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JANUARY 14, 2010

VIA E-MAIL dsg@thedirty.com and FACSIMILE (408) 248-3196
 David S. Gingras, Esq.
 TheDirty.com

Re: Infringement of Nadya Suleman Bikini Photographs
On The TheDirty.com Website

Dear Mr. Gingras:

I understand from Nik Richie's agent Ari that you are counsel for TheDirty.com. Please be advised that we represent Polaris Images, the copyright owner of the recent photographs of Nadya Suleman in a bikini (the "Photographs"). The Photographs are registered with the Copyright Office. Polaris recently learned that the Photographs have been published illegally and without Polaris Images' consent on TheDirty.com website (including putting its own watermark on each Photograph). Specifically, Polaris Images detected infringing Photographs on the web pages:


<http://TheDirty.com>
<http://TheDirty.com/2010/01/13/246067/>

We hereby demand that you immediately remove the Photographs from TheDirty.com website and advise us from where your company obtained the Photographs. We are sending a DMCA notice contemporaneously similarly demanding the takedown of the Photographs.

Such infringing publication or use of the Photographs will be considered willful copyright infringement under Title 17 of the United States Code and Polaris Images can, and will, seek all remedies available including statutory damages up to \$150,000, injunctive relief and its attorneys' fees. Moreover, the principals of Dirty World, LLC may be held individually liable for that infringement.

This letter is written without prejudice to any rights or claims our client may have in law or equity, all of which are expressly reserved.

Very truly yours,


 Matthew A. Kaplan

cc: Nancy E. Wolff, Esq. (via e-mail)
 Polaris Images (via e-mail)

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