

Shawn Chapman Holley
[REDACTED]
[REDACTED]

September 16, 2010

VIA U.S. MAIL AND FACSIMILE

Robert Feldman
David Feldman
Nick Orlandino
PIPEDREAM PRODUCTS, INC.
[REDACTED]
[REDACTED]

Re: Kim Kardashian-inspired blow-up "doll"

Gentlemen:

This law firm represents Kim Kardashian. It has recently come to our attention that you have used Ms. Kardashian's image on a plastic blow-up doll which your company is offering for sale. Accordingly, you are using Ms. Kardashian's likeness for your own commercial gain. Moreover, Ms. Kardashian has not authorized you to use her image in such a manner. Your unauthorized use of Ms. Kardashian's likeness on this doll constitutes a violation of her right of publicity.

California Civil Code Section 3344 prohibits the use of another's likeness "in any manner . . . for purposes of advertising or selling, or soliciting purchases of, products, merchandise, goods or services, without such person's prior consent . . ." Right of publicity violations are punishable by actual and punitive damages. Moreover, Ms. Kardashian is entitled to recover her reasonable attorney's fees under California law.

We hereby demand that you immediately cease and desist all use of Ms. Kardashian's likeness on all products and advertisements therefor. We demand written assurances no later than the close of business on September 20, 2010 that you will comply with the demands set forth herein. If your assurances are not received in a timely manner, Ms. Kardashian will not hesitate to exercise all of her legal and equitable rights against you.

PIPEDREAM PRODUCTS, INC.

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This letter is not intended as a complete statement of all facts concerning this matter. Nothing contained herein shall constitute a relinquishment of Ms. Kardashian's rights remedies, causes of action, and claims for relief, at law or in equity, all of which are expressly reserved.

Very truly yours,

Shawn Chapman Holley

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A large, light gray watermark logo consisting of the letters 'TMZ' in a bold, stylized, sans-serif font. The letters are thick and have rounded terminals. The 'T' has a horizontal top bar. The 'M' has a central dip and rounded bottom points. The 'Z' has a horizontal bottom bar and a slanted top bar.