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December 14, 2011

**VIA E-MAIL** 

Rotem Guez

Dear Mr. Guez,

As you know, we represent Facebook Inc., based in Palo Alto, California. On September 1, 2011, we sent you a letter demanding that you stop violating Facebook's terms.

Your continued activities violate Facebook's terms, and are illegal. Facebook demands that you immediately stop your activities.

Our continued investigation has linked you to the operation of two more websites, www.like-store.info and i-share.co.il, which offer services claiming to increase the number of "likes" that a customer's Facebook Page receives. Facebook continues to gather evidence detailing additional illegal activities.

Facebook takes the protection and proper working of its network very seriously and is committed to keeping Facebook a safe place for users to interact and share information. Facebook developed its terms to protect its users and to facilitate these goals.

Specifically, Facebook's terms prohibit:

- Incentivizing users to Like any page other than your own site or application;
- Creating more than one personal profile, or creating fake profiles;
- Using personal profiles for commercial purposes;
- Incentivizing users to use Facebook social channels, or imply that an incentive is directly tied to use of Facebook channels; and

Misleading Facebook users.

See Statement of Rights and Responsibilities, <u>www.facebook.com/terms.php</u>; Platform Policy, <u>http://developers.facebook.com/policy</u>.

In addition to violating Facebook's terms, your activities may violate the California Comprehensive Computer Data Access and Fraud Act, Cal. Penal Code § 502(c); the federal Computer Fraud and Abuse Act, 18 U.S.C. § 1030; and state laws prohibiting interference with Facebook's business expectations and interests.

Facebook has taken technical steps to deactivate your Facebook accounts and Pages, and hereby revokes your limited license to access and use Facebook's site and/or services. This means that you, your agents, your employees, affiliates, and/or anyone acting on your behalf (collectively, "You" or "Your"), may no longer access the Facebook website or use Facebook's services for any purpose whatsoever. Facebook will treat any further activity by You on Facebook's website as intentional and unauthorized access to Facebook's protected computer network.

In order to avoid escalation of this matter, you must respond to me in writing no later than close of business on Monday, December 19, 2011 confirming that you, your agents, your employees, your affiliates, and/or anyone acting on your behalf (collectively, You or Your):

- 1. Have stopped and will not in the future access Facebook's site, services, platform, or network for any reason whatsoever;
- 2. Have stopped and will refrain from developing, promoting, selling, offering and/or using websites or applications, including but not limited to www.like-store.info and i-share.co.il, that sell "Likes," incentivize Facebook users to "like" any page or website or to use Facebook social channels;
- 3. Have stopped and will not in the future mislead Facebook users; and
- 4. Have removed references to Facebook from any websites or other promotional material that You control, including but not limited to www.like-store.info and i-share.co.il.

If you ignore this letter and continue your current improper conduct, Facebook will take whatever measures it believes are necessary to enforce its rights, maintain the quality of its site, and protect its users' privacy and information.

This letter is not intended by us, and should not be construed by you, as a waiver or relinquishment of any of our client's rights or remedies in this matter. Our client specifically

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reserves all such rights and remedies whether at law or in equity, under applicable domestic and foreign laws.

Sincerely,

Joseph P. Cutler

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