

**MOTION PICTURE ASSOCIATION OF AMERICA, INC.**  
15503 VENTURA BOULEVARD  
ENCINO, CALIFORNIA 91436



UNITED STATES  
PHONE: (818) 728-8127  
Email: MPAA.23@Gateway.net  
Anti-Piracy Operations

Nick Levay  
SE2600: Sneaks, Freaks, and Telcom Geeks!  
1710 E. Northfield Blvd.  
Apt. R2  
Murfreesboro, TN 37130  
Rattle@TLORAH.NET

Date: February 7, 2000

RE: Illegal Provision of DeCSS/Circumvention Device

Site/URL: 334.se2600.org

Dear Nick Levay:

The Motion Picture Association of America is authorized to act on behalf of the following copyright owners:

Columbia Pictures Industries, Inc.  
Disney Enterprises, Inc.  
Metro-Goldwyn-Mayer Studios Inc.  
Paramount Pictures Corporation  
TriStar Pictures, Inc.  
Twentieth Century Fox Film Corporation  
United Artists Pictures, Inc.  
United Artists Corporation  
Universal City Studios, Inc.  
Warner Bros., a Division of  
Time Warner Entertainment Company, L.P.

We have knowledge that the above-referenced Internet site is providing a circumvention device commonly known as DeCSS. DeCSS is a software utility that decrypts or unscrambles the contents of DVDs (consisting of copyrighted motion pictures) or otherwise circumvents the protection afforded by the Contents Scramble System (CSS) and permits the copying of the DVD contents and/or any portion thereof. As such, DeCSS is an unlawful circumvention device within the meaning of 17 U.S.C. §1201(a)(2),(3). Providing or offering DeCSS to

the public on your system or network violates the provisions of §1201(a)(2) which prohibits the “manufacturing, importing or offering to the public, providing, or otherwise trafficking” in an unlawful circumvention device.

On January 20, 2000, the United States District Court for the Southern District of New York granted a Preliminary Injunction prohibiting the Internet posting or other provision of DeCSS, having found that DeCSS was a prohibited circumvention device within the meaning of §1201(a)(2) and that the offering, providing or trafficking of DeCSS on the Internet violated §1201(a)(2). That court thus enjoined:

Posting on any Internet web site, or in any other way manufacturing, importing or offering to the public, providing, or otherwise trafficking in DeCSS, and (b) posting on any Internet web site, or in any other way manufacturing, importing or offering to the public, providing, or otherwise trafficking in any technology, product, service, device, component, or part thereof, that: (i) is primarily designed or produced for the purpose of circumventing, or circumvention the protection afforded by, CSS, or any other technological measure that effectively controls access to plaintiffs’ copyrighted works or effectively protects the plaintiffs’ rights to control whether an end user can reproduce, manufacture, adapt, publicly perform and/or distribute unauthorized copies of their copyrighted works or portions thereof. . .

The Superior Court of Santa Clara County, California also recently granted a Preliminary Injunction against the Internet posting of DeCSS.

If you are bound by an injunction, maintaining the DeCSS utility on your system or network violates the above injunction[s] and risks court sanctions for contempt.

We hereby demand that you:

- 1) take appropriate steps to cause immediate removal of DeCSS from the above identified URL, along with such other actions as may be necessary or appropriate to suspend this illegal activity;
- 2) provide appropriate notice to the subscriber or account holder responsible for the presence of DeCSS on your system or network, advising him/her of the contents of this notice and directing that person to contact the undersigned immediately at the e-mail address provided above;
- 3) advise us of the name and physical address of the person operating this site; and

- 4) maintain, and take whatever steps are necessary to prevent the destruction of, all records, including electronic records, in your possession or control respecting this URL, account holder or subscriber.

Thank you for your cooperation in this matter. Your immediate response is requested.

The information in this notification is accurate, and we declare, under penalty of perjury, that the Motion Picture Association of America is authorized to act on behalf of the owner[s] of exclusive rights described above.

Should you have any questions, please contact us at the above listed address.

Respectfully,  
The Motion Picture Association of America