



Email: [REDACTED]

Office: [REDACTED]

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December 19, 2011

Red Light District  
20339 Nordhoff Street  
Chatsworth, CA 91311

Re: *Michelle McGee*

To Whom It May Concern:

As you are well aware from our recent screaming match over the phone, DD Entertainment represents Ms. Michelle McGee.

You have admitted to me that you are attempting to publish, distribute, sell, license or otherwise exploit *stolen* filmed footage of Ms. McGee. If RLD is to follow through with the threat, Ms. McGee will file a lawsuit to enjoin the sale and/or distribution and seek monetary damages from RLD.

Ms. McGee demands the return of the filmed footage. RLD is aware that it is her property that was *stolen* from Ms. McGee's possession. If the property is not promptly returned, RLD will have converted Ms. McGee's property for your own purpose, subjecting you to both compensatory and punitive damages.

This footage contains private materials relating to numerous individuals, including Ms. McGee. You have no authority whether actual or implied to commercially exploit any individual's image contained in Ms. McGee's private videographic image. Your arguments for releasing it in the public interest have absolutely no merit and saying that "this would help her career more than hurt it" is ridiculous. Each of these individual's privacy rights are protected by the United States and California Constitution; each also has the right to control the publicity rights in her name, likeness and persona. Any sale, disclosure or reproduction of the filmed footage would constitute an unauthorized use of her name, likeness and persona and violation of those rights.

California Civil Code section 3344 states, in relevant part:

"Any person who knowingly uses another's name, voice, signature, photograph, or likeness, in any manner, on or in products, merchandise, or goods, or for purposes of advertising or selling, or soliciting purchase of, products, merchandise, good or services, without such person's prior consent . . . shall be liable for any damages sustained by the person or persons injured as a result thereof."

Please contact me immediately to arrange for the return of Ms. McGee's property.

To avoid prompt legal action RLD must immediately:

1. provide a written acknowledgement that RLD have ceased and permanently desisted from attempting to publish, distribute, sell, license or otherwise exploit the footage in any manner;
2. return all copies of the footage in any media, whatsoever, including but not limited to any and all videotape, film, compact discs, DVDs, computer floppy discs, electronic mail, and provide a written confirmation under penalty of perjury that you have done so; and
3. provide a list of persons/companies and a list of names, e-mail addresses, and other contact information of those persons and entities to whom you have shown the footage and/or given a copy of the footage.

Nothing in this letter is intended to, nor does, waive any right, claim or defense, all of which are expressly reserved.

Sincerely



Gina Rodriguez  
*CEO-DD Entertainment*