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December 22, 2008

Via Email: info@mayfirst.org
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May First / People Link
461 54th Street
Brooklyn, NY 11220

Re: DMCA Take Down Notice: Infringing Posting of
[Fake New York Times on www.nytimes-se.com](http://www.nytimes-se.com)

Dear Sir or Madam:

I am with the Legal Department of The New York Times Company. Continuously for more than one hundred fifty years, The Times has published the world famous newspaper *The New York Times*. We are the owner of U.S. Registration No. 227,904 for our trademark "The New York Times", which registration is now incontestable.

We have learned of the existence of www.nytimes-se.com (domain servers a.ns.mayfirst.org and b.ns.mayfirst.org), a website on which is posted very nearly a complete facsimile of The Times's NYTimes.com website, including but not limited to The Times's exact trademark, logo, layout, and even certain photographs.

Further, the source code of www.nytimes-se.com reveals wholesale copying of The Times's HTML code, including The Times's internal proprietary references. Such copying is a clear infringement of The Times's rights under the Copyright Act of 1976.

We have a good faith belief that this usage has not been authorized by us, by our agent, or by law.

On behalf of The New York Times, I hereby demand that May First immediately disable the www.nytimes-se.com website and take down the infringing materials. THIS IS A DMCA TAKE DOWN NOTICE.

Under penalty of perjury, I hereby declare that this Notice is accurate and that I am authorized to act on behalf of The New York Times.

I look forward to your prompt response, as required by law.

Sincerely,



Deborah Beshaw

cc: Richard Samson, Esq.

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