October 28, 22

VIA E-MAIL

Designated Agent Stephen LaPorte Wikimedia Foundation, Inc. c/o CT Corporation System 330 N. Brand Blvd. Glendale, CA 91203-2336

Phone: 415-839-6885

Email: legal@wikimedia.org

RE: 17 U.S.C § 512(c) Takedown Notification

Sir or Madam:

This firm and the undersigned have been retained as litigation counsel to represent The Associated Press. This letter is official notification under Section 512(c) of Title 17 of the United States Code ("Digital Millennium Copyright Act").

The Associated Press is the copyright holder to one original photograph, which is attached to this letter as Exhibit 'A'. It has come to our attention that unauthorized copies of this photograph are being displayed on the wikimedia.org website. The photograph in question is registered with the United States Copyright Office under certificate number VA 2-121-710, a copy of which is attached as Exhibit 'B' to this letter.

The unauthorized copies are currently displayed at the following URLs:

https://commons.wikimedia.org/wiki/File:2010 Winter Olympics Canada clebrating hockey go ld medal.jpg

https://upload.wikimedia.org/wikipedia/commons/1/13/2010 Winter Olympics Canada clebratin g hockey gold medal.jpg

I have also attached a copy of the URL(s) as Exhibit 'C' to this letter.

My client has not authorized such use of their work and has a good faith belief that the image being displayed on the wikimedia.org website violates a number of their exclusive rights under 17 U.S.C § 106 and is not authorized by law.

I hereby request that you remove or disable access to the infringing material from the wikimedia.org website, and that you confirm to me in writing within 5 days of its removal. I may be contacted by email at the state of the infringing material from the wikimedia.org website, and that you confirm to me in writing within 5 days of its removal. I may be contacted by email at

714-617-8350; or by physical correspondence sent to my attention at 1504 Brookhollow Drive, Suite 112, Santa Ana, CA 92705.

Under penalty of perjury in a United States court of law, I certify that the information contained in this notification is accurate, and that I am authorized to act on behalf of the holder of the exclusive rights to the material in question.

This letter is not intended, nor should it be construed, as a full recitation of all of the facts in this matter. Additionally, this letter is written without waiver or relinquishment of any rights or remedies, all of which are hereby expressly reserved.

Sincerely,

Esq.

EXHIBIT A



EXHIBIT B



Public Catalog

Copyright Catalog (1978 to present)

Search Request: Builder = (Associated Press)[in Name Claimant]

Search Results: Displaying 387 of 497 entries



Labeled View

Group registration of an automated database entitled: Associated Press News...

Type of Work: Visual Material

Registration Number / Date: VA0002121710 / 2010-06-24

Application Title: Group registration of an automated database entitled: Associated Press News

Photographs; Published updates from 01/01/2010 to 02/28/2010, updated hourly.

Title: Group registration of an automated database entitled: Associated Press News

Photographs; Published updates from 01/01/2010 to 02/28/2010, updated hourly.

Description: Electronic file (eService)

Copyright Claimant: THE ASSOCIATED PRESS, Transfer: By written agreement. Address: 450

West 33rd Street, New York, NY, 10001, United States.

Date of Creation: 2010

Date of Publication: 2010-02-28 **Nation of First Publication:** United States

Alternative Title on Application: Representative publication dates: 1/15/10, 1/28/10, 2/15/10, 2/23/10 and 2/27/10

updated hourly.

Authorship on Application: A. J. Mast; Domicile: United States; Citizenship: United States. Authorship:

photograph(s)

Alexander Gallardo; Domicile: United States; Citizenship: United States.

Authorship: photograph(s)

Adam Hunger and 366 others; Domicile: United States; Citizenship: United

States. Authorship: photograph(s)

The Associated Press, employer for hire; Domicile: United States; Citizenship:

United States. Authorship: text, photograph(s), compilation.

Previous Registration: 2004, VA-1-233-533.

Pre-existing Material: Previously published database.

Basis of Claim: text, photograph(s), revised compilation of photos updated hourly.

Rights and Permissions: Laura Malone, The Associated Press, 450 West 33rd Street, New York, NY,

100001, United States

Copyright Note: C.O. correspondence.

Regarding title information: Information added by Copyright Office from

application.

Names: Mast, A. J.

Gallardo, Alexander
Hunger, Adam
Associated Press



Save, Print and Email (<u>Help Page</u>)						
Select Download Format Full Record	Format for Print/Save					
Enter your email address:	Email					

Help Search History Titles Start Over

<u>Contact Us</u> | Request Copies | Get a Search Estimate | Frequently Asked Questions (FAQs) about Copyright | Copyright Office Home Page | Library of Congress Home Page

EXHIBIT C



commons.wikimedia.org/wiki/File:2010_Winter_Olympics_Canada_clebrating_hockey_gold_medal.jpg

中心

Q 26 September Monday

Sound of All Human Knowledge. File Discussion

We usually invite the world to create the sum of all human knowledge. Now, we are inviting the world to create the sound of all human knowledge.

Learn more

Help with

File: 2010 Winter Olympics Canada clebrating hockey gold medal.jpg

From Wikimedia Commons, the free media repository

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File



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View Edit History Search Wikimedia Commons We usually invite the world to create the sum of all human knowledge. Now, we are inviting the Sound Learn more world to create the sound of all human knowledge.

File:2010 Winter Olympics Canada clebrating hockey gold medal.jpg



2010_Winter_Olympics_Canada_clebrating_hockey_gold_medal.jpg (402 x 409 pixels, file size: 45 KB, MIME type: image/peg)

File Information Structured data Captions Edit English Add a one-line explanation of what this file represents

Summary [edit]

Description	English: Haley Irwin, left, and Tessa Bonhomme, right; Gold Medal Canadian Women's hockey team, 2010
Date	4 April 2010, 11:32 (UTC)
Source	photographer friend in journalism.
	SKY _{child}

Licensing [edit]

Skychildandsonofthesun at English Wikipedia, the copyright holder of this work, hereby publishes it under the following license:

This file is licensed under the Creative Commons Attribution 3.0 Unported ♂ license.

Attribution: Skychildandsonofthesun at English Wikipedia

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You are free:

• to share - to copy, distribute and transmit the work

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• attribution – You must give appropriate credit, provide a link to the license, and indicate if changes were made. You may do so in any reasonable manner, but not in any way that suggests the licensor endorses you or your use.

Original upload log [edit]

The original description page was here ♂. All following user names refer to en.wikipedia.

Date/Time	Dimensions	User	Comment
2010-04-04 11:32	402×409× (46390 bytes)	Skychildandsonofthesun	{(Information iDescription = Gold Medal Canadian Women's hockey team, 2010 Source = photographer friend in journalism. Date =

File history

Click on a date/time to view the file as it appeared at that time

	Date/Time	Thumbnail	Dimensions	User	Comment
current	10:13, 10 July 2015	3	402 × 409 (45 KB)	Xgeorg (talk I contribs)	Transferred from en,wikipedia

You cannot overwrite this file.

File usage on Commons

There are no pages that use this file.

File usage on other wikis

The following other wikis use this file: Usage on de.wikipedia.org

- · Haley Irwin
- Usage on en.wikipedia.org
- The Golden Game
- User:Annatwohey/sandbox

Categories: Women's ice hockey at the 2010 Winter Olympics | Canada women's national ice hockey team | Haley Irwin | Tessa Bonhomme Hidden categories: CC-8Y3.0 | Self-published work

This page was last edited on 26 October 2020, at 19:45.

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② 2010_Winter_Olympics_Canad × +

upload.wikimedia.org/wikipedia/commons/1/13/2010_Winter_Olympics_Canada_clebrating_hockey_gold_medal.jpg

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