

MORSE,
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The Business Law Firm on Route 128

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mjc@mbbp.com

June 23, 2005

VIA ELECTRONIC MAIL: tiamo@prq.se

Fredrik Neij, Administrative Contact
PO Box 1206
Stockholm 11479
Sweden

Re: Copyright Infringement

To Whom It May Concern:

This law firm represents iRacing.com Motorsport Simulations, LLC, formerly known as FIRST, LLC ("iRacing"), in its intellectual property matters. iRacing is the owner of intellectual property rights, including without limitation copyrights, in and to the NASCAR Racing 2003 interactive game ("NR2003").

It has come to our attention that an unauthorized version of NR2003 is available for download from the web site <http://thepiratebay.org>, hosted by your website (identified by the "WHOIS" database), www.prq.de. This unauthorized version constitutes an infringement of iRacing's exclusive intellectual property rights.

The infringing work consists of a full version of NR2003 with a modified executable that also disables the securom copy protection. The file in question is called "NR_2005_Mod.zip." It can be found at the URL <http://thepiratebay.org/details.php?id=3345825>. I have attached the "WHOIS" information for this site for your convenience.

We hereby demand that you remove and disable access to the infringing work. Your continued facilitation of the distribution of the infringing work could constitute copyright infringement under U.S. and international laws and treaties.

The undersigned hereby declares: that he has a good faith belief that the use of the material in the manner complained of is not authorized by iRacing, its agents or the law; that based on information and belief the information contained herein is accurate; and that under penalty of perjury he is authorized to act on behalf of iRacing.

June 23, 2005

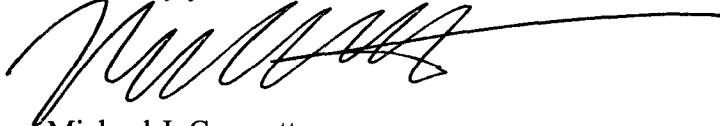
www.prq.de

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Continued violation of iRacing's intellectual property rights will cause injury to iRacing in Massachusetts, USA, the location of iRacing's home office.

Nothing in this letter shall be construed as a waiver or relinquishment of any rights or remedy possessed by iRacing or any other affected party.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Cavaretta", with a long horizontal line extending to the right.

Michael J. Cavaretta

cc: iRacing.com Motorsport Simulations, LLC

Attachment

ATTACHMENT

WHOIS Search Results for: THEPIRATEBAY.ORG

NOTICE: Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the PIR registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and PIR does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator or any ICANN-Accredited Registrar, except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. PIR reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D104576138-LROR
Domain Name:THEPIRATEBAY.ORG
Created On:28-Jun-2004 16:08:27 UTC
Last Updated On:09-Apr-2005 06:28:09 UTC
Expiration Date:28-Jun-2010 16:08:27 UTC
Sponsoring Registrar:Key-Systems GmbH (R51-LROR)
Status:CLIENT TRANSFER PROHIBITED
Registrant ID:P-FVN26-2691884
Registrant Name:Fredrik Neij
Registrant Organization:PRQ
Registrant Street1:Box 1206
Registrant Street2:
Registrant Street3:
Registrant City:Stockholm
Registrant State/Province:
Registrant Postal Code:11479
Registrant Country:SE
Registrant Phone:+46.707323819
Registrant Phone Ext.:
Registrant FAX:+46.707323819
Registrant FAX Ext.:
Registrant Email:tiamo@prq.se
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Name Server:NS0.THEPIRATEBAY.ORG
Name Server:NS2.THEPIRATEBAY.ORG
Name Server:NS3.THEPIRATEBAY.ORG