



BROOKE OLIVER LAW GROUP, P.C.
AN ART, ENTERTAINMENT AND BUSINESS LAW FIRM

SAN FRANCISCO, CA. 94110

FAX:

@artemama.com www.artemama.com

Via U.S. Mail

November 16, 2004
1363/910 12 B

Google, Inc.

Attn:

Mountain View, California 94043

Re: NOTICE OF COPYRIGHT INFRINGEMENT

Dear Sir or Madam:

We act on behalf of artist [REDACTED] (the "Owner"), who is known by his pseudonym Michael Parkes.

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 placing you on notice that:

1. The Owner is the exclusive owner of the copyrights in and to the original stone lithograph prints (the "Stone Lithographs"), which are displayed on the Owner's website located at <http://www.theworldofmichaelparkes.com/>, including:

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive2003.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographicArchives2002.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographicArchives2002.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive2001.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive2000.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1999.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1998.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1996.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1995.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1994.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1993.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1992.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1991.html>

<http://www.theworldofmichaelparkes.com/ArchivePages/LithographArchive1990.html>

2. Utilizing the search query, "kaleidoscope gallery michael parkes," at www.google.com, the search results include the following (the "Infringing Web Site") which contains unauthorized copies of the Stone Lithographs which infringe the exclusive rights of the Owner:

Infringing Web Site: www.kgallery.com/

The unauthorized copies of the Stone Lithographs (the "Infringing Materials") are located at the URL http://www.kgallery.com/parkes_b.htm on the Infringing Web Site. To navigate to the unauthorized copies of the Stone Lithographs on the Infringing Web Site, click on "Click to Enter the Site," click on the "Artist Menu" button, scroll down and click on "Michael Parkes," and finally click on "Stone Lithographs." The unauthorized copies of the Stone Lithographs are listed there alphabetically.

Please immediately remove or disable all access to the Infringing Materials.

3. The following contact information is provided so that Google can notify the owner and administrator of the Infringing Web Site:

Owner: [REDACTED] Direct Line: [REDACTED]
E-mail: [REDACTED]@kgallery.com

[REDACTED]
Mission Viejo, CA 92691

4. I have a good faith belief that the use of the copyrighted materials described above on the allegedly infringing web page is not authorized by the Owner, its agents, or the law. A lawsuit has been filed in U.S. District Court in the Central District of California (Case No. SACV-04-1289 AHS (ANx)) against Ed Bolin, the owner of www.kgallery.com and Kaleidoscope Gallery, for infringement of the Owner's copyrights in the Stone Lithographs which are the subject of this Notice.

5. I swear, under penalty of perjury, that the information in this Notice of Copyright Infringement is accurate, and that I am authorized to act on behalf of the Owner of an exclusive right that is allegedly infringed.

6. Should you require any further information regarding this matter, please contact me at the address, telephone number, or email address indicated below:

[REDACTED]
Brooke Oliver Law Group, P.C.
[REDACTED]
San Francisco, CA 94110
Telephone: [REDACTED]
Email: [REDACTED]@artemama.com

