

2003, Apr. 4

Google Inc,

My name is [REDACTED] and I am a professional photographer. I am sending this mail to you because I have suffered a breach of the rights which I hold on a number of my photographs. These photographs are being used illegally on the web and I would like your cooperation to have them removed. The illegal use of my pictures which were on Yahoo have been removed by them but most of them are on Google. I am therefore sending you proof that I am indeed the legal owner of these pictures and details of exactly where these sites are located.

RUSSIAN BEAUTIES (Photo Studio S.K)



<http://www.russian-b.com>



1. The relevant domain names are as follows:

google.com  
google.de  
google.fr  
google.co.uk  
google.cn.jp  
google.it  
google.ch  
google.ca

2. My address & Nationality

Japan (My address is [REDACTED] Gunma prefecture,  
Japan.)

Japan (Nationality)

3. Search Yulia Nova Infringing pages

google.com  
google.de  
google.fr  
google.co.uk  
google.co.jp  
google.it  
google.ch  
google.ca

(a) yulia nova

(b) Infringing pages

①

[www.putalocura.com/2002/articulos/yulia/yulia/](http://www.putalocura.com/2002/articulos/yulia/yulia/)  
[www.putalocura.com/2002/articulos/yulia.php](http://www.putalocura.com/2002/articulos/yulia.php)

②

[www.thongdaddy.com/kizu/k300902/index5.html](http://www.thongdaddy.com/kizu/k300902/index5.html)

③

[www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/  
Speciale-CD\\_Yulia\\_Nova.htm](http://www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/Speciale-CD_Yulia_Nova.htm)[www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/  
Speciale\\_Yulia\\_Nova\\_3.htm](http://www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/Speciale_Yulia_Nova_3.htm)

④

[yulianovaforum.com/](http://yulianovaforum.com/)[yulianovaforum.com/top.htm](http://yulianovaforum.com/top.htm)[lol.to/bbs.php?bbs=1331](http://lol.to/bbs.php?bbs=1331)[lol.to/bbs.php?bbs=1331&pg=2](http://lol.to/bbs.php?bbs=1331&pg=2)

⑤

[web131.germaninfo7.netzdienste.de/yufa/](http://web131.germaninfo7.netzdienste.de/yufa/) (www.yulia-nova.de - as same)[web131.germaninfo7.netzdienste.de/yufa/7464.html](http://web131.germaninfo7.netzdienste.de/yufa/7464.html)[web131.germaninfo7.netzdienste.de/yufa/7418.html](http://web131.germaninfo7.netzdienste.de/yufa/7418.html)

⑥

[www.tetasx.com/Famosa/Yulia/Yulia.htm](http://www.tetasx.com/Famosa/Yulia/Yulia.htm)[www.tetasx.com/home.php](http://www.tetasx.com/home.php)

⑦

[www.yulianova.de/](http://www.yulianova.de/)

⑧

[photojo.com/galleries/SharedAlbumPage.asp?album\\_id=5052](http://photojo.com/galleries/SharedAlbumPage.asp?album_id=5052)[photojo.com/galleries/SharedAlbumPage.asp?album\\_id=4430](http://photojo.com/galleries/SharedAlbumPage.asp?album_id=4430)

⑨

[www.sssgr.net/pages/yulianova.htm](http://www.sssgr.net/pages/yulianova.htm)[www.sssgr.net/pages/id27.html](http://www.sssgr.net/pages/id27.html)

⑩

[www.miop.com/APONY/PGyulia2.html](http://www.miop.com/APONY/PGyulia2.html)

[www.miop.com/APONY/PGyulia.html](http://www.miop.com/APONY/PGyulia.html)

⑪

[www.joeing2.i12.com/yulianov2/](http://www.joeing2.i12.com/yulianov2/)

[www.joeing2.i12.com/juliajul02/](http://www.joeing2.i12.com/juliajul02/)

⑫

[maulfotoze.com/Yulia/](http://maulfotoze.com/Yulia/)

⑬

[www.gerardtitsman.com/France/news.html](http://www.gerardtitsman.com/France/news.html)

⑭

[www.celebnakedness.com/YuliaNovav1561.htm](http://www.celebnakedness.com/YuliaNovav1561.htm)

⑮

[www.wlatopa.com/model.htm](http://www.wlatopa.com/model.htm)

⑯

[orbita.starmedia.com/~soutien/contendo.html](http://orbita.starmedia.com/~soutien/contendo.html)

⑰

[abpebl.news2cum.com/22-oct-02/page22.html](http://abpebl.news2cum.com/22-oct-02/page22.html)

⑱

[e111.de/](http://e111.de/)

⑲

[www.sweatermeat.net/yulia/](http://www.sweatermeat.net/yulia/)

[www.sweatermeat.net/](http://www.sweatermeat.net/)

⑳

[www.yulia-nova.de/](http://www.yulia-nova.de/)

4.

As I mentioned above I am a Japanese photographer who since 1994 has been going to Russia to take pictures of Russian models. I have the exclusive rights to the model Yulia Nova and nobody except me is allowed to photograph her. To prove that I am the owner of the rights to these pictures which are being used illegally by the above sites I site the evidence of [REDACTED] of Diapress where these pictures were published in Japan and American DHD. I also enclose the covers of my videos and photo collection. I hope this will suffice as evidence of my rights of ownership. I have produced 7 videos, 2 photo collections, postcards of Yulia. The only items which were for sale outside of Japan were 3 of the videos of Yulia. In July 2002 I made a contract with DHD to start the site named KIZU.NET. However I suffered so much illegal use of my photos that I was forced to suspend this contract in November 2002. Because there was so much illegal use of my pictures the membership of this site has failed to grow as expected. One site called Yulia nova/de stole over 500 of my pictures from my site and videos and photo collections etc. Even though I have sent countless warnings to the sites illegally using my work these warning have been ignored. I would like to use the originals on my own home page RUSSIAN BEAUTIES but because at the moment if I do this I am sure these pictures will be stolen I am in great difficulties. These sites are clearly infringing the rights both of me as copyright holder and the rights of the model Yulia. Such illegal use has done a huge amount of damage to my business. I cannot publish any new material because of this illegal use which is also causing me serious problems. In the course of my work on this project I have spent over \$100000 and produced more than 60000 pictures and taken over 200 hours of video. I am unable to use this material. I would like to see all the illegal sites removed so that I will be able to continue my work. I would be most grateful if you could remove all these illegal sites which appear all over the world. Please contact me to let me know what you can do.

Yours,

[REDACTED] (copyright owner)

5. [REDACTED]

6. The following is a list of the names of the owners of the illegal sites and those responsible for managing them.

③

[www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/  
Speciale-CD\\_Yulia\\_Nova.htm](http://www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/Speciale-CD_Yulia_Nova.htm)

[www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/  
Speciale\\_Yulia\\_Nova\\_3.htm](http://www.romanaclub.com/pages/SPECIALI/Yulia%20Nova/Speciale_Yulia_Nova_3.htm)

[REDACTED]

⑥

[www.tetasx.com/famosa/Yulia/Yulia.htm](http://www.tetasx.com/famosa/Yulia/Yulia.htm)

[www.tetasx.com/home.php](http://www.tetasx.com/home.php)

[REDACTED]

⑦

[www.yulianova.de/](http://www.yulianova.de/)

[REDACTED]

⑧

[photojo.com/galleries/SharedAlbumPage.asp?album\\_id=5052](http://photojo.com/galleries/SharedAlbumPage.asp?album_id=5052)

[photojo.com/galleries/SharedAlbumPage.asp?album\\_id=4430](http://photojo.com/galleries/SharedAlbumPage.asp?album_id=4430)

[REDACTED]

⑨

[www.sssgr.net/pages/yulianova.htm](http://www.sssgr.net/pages/yulianova.htm)

[www.sssgr.net/pages/id27.html](http://www.sssgr.net/pages/id27.html)

[REDACTED]

⑩

[www.miop.com/APONY/PGyulia2.html](http://www.miop.com/APONY/PGyulia2.html)

[www.miop.com/APONY/PGyulia.html](http://www.miop.com/APONY/PGyulia.html)

[REDACTED]

⑬

[www.gerardtitsman.com/France/news.html](http://www.gerardtitsman.com/France/news.html)

[REDACTED]

([www.micp.com/APONY/PGyulia.html](http://www.micp.com/APONY/PGyulia.html) As same person)

⑭

[www.celbnakedness.com/YuliaNovay1561.htm](http://www.celbnakedness.com/YuliaNovay1561.htm)

[REDACTED]

⑮

[www.wlatopa.com/model.htm](http://www.wlatopa.com/model.htm)

[REDACTED]

⑯

[orbita.starmedia.com/~scutien/contcudo.html](http://orbita.starmedia.com/~scutien/contcudo.html)

[REDACTED]

⑰

[abpebl.news2cum.com/22-oct-02/page22.html](http://abpebl.news2cum.com/22-oct-02/page22.html)

[REDACTED]

7. I am quite certain that the sites mentioned above are using my work without permission and are therefore illegal.

8. I am fully aware that the information given by me is true and that I am legally liable if any of the above claims are false.

9.

RUSSIAN BEAUTIES (Photo Studio S.K)

[REDACTED]

<http://www.russian-b.com>

[REDACTED]

[REDACTED]