

**Godsy, Michael M.**

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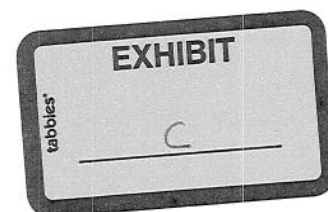
**From:** Godsy, Michael M.  
**Sent:** Thursday, August 13, 2009 3:25 PM  
**To:** REMOVE@THEDIRTY.COM  
**Subject:** The Tan Company - Todd Beckman; thedirty.com/2009/08/12/where-america/tans

**Attachments:** 8.13.09.pdf



8.13.09.pdf  
(448 KB)

Attached please find our demand that thedirty.com take down certain defamatory content that misappropriates our client's federally registered trademark.



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August 13, 2009

FOR SETTLEMENT PURPOSES ONLY

**VIA FEDERAL EXPRESS AND ELECTRONIC MAIL**

Mr. Hooman Karamian  
a/k/a Mr. Corbin Grimes  
a/k/a Mr. Nik Richie  
Dirty World Entertainment, LLC  
4453 E. Pleasant Run  
Scottsdale, Arizona 85258

Mr. Hooman Karamian  
a/k/a Mr. Corbin Grimes  
a/k/a Mr. Nik Richie  
Dirty World Entertainment, LLC  
615 South Dupont Highway  
Dover, Delaware 19901

Mr. Hooman Karamian  
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1 Rue Renoir  
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Mr. Hooman Karamian  
a/k/a Mr. Corbin Grimes  
a/k/a Mr. Nik Richie  
Dirty World Entertainment, LLC  
REMOVE@THEDIRTY.COM

Mr. John Webber  
4453 E. Pleasant Run  
Scottsdale, Arizona 85258

***Re: The Tan Company - Todd Beckman***  
***thedirty.com/2009/08/12/where-america-tans***

Dear Messrs. Karamian and Webber:

Sonnenschein, Nath & Rosenthal, LLP represents THETANCO, Inc. ("TANCO") in connection with a matter for which we request your cooperation and assistance.

We have been advised that you have posted false and defamatory statements in connection with the website **thedirty.com**, specifically the URL **thedirty.com/2009/08/12/where-america-tans** (collectively the "Web Page") that misappropriates our client's federally registered trademark and makes false, defamatory and libelous statements about Todd Beckman. While TANCO acknowledges that you have the right to freely express your opinion, the Web Page contains inaccurate, false, defamatory and libelous statements.

Mr. Hooman Karamian  
August 13, 2009  
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Your unauthorized use of our client's trademark, along with false, defamatory and libelous statements, has caused harm and has and will continue to cause confusion in the marketplace, and in general, dilutes the goodwill generated by our client at considerable cost and expense. The inescapable conclusion from your conduct is that you seek to pursue your objectives at the expense of our client's rights and goodwill.

Please be advised that the Web Page content and components therein constitute trademark infringement, defamation and libel under applicable federal and state laws. As a result, you may be liable for damages, treble damages, corrective advertising and the recovery of court costs and attorneys fees.

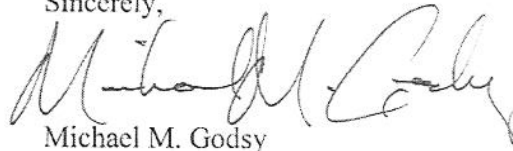
Accordingly, in order to resolve this matter amicably, the following is required:

- (1) Immediately take down all content and postings located at <http://thedirty.com/2009/08/12/where-america-tans>;
- (2) Immediately discontinue all use of our client's trademarks and servicemarks;

If we have not heard from you or your legal advisors with respect to your definitive steps to comply with the terms of this letter by 5:00 p.m. Central Daylight Time on Friday, August 14, 2009, we will not hesitate to pursue any and all available remedies against you to preserve and protect our client's rights.

We await your response.

Sincerely,



Michael M. Godsy