

To: [REDACTED]

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

January 2, 2006 10:50 AM (California Time)

Subject: Contributory Copyright Infringement by Google

From: [REDACTED] (email: [REDACTED]@msn.com)
C/o [REDACTED] (SBN: 1303131) and [REDACTED] (SBN: 175030)
[REDACTED] LLP
[REDACTED]
Santa Monica, CA 90401
[REDACTED]

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

[REDACTED] v. LFP Broadcasting, et al/Copyright Violations
United States District Court, Central District of California
Case No. CV 05-8603

Dear [REDACTED]

I guess you probably 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 [REDACTED] 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 letters to you of November 29, 2005, December 7, 2005, December 12, 2005, December 14, 2005, and December 22, 2005. I also attach signed copies of the court-stamped above-referenced United States District Court complaints **[the latter of these two complaints was filed on December 8, 2005]**.

As you may recall, [REDACTED] LLP are litigation counsel for my brother [REDACTED]. Pursuant to Google's copyright complaint procedure, this letter shall set

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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.

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.

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-2-780-223] 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 by: (a.) directly infringing upon the copyrights in the Video; and/or (b.) 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 Searches: Paris Hilton Sex

Paris Hilton Sex Free

Paris Hilton Sex Movie

Paris Hilton Sex Movie Free

Paris Hilton Sex Tape

Paris Hilton Sex Tape Free

Paris Hilton Sex Video

Paris Hilton Sex Video Free

Infringing Sites:

[A.] baseballinva.org/paris/

[B.] www.paris-hilton-sex.com/index.shtml

[C.] www.181st.net/paris-hilton-sex-video/

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[A.] baseballinva.org/paris/

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

[paris hilton sex tape. \[paris hilton naked, free paris hilton ...](#)
PARIS HILTON SEX TAPE. free paris hilton sex tape. free paris hilton video.
baseballinva.org/paris/

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

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

[B.] www.paris-hilton-sex.com/index.shtml

{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, catherine bosley naked, jackie gayda](#)
Nude celebrity pictures, **Paris Hilton**, Cameron Diaz and many more.
www.paris-hilton-sex.com/index.shtml

{2.} Attached hereto please find a gif entitled paris-hilton-sex.

**There you will find infringing images of both my brother, Rick
Salomon, and Paris Hilton; along with the promise of still more
infringing images.**

[C.] www.181st.net/paris-hilton-sex-video/

{1.} Attached hereto please find a JPG screenshot entitled Google-181. There you will find the following Google result:

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PARIS HILTON SEX VIDEO - FREE SEX TAPE DOWNLOAD

Download the famous Paris Hilton sex tape. free paris hilton photos and video ... Check out the highlights of the full Paris Hilton sex tape:. What you get: ...
www.181st.net/paris-hilton-sex-video/

{2.} Attached hereto please find a JPG screenshot entitled 181.

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

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 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.

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: [REDACTED] at Google (with attachments; via e-mail)
[REDACTED] Esq. (with attachments; via e-mail)
[REDACTED] Esq. (with attachments; via e-mail)
[REDACTED] Esq. (with attachments; via e-mail)
[REDACTED] (with attachments; via e-mail)
[REDACTED] (with attachments; via e-mail)
[REDACTED]@google.com (with attachments; via e-mail)

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