

To: [REDACTED]

Page 1 of 4

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

March 27, 2006 10:25 PM (California Time)

Subject: **Contributory Copyright Infringement by Google**

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

C/o [REDACTED]

COSTA, ABRAMS, and COATE, LLP

[REDACTED]  
Santa Monica, CA 90401  
[REDACTED]

To: [REDACTED]

Intellectual Property Counsel

Google, Inc.

[REDACTED]  
Mountain View, CA 94043

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

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

Dear [REDACTED]

I guess by now you probably remember me. My name is [REDACTED] and I own substantial rights in the Salomon/Hilton Video. This is a follow up to: the [REDACTED] Esq. of Lavelly & Singer letter to you of March 16, 2004 (in numerous prior emails to you, I've already attached copies) as a result of which Google reportedly removed something like 23 URL's; the [REDACTED] Esq. of Costa, Abrams & Coate LLP letter to you of May 28, 2004 (in numerous prior emails to you, I've already attached signed copies) as a result of which Google reportedly removed 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, December 22, 2005, January 2, 2006, January 3, 2006, January 11, 2006, January 16, 2006, January 29, 2006, February 2, 2006, February 17, 2006, February 20, 2006, February 21, 2006, February 25, 2006, February 27, 2006, March 2, 2006, March 11, 2006, March 20, 2006, March 21, 2006, March 22, 2006, March 23, 2006, and March 24, 2006. Also in numerous prior emails to you, I've

To: [REDACTED]

Page 2 of 4

already attached copies of the signed 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, Costa, Abrams & Coate LLP are litigation counsel for [REDACTED]. Pursuant to Google's copyright complaint procedure, this letter shall set forth a page(s) returned on a Google Search(es) which is infringing upon my rights, the rights of Rick Salomon, 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 [REDACTED] and his girlfriend at the time, famous socialite and aspiring actress, [REDACTED] engaged in sexual activity and other intimate relations. Footage was registered in November, 2003. [No. PAu-2-780-223] **Please submit the removal request and remove the infringing page(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 page???** 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 pages 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**

To: [REDACTED]

Page 3 of 4

**Paris Hilton Sex Video**  
**Paris Hilton Sex Video Free**

**Infringing Pages:**

**[A.]** [www.mtedenvaulting.com/paris.htm](http://www.mtedenvaulting.com/paris.htm)

**[B.]** [www.advancegb.com/paris.htm](http://www.advancegb.com/paris.htm)

**[A.] [www.mtedenvaulting.com/paris.htm](http://www.mtedenvaulting.com/paris.htm)**

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

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paris hilton sex tape! exclusive paris hilton nude gallery of ...  
PARIS HILTON SEX TAPE. paris hilton sex video. gallery of paris hilton.  
[www.mtedenvaulting.com/paris.htm](http://www.mtedenvaulting.com/paris.htm)

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

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

**[B.] [www.advancegb.com/paris.htm](http://www.advancegb.com/paris.htm)**

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

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paris hilton sex tape! exclusive paris hilton sex paris hilton ...  
PARIS HILTON SEX TAPE. paris hilton porn. paris hilton porn.  
[www.advancegb.com/paris.htm](http://www.advancegb.com/paris.htm)

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

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

To: [REDACTED]

Page 4 of 4

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] 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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