

WATCH TOWER

Bible and Tract Society of Pennsylvania

Legal Department

100 Watchtower Drive, Patterson, NY 12563-9204, U.S.A.

Phone: (845) 306-1000 Fax: (845) 306-0709

February 23, 2018

BY UPS AND E-MAIL

IRELAND

Telephone: _____

Email: _____

Mr. _____ :

I represent Watch Tower Bible and Tract Society of Pennsylvania (“Watch Tower”).

It has come to our attention that you, in your name and through pseudonyms such as “Tom Durbridge”, are reproducing and distributing intellectual property on www.avoidjw.org, <https://jw.servehttp.com> and <http://jwsites.org> that belongs to Watch Tower, Christian Congregation of Jehovah’s Witnesses, and other cooperating entities listed in the attached Schedule C. The attached Schedule A lists some of these misappropriated items.

Watch Tower has never given you, the owner(s), or administrators of www.avoidjw.org, <https://jw.servehttp.com>, or <http://jwsites.org> permission to reproduce or distribute its intellectual property. Accordingly, your misappropriation and use of these items constitutes willful copyright infringement according to both 17 U.S.C. § 101 et. seq. and section 127 of the Copyright and Related Rights Act, 2000 (CRRA 2000). Watch Tower’s rights are enforceable in Ireland.

Compounding these wrongs, you are also making use of Watch Tower’s trademarks including registration Nos. 1283519 and 5,321,955 (the “JW trademark”) and registration Nos. 1284180 and 5,126,709 (the “JW.ORG Logo”). At no time has Watch Tower ever given you permission to use these trademarks.

For your information, the JW trademark is registered in classes 9, 16, 41, and 45. As such, any use of the term “JW” on a website in connection with describing or discussing the tenants of the Jehovah’s Witnesses denomination constitutes trademark infringement. Your use of Watch Tower’s trademarks constitutes willful infringement according to both 15 U.S.C. § 1111 et. seq. and the Trade Marks Act, 1996. Watch Tower’s rights with respect to its trademarks are also enforceable in Ireland.

Watch Tower has spent a great deal of time and effort to develop its intellectual property. Your intentional misappropriation of Watch Tower’s intellectual property and that of Christian Congregation of Jehovah’s Witnesses and other cooperating entities is causing irreparable damage. We demand that you immediately cease and desist the infringement referenced in this letter, sign the undertaking attached as Schedule B, and return it to me via e-mail at inboxlgcopyright@jw.org within the next ten days. If we do not receive the signed undertakings,

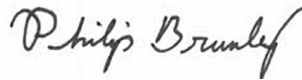
Watch Tower will take this matter to court. If this is the remedy we are obligated to pursue, we will seek monetary damages and compensation to the fullest extent of the law.

These damages may include statutory penalties and reimbursement of any costs we incur including Watch Tower's attorney's fees. We will also make every effort to legally enjoin you from further misappropriation under penalty of additional damages.

This letter is not a complete statement of Watch Tower's rights in connection with this matter. Watch Tower reserves its rights with respect to the infringement of its intellectual property rights by you and all contributors to www.avoidjw.org, <https://jw.servehttp.com>, and <http://jwsites.org>.

Should you determine to allow this matter to go to court, have your solicitor contact my office at the above address.

Sincerely,

A handwritten signature in cursive script that reads "Philip Brumley".

Philip Brumley
General Counsel

Attachments (3)

Schedule A

Representative List of Infringing Works Appearing on www.avoidjw.org, https://jw.servehttp.com, and https://jwsites.org	
Listen to God and Live Forever	Fulfilling the Law of Christ When Unseen by Humans
Good News from God	Fulfilling the Law of Christ in the Field Ministry
Who Are Doing Jehovah's Will Today	The Law of Christ—Why Superior?
How do You View the Bible	Dedication and Baptism
How do You View the Future	Never Abandon Your Loyal Love for Jehovah
What is the Key to Happy Family Life	Do Not Give In to Fear!
Who Really Controls the World	Fulfilling the Law of Christ in the Family
Will Suffering Ever End	Fulfilling the Law of Christ at School
How Can You Have a Happy Life	Love One Another, Just as Jesus Loved You
My Bible Lessons	Why Is It Difficult to Do What Is Fine?
What is the kingdom of God	Use Social Media Wisely
Where Can We Find Answers to Life's Big Questions	Choose Wholesome Entertainment
Your Family Can Be Happy	Fight the Spirit of Envy
Teach Your Children	Invest in a Secure Future
Return to Jehovah	Keep Working Good Toward All

Answers to 10 Questions Young People Ask	Dedication and Baptism
Was Life Created	Never Abandon Your Loyal Love for Jehovah
The Origin of Life - 5 Questions Worth Asking	Do Not Give In to Fear!
The Pathway to Peace and Happiness	Public Bible Discourse: Avoid Mocking God—In What Sense?
Real faith Your key to a happy life	Develop Good Study Habits
Listen to God	Use Bible Principles to Guide Your Life
Can the Dead Really Live Again	“Do Not Let Your Hand Rest”
Youths - What Will You Do With Your Life	What We Will Reap if We Do Not Tire Out
What is the Law of Christ?	New World Translation of the Holy Scriptures (2013 Revision)
New World Translation of the Holy Scriptures (1984 Edition)	

Schedule B

To: [REDACTED], Owner(s)/Administrator(s) of www.avoidjw.org,
<https://jw.servehttp.com>, and <http://jwsites.org>

Dear Sirs,

I, [REDACTED], after being duly sworn, depose and say:

I acknowledge that unauthorized use of the copyrighted works on www.avoidjw.org, <https://jw.servehttp.com>, and <http://jwsites.org> infringe Watch Tower Bible and Tract Society of Pennsylvania's ("Watch Tower") copyright. In consideration for Watch Tower refraining from bringing legal proceedings against me for copyright and trademark infringement, including the seeking of monetary damages, with respect to the trademarks and copyrighted work as outlined in the attached letter dated February 23, 2018, but without prejudice to your right to take action in respect of any further acts of infringement that may occur after the date of the execution of this document, I hereby undertake as follows to:

1. Immediately cease and desist displaying and disseminating intellectual property belonging to Watch Tower or legal entities cooperating with Watch Tower (*see* Schedule C listing cooperating entities), and refrain from using such works on any website and any social media sites including but not limited to Dropbox, Facebook, YouTube, Tumblr, LinkedIn, Twitter, Vimeo, Vid.me, Rutube, and any other Google service.
2. Immediately disable access to Watch Tower's copyrighted works available at www.avoidjw.org, <https://jw.servehttp.com>, and <http://jwsites.org> or any other website that I own, control, or manage.
3. Immediately remove any of Watch Tower's trademarks available at www.avoidjw.org, <https://jw.servehttp.com>, and <http://jwsites.org> or any other website that I own, control, or manage.
4. Remove, delete, or destroy any data stored which is or provides access to Watch Tower's intellectual property, at my own cost, for a period of 72 months from the date of this undertaking.
5. Provide a witness statement, endorsed with a statement of truth (i.e., sworn affidavit), to confirm that I have complied with the undertakings above within ten days of the date of this undertaking.
6. Not cause, enable, permit, or assist any other person committing the acts described in these undertakings.
7. Consent to personal jurisdiction of the Federal District Court for the Southern District of New York in the event that I fail to uphold any of these undertakings.

- 8. Keep any and all communications and information relating to infringement of Watch Tower's intellectual property and the terms of these undertakings strictly confidential.
- 9. I acknowledge that failure to comply with any of the above undertakings will constitute a breach of the undertakings such that Watch Tower may bring an action for infringement for any infringement of Watch Tower's intellectual property that occurred prior to the execution of this document.

Dated: _____

Signature: _____

CERTIFICATE OF NOTARY PUBLIC

BE IT KNOWN that I, _____ of

_____ ,

Notary Public, commissioned for life by the Chief Justice CERTIFY that

_____, residing at

_____ identified to me by

production of _____ who, in my opinion, has the

necessary legal capacity and understands the consequences of this act APPEARED

before me on _____ AND TESTIFIED that he assents to and signed the

undertakings titled, "Schedule B" sent to: Jason Wynne, Owner(s)/Administrator(s) of

www.avoidjw.org, <https://jw.servehttp.com>, and <http://jwsites.org>.

THIS ACT may be received in evidence in a court of law.

SIGNED AND SEALED

At _____

On _____

Notary Public Seal

Schedule C

Representative List of Entities Cooperating with Watch Tower

Christian Congregation of Jehovah's Witnesses (Britain)

Christian Congregation of Jehovah's Witnesses (Ghana)

Christian Congregation of Jehovah's Witnesses (United States)

Christian Congregation of Jehovah's Witnesses (Canada)

Testigos Cristianos de Jehova (Spain)

Congregation Chretienne des Temoins de Jehovah (Canada)

Watchtower Bible and Tract Society of Australia

Watchtower Bible and Tract Society of New York, Inc.

Christian Jehovah's Witnesses (Greece)

Watch Tower Bible and Tract Society of the Philippines, Inc.