Case: 1:10-cv-06517 Document #: 115-14 Filed: 10/26/11 Page 1 of 99 PageID #:2701



April 22, 2011

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DMCA Notice of Copyright Infringement

Notice to Cease and Desist Copyright Infringement Under the Provisions of the Digital Millennium Copyright Act

Under Reservation of All Rights

To Whom It May Concern:

I, Phillip Bleicher, owner of Flava Works, Inc., certify under penalty of perjury, that I am an agent authorized to act on behalf of the owner of certain intellectual property rights. Flava Works, Inc. owns the copyright concerning an astounding number of still images and videos which are being openly published on your site without its license or other authority, each of which will be particularly identified in this letter together with information precisely identifying the location of that material in the works



which you host or otherwise publish. The verified and documented infringements listed in this letter were traced to URLs and/or IP addresses controlled by your company. All of the infringements occur from this base URL or derivations thereof. Some links permit, or have permitted, direct download of the infringing material. Others are hotlinked to other locations containing, or that have contained, pirated versions of Flava Works's copyrighted works.

I have been authorized and directed to demand that you immediately cease and desist your unlawful publication of this intellectual property immediately without prejudice to Flava Work's further rights concerning the infringement, including the recovery of both compensatory and punitive damages and injunctive remedies compelling the protection of Flava Work's rights in the images and directed at permanent cessation of the unlawful conduct. This letter puts you on notice of the ownership of the referenced images and videos in the remote and unlikely case that you were unaware that rights in the subject images and video – from whose distribution you profited - actually belonged to someone. This letter calls upon you to immediately disable all links and other mechanisms by which you display or facilitate the display of that material and by which you enable the downloading or facilitate the downloading of the identified images and videos, directly or indirectly through the conduct of other websites, hosting providers, or any other persons or providers of services without limitation. On behalf of Flava Works, Inc., I demand that you immediately remove or disable access to, the infringing material listed in this letter, including links that enable infringement through a third party and any other Flava Work's property which are displayed or made available for download, either directly or indirectly, whether presently known by you to belong to Flava Work's or which you may subsequently learn to belong to Flava Works.

This letter is written as Notice under the provisions of the Digital Millennium Copyright Act (17 U.S.C. § 512 *et seq.)* for the purpose of terminating any immunity you might otherwise possess under the provisions of law with respect to your conduct in infringing Flava Work's copyrights in the identified material. This letter will conclude with my written certification under penalty of perjury that I have a good faith belief that the information contained in this notification is accurate to the best of my knowledge and that I am authorized to act on behalf of the owner(s) of the copyright protected material particularly identified in this letter. It is possible that you currently have repeat infringers posting on your site. As you know, in order to be eligible for the safe harbor provisions of the DMCA you must adopt and reasonably implement a repeat infringer policy. Under 17 U.S.C. § 512(i), service providers are not eligible for the limitations on liability that have been established by 17 U.S.C. § 512, including those established in subsection (a), unless they have adopted and reasonably implemented, and informed subscribers and account holders, about a policy that provides for the termination in appropriate circumstances of subscribers and account holders who are repeat infringers.



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Sincerely,



April 28, 2011

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Sincerely,



August 19, 2011

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http://www.ThugBoy.com

http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,





August 25, 2011

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Sincerely,





August 29, 2011

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Sincerely,



August 31, 2011

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Sincerely,



September 8, 2011

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I, Phillip Bleicher, owner of Flava Works, Inc., certify under penalty of perjury, that I am an agent authorized to act on behalf of the owner of certain intellectual property rights. Flava Works, Inc. owns the copyright concerning an astounding number of still images and videos which are being openly published on your site without its license or other authority, each of which will be particularly identified



in this letter together with information precisely identifying the location of that material in the works which you host or otherwise publish. The verified and documented infringements listed in this letter were traced to URLs and/or IP addresses controlled by your company. All of the infringements occur from this base URL or derivations thereof. Some links permit, or have permitted, direct download of the infringing material. Others are hotlinked to other locations containing, or that have contained, pirated versions of Flava Works's copyrighted works.

I have been authorized and directed to demand that you immediately cease and desist your unlawful publication of this intellectual property immediately without prejudice to Flava Work's further rights concerning the infringement, including the recovery of both compensatory and punitive damages and injunctive remedies compelling the protection of Flava Work's rights in the images and directed at permanent cessation of the unlawful conduct. This letter puts you on notice of the ownership of the referenced images and videos in the remote and unlikely case that you were unaware that rights in the subject images and video – from whose distribution you profited - actually belonged to someone. This letter calls upon you to immediately disable all links and other mechanisms by which you display or facilitate the display of that material and by which you enable the downloading or facilitate the downloading of the identified images and videos, directly or indirectly through the conduct of other websites, hosting providers, or any other persons or providers of services without limitation. On behalf of Flava Works, Inc., I demand that you immediately remove or disable access to, the infringing material listed in this letter, including links that enable infringement through a third party and any other Flava Work's property which are displayed or made available for download, either directly or indirectly, whether presently known by you to belong to Flava Work's or which you may subsequently learn to belong to Flava Works.

This letter is written as Notice under the provisions of the Digital Millennium Copyright Act (17 U.S.C. § 512 *et seq.)* for the purpose of terminating any immunity you might otherwise possess under the provisions of law with respect to your conduct in infringing Flava Work's copyrights in the identified material. This letter will conclude with my written certification under penalty of perjury that I have a good faith belief that the information contained in this notification is accurate to the best of my knowledge and that I am authorized to act on behalf of the owner(s) of the copyright protected material particularly identified in this letter. It is possible that you currently have repeat infringers posting on your site. As you know, in order to be eligible for the safe harbor provisions of the DMCA you must adopt and reasonably implement a repeat infringer policy. Under 17 U.S.C. § 512(i), service providers are not eligible for the limitations on liability that have been established by 17 U.S.C. § 512, including those established in subsection (a), unless they have adopted and reasonably implemented, and informed subscribers and account holders, about a policy that provides for the termination in appropriate circumstances of subscribers and account holders who are repeat infringers.



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http://www.CocoDorm.com

http://www.ThugBoy.com

http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com



Sincerely,



September 12, 2011

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DMCA Notice of Copyright Infringement

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http://www.CocoDorm.com

http://www.ThugBoy.com

http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,



Phillip Bleicher, Chief Executive Officer phil@flavaworks.com



September 19, 2011

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September 22, 2011

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This letter is written as Notice under the provisions of the Digital Millennium Copyright Act (17 U.S.C. § 512 *et seq.)* for the purpose of terminating any immunity you might otherwise possess under the provisions of law with respect to your conduct in infringing Flava Work's copyrights in the identified material. This letter will conclude with my written certification under penalty of perjury that I have a good faith belief that the information contained in this notification is accurate to the best of my knowledge and that I am authorized to act on behalf of the owner(s) of the copyright protected material particularly identified in this letter. It is possible that you currently have repeat infringers posting on your site. As you know, in order to be eligible for the safe harbor provisions of the DMCA you must adopt and reasonably implement a repeat infringer policy. Under 17 U.S.C. § 512(i), service providers are not eligible for the limitations on liability that have been established by 17 U.S.C. § 512, including those established in subsection (a), unless they have adopted and reasonably implemented, and informed subscribers and account holders, about a policy that provides for the termination in appropriate circumstances of subscribers and account holders who are repeat infringers.

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http://www.myvidster.com/video/2766724/GayForIteu - Baby star
http://www.myvidster.com/video/2766705/GayForIteu_-_Baby_star
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http://www.myvidster.com/video/2766582/Big_Dick_In_Tight_Hole_Raw_
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http://www.myvidster.com/video/2766321/Dorm Life 19 - Night Vision pt 1
http://www.myvidster.com/video/2763505/Raw_Dickin_it_4_Free_Porn_Hotrod_Freakzilla
http://www.myvidster.com/video/2745804/Miami Uncut 2 Hot As Hell -
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_Free_Videos_Adult_Sex_Tube_-_JuiceStreamcom

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http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,

Phillip Bleicher, Chief Executive Officer phil@flavaworks.com



October 4, 2011

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http://www.myvidster.com/video/2805461/How_Soldier_Served_Malos_Horny_Ass_-

http://www.myvidster.com/video/2775594/The_Thug_Boys

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http://www.ThugBoy.com

http://www.CocoBoyz.com

http://www.MixItUpBoy.com



http://www.FlavaMen.com

Sincerely,

Phillip Bleicher, Chief Executive Officer phil@flavaworks.com



October 5, 2011

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http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,

Phillip Bleicher, Chief Executive Officer phil@flavaworks.com



October 7, 2011

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http://www.CocoBoyz.com

http://www.MixItUpBoy.com

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Phillip Bleicher, Chief Executive Officer phil@flavaworks.com



October 10, 2011

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http://www.MixItUpBoy.com

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Sincerely,



October 12, 2011

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http://www.myvidster.com/video/2896179/PapiCock_-_Baby_Star_amp_Ricco_Furtado

http://www.myvidster.com/video/1498747/Gay_Rickydnkfierce_Adultspacecom

http://www.myvidster.com/video/1163598/RawRods_Romeo_Storm_amp_Kannon

http://www.myvidster.com/video/2900489/PapiCock_Flame_Tech

http://www.myvidster.com/video/509933/Quiet_Storm_Romeo_Storm_Tokyo_Pornhubcom

http://www.myvidster.com/video/213026/Quan_and_Breon_at_the_end

http://www.myvidster.com/video/2831098/Romeo Storm and Seduction Free Videos Adult Sex Tube Juic eStreamcom

http://www.myvidster.com/video/2830961/Would_you_like_to_taste_chocolate_dick_-

_Free_Videos_Adult_Sex_Tube_-_JuiceStreamcom

http://www.myvidster.com/video/1426664/Rico BabyStar

http://www.myvidster.com/video/111448/Its_All_Gay_Romeo_Storm_and_Spyder_Man

http://www.myvidster.com/video/78727/Kydezion Rockafella Shiri pt22

http://www.myvidster.com/video/84966/Wet_Dream

http://www.myvidster.com/video/68239/MarkellSkittles And Snow Bunni

http://www.myvidster.com/video/2615764/Quiet_Storm_Romeo_Storm_Tokyo_

http://www.myvidster.com/video/2906157/boys ass for black daddy

http://www.myvidster.com/video/323686/Raw Rods Pornhubcom

http://www.myvidster.com/video/546971/Raw Rods Black Bareback Fucking

http://www.myvidster.com/video/547016/Raw Rods - Black Bareback Fucking

http://www.myvidster.com/video/547009/Raw_Rods_-_Black_Bareback_Fucking

http://www.myvidster.com/video/547001/Raw Rods - Black Bareback Fucking

http://www.myvidster.com/video/1743700/Billy baxter and flamez XVIDEOSCOM

http://www.myvidster.com/video/2795461/MALO AND BABYSTAR

http://www.myvidster.com/video/2092246/Malo_and_Usher_Richbanks_Pornhubcom

http://www.myvidster.com/video/2236461/Malo and Usher xHamstercom

http://www.myvidster.com/video/2055379/Malo_and_Usher_Richbanks

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http://www.myvidster.com/profile/BigBoy

http://www.myvidster.com/profile/jeansboy

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http://www.CocoDorm.com

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http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,



October 14, 2011

Marques Gunter
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E-mail: gleighton@ngelaw.com

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http://www.myvidster.com/video/2821695/Party_at_the_club

http://www.myvidster.com/video/2774869/Sexy_redbone_fucking_tall_sexy_dude_

http://www.myvidster.com/video/1374007/Cuban_Redd_fucks_Raymond_Usher_Pornhubcom

http://www.myvidster.com/video/468196/papi_cock_solo

http://www.myvidster.com/video/1768105/Cuban_Redd_amp_Shooter_Fuck

http://www.myvidster.com/video/2918671/Cuban Redd and Raymond Usher Redtube Free Anal Porn Videos Gay Movies amp I

http://www.myvidster.com/video/2948652/Cuban Redd and Raymond Usher Redtube Free Anal Porn Videos Gay Movies ampam

http://www.myvidster.com/video/2405565/Pinky Peanut and two other guys -

_Free_Videos_Adult_Sex_Tube_-_JuiceStreamcom

http://www.myvidster.com/video/2372709/Black Gang Bang Party - Free Videos Adult Sex Tube - JuiceStreamcom

http://www.myvidster.com/video/1683977/ace_rockwood

http://www.myvidster.com/video/677438/Ace rockwood thugboy

http://www.myvidster.com/video/677138/Dunkins Playground Ace Rockwood

http://www.myvidster.com/video/677915/Dunkins Playground Ace Rockwood

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FlavaWorks
World Headquarters 2610 North Miami Ave., Miami FL 33127-4438 * www.FlavaWorks.com * 305-438-9450 * FAX: 305-438-9470 * Toll Free: 1-877-352-8254
Chicago Office 933 West Irving Park Road, Suite C, Chicago, IL 60613

http://www.myvidster.com/video/1949367/Anal_ream_fuck_fun - XVIDEOSCOM http://www.myvidster.com/video/1917787/Kemancheo_amp_protege_XVIDEOSCOM http://www.myvidster.com/video/2078248/kemancheo_XTube_Porn_Video_nleepi http://www.myvidster.com/video/2416479/Raw_Rods - XTube_Porn_Video - keithindc http://www.myvidster.com/video/2512251/KEMANCHEO_XTube_Porn_Video_teshawn_bisexy

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October 17, 2011

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http://www.myvidster.com/video/2567849/xxxbunkercom_rent_a_black_boy_httpxxxbunkercom

http://www.myvidster.com/video/2449579/Two_Thugs_and_a_Latino_Video_- FindFreeGayMovies_-

_Gay_Porn_Tube_Sex_Videos

http://www.myvidster.com/video/1779402/ACE_ROCKWOOD_HOOKS_UP_IN_HOTEL_Free_Porn_Sex_Porno at Tnaflix

http://www.myvidster.com/video/1300299/Remy_Mars_fucks_Thug_Nasty

http://www.myvidster.com/video/1268549/Xtube_Ricco_Furtado_fucks_Domino_Star

http://www.myvidster.com/video/3009443/Great_Sex_With_Black_Gays_Here_Nude_Fucking_Hard_-

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http://www.myvidster.com/video/3009851/GayForIteu - CaydenKen

http://www.myvidster.com/video/3009850/London_D_RockSEXY_REDBONE_FUCKED_HARD_AND_RAW

http://www.mvvidster.com/video/3009848/GayForIteu_-_CaydenKen

http://www.myvidster.com/video/3009851/GayForIteu - CaydenKen

http://www.myvidster.com/video/3009850/London_D_RockSEXY_REDBONE_FUCKED_HARD_AND_RAW

http://www.myvidster.com/video/3009660/GayForIteu - CaydenKen

http://www.myvidster.com/video/3009597/GayForIteu - CaydenKen

http://www.myvidster.com/video/3009898/GayForIteu_-_CaydenKen

http://www.myvidster.com/video/2134369/Deangelo jackson and lil niz by first75 - XVIDEOSCOM

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Sincerely,



October 21, 2011

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http://www.myvidster.com/video/3046261/saukindre_-_Pornhubcom

http://www.myvidster.com/video/2793645/306 Two Thugs and a Latino Video - FindFreeGayMovies - Gay Porn Tube Sex Videos

http://www.myvidster.com/video/3049168/uFFFDBig_Dick_In_Tight_Hole_Raw

http://www.myvidster.com/video/3049154/saukindre_-_Pornhubcom

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_Free_Videos_Adult_Sex_Tube_-_JuiceStreamcom

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Flava Works

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http://www.RawRods.com

http://www.CocoDorm.com

http://www.ThugBoy.com



http://www.CocoBoyz.com

http://www.MixItUpBoy.com

http://www.FlavaMen.com

Sincerely,



October 24, 2011

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