

Exhibit 3

Exhibit 3 to Complaint

Dark-Hunter / Shadowhunter Comparison

Both Series employ a line of warriors who protect the normal world from demons. The Hunters (whether “shadow” or “dark”) operate in a high tech world that is hidden from everyday mortals and deal with demons who come and go through portals to a “Veil World.” In both Series, a young person becomes part of the Dark-Hunters (or Shadowhunters) world after being saved by a gorgeous blond Dark-Hunter (or Shadowhunter). The protagonists learn their purpose and how to fight various demons and their own personal inadequacies, while dealing with intricate family and friend issues. They face the constant threat of being consumed or being converted to evil. They each must kill their demonic father.

Both Series feature mortal or normal objects (referred to as “instruments” by the DEFENDANT), including without limitation a cup, a sword, and a mirror, each imbued with magical properties to help battle evil and protect mankind. The character’s powers are heightened or restrained by the use of supernatural markings. Both Dark-Hunters and Shadowhunters have enchanted swords that are divinely forged, imbued with otherworldly spirits, have unique names, and glow like heavenly fire.

Both Series feature “regular humans” who are oblivious to the supernatural world. They are called “Baretos” or “Ords” in the Dark-Hunter Series and “Mundanes or “Mundies” in the Shadowhunter Series. They can be “turned” by various demonic beasts into like creatures or servants when bitten or fed blood. Humans can also be turned by drinking divine blood from a sacred cup. They can use and perform magic. They cannot see through demon “glamour” (a term used by both authors). Both Ords and Mundies can become “forsaken” (a condition referred to

as “shade” in the Dark-Hunter Series). Once in this state, they do not eat or sleep, are in agony and cannot be seen or heard.

When regular humans mix with supernatural beings (whether Dark-Hunters or Shadowhunters), the divine blood is dominant and the children will inherit those powers. In both works, demons often seduce humans to produce offspring with powers. Shadowhunter, like Dark-Hunters, can be freed from their lives but each supernatural character must first figure out his or her own unique path to freedom.

SETTING

Both works take place in an urban world that is not what it seems. There is a world behind the veil with portals that lead to heaven realms and hell realms. There are segregated wards used as walls to hold back demons and neutral grounds that are safe zones. Different dimensions exist. Supernatural beings break through to the world of man. These worlds are not readily accessible to mortals.

CHARACTERS

Dark-Hunters	Shadowhunters
<p>Nick Gautier:</p> <ul style="list-style-type: none"> a. Believes himself a normal human until the night when a mysterious Dark-Hunter saves his life. b. Has his supernatural powers bound and doesn't know about them until after his mother is kidnapped by demons. c. Discovers the psychic mystic who lives next door is not what she seems. 	<p>Clary Fray:</p> <ul style="list-style-type: none"> a. Is at a club with friends when they are attacked by a group of demons. A mysterious Shadowhunter saves her life. b. Has supernatural powers and does not know about them until after her mother is kidnapped by demons. c. Discovers the psychic next door is not what she seems.

Dark-Hunters	Shadowhunters
<ul style="list-style-type: none"> d. He becomes a Dark-Hunter only to learn he has the blood of angels in him. e. His mother, who also has angel blood, is put into a trance. f. Has a childhood friend in love with him. g. His father is a demon he has to destroy. h. Events cause him to mistrust the hero of the story who was once his best friend. He wants to trust him, but can't. 	<ul style="list-style-type: none"> d. She becomes a Shadowhunter and learns she has angel blood in her. e. Her mother, who also has angel blood, is put into a trance. f. Has a childhood friend in love with her. g. Her father is a demon she has to destroy. h. Events cause her to mistrust the hero of the story who was once her best friend. She wants to trust him, but can't.
<p>Adarian Malachai:</p> <ul style="list-style-type: none"> a. Nick's father. b. Has another paranormal son. c. Tries to make his sons more evil and strengthen himself. d. Escapes and goes into hiding. e. Tall and very handsome. f. He uses demon blood to convert humanity. g. Had a brother-like friend he betrayed who hates his guts. h. Tries to burn the humanity from his children. 	<p>Valentine Morgenstern:</p> <ul style="list-style-type: none"> a. Clary's father. b. Has another paranormal son. c. Tries to make his sons more evil and strengthen himself. d. Escapes and goes into hiding. e. Tall and very handsome. f. He uses demon blood to convert humanity. g. Had a brother-like friend he betrayed who now despises him. h. Tries to burn the humanity from his children.

Dark-Hunters	Shadowhunters
i. Fosters a protégé.	i. Fosters a protégé.
<p>Cherise Gautier:</p> <ul style="list-style-type: none"> a. Nick’s mother. b. Lives next door to an African-American psychic whose home is decorated with protection symbols and ancient artifacts. c. Was a young mother who has the blood of angels and humans in her. d. Gets kidnapped by demons and goes into a “magical coma.” 	<p>Joceylyn Fray:</p> <ul style="list-style-type: none"> a. Clary’s mother. b. Lives next door to an African-American psychic whose home is decorated with protection symbols and ancient artifacts. c. Was a young mother who has the blood of angels and humans in her. d. Gets kidnapped. Goes into a “magical coma.”
<p>Urian/Galan:</p> <ul style="list-style-type: none"> a. Nekoda’s brother. b. He has one name but goes by another. c. Can be sadistic as a result of feeding on demon blood and has lost most of his humanity. d. He can be charming when he wants. e. He attacks the heroes, killing the sibling of the main characters, severely 	<p>Jonathan Morgenstern:</p> <ul style="list-style-type: none"> a. Clary’s brother. b. He has one name but goes by another. c. Can be sadistic as a result of feeding on demon blood and has lost most of his humanity. d. He can be charming when he wants. e. He attacks the heroes, killing the sibling of the main characters, severely

Dark-Hunters	Shadowhunters
<p>wounding others and is eventually killed himself.</p> <p>f. His body is never recovered by his father.</p> <p>g. He is brought back to life by the hero who puts his mark on him to control him.</p> <p>h. He plays a double agent.</p> <p>i. Because of the way he is brought back, his life force is tied to the main hero.</p> <p>j. He threatens to raise an army of demons to destroy the world and cannot be killed without it killing the hero.</p> <p>k. Said to be the spitting image of his father.</p>	<p>wounding others and is eventually killed himself.</p> <p>f. His body is never recovered by his father.</p> <p>g. He is brought back to life by the hero who puts his mark on him to control him.</p> <p>h. He plays a double agent.</p> <p>i. Because of the way he is brought back, his life force is tied to the main hero.</p> <p>j. He raises an army of “Dark Shadowhunters” and demons to destroy the world and cannot be killed without it killing the hero.</p> <p>k. Said to be the spitting image of his father.</p>
<p>Menyara Chartier:</p> <p>a. African-American psychic and clairvoyant.</p> <p>b. She shields Nick and his mother from the powers of darkness and watches</p>	<p>Madame Dorothea:</p> <p>a. African-American psychic and clairvoyant.</p> <p>b. She shields Clary and her mother from the powers of darkness and watches</p>

Dark-Hunters	Shadowhunters
<p>over them.</p> <p>c. She wants to protect them and keep them safe from the demon world. She lives next door to them.</p>	<p>over them.</p> <p>c. She wants to protect them and keep them safe from the demon world. She lives next door to them.</p>
<p>Michael Tyler “Big Bubba” Burdette:</p> <p>a. Nick’s best friend.</p> <p>b. Blue eyes with dark hair.</p> <p>c. The only father Nick has ever known.</p> <p>d. Owns a computer and oddity store that bears his name.</p> <p>e. Is a human hunter of paranormal beasts because he fell victim to one.</p> <p>f. Wears flannel shirts (consistent with rural character background PLAINTIFF uses for her character).</p>	<p>Luke Garroway a/k/a Lucian Graymark:</p> <p>a. Clary’s best friend.</p> <p>b. Blue eyes with dark hair.</p> <p>c. The only father Clary has ever known.</p> <p>d. Owns books and oddities store that bears his name.</p> <p>e. A former human hunter of paranormal beasts because he fell victim to one.</p> <p>f. Wears flannel shirts (inconsistent with city setting in which CLARE sets her character).</p>
<p>Ash a/k/a Acheron Parthenopaeus, Acheron of Didymos, Apostolos, Ash Parthenopaeus, The Elekti, The Harbinger:</p> <p>a. Orphaned at a young age, he’s raised in adoptive homes.</p> <p>b. Sends a note to his enemy that says, “I am coming for you.”</p>	<p>Jace a/k/a Jonathan Christopher Wayland/Lightwood/Morgenstern/Herondale:</p> <p>a. Orphaned at a young age, and grows up with an adoptive family.</p> <p>b. Sends a note to his enemy that says, “I am coming.”</p>

Dark-Hunters	Shadowhunters
<p>c. He has characters who call him different names and often has to correct them.</p>	<p>c. He has characters who call him different names and often has to correct them.</p>
<p>d. Tattooed, blond, “goth” and sarcastic.</p>	<p>d. Tattooed, blond, “goth” and sarcastic.</p>
<p>e. Generally aloof but bonded to the protagonist saved by a Dark-Hunter.</p>	<p>e. Generally aloof but bonded to the protagonist saved by a Shadowhunter.</p>
<p>f. Knows who and what the psychic is who bound Nick’s powers the moment they meet.</p>	<p>f. He knows who and what the psychic is the instant they meet.</p>
<p>g. Is told he has one father, but his father is someone else.</p>	<p>g. Is told he has one father, but his father is someone else.</p>
<p>h. Has powers greater than other Dark-Hunters. His abilities are a result of his parent’s actions while he was a fetus.</p>	<p>h. Has powers greater than other Shadow-hunters. His abilities are a result of his parent’s actions while he was a fetus.</p>
<p>i. Stealthy.</p>	<p>i. Stealthy.</p>
<p>j. Body covered in scars.</p>	<p>j. Body is covered in scars.</p>
<p>k. Tattoos that come and go and serve as protection.</p>	<p>k. Tattoos that come and go and serve as protection.</p>
<p>l. Is left handed.</p>	<p>l. Is left handed.</p>
<p>m. Had a sister not really related to him</p>	<p>m. Has a sister not really related to him</p>

Dark-Hunters	Shadowhunters
<p>who nagged him.</p> <p>n. Has a friend named Alexion who is like a brother to him and they are bonded together for life.</p> <p>o. Ash takes care of Alexion.</p>	<p>who nagged him.</p> <p>n. Has a friend named Alec who is like a brother to him and they are bonded together for life.</p> <p>o. Jace takes care of Alec.</p>
<p>Tabitha Deveraux Magnus:</p> <p>a. Rebellious and beautiful.</p> <p>b. Stalks demons and vampires, anything that preys on humans.</p> <p>c. Her cooking is mocked.</p> <p>d. She wears tall boots and is known to be dangerous and heavily armed at all times.</p> <p>e. She always has weapons in her boots.</p> <p>f. Wears heels or platform boots (even though she is tall).</p> <p>g. Unique signature weapon she is skilled with. Dresses well and loans other characters her clothes.</p> <p>h. Seems flamboyant and loud, but is generous and tender-hearted.</p>	<p>Isabelle Lightwood:</p> <p>a. Rebellious and beautiful.</p> <p>b. Stalks demons and vampires, anything that preys on humans.</p> <p>c. Her cooking is mocked.</p> <p>d. She wears tall boots and is known to be dangerous and heavily armed at all times.</p> <p>e. She always has weapons in her boots.</p> <p>f. She wears high heels (even though she is tall).</p> <p>g. Unique signature weapon she is skilled with. Dresses well and loans other characters her clothes.</p> <p>h. Seems flamboyant and loud, but is generous and tender-hearted.</p>

Dark-Hunters	Shadowhunters
<ul style="list-style-type: none"> i. Extremely caring and responsible for all those around her. Always takes responsibility. j. When a loved one is killed she feels responsible even though she was unconscious at the time. k. She is friends with Nick and Ash. l. Is fiercely protective of her gay roommate. m. Has amber/gold eyes. n. Has long dark auburn hair she dyes jet black. o. Thinks of Ash as a brother. p. Loses a sibling she's close to early in the series. 	<ul style="list-style-type: none"> i. Extremely caring and responsible for all those around her. Always takes responsibility. j. When a loved one is killed she feels responsible even though she was unconscious at the time. k. Friends with Simon. l. Fiercely protective of her gay friend. m. Has brown eyes with gold/amber. n. Has long ink black hair. o. Thinks of Jace as her brother. p. Loses a sibling she's close to early in the series.
<p>Nicolette Peltier:</p> <ul style="list-style-type: none"> a. Shapeshifter. b. Cares for other shapeshifters who lose their families. c. Has a strong sense of code. d. Turns on her own family when she 	<p>Amatis Graymark:</p> <ul style="list-style-type: none"> a. Shapeshifter. b. Cares for other shapeshifters who have lost their families. c. Has a strong sense of code. d. Turns on her own family when she

Dark-Hunters	Shadowhunters
<p>feels they violated shapeshifter code.</p> <p>e. Because of her mixed family, she is looked down upon by other paranormal entities and judged harshly for it.</p> <p>f. Regrets her decision to banish a shapeshifter who became distrustful of her.</p> <p>g. In <i>Night Embrace</i> (2003), werewolves take refuge in her home after a battle with demons and Dark-Hunters where they're wounded. Helps Dark-Hunters battle demons.</p> <p>h. Is seen for a time as an enemy.</p> <p>i. Dies in battle while passing one last longing look at her family she loves and redeems herself.</p>	<p>feels they violated shapeshifter code.</p> <p>e. Because of her mixed family, she is looked down upon by other paranormal entities and judged harshly for it.</p> <p>f. Regrets her decision to banish a shapeshifter who became distrustful of her.</p> <p>g. In <i>City of Glass</i> (2009), werewolves take refuge in her home after a battle with demons and Shadowhunters where they're wounded. Helps Shadowhunters battle Dark Shadowhunters.</p> <p>h. Is seen for a time as an enemy.</p> <p>i. Dies in battle while passing one last longing look at her family she loves and redeems herself.</p>
<p>Ias of Groesia AKA Alexion:</p> <p>a. Highly protective of Ash.</p> <p>b. He is bound to Ash for life and depends on him.</p>	<p>Alexander "Alec" Gideon Lightwood:</p> <p>a. Highly protective of Jace.</p> <p>b. He is bound to Jace for life and depends on him.</p>

Dark-Hunters	Shadowhunters
c. They fight together.	c. They fight together.
Eric St. James: a. Jet black hair spiked with color. b. Bisexual	Magnus Bane: a. Jet black hair spiked with color. b. Bisexual
Simone Dubois: a. Biracial heroine. b. Brother is violently killed thus traumatizing the heroine. c. She doesn't know she's anything other than a regular human. d. Turns out to be a creature of the paranormal world. e. Is raised in an adoptive environment. f. Is violently attacked by a demon. g. She is haunted by a teen boy who dies in a car wreck. h. Curly brown and gold hair. i. Amber brown eyes. j. Light brown skin. k. Not much is said about her parents,	Maia Roberts: a. Biracial heroine. b. Brother is violently killed thus traumatizing the heroine. c. She doesn't know she's anything other than a regular human. d. Turns out to be a creature of the paranormal world. e. Is raised in an adoptive environment. f. Is violently attacked by a demon. g. She is haunted by a teen boy who dies in a car wreck. h. Curly brown and gold hair. i. Amber brown eyes. j. Light brown skin. k. Not much is said about her parents,

Dark-Hunters	Shadowhunters
only her brother Tony who died at a young age.	only her brother Daniel who died at a young age.
Apollodorus: <ul style="list-style-type: none"> a. Ash’s “nephew.” b. Gives him a toy. c. Apollodorus’ death devastates Ash. 	Max: <ul style="list-style-type: none"> a. Jace loves him like a little brother. b. He passes a toy along to him. c. Max’s death devastates Jace.
Wulf: Cursed so that no one can remember him after he leaves their presence.	Raziel: Memory of Raziel’s appearances “fled from mind and memory as quickly as they were seen.”
Malachai: The highest order of demon.	Moloch: The highest order of demon.

SCENE SIMILARITIES

Dark-Hunter	Shadowhunter
Squire Council: <ul style="list-style-type: none"> a. Political organization that oversees the Dark-Hunters. b. Local branches and regions c. There are other councils for Were-Hunters and Dream-Hunters, as well as 	Clave Council: <ul style="list-style-type: none"> a. The political body that oversees the Shadowhunters. b. Local branches and regions. c. The Clave Council incorporates all related supernatural beings, not only

Dark-Hunter	Shadowhunter
<p>Squires.</p> <p>d. Entire Council may be summoned, or only those who are necessary or involved in the matter at hand.</p> <p>e. Particular meetings have distinct names.</p> <p>f. A particular group lost its seat at the council.</p> <p>g. Round chamber-hall with a magical portal entrance.</p>	<p>Shadowhunters.</p> <p>d. Entire Council may be summoned, or only those who are necessary or involved in the matter at hand.</p> <p>e. Particular meetings have distinct names.</p> <p>f. A particular group lost its seat at the council.</p> <p>g. Round chamber-hall with a magical portal entrance.</p>
<p>Were-Hunters:</p> <p>a. Practice magic they inherit through birth.</p> <p>b. Have to make their own way in the world. Have been betrayed by Dark-Hunters.</p> <p>c. Have their own special markings from subtle to obvious.</p> <p>d. Can hide their marks with their powers.</p> <p>e. Originally created through deceit.</p>	<p>Daimons:</p> <p>a. Practice magic they inherit through birth.</p> <p>b. Have to make their own way in the world. Have been betrayed by Shadowhunters.</p> <p>c. Have their own special markings from subtle to obvious.</p> <p>d. Can hide their marks with their powers.</p> <p>e. Originally created through deceit.</p>

Dark-Hunter	Shadowhunter
<p>f. While not immortal, they live incredibly long lives that make them appear immortal to some.</p> <p>g. They are unable to have children.</p>	<p>f. They were immortal beings who stopped aging.</p> <p>g. They are unable to have children.</p>
<p>Adoni:</p> <p>a. Practice magic they inherit through birth.</p> <p>b. Have their own special markings from subtle to obvious.</p> <p>c. They can hide their marks with powers.</p> <p>d. Immortal beings who stop aging.</p> <p>e. They are often referred to by derogatory terms.</p>	<p>Warlocks:</p> <p>a. Practice magic they inherit through birth.</p> <p>b. Have their own special markings from subtle to obvious.</p> <p>c. They can hide their marks with powers.</p> <p>d. Immortal beings who stop aging.</p> <p>e. They are often referred to by derogatory terms.</p>
<p>Sanctuary:</p> <p>a. Founded over one hundred years ago after the death of shape-shifter relative to provide a place of refuge or Sanctuary for other preternatural beings.</p> <p>b. A place where others can learn their</p>	<p>The Praetor Lupus:</p> <p>a. Founded over one hundred years ago after the death of shape-shifter relative to provide a place of refuge or Sanctuary for other preternatural beings.</p> <p>b. A place where others can learn their</p>

Dark-Hunter	Shadowhunter
powers and have protection.	powers and have protection.
A particular disease can turn humans into demons.	A particular disease can turn humans into demons.
<p>Portals:</p> <ul style="list-style-type: none"> a. Demons come and go from the human world through secret portals. b. Dark-hunters do not know the layout of the demon realm. c. Humans cannot return from the demon realm but demons who are killed can return. 	<p>Portals:</p> <ul style="list-style-type: none"> a. Demons come and go from the human world through secret portals. b. Shadowhunters do not know the layout of the demon realm. c. Humans cannot return from the demon realm but demons who are killed can return.