

To: [REDACTED]

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FOURTH NOTICE**Via Signed Facsimile to [REDACTED] and Via email to [REDACTED]@google.com**

December 8, 2005 1:55 AM (California Time)

re: **Continued Contributory Copyright Infringement by Google**

Dear [REDACTED]

You've already had more than 24 hours since my first notice (see below). I note that the Infringing Sites are still returned on the Google Search delineated below!

Pursuant to 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)), I hereby place you on notice!

I swear, under penalty of perjury consistent with United States Code Title 17, Section 512, that the information in the notification is accurate and that I am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

For ease of reference, I include hereafter my third notice to you regarding these Infringing Sites:

THIRD NOTICE**Via Signed Facsimile to [REDACTED] and Via email to [REDACTED]@google.com**

December 7, 2005 7:35 PM (California Time)

re: **Continued Contributory Copyright Infringement by Google**

Dear [REDACTED]

You've already had more than 18 hours since my first notice (see below). I note that the Infringing Sites are still returned on the Google Search delineated below!

For ease of reference, I include hereafter my second notice to you regarding these Infringing Sites:

To: [REDACTED]

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SECOND NOTICE**Via Signed Facsimile to [REDACTED] and Via email to [REDACTED]@google.com**

December 7, 2005 6:25 AM (California Time)

re: **Continued Contributory Copyright Infringement by Google**

Dear [REDACTED]

You've already had more than 5 hours since my first notice (see below). I note that the Infringing Sites are still returned on the Google Search delineated below!

For ease of reference, I include hereafter my first notice to you regarding these Infringing Sites:

Via Signed Facsimile (without attachments) to [REDACTED] and Via email (with attachments) to [REDACTED]@google.com

December 7, 2005 1:20 AM (California Time)

re: **Contributory Copyright Infringement by Google**

From: [REDACTED] (email: [REDACTED]@msn.com)

[REDACTED] (SBN: 1303131) and [REDACTED] (SBN: 175030)

COSTA, ABRAMS, and COATE, LLP

[REDACTED] Third Floor

Santa Monica, CA 90401

(310) 576-6161

To: [REDACTED]

Intellectual Property Counsel
Google, Inc.[REDACTED]
Mountain View, CA 94043

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

To: [REDACTED]

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Dear [REDACTED]

Perhaps you remember me. My name is [REDACTED], and I own substantial rights in the [REDACTED] Hilton Video. This is a follow up to: the [REDACTED] Esq. of Lavelly & Singer letter to you of March 16, 2004 (copy attached) as a result of which Google reportedly "took down" something like 23 URL's; the [REDACTED] Esq. of Costa, Abrams & Coate LLP letter to you of May 28, 2004 (signed copy attached) as a result of which Google reportedly "took down" something like 41 URL's; my letter to [REDACTED] and you of November 15, 2005; and my letter to you of November 29, 2005. I also attach a signed copy of the court-stamped above-referenced United States District Court complaint.

As you may recall, Costa, Abrams & Coate LLP are litigation counsel for my brother [REDACTED]. Pursuant to Google's copyright complaint procedure, this letter shall set forth a website(s) returned on a Google Search which is infringing upon my rights, the rights of [REDACTED] and the rights of other significant interests.

The copyrighted work at issue is the much-publicized Video showing my brother [REDACTED] and his girlfriend at the time, famous socialite and aspiring actress, Paris Hilton, engaged in sexual activity and other intimate relations. Footage was registered in November, 2003 (NO. Pau-780-223). Please take the necessary steps to remove the infringing website(s) from your search engine immediately and confirm the removal with me — via email — as soon as possible!

Remember, the longer you take, the more your unlawful conduct damages us and the more you incentivize the infringer / fraudster for the next time!

Why does it take many hours for Google to remove an infringing site?
By contrast — for example — it only takes EBay/PayPal a matter of minutes (even on a Sunday) to terminate PayPal accounts — associated with infringing sites — in response to my similar reasonable demands.

Infringing Material: We strongly believe that the operators of the following websites are engaging in copyright infringement either by (a) directly infringing upon the copyrights 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 relates to recognizable portions of the Video which has been registered by the U.S. Copyright Office.

Google Search: Paris Hilton Sex

Infringing Sites:

To: [REDACTED]

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[A.] www.paris-hilton-sex.com/

[B.] www.celebritywizard.com/paris_hilton_video.html

[A.] www.paris-hilton-sex.com/

{1.} Attached hereto please find a JPG screenshot entitled Google-Paris Hilton Sex. There you will find the following Google result:

Paris Hilton Sex Tape, [REDACTED] **naked,** [REDACTED]
Nude celebrity pictures, **Paris Hilton**, Cameron Diaz and many more.
www.paris-hilton-sex.com/

As you can plainly see, Paris Hilton Sex Tape is clearly mentioned.

{2.} Attached hereto please find a gif entitled Paris-Hilton-Sex which was saved from www.paris-hilton-sex.com/.

**There you will find an infringing image of both my brother, [REDACTED]
[REDACTED] and Paris Hilton.**

[B.] www.celebritywizard.com/paris_hilton_video.html

{1.} Attached hereto please find a JPG screenshot entitled Google-Paris Hilton Sex. There you will find the following Google result:

Paris Hilton Video
Download the **Paris Hilton sex** tape for free. ... Red Light District has secured the rights to the **Paris Hilton sex** video and will release 1 Night in Paris ...
www.celebritywizard.com/paris_hilton_video.html

As you can plainly see, Download the Paris Hilton sex tape is clearly mentioned.

{2.} Attached hereto please find a JPG screenshot entitled Celebrity Wizard.

**There you will find an infringing image of both my brother, [REDACTED]
[REDACTED] and Paris Hilton; along with the promise of still more infringement.**

To: [REDACTED]

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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.

I swear, under penalty of perjury, that the information in the 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, we will have no alternative but to assert our legal rights against Google, and those acting on Google's behalf, under both U.S. 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 letter does not constitute a complete or exhaustive statement of all of our 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 our rights or remedies, whether legal or equitable, all of which are hereby expressly reserved.

We await your email response. - [REDACTED]

cc: Mr. [REDACTED] at Google (with attachments; via e-mail)
[REDACTED] Esq. (with attachments; via e-mail)
[REDACTED] Esq. (with attachments; via e-mail)
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