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November 12, 2014

VIA EMAIL

Mr. John Ziegler
26250 Alizia Canyon Drive
Calabasas, CA 91302

Re: Notice of Infringement of Copyright/Happy Valley

Dear Mr. Ziegler:

We are intellectual property and litigation counsel for A&E Television Networks, LLC (“AETN”). We write concerning your infringement of AETN’s copyright in the film *Happy Valley*.

Yesterday, you announced that you were “releasing, exclusively, the first half of the actual, unedited, “Happy Valley” film, and you in fact posted half of that film to YouTube at the following link: <https://www.youtube.com/watch?v=mgY0l8bpVzs>. You further announced that, although the film “will be released nationally later this month[,] I plan to release the second half of the film later this week.” Your unauthorized reproduction, distribution and public performance of the as-of-yet unaired *Happy Valley* is a blatant violation of AETN’s rights.

Your scheme to “release” AETN’s film is not excused by any doctrine of law. Posting of the entirety of the film, whether in one or two segments, goes far beyond the bounds of fair use. You may not be happy with the content of the film, but that affords you no right to appropriate for yourself the authority to release it to the public.

AETN respects that the public has rights to expression under the First Amendment, including by commenting about or criticizing its programs. But, exercise of those rights neither justifies nor permits the wholesale taking and use of someone else’s intellectual property. There is no legal justification whatsoever for your infringing acts.

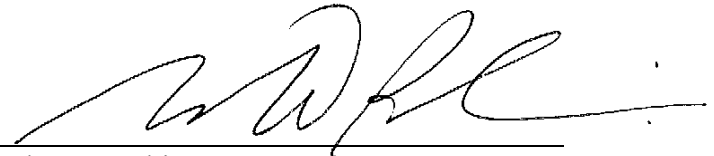
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As you no doubt are aware, YouTube has disabled access to your posting of the “Actual Unedited ‘Happy Valley’” in response to a DMCA takedown notice. On behalf of AETN, we hereby demand that you cease and desist from any and all actions to reproduce, distribute or publicly perform *Happy Valley*, including but not limited to seeking to restore the removed content to YouTube, or to make it, the “second half of the film, or any other substantial portion of *Happy Valley* available to the public.

Please confirm to me in writing on or before the close of business on November 14, 2014 whether you are complying with this demand. AETN reserves all of its rights and remedies in the event we do not receive a satisfactory response within the specified time.

Sincerely,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Robert Penchina