



COWAN
 DeBAETS
 ABRAHAMS &
 SHEPPARD LLP

41 MADISON AVENUE
 NEW YORK, NY 10010
 t: 212 974 7474
 f: 212 974 8474
 www.cdas.com

MATTHEW A. KAPLAN
 212 974 7474 ext 1933
 mkaplan@cdas.com

FREDERICK P. BIMBLER
 TOBY M.J. BUTTERFIELD
 AL J. DANIEL, JR.*
 TIMOTHY J. DeBAETS
 ELLIS B. LEVINE
 MITCHELL E. RADIN
 M. KILBURG REEDY
 ROBERT L. SELIGL
 J. STEPHEN SHEPPARD
 KENNETH N. SWEZEY
 DAVID BRUCE WOLF
 NANCY E. WOLFF*

ZEHRA J. ABDI
 LISA K. DIGERNES
 HAYDEN M. GOLDBLATT*
 MATTHEW A. KAPLAN*
 CHRISTOPHER J. MARINO*
 ALEXIS N. MUELLER

OF COUNSEL:
 ANNE C. BAKER
 ANDREA F. CANNISTRACI
 ROBERT J. FREEDMAN
 JERROLD B. GOLD
 ALBERT GOTTESMAN
 ROGER E. KASS
 GARY F. REDENTE*
 MICHAEL D. REMER
 ROBERT F. VAN LIEROP

SPECIAL COUNSEL:
 SUSAN H. BODINE

WEST COAST COUNSEL:
 STEVEN M. WEINBERG*

PHILIP M. COWAN
 (1943-2001)
 HOWARD ABRAHAMS
 (1945-1996)

* ALSO ADMITTED IN:
 • ALSO ADMITTED IN:
 • ALSO ADMITTED IN:
 * ALSO ADMITTED IN:
 • ALSO ADMITTED IN:

WEST COAST OFFICE:
 38760 PACIFIC COAST HIGHWAY
 SUITE 411, MALIBU, CA 90263
 P: 310 457 6100 F: 310 457 0655

JANUARY 14, 2010

VIA E-MAIL dsg@thedirty.com and FACSIMILE (408) 248-3196
 David S. Gingras, Esq.
 TheDirty.com

Re: Infringement of Nadya Suleman Bikini Photographs
On The TheDirty.com Website

Dear Mr. Gingras:

I understand from Nik Richie's agent Ari that you are counsel for TheDirty.com. Please be advised that we represent Polaris Images, the copyright owner of the recent photographs of Nadya Suleman in a bikini (the "Photographs"). The Photographs are registered with the Copyright Office. Polaris recently learned that the Photographs have been published illegally and without Polaris Images' consent on TheDirty.com website (including putting its own watermark on each Photograph). Specifically, Polaris Images detected infringing Photographs on the web pages:


<http://TheDirty.com>
<http://TheDirty.com/2010/01/13/246067/>

We hereby demand that you immediately remove the Photographs from TheDirty.com website and advise us from where your company obtained the Photographs. We are sending a DMCA notice contemporaneously similarly demanding the takedown of the Photographs.

Such infringing publication or use of the Photographs will be considered willful copyright infringement under Title 17 of the United States Code and Polaris Images can, and will, seek all remedies available including statutory damages up to \$150,000, injunctive relief and its attorneys' fees. Moreover, the principals of Dirty World, LLC may be held individually liable for that infringement.

This letter is written without prejudice to any rights or claims our client may have in law or equity, all of which are expressly reserved.

Very truly yours,


 Matthew A. Kaplan

cc: Nancy E. Wolff, Esq. (via e-mail)
 Polaris Images (via e-mail)

{A067563.DOC\}