

Frankfurt Kurnit Klein + Selz PC

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March 15, 2017

BY EMAIL

[REDACTED]

Re: Amanda Seyfried – Unauthorized Publication of Private Photographs

Dear Sir/Madam:

This firm represents Amanda Seyfried.

It recently has come to our client's attention that, without the authorization of our client or the copyright holder, several very private photographs of Ms. Seyfried either in various states of nudity or in intimate moments with her former boyfriend (the "Seyfried Photographs") have been reproduced and posted on th [REDACTED]

As you acknowledge on your website, these photographs are believed to have been leaked, *i.e.*, wrongfully obtained by a third party or parties without Ms. Seyfried's knowledge or consent. Your unauthorized use and distribution of the Seyfried Photographs constitutes, at a minimum, copyright infringement, violation of Ms. Seyfried's right of privacy under applicable law, and tortious conduct under state and common law.

On behalf of our client, we hereby demand that you immediately and permanently: (i) cease and desist any use of the Seyfried Photographs, and (ii) remove the Seyfried Photographs from your website.

Absent immediate compliance with the foregoing demands, we will take any and all appropriate steps to protect and enforce our client's rights, including, if necessary, commencing legal action and pursuing all appropriate remedies, which may include injunctive relief, claims for compensatory and exemplary damages, attorneys' fees, an accounting of your revenues from

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the unauthorized use of our client's images, and all other costs associated with our client's claims.

DUTY TO PRESERVE EVIDENCE

In addition to the foregoing, we demand that you take immediate and affirmative steps to preserve all electronic and paper evidence in your possession, custody and control relating or referring in any way to: (i) the use or distribution of the Seyfried Photographs, and (ii) the source of the Seyfried Photographs. Such evidence includes all emails, text messages, chat logs, screenshots or other electronic or paper documents stored on the work or home computers or mobile devices of your employees or on the cloud. Please immediately notify all your employees that they must immediately preserve such evidence. Please be advised that the deletion or modification of any of this information could subject you to sanctions under federal or state law.

Nothing contained in or omitted from this letter is intended to be or should be considered an admission of any fact or a waiver of any right or defense in this or any other matter, all of which are specifically and expressly reserved.

Very truly yours,

[REDACTED]

[REDACTED]

Enclosure

cc:

[REDACTED]