

**costa abrams & coate llp** | trial & transactional attorneys

██████████ Street, ██████████ Floor, Santa Monica, California 90401

tel ██████████ fax ██████████

A limited liability partnership including professional corporations

June 29, 2004

**CONFIDENTIAL LEGAL COMMUNICATIONS**  
**PROTECTED UNDER THE UNITED STATES COPYRIGHT ACT**  
**NOT FOR PUBLICATION OR OTHER USE**

**Via First Class Mail and Facsimile @** ██████████

Google, Inc.

Attn: Customer Support / Mr. ██████████

DMCA Complaints

██████████ Parkway

Mountain View, CA 94043

**Re: ██████████ v. Net Management Services, et al./Copyright Violations**  
**United States District Court, Central District of California**  
**Case No. CV 04-1553 DDP**

Dear Mr. ██████████:

As you may recall, our office represents ██████████ (and others) and his website, [www.trustfundgirls.com](http://www.trustfundgirls.com). In response to our firm's May 28, 2004, and June 7, 2004, letters Google seems to have temporarily removed some infringing websites from Google's "Sponsored Links." However, Google's remedial action was short lived. Remarkably, less than one month later, many previously identified infringing sites remain listed in Google's regular search term returns section. In addition to these previously identified infringing sites, several more unlawful infringers (see below) have appeared as "Sponsored Links" on Google. Please take the necessary steps to immediately remove the previously identified infringing sites (which should have already been done), and the newly identified sites (see below) from your search engine and confirm the removal with me as soon as possible.

**Copyrighted Material:** As discussed in our prior letters, the copyrighted work at issue is the much-publicized video showing Mr. ██████████ and his girlfriend at the time, famous socialite and aspiring actress, ██████████, engaged in intimate relations (the "video"). Mr. ██████████ is the sole and exclusive owner of the copyrights in the video. Footage was registered in November 2003 (No. Pau-780-223).

Google, Inc.  
June 29, 2004  
Page Two

**Infringing Material:** We strongly believe that the operators of the following newly-discovered websites are engaging in copyright infringement either by (a) directly infringing upon Salomon's rights in the video, or (b) by engaging in "personal conduct that encourages or assists the infringement." Perfect 10, Inc. v. Cybernet Ventures, Inc., 213 F.Supp.2d 1146 (9th Cir. 2002). Each of these instances of copyright infringement relate to a recognizable portion of the 27-minute segment of the video which has been registered by the U.S. Copyright Office.

**Google Search:** "Paris Hilton Sex Tape"

**Infringing Sites:** Paris Hilton sex tape - www.sexcia.com/paris\_hilton\_sex\_tape.html  
PARIS HILTON SEX VIDEO - DOWNLOAD THE TAPE FOR FREE  
 !! - www.paris-hilton-sex-video.info/  
Gena Lee Nolin Sex Tape - The FULL Paris Hilton Video @ BeerOrSex.  
 ... - www.beerorsex.com/  
Paris Hilton sex tape - www.celebsdb.com/Paris-Hilton-sex-tape/  
 -:- Hilton Paris Photo pussy shot - www.parishilton.video.new.net/cgi-bin/index.pl  
Paris Hilton Sex Video - Paris Hilton Sex Tape with Rick Solomon ... -  
www.chemint.org/free-paris-hilton-video.htm  
PARIS HILTON SEX VIDEO - SEX Tape Paris Hilton Video for  
FREE - dirtymafia.com/video/  
Paris Hilton Video download. Best sex tape online right here - paris-  
hilton-video.incredishop.com  
XXX - PARIS HILTON SEX VIDEO - XXX  
www.beautyandthedirt.co.uk/html/ParisHilton/paris\_hilton.html

**Infringing Sites**

**(Sponsored Links):** 37 Minute Paris Hilton - payloadz.com  
Paris Hilton Tape \$ 3.99 - www.scandalvideos.com

Google, Inc.  
June 29, 2004  
Page Three

**Google Search:** **"Paris Hilton Sex Video"**

**Infringing Sites:** **PARIS HILTON SEX VIDEO - DOWNLOAD THE TAPE FOR FREE**

**!! - [www.paris-hilton-sex-video.info/](http://www.paris-hilton-sex-video.info/)**

**XXX - PARIS HILTON SEX VIDEO - XXX**

**www.beautyandthedirt.co.uk/html/ParisHilton/paris\_hilton.html**

**Paris Hilton sex video - [www.jays-xxx-links.com/paris\\_hilton\\_sex\\_video/](http://www.jays-xxx-links.com/paris_hilton_sex_video/)**

**PARIS HILTON SEX VIDEO - SEX Tape Paris Hilton Video for FREE - [dirtymafia.com/video/](http://dirtymafia.com/video/)**

**Paris Hilton sex tape - [www.celebsdb.com/Paris-Hilton-sex-tape/](http://www.celebsdb.com/Paris-Hilton-sex-tape/)**

**Paris Hilton sex tape - [www.sexcia.com/paris\\_hilton\\_sex\\_tape.html](http://www.sexcia.com/paris_hilton_sex_tape.html)**

**Paris Hilton fan page, stolen sex video download - [www.visitcelebrities.com/paris-hilton/](http://www.visitcelebrities.com/paris-hilton/)**

**Paris Hilton Video News plus 100s of celebs caught nude! - [www.sex-paris-hilton.com](http://www.sex-paris-hilton.com)**

**Infringing Sites**

**(Sponsored Links):** **You Want It, We Got It - [payloadz.com](http://payloadz.com)**  
**37 Min Paris Hilton Video - [payloadz.com](http://payloadz.com)**  
**Paris Hilton Tape \$ 3.99 - [www.scandalvideos.com](http://www.scandalvideos.com)**

**Google Search:** **"Paris Hilton Tape"**

**Infringing Sites:** **Paris Hilton tape - [www.allthechicks.com/Paris-Hilton-tape/](http://www.allthechicks.com/Paris-Hilton-tape/)**

**:- Hilton Paris Photo pussy shot - [www.parishilton.video.new.net/cgi-bin/index.pl](http://www.parishilton.video.new.net/cgi-bin/index.pl)**

**Infringing Sites**

**(Sponsored Links):** **Don't Pay \$50 for PH Vid - [payloadz.com](http://payloadz.com)**  
**37 Min Paris Hilton Video - [payloadz.com](http://payloadz.com)**

The 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.

Google, Inc.  
June 29, 2004  
Page Four

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

Should Google fail to fully comply with these reasonable demands, our client will have no alternative but to assert his legal rights against Google and those acting on Google's behalf under both federal and state law and seek compensatory damages, punitive damages, injunctive relief, and the recovery of attorneys' fees necessitated by Google's unlawful conduct.

This is a confidential legal notice and may not be published, in whole or in part. Any republishing or dissemination of same, including but not limited to the posting of the contents hereof on the Internet, shall constitute a copyright infringement and will subject the republisher(s) to civil liability for such actions. This letter does not constitute a complete or exhaustive statement of all of my client's rights, claims, contentions or legal theories regarding this matter. Nothing stated herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of my client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

Your sincerely,

[REDACTED]  
[REDACTED]

cc: Mr. [REDACTED];  
[REDACTED], Esq.