

Bringing Sexy Back: Unauthorized Film Editing, Copyright, and How Removing Reproductive Acts Violates Reproduction Rights

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INTRODUCTION

In the late 1990s,¹ Ray Lines, along with his wife Sharon, endeavored to mine a previously untapped market by creating clean, edited versions of major Hollywood films and turning them into E-Films.² The process was simple: take a hit film, delete objectionable and indecent content, including bad language, nudity, and graphic violence so that conservative audiences could enjoy mainstream entertainment free of salacious situations.³ The idea was a popular one, and a number of businesses began to offer

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¹ See Andrew Gumbel, *Censored in the Name of the Lord*, INDEP. (London), Sept. 21, 2005.

² See *Clean Flicks of Colo., LLC v. Soderbergh*, 433 F. Supp. 2d 1236, 1238 (D. Colo. 2006). Mr. Lines has stated: "I enjoy movies but I got tired of sitting in theaters saying, if only they had left that one scene out." Kieth Merrill, *Cleaning Up the Movies* (pt. 1), MERIDIAN MAG., <http://www.meridianmagazine.com/arts/020604clean.html> (last visited Jan. 27, 2007). E-films are simply "cleaned up versions of box-office hits." Rick Lyman, *Hollywood Balks at High-Tech Sanitizers; Some Video Customers Want Tamer Films, and Entrepreneurs Rush to Comply*, N.Y. TIMES, Sept. 19, 2002, at E1.

³ The first foray into this business was the creation of a sanitized version of TITANIC for Lines' Mormon neighbors. Gumbel, *supra* note 1.