

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
NORTH CAROLINA

Joe Hand Promotions, Inc. v. PT Media LLC and Earl Hugh Thomas

Civil Action No. 3:25-CV-00695-KDB-DCK · No. 3:25-CV-00695-KDB-DCK · Decided December 17, 2025

SUMMARY

The United States District Court for the Western District of North Carolina granted Joe Hand Promotions, Inc.'s motion for default judgment against PT Media LLC and Earl Hugh Thomas. The court found the defendants liable for unauthorized transmission of a UFC broadcast under 47 U.S.C. § 605 and awarded statutory damages, costs, and attorneys' fees totaling \$4,504.09, jointly and severally. The court also directed the Clerk to close the matter.

CASE DETAILS

COURT	United States District Court for the Western District of North Carolina
WRITING FOR THE COURT	Kenneth D. Bell
JURISDICTION	United States District Court for the Western District of North Carolina
DECIDED	December 17, 2025
DOCKET	3:25-CV-00695-KDB-DCK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for default judgment after Defendants failed to respond to the Complaint and default was entered. The Court granted the motion and awarded statutory damages, costs, and attorneys' fees.
STANDARD OF REVIEW	On a motion for default judgment, the court determines whether the well-pleaded factual allegations support the requested relief. Liability allegations are accepted as admitted upon default, but legal conclusions and damages are not; the court must independently determine damages and may rely on affidavits or documentary evidence without conducting an evidentiary hearing.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Joe Hand Promotions, Inc.

TOPICS

- default judgment
- default
- damages
- attorney fees
- commercial litigation

PRACTICE AREAS

civil procedure

communications law

commercial litigation

statutory damages

attorney fees

QUESTIONS PRESENTED

1. Whether Defendants' default established liability for the alleged unauthorized transmission of the broadcast under 47 U.S.C. §§ 553 and 605.
2. Whether Plaintiff could recover damages under both §§ 553 and 605 or had to elect one statutory remedy.
3. What amount of statutory and enhanced statutory damages, costs, and attorneys' fees should be awarded under 47 U.S.C. § 605.

HOLDINGS

1. Defendants' default admitted the Complaint's well-pleaded factual allegations and established liability for the unauthorized transmission of the Event, but did not admit legal conclusions such as willfulness.
2. When liability exists under both 47 U.S.C. §§ 553 and 605, a plaintiff may recover damages under only one of those sections.
3. The Court awarded a total of \$2,500 in statutory damages under 47 U.S.C. § 605, including the enhanced-damages provision, rather than the larger enhanced award requested by Plaintiff.
4. A prevailing plaintiff under § 605 is entitled to recover full costs, including reasonable attorneys' fees, and Plaintiff was awarded \$504.09 in costs and \$1,500 in attorneys' fees.

KEY QUOTATIONS

“There must be a sufficient basis in the pleadings for the judgment entered.” (Section I)

“The court must make an independent determination regarding damages.” (Section III)

FACTUAL BACKGROUND

Joe Hand Promotions, Inc. distributes sports and entertainment programming to commercial establishments. It alleged that PT Media LLC, doing business as Sports One Bar & Lounge, and its manager Earl Hugh Thomas displayed an Ultimate Fighting Championship broadcast on March 4, 2023, without paying the required commercial licensing fee, which would have been \$1,270. An auditor observed the broadcast at the bar, where he paid a \$10 cover charge, counted as many as 83 patrons, observed the match on nine televisions, and estimated the establishment's capacity at 120 people.

PROCEDURAL HISTORY

Plaintiff filed the Complaint on September 10, 2025, alleging that Defendants violated 47 U.S.C. §§ 553 and 605 by exhibiting an Ultimate Fighting Championship broadcast without paying the required commercial licensing fee. Defendants were served in September 2025, failed to respond, and had default entered on October 27, 2025. Plaintiff moved for default judgment on December 5, 2025, and the Court granted the motion on December 17, 2025.

DISPOSITION

other

CASES CITED

- United States v. Moradi, 673 F.2d 725, 727 (4th Cir. 1982)
- United States v. Rutledge Fin. Partners, LLC, No. 3:25-CV-00471-KDB-DCK, 2025 WL 2677543, at *1 (W.D.N.C. Sept. 18, 2025)
- Ryan v. Homecomings Fin. Network, 253 F.3d 778, 780 (4th Cir. 2001)
- Nishimatsu Constr. Co. v. Houston Nat'l Bank, 515 F.2d 1200, 1206 (5th Cir. 1975)
- J & J Sports Prods., Inc. v. Romenski, 845 F. Supp. 2d 703, 706 (W.D.N.C. 2012)
- Kingvision Pay-Per-View Corp., LTD. v. Wright, No. 8:06-CV-892-T-30MAP, 2006 WL 4756450, at *1 (M.D. Fla. Oct. 27, 2006)
- Thomson v. Wooster, 114 U.S. 104, 113 (1885)
- Gomez v. Midlo Floors LLC, No. 3:22CV746, 2024 WL 556650, at *9 (E.D. Va. Feb. 12, 2024)

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