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BASS, BERRY & SIMS PLC

A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

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[REDACTED]
NASHVILLE, TN 37238-3001
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OTHER OFFICES:

NASHVILLE MUSIC ROW
KNOXVILLE
MEMPHIS

August 11, 2004

VIA FACSIMILE AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Google, Inc.

Attn: [REDACTED]
[REDACTED]
[REDACTED]

Mountain View, CA 94043

Re: Notice of Copyright Infringement and Request for Immediate Takedown

Ladies and Gentlemen:

This firm represents Loan Alliance, Inc. ("Loan Alliance"), which has authorized us to act on its behalf for this copyright infringement notification. As required under Sections 512(c)(3) and 512(d)(3) of the Digital Millennium Copyright Act (17 U.S.C. §§512(c)(3) and 512(d)(3)), we are instructed to place you on notice that:

1. Loan Alliance operates the website located at "www.icreditcentral.com" (the "Site"). The copyrighted work enclosed herewith was first published on the Internet on this Site owned by Loan Alliance. These pages are available for reference online at the "Internet Archive" (a/k/a the "WayBack Machine" (<http://www.archive.org>)), which supports our client's claim that Loan Alliance is the original author of the above-referenced pages.

2. Substantial portions of the content from the Site have been reproduced without permission or attribution on the pages of a website known as "Credit Services Guide", located at "<http://www.creditservicesguide.com>" (the "Infringing Website"), owned by [REDACTED] and Center Point Media ("Center Point Media"). Content on the Infringing Website is substantially similar to the content contained on the Loan Alliance Site. Major blocks of text and other copy have simply been "cut and pasted" into the Infringing Website, with only a few words added or removed.

At least one entire Loan Alliance article is reproduced verbatim on the Infringing Website. Center Point Media's reproduction of this article unquestionably constitutes copyright infringement. No permission to copy or display this article or any other Loan Alliance materials has been sought or obtained by Center Point Media from Loan Alliance.

Upon entering some or all of the text from the Infringing Website into Google's search engine, the search results included links to Center Point Media's Infringing Website. In fact,

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Loan Alliance's website was reduced in rank in the Google search results, due in whole or in part to Center Point Media's copyright infringement and posting of Loan Alliance materials on the Infringing Site.

Loan Alliance has sent [REDACTED] and Center Point Media a cease-and-desist letter, a copy of which is enclosed. Although our client believes that Credit Services Guide removed a small portion of the misappropriated pages and content from its Infringing Website, Loan Alliance's Site has been removed completely from Google's search results, presumably because the search engine deems the Infringing Website is somehow associated with Loan Alliance and has determined it is duplicate content.

3. Contact information for Loan Alliance:

[REDACTED]
Bass, Berry & Sims PLC

[REDACTED]
Nashville, Tennessee 37238

4. Upon information and belief, and according to the WHOIS database, the infringing site is registered to:

[REDACTED]
Center Point Media
[REDACTED]
Richmond Hill, Ontario
Canada
L4C 5N7

5. Our client has a good faith belief that the use by Center Point Media of the content contained on the Loan Alliance Site is not authorized by Loan Alliance, its agents or the law. The information in this Notice of Copyright Infringement is accurate and under penalty of perjury, I am authorized to act on behalf of Loan Alliance.

Please immediately remove or disable all access to the Infringing Website and any infringing materials therein. In addition, please let us know how our client can help in putting its website back in the position and search engine ranking it achieved prior to this infringement.

Thank you in advance for your prompt consideration of this claim in accordance with Section 512 of the DMCA. Should you require any further information regarding this matter, please contact me at the telephone number or email address above. Thank you.

Sincerely,

[REDACTED]