

February 3, 2015

**CERTIFIED MAIL  
RETURN RECEIPT**

Shapeways HQ  
419 Park Avenue South  
Suite 900  
New York, NY 10016  
[www.shapeways.com](http://www.shapeways.com)

***Re: DEMAND TO CEASE AND DESIST INFRINGEMENTS  
OF KATY PERRY INTELLECTUAL PROPERTY***

Dear Sirs:

We represent Katy Perry, the owner of the intellectual property depicted or embodied in connection with the shark images and costumes portrayed and used in Katy Perry's Super Bowl 2015 half-time performance ("IP").

Our client recently has learned that you have been involved in the manufacture, sale, marketing and distribution of merchandise featuring a shark sculpture which embodies and uses the IP, and that you have displayed this product on your website, [www.shapeways.com](http://www.shapeways.com), in connection with such sale and distribution.

As you are undoubtedly aware, our client never consented to your use of its copyrighted work and IP, nor did our client consent to the sale of the infringing product. Your unauthorized display and sale of this product infringes our client's exclusive rights in numerous ways, including, but not limited to, infringement of our client's exclusive rights to reproduce, display, and distribute its copyrighted images under the United States Copyright Act as set forth in 17 U.S.C. §106.

Your infringing conduct entitles our client to significant legal relief against you, which may include actual damages, statutory damages, and punitive damages, as well as immediate and permanent injunctive relief.

Based upon the foregoing and to avoid any further proceedings in this matter, we hereby demand on behalf of Katy Perry that you and all others involved:

(1) Immediately cease and desist from all further commercial use or exploitation of unauthorized products bearing the IP and copyrighted images;

(2) Confirm to us in writing within three (3) business days of the date of this letter that you have done so;

(3) Turn over to this office all of the infringing merchandise in your possession, as well as advertising, packaging, or other materials which you have used to promote, market or distribute said offending merchandise within ten (10) business days from this letter; and

(4) Provide a complete accounting for all of the revenue you have received from the sale of the infringing products within twenty (20) days from the date of this letter, which must include copies of all of the sales and shipment records for the sale of this infringing merchandise.

Your failure to comply with our demands will result in our client's enforcing its rights against you. Further, your failure to comply with our demands will be viewed by the courts as willful infringement, which will entitle us to obtain statutory and/or treble damages against you.

Further, if you decide not to comply with our demands, our client reserves its rights to assert all claims and seek all remedies that are available under the law.

Please send your confirmation to my attention by fax or email, (310) 586-7800 or [plinios@gtlaw.com](mailto:plinios@gtlaw.com).

Sincerely,



Steve Plinio, Esq

cc: Steve Jensen  
Martin Kirkup  
Bradford Cobb  
Jay Cooper, Esq.