

MARK D. PASSIN
PARTNER
310-229-5851

June 28, 2012

BY CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. [REDACTED]
[REDACTED]
[REDACTED]
Hollywood, CA 90078

U.S. MAIL:

Mr. [REDACTED]
[REDACTED]
Los Angeles, [REDACTED]

U.S. MAIL:

Mr. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Photo of: Jamie Meril

Re: Jamie Meril v. [REDACTED]
Our File No.: 910024.8117

Dear [REDACTED]:

We are attorneys for Jamie Meril and are writing to you on her behalf.

We have been informed that [REDACTED] has recently released a DVD entitled "Spring Break Uncensored" embodying unauthorized film of Ms. Meril running into the ocean topless and laying with friends on lounge chairs on the beach. We are also informed and believe that the DVD is being sold in New York and throughout the rest of the United States and that the unauthorized film of Ms. Meril also appears in a Girls Gone Wild infomercial being broadcast on television in New York.

We understand that the film was shot by a cameraman employed by [REDACTED] named Joey Fry while Ms. Meril was vacationing in Puerto Vallarta, Mexico in March, 2011. Ms. Meril never granted any oral or written consent to Mr. Frey, [REDACTED], or anyone

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else to use her likeness for any purpose including in the DVD or the infomercial. Enclosed is a picture of Ms. Meril so that you can identify her.

Ms. Meril is a resident of the State of New York. Pursuant to NY CLS Civ. R. § 51 any person whose likeness is used within the State of New York for purposes of advertising or trade without first having obtaining the written consent of such person may maintain an action against the entity using the unauthorized image to prevent and restrain the future use of the image and to recover damages for any injuries sustained, as well as exemplary damages. The unauthorized use of Ms. Meril's likeness in the DVD and infomercial constitutes, among other things, a violation of NY CLS Civ. R. § 51.

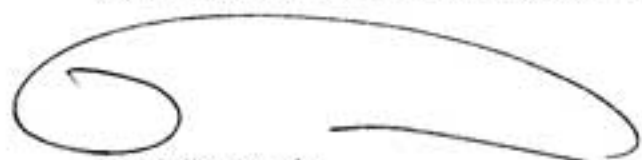
On behalf of our client we demand that:

1. You immediately discontinue the manufacture, advertising, offering for sale and sale of the DVD embodying Ms. Meril's likeness;
2. You immediately cease and desist from broadcasting the infomercial embodying Ms. Meril's likeness;
3. On or before July 10, 2012, you provide us with a full accounting of the total number of DVD's embodying Ms. Meril's likeness that have been sold to date by any and all means, including, but not limited to, in hard copy format and digitally, together with the dollar value of such sales so that we can ascertain and inform our client of any and all damages resulting from the sale of the DVDs; and
4. On or before July 10, 2012, you provide us with the names of the markets in which the infomercial embodying Ms. Meril's likeness was broadcast and the total number of times it was broadcast in each of those markets so that we can ascertain and inform our client of any and all damages resulting from the broadcast of the infomercial.

Unless we receive a written response to all of the above demands on or before July 10, 2012, we are instructed to proceed without further notice to you to enforce our client's rights, including, but not limited to, her right to compensatory and exemplary damages, as well as injunctive relief. Nothing in this letter shall be deemed a waiver of any of our client's rights and remedies, all of which are hereby expressly reserved.

Very truly yours,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P



Mark D. Passin