

William O'Connor
[REDACTED]

July 27, 2010

VIA FEDERAL EXPRESS

Michael Lohan
[REDACTED]

Southampton, NY [REDACTED]

Re: KATE MAJOR

Dear Mr. Lohan:

This firm represents Kate Major. We have recently become aware that you are illegally selling or offering for sale one or more nude photographs of Ms. Major to kikster LLC and other websites. On behalf of Ms. Major, we hereby demand that you immediately cease and desist such illegal activity.

As you are well aware, these photographs were taken without the knowledge or consent of Ms. Major in total disregard of her personal rights, including her rights and expectations of privacy. As you also are well aware, Ms. Major did not consent to the public use or display of these photographs. By making these photographs available to kikster LLC and other websites, you have acted in intentional and flagrant violation of her rights, including but not limited to her rights of privacy under the laws of the State of New York, and her rights of privacy and publicity under the laws of various other states, including the State of California. Any use by you of these photographs, including any attempt to offer or sell these photographs for use by others, is illegal and must be stopped immediately.

On behalf of Ms. Major, we hereby demand that you: (1) immediately and permanently cease and desist from any and all use of, including any attempts to sell, the aforementioned photographs of Ms. Major or any similar photographs of Ms. Major; (2) immediately and permanently delete from your systems all copies of these or similar photographs and that you return any physical copies of these photographs to us; (3) immediately advise kikster LLC and any other party with whom you may have communicated regarding the photographs that you have no

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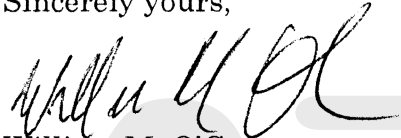
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rights to sell or offer the photographs for sale and that you demand that they immediately cease all further use of the photographs; (4) immediately provide us with all communications with any third parties regarding the photographs; and (5) provide us with immediate assurances that you have taken the aforementioned action and that you will not make any further use of these or any similar photographs in the future.

Nothing but immediately compliance with the above demands will be acceptable. Please note that Ms. Major did not waive any other rights or claims she may have with respect to this matter or any other matter with respect to your conduct.

We look forward to your prompt and immediate compliance.

Sincerely yours,



William M. O'Connor

WMO/ck