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VIA CERTIFIED MAIL, RETURN RECEIPT
REQUESTED

March 18, 2011

Re: Northland Family Planning

Gregg Lee Cunningham
Executive Director
Center for Bio-Ethical Reform
26882 Vista Terrace
Lake Forest, California 92630

Don Cooper
Operations Manager
Center for Bio-Ethical Reform
P.O. Box 219
Lake Forest, California 92609

Dear Mr. Cunningham and Mr. Cooper:

We represent Northland Family Planning Clinic, Inc. ("Northland"). The purpose of this letter is to inform you that the Center for Bio-Ethical Reform ("CBR") and Mr. Cooper are in violation of copyright law and are infringing Northland's rights. This letter is also official notification under the provisions of Section 512(c) of the Digital Millennium Copyright Act ("DMCA") to effect removal of the infringements described below. Northland holds the registered copyright to "Every Day, Good Women Choose

Abortion.”¹ If you do not remove the infringing material as described below, Northland will take further action to protect its rights in its copyrighted work.

There are at least four infringing videos containing Northland’s copyrighted material on CBR’s website, all entitled “The Most Shocking (graphic imagery), Four-Minute, Abortion Debate You Will Ever See!” The infringing videos are posted on CBR’s website on at least the following urls: http://www.abortionno.org/index.php/audio_video/; http://abortionno.org/index.php/blog/the_most_shocking_graphic_imagery_four-minute_abortion_debate_you_will_ever/; http://www.abortionno.org/index.php/audio_video/quicktime/the_most_shocking_graphic_imagery_four-minute_abortion_debate_you_will_ever/; http://www.abortionno.org/index.php/audio_video/the_most_shocking_graphic_imagery_four-minute_abortion_debate_you_will_ever/. The person or persons who posted these videos on CBR’s website ignored the clear copyright language on the portions that were copied from Northland’s copyrighted material.

In addition, two similar infringing videos containing Northland’s copyrighted material are posted on the website Pro-Lifetube.com by a user with the handle “abortionNO,” which appears to be Donald Cooper, acting on behalf of CBR.² The infringing videos are posted on Pro-Lifetube.com at <http://pro-lifetube.com/videos/577/the->

¹ The copyrighted material may be viewed on Northland’s website at <http://www.northlandfamilyplanning.com/videos/everyday-good-women/>.

² See user profile of “abortionNO” at <http://pro-lifetube.com/members/abortionNO>.

most-shocking-(graphic-imagery),-four-minute,-abortion-debate-yo and [http://pro-lifetube.com/videos/583/the-most-shocking-\(graphic-imagery\),-four-minute,-abortion-debate-yo](http://pro-lifetube.com/videos/583/the-most-shocking-(graphic-imagery),-four-minute,-abortion-debate-yo). Again, Mr. Cooper posted these videos with no regard to the blatant theft of Northland's copyrighted materials.

Northland has not authorized any of the foregoing uses of its copyrighted material. Northland demands that this unauthorized use of copyrighted material cease immediately and that all videos entitled "The Most Shocking (graphic imagery), Four-Minute, Abortion Debate You Will Ever See!"—and any other videos containing Northland's copyrighted material—be removed from all places they are posted on the CBR website and Pro-Lifetube.com at once, as well as anywhere else you or your agents have placed them. The information in this letter is accurate to the best of our knowledge. We have a good faith belief that the use of Northland's copyrighted material is unauthorized, and I swear under penalty of perjury that I am authorized to act on behalf of Northland, the copyright holder.

Unless this demand is complied with, Northland shall take such action as may be necessary to protect its interests without further notice to CBR or any individuals concerned in these acts of infringement and false statements. This includes, but is not limited to, pursuing the full statutory penalty for willful infringement of copyright of \$150,000.00 per infringement. CBR may also be subject to criminal sanctions for its actions. Northland fully reserves all its rights with respect to this matter.

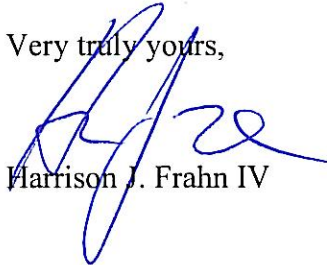
Gregg Lee Cunningham
Don Cooper

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March 18, 2011

Please advise me by no later than March 31, 2011 that CBR has complied
with this demand.

Very truly yours,



Harrison J. Frahn IV

cc: CBR Directors:
Lois Cunningham
Mark Harrington
Bill Calvin
Fletcher Armstrong
Darius Hardwick
Michael Schrimsher
Steve Holck
Kurt and Samantha Linneman
Gregg Cunningham (*alternate address*)