**9.20 Copyright – Infringement – Contributory Infringement**

In this case, [name of plaintiff] claims that [name of defendant] is a contributory infringer. A “contributory infringer” is one who, with knowledge of another’s infringing conduct, induces, causes, or materially contributes to the infringing conduct. “Knowledge” means the alleged contributory infringer actually knew, or had reason to know, of the infringement. If you find that there has been a direct infringement of [name of plaintiff]’s copyrighted materials by one defendant, you can also consider whether there has been “contributory infringement” by another defendant (or a third party).

**Special Interrogatories to the Jury**

**Do you find that from a preponderance of the evidence that:**

 That there was a direct infringement of [name of plaintiff]’s copyright?

Answer Yes or No \_\_\_\_\_\_\_\_\_\_\_\_\_

If you answered “No,” you don’t need to answer the remaining questions.

 That [name of defendant] induced, caused, or materially contributed to the infringing conduct of this other defendant?

Answer Yes or No \_\_\_\_\_\_\_\_\_\_\_\_\_

If you answered “No,” you don’t need to answer the remaining questions.

 That [name of defendant] engaged in this contributory infringement with actual knowledge, or with reason to know, of the infringing activity relating to [name of plaintiff]’s copyright?

Answer Yes or No \_\_\_\_\_\_\_\_\_\_\_\_\_

If you answered “No,” you don’t need to answer the remaining questions.

 That [name of defendant] contributorily infringed [name of plaintiff]’s copyright(s)?

Answer Yes or No \_\_\_\_\_\_\_\_\_\_\_\_\_