB* and *Wild Rift* and *LoL*, of which the above are merely examples. Screenshots of examples of comments from gamers include, but are not limited to:



Kenley Yee 2 months ago (edited)

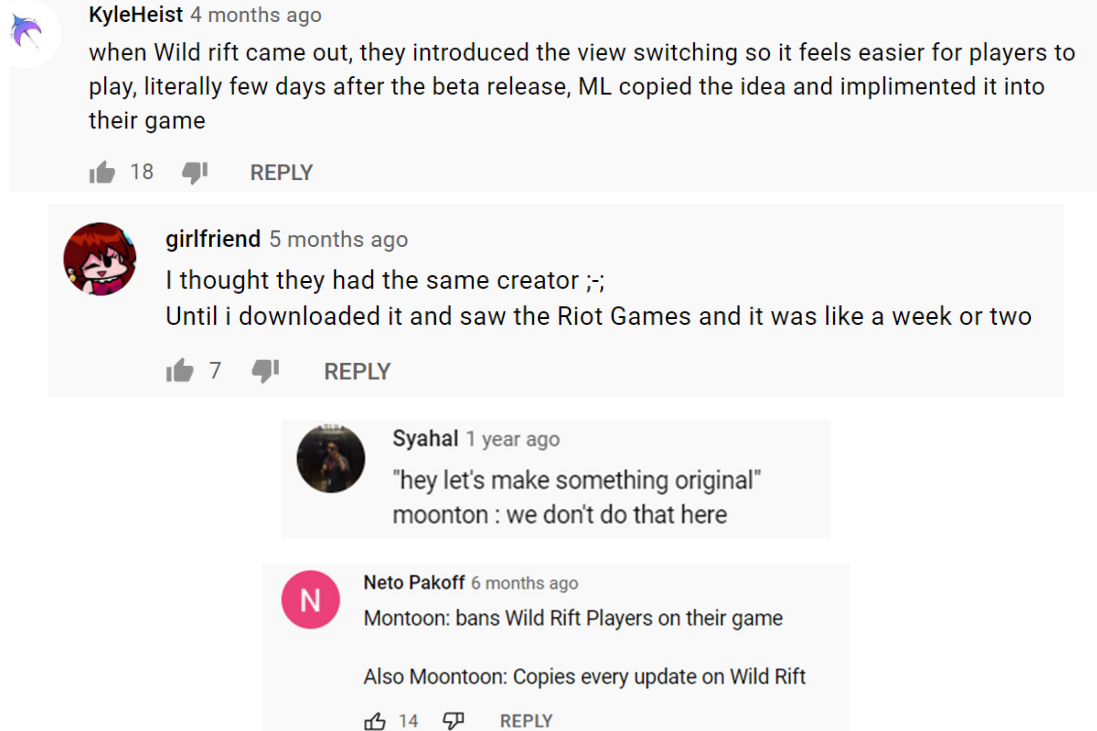
I just like the fact that moonton just literally gave up and straight up copying everything, they don't even care anymore
Like those logo, heros, skills, music and etc
Man what happened



rage stinger 5 months ago (edited)

wild rift: gets updated with new features by riot games
moonton: WRITE THAT DOWN WRITE THAT DOWN!!!

888 REPLY



71. Entire forums and videos on YouTube are dedicated to comparing *Wild Rift* and *LoL*, on the one hand, to *MLBB*, on the other hand. In one Reddit thread entitled “Did Mobile Legends Really Copy from League of Legends?” fans and community members point out the similarities between the game, noting that “it seems blatant,” and that most *MLBB* heroes are “literal carbon copies of League champs.” Another exasperated fan commented about the prevalence of videos comparing the two games, complaining, “These videos are getting tiring tbh. Everyone knows they copy.”

72. Upon information and belief, Moonton used, played, and accessed *Wild Rift* and *LoL* to copy the game to develop *MLBB*. To do so, when Moonton installed, played, and otherwise accessed *Wild Rift* and *LoL*, it was required to agree to the terms of Riot’s Terms of Service, where it was put on notice of Riot’s intellectual property rights.

73. Upon information and belief, Moonton has received and complied with fan requests for Moonton to include elements from *Wild Rift* and *LoL* in *MLBB*. The screenshot below shows a request from a fan sharing an image from a new champion

1 developed by Riot called “Seraphine” and asking Moonton to make something
 2 similar. Moonton responds that it will pass the request on to its game developers to
 3 satisfy the fan’s wishes.



17 74. *MLBB* is available for purchase in the United States, including on the
 18 Google Play Store and the Apple App Store. Upon information and belief, *MLBB*
 19 averages millions of monthly players. Moonton also runs *MLBB* tournaments at
 20 which professional gamers compete for prize money.

21 75. On the Google Play store, *MLBB* has received over 30,759,000 ratings
 22 and reviews, and has been installed over 500,000,000 times. On the Apple Store,
 23 *MLBB* is ranked #67 in the “Strategy” category and has received over 402,000 ratings
 24 and reviews and, upon information and belief, has been installed millions of times.

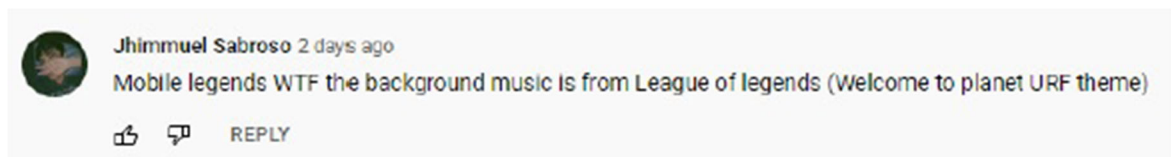
25 76. As a result, upon information and belief, Moonton has received millions
 26 of dollars in revenue in connection with *MLBB*, including from sales of virtual
 27 currency and/or in-game items, and from professional tournaments.

Marketing and Promotional Materials

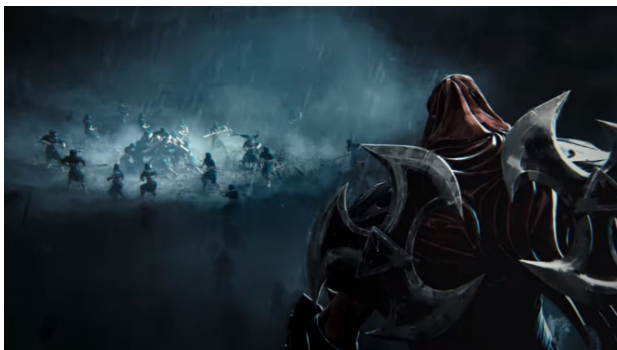
77. In addition to the copying in *MLBB* itself, Moonton markets and promotes the game using infringing trailers.

78. On April 25, 2022, Moonton released a video promoting *MLBB* and *MLBB* “All Stars” in Myanmar (the “All Star Video”). In the background of the video, Moonton uses the Welcome to Planet Urf Music. A true and correct copy of the All Star Video is attached hereto as **Exhibit 11**.

79. The community was once again quick to point out Moonton’s blatant copying. Indeed, the day after the All Star Video was released, one commentator noted the copying of Riot’s Welcome to Planet Urf music, as shown below.



80. On January 13, 2021, Moonton released a trailer for the hero Paquito (the “Paquito Trailer”). The Paquito Trailer copies extensive expressive elements from the Runeterra Trailer discussed above, including similar colors, characters, shots, and sequences. An example a screenshot showing one of the sequences in the Paquito Trailer compared with a highly similar sequence in the Runeterra Trailer is shown below. A true and correct copy of the Paquito Trailer is attached hereto as **Exhibit 12**.



Runeterra Trailer

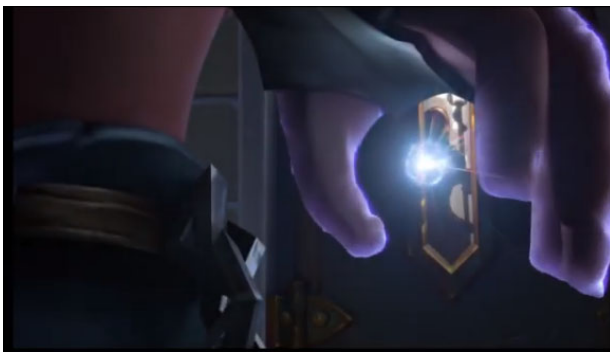


Paquito Trailer

81. Following the release of the Paquito Trailer, Riot was made aware of the similarities in the trailer. Riot Games Support posted a public Tweet stating that it

1 would look into the reported similarities. After the Tweet, the trailer was removed
 2 from YouTube. Upon information and belief, Moonton removed the trailer.

3 82. On May 30, 2019, Moonton released a trailer for the hero Terizla (the
 4 “Terizla Trailer”). The Terizla Trailer copies extensive expressive elements from the
 5 Sylas Trailer discussed above, including similar colors, characters, shots, and
 6 sequences. An example of a screenshot showing one of sequences in the Terizla
 7 Trailer compared with a highly similar sequence in the Sylas Trailer is shown below.
 8 A true and correct copy of the Terizla Trailer is attached hereto as **Exhibit 13**.



21 **Sylas Trailer**



21 **Terizla Trailer**

22 83. Commenters online have pointed out the similarities between the Sylas
 23 Trailer and the Terizla Trailer, calling the Terizla Trailer a “shameless copy” of the
 24 Sylas Trailer. Upon information and belief, Moonton took the trailer offline.

25 84. In 2020, Moonton released an advertisement for a series of summer
 26 themed skins called “Summer Splash” (the “Summer Splash Trailer”). The Summer
 27 Splash Trailer copies extensive expressive elements from the Pool Party Trailer,
 28 including similar colors, characters, shots, and sequences. An example of a screenshot

1 showing one of sequences in the Summer Splash Trailer compared with a highly
 2 similar sequence in the Pool Party Trailer is shown below. A true and correct copy of
 3 a video showing the Summer Splash Trailer side-by-side with the Pool Party Trailer is
 4 attached hereto as **Exhibit 14**. Upon information and belief, Moonton has since taken
 5 down this trailer.

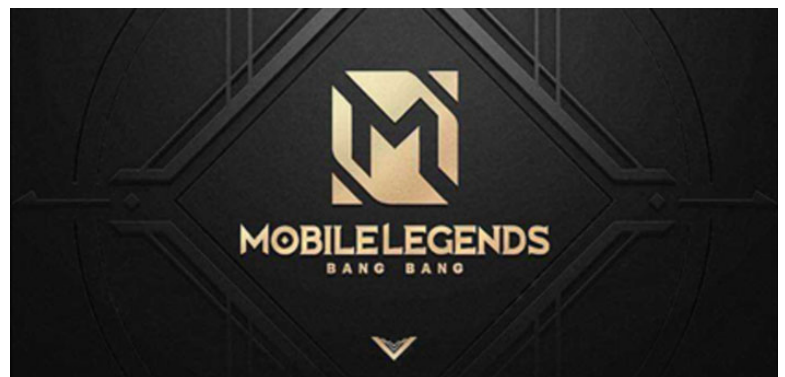
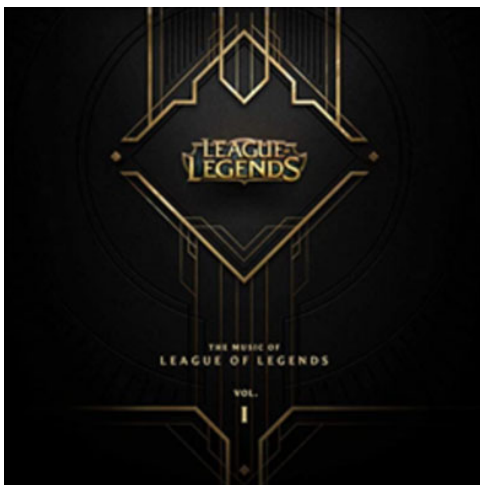


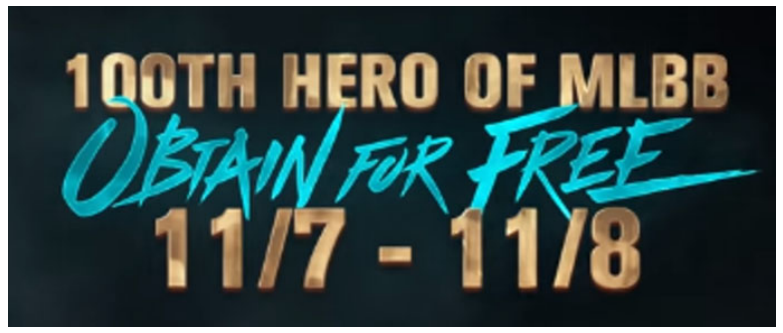
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11 **Pool Party Trailer**



12 **Summer Splash Trailer**

13 85. Marketing materials for *LoL* and *Wild Rift*, on the one hand, and *MLBB*,
 14 on the other hand, also are highly similar, and Moonton regularly copies Riot's
 15 marketing and promotional materials. Images comparing some of the similar
 16 marketing materials are shown below. These examples illustrate the myriad ways
 17 Moonton tracks and mimics Riot.





Wild Rift Marketing

MLBB Marketing

86. Moonton has also released trailers and promotional materials using variations on the word LEGENDS, a common name for *LoL*. For example, Moonton released a music video for a song entitled “Beyond Legends,” and promoted it using the term BEYOND LEGENDS, as shown in the image below.



87. Moonton’s imitation even goes as far as mimicking Riot’s promotional campaigns. In October 2020, Riot sent out customized Nike sneakers to promote *Wild Rift*, as shown below. An article describing the campaign is attached as **Exhibit 15**. In March 2021, Moonton sent out highly similar customized Nike sneaker, with highly similar gold font placed in the same part of the sneaker.



***Wild Rift* Shoe Promotion**



***MLBB* Shoe Promotion**

The Harm to Riot

88. As discussed above, Riot produces video games for which it receives revenue from in-game purchases. Moonton's willful infringement robs Riot of these revenues and will continue to do so unless enjoined. Specifically, its creation of a knock off video game (a) allows Moonton to profit commercially without investing in the creativity and marketing ingenuity that Riot has, thereby undermining Riot's willingness to create new content for *Wild Rift* and *LoL*; (b) takes sales away from Riot; and (c) devalues and causes substantial harm to the value of *Wild Rift* and *LoL*. Moonton's continual copying of Riot's content and marketing materials means that Riot has lost its ability to control the use of its copyrights.

89. Given Moonton's intransigence and willingness to openly flaunt the intellectual property laws, upon information and belief, unless enjoined by this Court, Moonton intends to continue to infringement upon Riot's copyrights and otherwise profit from *Wild Rift* and *LoL*.

90. Accordingly, Riot has suffered irreparable harm as a result of Moonton's conduct. They have no adequate remedy at law to redress of the injuries that Moonton has caused and intends to cause by its conduct. Riot will continue to suffer irreparable damage until Moonton's actions alleged above are enjoined by this Court.

CLAIMS FOR RELIEF

COUNT I

Copyright Infringement (17 U.S.C. §§ 101 *et seq.*)

91. Riot repeats and realleges every allegation above as if fully set forth herein.

92. *Wild Rift*, *LoL*, the Runeterra Trailer, the Sylas Trailer, the Pool Party Trailer, and the Welcome to Planet Urf Music are original and creative. As a result, they constitute copyrightable subject matter under the laws of the United States.

93. Riot is the owner of valid copyrights in *Wild Rift*, *LoL*, the Runeterra Trailer, the Sylas Trailer, the Pool Party Trailer, and the Welcome to Planet Urf Music. Those copyrights were registered with the Copyright Office, and the Copyright Office issued valid certificates of registration therefor, as indicated in Exhibits 2, 4, 6, 8, and 9.

94. By its actions, alleged above, Moonton has infringed and will continue to infringe Riot's copyrights in and to *Wild Rift* and *LoL* by reproducing, distributing, and developing *MLBB*, a substantially similar work, without any authorization or permission from Riot.

95. By its actions, alleged above, Moonton has infringed and will continue to infringe Riot's copyrights in and to the Runeterra Trailer, the Sylas Trailer, the Pool Party Trailer, and the Welcome to Planet Urf Music by reproducing, distributing, and developing the Paquito Trailer, the Terizla Trailer, the Summer Splash Trailer, and the All Star Video, substantially similar works, without any authorization or permission from Riot.

96. Moonton's direct infringement of Riot's copyrights is deliberate, willful, and in utter disregard for Riot's rights.

97. Further, Moonton is liable for the direct infringement of the customers who download *MLBB*. Upon information and belief, Moonton knowingly induces the infringement of its customers, including by selling and promoting the infringing

1 *MLBB* game to customers in the United States through the Apple Store and Google
2 Play Store.

3 98. Upon information and belief, as a direct and proximate result of its
4 wrongful conduct, Moonton has obtained benefits, including, without limitation,
5 profits to which Moonton is not entitled.

6 99. As a direct and proximate result of Moonton's wrongful conduct, Riot
7 will be substantially and irreparably harmed in an amount not readily capable of
8 determination. Unless restrained by this Court, Moonton will cause further irreparable
9 injury to Riot.

10 100. Riot is entitled to injunctive relief enjoining Moonton, its agents and
11 employees, and all persons acting in concert or participation with it, from infringing
12 *Wild Rift*, *LoL*, the Runeterra Trailer, the Sylas Trailer, the Pool Party Trailer, and the
13 Welcome to Planet Urf Music.

14 101. Riot is further entitled to recover from Moonton the damages, including
15 attorneys' fees and costs, it has sustained and will sustain, and any gains, profits, and
16 advantages obtained by Moonton in the United States as a result of its acts of
17 infringement as alleged above. At present, the amount of such damages, gains,
18 profits, and advantages cannot be fully ascertained by Riot, but will be established
19 according to proof at trial.

20 **PRAYER FOR RELIEF**

21 WHEREFORE, Riot respectfully requests judgment against Defendant
22 Moonton as follows:

- 23 A. Find that Moonton directly and indirectly infringed Riot's copyrights;
24 B. Enter judgment for Riot against Moonton for all damages suffered by
25 Riot, including any profits or gain by Moonton in the United States that is attributable
26 to the infringement of Riot's copyrights in amounts to be determined at trial;
27 C. Issue a preliminary and permanent injunction enjoining Moonton; its
28 subsidiaries, affiliates, officers, agents, representatives, servants, employees, and

1 attorneys; and all persons acting in concert or participation with them from directly or
2 indirectly infringing Riot's copyrights, including by reproducing, distributing,
3 publicly performing, publicly displaying, or creating derivative works from *Wild Rift*,
4 *LoL*, the Runeterra Trailer, the Sylas Trailer, the Pool Party Trailer, or the Welcome to
5 Planet Urf Music;

6 D. Award Riot the costs and disbursement of this action, including
7 reasonable attorney's fees and costs pursuant to 17 U.S.C. § 505;

8 E. Award Riot pre-judgment and post-judgment interest to the fullest extent
9 available, on the foregoing; and

10 F. Grant such other, further, or different relief as the Court deems just and
11 proper.

12 **DEMAND FOR TRIAL BY JURY**

13 Plaintiff Riot demands a trial by jury on all issues so triable in this action.
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1 DATED: May 9, 2022

2 /s/ Yungmoon Chang

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