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8 Attorneys for Plaintiff STEPHANIE TAYLOR

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 STEPHANIE TAYLOR,

12 Plaintiff,

13 v.

14 HILTON HOTELS CORPORATION, a
15 Delaware Corporation,

16 Defendant.

CASE NO: C 06 7730

COMPLAINT FOR DAMAGES

JURY TRIAL DEMANDED

17 Plaintiff Stephanie Taylor ("Taylor") alleges as follows:

18 INTRODUCTION


19 1. In or about 1996, Hilton Hotel Corporation ("Hilton") commissioned
20 Taylor to create several large murals to be displayed in the Hilton Hotel located at 333 O'Farrell
21 Street in San Francisco. One of the murals was created in the Lobby Bar. The mural covered
22 three walls in the bar, the main portion depicted hands doing various sports in sepia tones and the
23 two smaller walls were covered by a mural depicting a horse race, also in sepia tones ("the
24 mural"). The mural complemented and was integral to several large glove sculptures that Taylor
25 had created and placed at the entrance to the bar, reflecting the tone of the lobby decor. The
26 mural was displayed from approximately 1997 until approximately 2006. The mural was
27 important as a work of art and was of recognized quality and stature.

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- 3. For punitive damages pursuant to the Visual Artists Rights Act;
- 4. For attorneys' fees and costs of suit as provided for by the Visual Artists Rights Act; and
- 5. For such other and further relief as this courts deems just and proper.

Dated: December 15, 2006

MENNEMEIER, GLASSMAN & STROUD LLP
HEATHER L. WALLACE

By: 
Andrew W. Stroud
Attorneys for Plaintiff STEPHANIE TAYLOR