

April 14, 2020

VIA E-MAIL

Amanda Keton
Wikimedia Foundation, Inc.
c/o CT Corporation System
818 Seventh Street
Los Angeles, CA 90017
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 Trunk Archive. Trunk Archive represents the portfolio of photographer Vera Tammen 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”).

Vera Tammen is the copyright holder to one original photograph, which is attached to this letter as Exhibit ‘A’. It has come to our attention that an unauthorized copy of this photograph is being displayed on the Wikipedia.org and Wikimedia.org websites.

The unauthorized copy is currently displayed at the following URLs:

https://en.wikipedia.org/wiki/Jeff_Wilbusch

https://commons.wikimedia.org/wiki/File:Vera_Tammen.jpg

https://de.wikipedia.org/wiki/Datei:By_Vera_Tammen.jpg

I have also attached a copy of the URLs as Exhibit ‘B’ to this letter.

My client has not authorized such use of Vera Tammen’s work and has a good faith belief that the image being displayed on the Wikipedia.org and Wikimedia.org websites 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 Wikipedia.org and Wikimedia.org websites, and that you confirm to me in writing within 5 days of its removal. I may be contacted by email at nsarega@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.

Mathew Higbee: CA # 241380, MI # P73980, MN # 0388759, NV # 11158, OR # 106514, UT # 11133, WA # 42755, TX # 24076924, IL # 6319929, OH #0094107 *

Ray Ngo: UT # 11936, NY # 4780706

Melissa Higbee: CA # 247998, AZ # 024644, FL # 62465, PA # 322114, NJ # 030812012, TN # 034677

Theodore Sell: CO # 44157

Taryn Murray: MA

Naomi Sarega: CA # 306967, IN # 34182-49 *

* Multiple additional federal courts

LETTER OF REPRESENTATION
POWER OF ATTORNEY

RE: Great Bowery, Inc. dba Trunk Archive

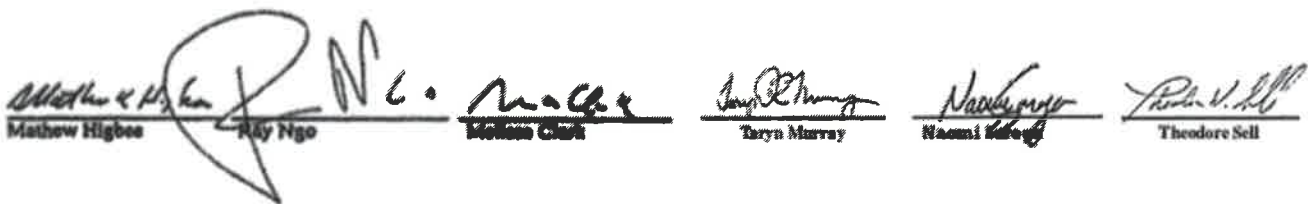
To Whom It May Concern:

Please be advised that the Law Firm of Higbee & Associates has been retained by Great Bowery, Inc. dba Trunk Archive regarding a copyright infringement matter. As such, we have been appointed as attorney in fact with full power and authority in determining the validity of the above matter and assist in any negotiation, settlement, and payment. We are further authorized to pursue any legal remedies available to our client as a result of this matter. Any attorney, staff member or agent of Higbee & Associates is hereby authorized to discuss any effort to settle and resolve the above matter.

Effective immediately, all communication (mail, phone, electronic or otherwise) regarding the above matter must be forwarded to Higbee & Associates at:

Higbee & Associates
1504 Brookhollow Drive, Suite 112
Santa Ana, CA 92705
(714) 617-8385 Telephone

Sincerely,


Mathew Higbee Ray Ngo Melissa Clark Taryn Murray Naomi Sarega Theodore Sell

The undersigned have retained Higbee & Associates and grant full power and authority as described above.

Date: 1/18/2019

Client: Great Bowery, Inc. dba Trunk Archive

Signature: 

EXHIBIT A



EXHIBIT B



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

Size of this preview: 423 x 599 pixels. Other resolutions: 169 x 240 pixels | 339 x 480 pixels | 424 x 600 pixels | 542 x 765 pixels | 1,134 x 1,606 pixels.
Original file (1,134 x 1,606 pixels, file size: 1.25 MB, MIME type: image/jpeg)

Open in Media Viewer



Main page
Welcome
Community portal
Village pump
Help center

Language select
English

Participate
Upload file
Recent changes
Latest files
Random file
Contact us

Print/export
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Tools
What links here
Related changes
Special pages
Permanent link
Page information
Cite this page
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