

From: Scott Carr [REDACTED]
Date: October 18, 2010 12:53:52 PM PDT
To: "nik [REDACTED]" <nik@[REDACTED]>
Subject: Unlawful Erin Andrews Postings

My name is Scott H. Carr, Esq. of Greene Broillet & Wheeler LLP, and we represent Erin Andrews. On your website, including but not limited to <<http://www.thedirty.com>> www.thedirty.com <<http://www.thedirty.com>>, there is currently a link to images that you represent are of our client. Even a cursory review of these still and video images immediately reveals that they were taken unlawfully and surreptitiously without consent, and are unlawfully being shown on this website. In fact, an individual has already been prosecuted for unlawfully taking these images. In addition, the copyright of these images belongs exclusively to Ms. Andrews.

We demand that you immediately cease and desist from showing these images or the link to the images on this website and on/through your server. The display of these illegally obtained images, as well as the link, has already violated the rights of Ms. Andrews (including but not limited to her right to privacy.) Your posting such images and offering them for sale continues to cause our client substantial damage. In addition to removing the material from your website, we are demanding that you remove the offending material and images from all search engine databases, including, but not limited to, Google. Here is the link that you should use to remove the material from Google. <<http://www.google.com/support/webmasters/bin/answer.py?answer=35301>> <http://www.google.com/support/webmasters/bin/answer.py?answer=35301>.

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Please contact me via email or at [REDACTED] to confirm that you have fully complied with this cease and desist demand. Also, please immediately provide all information concerning the source of these images.