

January 19, 2004

FROM:

[REDACTED]
DVD Direct 4 Less / Stages and Pages
[REDACTED] ST [REDACTED]
New York, New York 10036

TO:

Google, Inc.
Attn: Customer Support, DMCA Complaints
[REDACTED] Pkwy
Mountain View, CA 94043

Re: Copyright Infringement Notification

Sent via Fax: [REDACTED]

This is a notice to inform you that web pages that have been indexed and displayed on the google search engine at <http://www.google.com> infringe on my copyright.

1. The copyrighted work was first published on the internet at the "DVD Direct 4 Less" web site (<http://www.dvddirect4less.com>) on pages located at the following URLs:

http://www.dvddirect4less.com/netflix_DVD_distribution.html

http://www.dvddirect4less.com/renting_netflix_DVDs1.html

http://www.dvddirect4less.com/renting_netflix_DVDs2.html

http://www.dvddirect4less.com/netflix_price_plans_DVDs.html

http://www.dvddirect4less.com/netflix_DVD_rental_queue.html

2. Substantial portions of the content from the "DVD Direct 4 Less" web pages referenced above have been reproduced without permission or attribution on the pages of a web site known as "DVD Movie Rentals."

When using the following search phrases on the google search engine, the search results returned include the following results from the "DVD Movie Rentals" web site:

Search terms: "netflix distribution centers" or "netflix distribution facility" or "netflix distribution facilities"

Infringing Web pages:

<http://www.dvd-movie-rentals.com/netflix-shipping.htm>

<http://www.dvd-movie-rentals.com/netflix-distribution.htm>

Search term: "netflix no risk free trial"

Infringing Web page:

<http://www.dvd-movie-rentals.com/netflix-sign-up.htm>

Search term: "netflix special offer DVD movie rentals"

Infringing Web Page:

<http://www.dvd-movie-rentals.com/netflix-special-offer.htm>

Search term: "netflix DVD rentals price plans"

Infringing Web Page:

<http://www.dvd-movie-rentals.com/netflix-prices.htm>

In addition to major blocks of copy being "cut and pasted" into the infringing pages, there are several instances of misspelled words in the original copyrighted work that have been reproduced in the infringing work.

The word "metropolitan" is misspelled in the original work here:

http://www.dvddirect4less.com/netflix_DVD_distribution.html

... and reproduced on the infringing page here:

<http://www.dvd-movie-rentals.com/netflix-shipping.htm>

The words "efficient" and "Pennsylvania" are misspelled in the original work here:

http://www.dvddirect4less.com/netflix_DVD_distribution.html

... and in the infringing work here:

<http://www.dvd-movie-rentals.com/netflix-distribution.htm>

Please note that pages available for reference at the "Internet Archive" a.k.a. the "WayBack Machine" (<http://www.archive.org>), support our claim as the original author of the above referenced pages.

3. Contact information for DVD Direct 4 Less and Stages and Pages:

[REDACTED]
DVD Direct 4 Less / Stages and Pages

[REDACTED] ST # [REDACTED]

New York, New York 10036

Day: [REDACTED]

Night: [REDACTED]

Mobile: [REDACTED]

e-mail: [REDACTED]@[REDACTED].com

e-mail: [REDACTED]@[REDACTED].com

4. According to the "Who Is" database, the infringing site is registered to:

[REDACTED]
[REDACTED] e-mail: [REDACTED]@[REDACTED].com

[REDACTED] Pkwy

San Diego, CA, United States 92114-6549

The "DVD Movie Rentals" site also supplies an e-mail address for filing complaints with their "Intellectual Property Rights Department":

[REDACTED]@[REDACTED].com.

5. I have a good faith belief that use of the copyrighted materials described above on the allegedly infringing web pages is not authorized by the copyright owner, its agent, or the law.

6. I swear, under penalty of perjury, that the information in the notification is accurate and that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Many thanks for your consideration of this claim.

[REDACTED]

1/19/04

[REDACTED]
DVD Direct 4 Less / Stages and Pages