

**EXHIBIT “I”**  
**(Plaintiff’s cease and desist letter to Defendant dated January 4, 2012)**

 **SANTUCCI PRIORE, P.L.**

<http://www.spl-law.com>

January 4, 2012

Museum Plaza  
200 South Andrews Avenue  
Suite 100  
Fort Lauderdale, FL 33301  
Tel: 954.351.7474  
Fax: 954.351.7475

VIA FIRST CLASS MAIL  
AND CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
#7009 1680 0001 5209 7412

<http://www.spl-law.com>

LifeLock, Inc.  
Attention: Legal Counsel  
60 E. Rio Salado Parkway, Suite 600  
Tempe, Arizona 85281

ATTORNEYS:  
Michael I. Santucci  
Joseph V. Priore  
Allison M. Sinclair  
Daniel Devine

RE: Michael I. Santucci, P.A.  
TM: LIFELONG  
Cease and Desist  
Our File No. 7013.015

OF COUNSEL:  
Francis X. Castoro, P.A. °

Dear Sir/Madam:

**PLEASE BE ADVISED THAT** this firm is intellectual property counsel to Michael I. Santucci, P.A., a Florida professional association.

REG. PATENT AGENT:  
Phillip Vales

Our client and its related entities and people provide and license credit repair, debt, identity theft, credit counseling and legal services in connection with the service mark LIFELONG. Our client is the exclusive owner of U.S. Service Mark Registration Number 2,822,613 for the mark LIFELONG for use in connection with credit consultation and debt counseling services. (See the attached Certificate of Registration). Our client is also the owner of Florida Service Mark Registration Document No. T11000000160 for the mark LIFELONG. (See the attached Florida Mark Certificate of Registration).

Our client holds federal, Florida, and common law trademark rights pertaining to the mark LIFELONG, and has been using and licensing this mark in connection with said services for nearly ten (10) years.

As a result of our client's continuous advertising, promotion, and use of its mark over many years, said mark has become distinctive to its customers throughout the United States. Such advertising, investment, and a reputation for quality have resulted in the development of extremely valuable goodwill in relation to this mark.

It was thus with great alarm that our client learned of your use of the mark LIFELOCK in connection with seemingly identical services, in the same channels of trade. This use constitutes an infringement of our client's common law trademark rights, state trademark rights, federal trademark rights under the Trademark Act, and unfair competition under both state and federal law. Confusion by customers, as to the source of origin of these services, if it has not already occurred, could lead to substantial damage to our client in terms of not only sales, but also, potential injury to its reputation in the event that your services not commensurate with those of our client.

° Also admitted in NY

Our client does not consent to your use of our client's mark LIFELONG, or any confusingly similar variation thereof, and never has.

Therefore, **DEMAND IS HEREBY MADE** that you **IMMEDIATELY** cease all use of the mark LIFELOCK, any confusingly similar variations thereof and any mark whether is confusingly similar to our client's LIFELONG mark. Any refusal or failure to do so will compel us to initiate an action in a court of law for injunctive relief and monetary damages, fees and costs.

In addition to the above demands, we ask that you provide our office with proof of the destruction of any and all advertisements, literature, or displays that use said mark or any confusingly similar variations thereof in commerce, within sixty (60) days of the date of this letter.

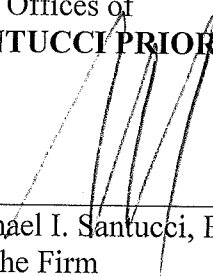
We must receive your assurances of discontinuance of use of our client's mark, or notice of your good faith intent to discuss a means of resolution, by February 3, 2012. If you fail to so advise us by that date, our client reserves the right, without further notice to you, to pursue all available legal and equitable remedies.

Please govern yourselves accordingly. Direct all correspondence to our Fort Lauderdale office shown above.

Very truly yours,

Law Offices of  
**SANTUCCI PRIORE, P.L.**

BY:

  
\_\_\_\_\_  
Michael I. Santucci, Esquire  
For the Firm


MIS/jl

Enclosure (as above)

Cc: Heather A. Dunn, Esq.  
Dla Piper LLP  
555 Mission Street, Suite 2400  
San Francisco, CA 94105-0922  
Facsimile: (415) 836-2501  
(via First Class Mail and facsimile)

Michael I. Santucci, P.A.  
(via hand delivery)

# State of Florida



Department of State

I certify from the records of this office that MICHAEL I. SANTUCCI, P.A., a Florida Corporation located at 200 SOUTH ANDREWS AVENUE, SUITE 100, FORT LAUDERDALE, FL 33301 has registered LIFELONG to be used as a mark under class(es) 0036. Said mark was first used anywhere September 1, 2002 and was first used in Florida September 1, 2002.

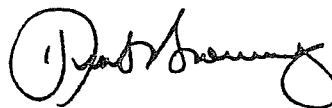
I further certify this mark is being used in connection with the following goods and/or services: CREDIT CONSULTATION, DEBT, AND IDENTITY THEFT COUNSELING AND LEGAL SERVICES.

I further certify that said mark was registered in this office on February 16, 2011 and its date of expiration is February 16, 2016.

The number of this mark is T11000000160.

Authentication Code: 711A00004087-021711-T11000000160-1/1

Given under my hand and the  
Great Seal of the State of Florida,  
at Tallahassee, the Capital, this the  
Seventeenth day of February, 2011



Kurt S. Browning  
Secretary of State

Int. Cl.: 36

Prior U.S. Cls.: 100, 101 and 102

**United States Patent and Trademark Office**

**Reg. No. 2,822,613**

Registered Mar. 16, 2004

**SERVICE MARK  
PRINCIPAL REGISTER**

**LIFELONG**

MICHAEL I. SANTUCCI, P.A. (FLORIDA CORPORATION)  
885 SE 6TH AVE, SUITE C  
DELRAY BEACH, FL 33483

FIRST USE 9-1-2002; IN COMMERCE 9-1-2002.

SER. NO. 76-489,705, FILED 2-7-2003.

FOR: CREDIT CONSULTATION AND DEBT  
COUNSELING SERVICES, IN CLASS 36 (U.S. CLS.  
100, 101 AND 102).

MARK T. MULLEN, EXAMINING ATTORNEY