

International Legal Counsels PC
A PROFESSIONAL CORPORATION

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May 03, 2013

VIA EMAIL (bharris@gaijin.com)

Brandon Harris
90 Athol Ave, Apt 1F
Oakland, CA 94606
T: 415-806-4208

Re: *Trademark Infringement by Gaijin.com*

Dear Mr. Harris:

Our firm represents Gaijin Entertainment Corporation (“**Gaijin**”). Gaijin is a well-known game development company that specializes in creating video games for various platforms (PlayStation3/Xbox 360/iOS/PC). Gaijin is the biggest independent PS3, Xbox 360 and iOS games developer in the Russia Federation and an official partner of Activision, 505 Games, Microsoft, TopWare Interactive, SouthPeak Interactive, Sony Computer Entertainment, 1C Company, Apple and many others. Gaijin’s games have received a range of media and game industry awards including such KRI Awards as “Best Simulation Game,” “Best Technology,” “Best sound” and many more. Gaijin also owns, among other intellectual property, a U.S. trademark registration “GAIJIN” (Reg. No. 4,037,227) (“**Gaijin Mark**”).

It came to our attention that you registered and maintain a website www.gaijin.com (“**Infringing Website**”) that infringes Gaijin Mark. By maintaining and offering to public your content via the website, i.e., Infringing Website, having the same domain as Gaijin Mark, you create consumer confusion and mistake as to the source, sponsorship and/or affiliation of the Infringing Website and Gaijin, thereby infringing Gaijin Mark.

Consequently, the main purpose of this letter is to demand that you immediately cease and desist from maintaining and offering your content via the Infringing Website or any other site having the domain substantially similar to Gaijin Mark. Gaijin also demands that you immediately transfer the Infringing Domain to Gaijin.

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If you wish to amicably resolve this matter, we should hear from you not later than **five days** from the date of this letter regarding the demands listed above. Should we not receive your response that would be satisfactory to our client, we intend to undertake all legal actions and seek statutory and actual damages (including punitive damages and attorneys' fees) afforded to our client under applicable law and equity, including, without limitation, pursuant to ICANN's Uniform Domain Name Dispute Resolution Policy (UDRP).

This letter is written for the purpose of bringing to an end the illegal activities described above and with a view of potential settlement of our client's claims and may not be used by you for any other purpose whatsoever without our written consent. Our client reserves all rights granted to it by law and specifically reserves the right to withdraw any offers before they are accepted or before any payments are made and to avail itself of any enforcement, legal action or relief available to him in law or equity. Additionally, this letter is without prejudice to all further rights our client or its publishers, licensors or licensees may have, including, without limitation, rights to injunctive relief, profits, damages, statutory damages, royalties and attorney's fees.

Should you have any questions, please address any communications regarding this matter to us as follows:

Leo V. Goldstein-Gureff, Esq.
Int'l Legal Counsels PC (aka femida.us)
901 N. Pitt Street, Suite 325
Alexandria, VA 22314
e-mail: info@legal-counsels.com
facsimile: 202.318.0723

Thank you for your time and prompt attention to this matter.

Very truly yours,



Leo V. Goldstein-Gureff, Esq.

cc: Gaijin