

June 30, 2010

**VIA CERTIFIED MAIL**

Mr. Myles Hass (also known as Mohammed Ali Hassan)  
5689 Berwyn Street  
Dearborn Heights, MI 48127

**Re: Infringement of Copyright, Trademark, and Acts of Unfair Competition**

Dear Mr. Myles: Aka Mohamed Ali Hassan

Our law firm represents Erotic Images, Inc., ("Erotic Images") of 26177 Southfield Rd., Suite 201, Lathrup Village, MI 48076.

We have been advised that you were employed by Erotic Images until you resigned from your employment on May 20, 2010. We have been further advised that you copied several data files from a server belonging to Erotic Images. These data files, including source code and pictures, are used by Erotic Images to post a website ("41 Strip site") for an adult entertainment business called 41 Strip ("41 Strip"). 41 Strip is operated in Michigan by Erotic Images. The 41 Strip site has a Uniform Resource Locator (URL) of [www.41strip.com](http://www.41strip.com). Subsequent to your copying, you deleted the original files from the server.

We have been further advised that, on or about May 20, 2010, you posted a website having a URL of [www.premierstrippers.com](http://www.premierstrippers.com) ("Premier site"). The Premier site appears to be intended to advertise a competing adult entertainment business called Premier Strippers ("Premier"). The Premier site, as originally posted, was a complete and direct copy of the 41 Strip site. The only substantive changes were that (1) the name 41 Strip was changed to Premier Strippers and (2) the contact information was changed. Substantial copyrighted material was directly copied from the 41 Strip site to create the Premier site. The copyrighted material included a graphical logo of two dancers in silhouette ("Dancer Logo" - a copy of which is attached), photos of dancers affiliated with Erotic Images, and substantially all of the 41 Strip site text and graphical design.

Your copying of the source files, images, logos, photos, and text from the 41 Strip site are in direct violation of Erotic Image's rights under the Federal Copyright Act. Demonstrated violations of the Federal Copyright Act may subject you to an injunction and to liability for monetary damages, including, (1) lost profits to Erotic Images, (2) forfeiture and restitution of your profits to Erotic Images, (3) statutory damages of up to \$30,000 per occurrence or of up to \$150,000 per occurrence if shown to be willful, (4) court costs, and (5) attorney's fees. The

posting of photographs of dancers associated with Erotic Images violates, at a minimum, each dancer's Right of Publicity and is an actionable tortious act under Michigan Law. Demonstrated tortious acts under Michigan Law may subject you to liability for monetary damages.

Your use of the Dancer Logo to advertise your services on the Premier website (or any other site, publication, handbill, etc.) is in direct violation of Erotic Image's rights to the logo as a service mark under Federal and State Trademark Law. Demonstrated violations the Federal Trademark Act (known as the Lanham Act) may subject you to an injunction and to liability for monetary damages, including, (1) damages to Erotic Images, (2) forfeiture and restitution of your profits to Erotic Images, (3) statutory damages of between \$1,000 and \$200,000 per occurrence, and up to \$2,000,000 if willful, (4) court costs, and (5) attorney's fees. Violations of the Trademark Act of the State of Michigan carry similar potential liabilities. In addition, your use of the Dancer Logo to advertise services constitutes a form of "palming off" which is actionable as a tortious violation of Erotic Image's rights under Michigan Unfair Competition Law. Demonstrated tortious acts under Michigan Law may subject you to liability for monetary damages.

Your blatant breaches of Erotic Images rights are not tolerable. Accordingly, we hereby demand that you immediately cease and desist from all further violations of Erotic Images rights under Copyright, Trademark, and Unfair Competition Law as well as the rights of dancers associated with Erotic Images. We further demand that you immediately remove from any website under your control, particularly from the Premier site, all material based on Erotic Images source files, photographs, HTML code, text, and graphical designs used in Erotic Images websites, in general, and the 41 Strip site in particular. We further demand that you immediately return all documents and electronic data containing source files, photographs, HTML code, text, and graphical designs relating to Erotic Images websites, in general, and the 41 Strip site in particular.

If you fail to do so within seven days of the date of this letter, Erotic Images will not hesitate to seek all available relief under the law, including but not limited to seeking injunctive relief and monetary damages.

Please have your attorney contact my office if you have any questions regarding the above. If you are not represented by an attorney, you may contact my office directly.

Sincerely,

McKellar IP Law, PLLC

By /s/ \_\_\_\_\_  
Douglas Schnabel

cc: Mr. Hassan, (w/enc)