

June 8, 2021

**VIA E-MAIL**

Copyright Agent  
Amanda Keton  
Wikimedia Foundation, Inc.  
c/o CT Corporation System  
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**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 REDUX PICTURES. REDUX PICTURES represents the portfolio of photographer Graeme Mitchell for exclusive worldwide licensing. This letter is official notification under Section 512(c) of Title 17 of the United States Code (“Digital Millennium Copyright Act”).

Graeme Mitchell 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 commons.wikimedia.org website.

The unauthorized copies are currently displayed at the following URLs:

[https://commons.wikimedia.org/wiki/File:Cheryl Strayed for the New York Times by Graeme Mitchell.jpg](https://commons.wikimedia.org/wiki/File:Cheryl_Strayed_for_the_New_York_Times_by_Graeme_Mitchell.jpg)

I have also attached a copy of the URL as Exhibit ‘B’ 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 commons.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 commons.wikimedia.org website, and that you confirm to me in writing within 5 days of its removal. I may be contacted by email at [REDACTED]@higbeeassociates.com; by telephone 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,

Naomi Sarega, Esq.



# EXHIBIT A



# EXHIBIT B



- Main page
- Wikiquote
- Community portal
- Village pump
- Help page
- Language select
- English

# File:Cheryl Strayed for the New York Times by Graeme Mitchell.jpg

From Wikimedia Commons, the free media repository.



Size of this preview: 800 × 400 pixels. Other resolutions: 240 × 120 pixels | 480 × 240 pixels | 1,000 × 500 pixels. Original file (1,000 × 1,000 pixels, file size: 294 KiB, MIME type: image/jpeg)

Open in Media Viewer

- Download all sizes
- Use this file on the web
- Use this file on a wiki
- Email a link to this file
- Information about this file

File information Structured data

Captions
English Cheryl Strayed for the New York Times by Graeme Mitchell

## Summary

<b>Description</b>	English: <span>HEIS, TINA, Holder/Pew, 07-25, 001</span>
<b>Date</b>	19 October 2012, 09:37:07
<b>Source</b>	http://archive.nytimes.com/www.nytimes.com/kleinfelder/2012/10/20/2012-10-20-nytimes-0725-001.html
<b>Author</b>	Graeme Mitchell

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