

EXHIBIT 3



Private & Confidential

Roblox Legal
970 Park Place
Suite 1000
San Mateo
California
CA94401

17 May 2022

Our ref: MK7621/1400218/2/4136-6161-7976.1

Dear Sirs,

Re: IP Infringement

As you will be aware from previous correspondence, we are instructed by Mr Christopher Boomer ('our Client') in relation to the protection of his intellectual property rights ('IPR') arising from games which are created and hosted on the Roblox platform.

The purpose of this letter is to notify you of content currently live on the Roblox platform which infringes our client's IPR and to request that the content is removed pursuant to the Digital Millennium Copyright Act 1998 ('DMCA').

Our Client's Games

Our Client is the independent creator and developer of a number of original games on Roblox including the following:

1. Weight Lifting Simulator 2: <https://www.roblox.com/games/985510407/Weight-Lifting-Simulator-2>
2. Weight Lifting Simulator 3: <https://www.roblox.com/games/2346834658/Content-Deleted>
3. Muscle Legends: <https://www.roblox.com/games/3623096087/Muscle-Legends>

The above three games are updated versions of the previous game and therefore largely use the same script/code with some modifications.

Our Client's IPR

Our Client has intellectual property rights arising from his games as follows:

Copyright

All of the above games are the original and creative expressive work of our Client and therefore amounts to copyrightable subject matter. Our Client owns all rights and privileges for this work. Our Client has acquired copyright registrations from the United States Registrar of Copyrights in respect of his work as follows:

Weight Lifting Simulator 2: TX0009098098

Lewis Silkin (N.I.) LLP
1-3 Lombard Street
Belfast
Northern Ireland
BT1 1RB

Office details
T +44 (0) 20 7074 8000
F -
E info@lewisilkin.com
W lewisilkin.com

Megan Kerr
T +442890897621
E megan.kerr@lewisilkin.com



Weight Lifting Simulator 3: TX0009098172

Muscle Legends: TX0009104854

Copies of our Client’s copyright certificates for are enclosed at **Annex 1**. Our Client also claims copyright in the figurative elements of his trademarks set out below.

Trademarks

Our Client is also the proprietor of the following registered trademarks which protect his games:

1. UK mark no. UK00003658352 comprising a figurative mark with the words “WEIGHT LIFTING SIMULATOR” which was filed on 21 June 2021 (**‘the Weight Lifting Simulator Mark’**). You can view our Client’s trademark registration (which unequivocally evidences our Client’s registered proprietary rights in connection with the mark) in respect of the Weight Lifting Simulator Mark at the following link: <https://trademarks.ipo.gov.uk/ipo-tmcase/page/Results/1/UK00003658352>
2. UK trade mark no.UK00003658335 comprising the word mark “Muscle Legends” which was filed on 21 June 2021 (**‘the Muscle Legends Mark’**). You can view our Client’s trademark registration (which unequivocally evidences our Client’s registered proprietary rights in connection with the mark) in respect of the Muscle Legends Mark at the following link: <https://trademarks.ipo.gov.uk/ipo-tmcase/page/Results/1/UK00003658335>

Copyright Infringement

Our Client has discovered the following game which is currently live on the Roblox platform and which infringes our Client’s copyrighted work arising from his games, Weight Lifting Simulator 2, Weight Lifting Simulator 3 and Muscle Legends (**‘our Client’s Games’**):

<https://www.roblox.com/games/8601438093/Weight-Lifting-Simulator-5> (**‘the Infringing Game’**)

The Infringing Game has blatantly taken artwork, code and assets from our Client’s Games without the consent of our Client, who is the copyright holder.

You will note the Infringing Game was published by the group “Estatic Studios” (<https://www.roblox.com/groups/3116706/Estatic-Studios>). Estatic Studios previously published two other games which infringed our client’s copyright in the Weight Lifting Simulator 3 game. These games were highlighted in previous DMCA requests issued by this firm to Roblox and were ultimately removed by Roblox as they were found to be infringing. These games were as follows:

Infringing Games by Estatic Studios

	Link to Infringing Game	Game Infringed	Visits	DMCA Request	Status
1.	https://www.roblox.com/games/857570547/Lifting-Simulator	Weight Lifting Simulator 3	34.4M	23.12.21	Removed
2.	https://www.roblox.com/games/4156508179/Weight-Lifting-Simulator-3	Weight Lifting Simulator 3	15M	25.03.22	Removed



3.	https://www.roblox.com/games/8601438093/Weight-Lifting-Simulator-5	Weight Lifting Simulator 3	629K	10.05.22	Live
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You will note the Infringing Games set out above are receiving significant numbers of visits and are therefore generating significant revenues which are being redirected from our Client's games, thereby causing damage and loss to our Client.

It is quite clear from the above that the individual behind this group is deliberately targeting our Client's Games and is continuing to maliciously infringe our Client's copyright. The above conduct demonstrates that this User is a repeat infringer and is flagrantly breaching the Roblox Terms of Use. It is our view that such targeted and brazen infringement should also be considered grievous in accordance with Roblox's Intellectual Property Policy. We would therefore specifically request that this account is looked at in the context of Roblox's repeat/grievous infringement policy and guidelines.

We trust that, in accordance with the Roblox Terms of Use (specifically Section 6C subparagraphs 1-4) the Infringing Content will be removed from the Roblox platform immediately, and where necessary, the infringing User's account(s) will be disabled.

In accordance with the Roblox Terms of Use, we enclose a signed declaration confirming that our client is the copyright owner and that the use of our client's copyright for the above game has not been authorized by our client.

We trust that the enclosed information is sufficient to enable you to take the appropriate remedial action sought by our client, however should you have any further queries, please do not hesitate to contact us using the contact details provided below.

Solicitor: Mr Mathew Forde Telephone: +44 (0) 28 90 897610

Email: Mathew@fordelaw.com

Address: 1-3 Lombard Street, Belfast, Northern Ireland, BT1 1RB.

Yours sincerely

Lewis Silkin (NI)

Lewis Silkin (N.I.) LLP

Notice of Copyright Infringement Pursuant to the Digital Millennium Copyright Act 1998 ("DMCA")

1. I, Mathew Forde, Lawyer and Partner at Lewis Silkin (N.I) LLP, confirm that I am instructed by Mr Christopher Boomer of 25 Cultra Avenue, Holywood, Northern Ireland, BT18 0AZ and am duly authorized to act on his behalf in respect of the matters more specifically set out in Lewis Silkin's letter dated 17 May 2022 ('Our Letter'). This declaration should be read in conjunction with Our Letter and the attachments therein.

2. I am instructed by my client that the content at the following web addresses is the original content and creation of my client and as such the material therein, including the artwork, imagery, text, gameplay, software, and coding, attracts copyright protection pursuant to the DMCA for the purposes of which my client is the copyright owner:
<https://www.roblox.com/games/985510407/Weight-Lifting-Simulator-2>
<https://www.roblox.com/games/2346834658/Weight-Lifting-Simulator-3>
<https://www.roblox.com/games/3623096087/QUESTS-Muscle-Legends>

3. I am instructed by my client that the content at the following web address is currently live on the Roblox platform and that the content contains material which infringes my client's copyright arising from the games set out at (2) above:
<https://www.roblox.com/games/8601438093/Weight-Lifting-Simulator-5>

4. I confirm that I have a good faith belief that the game referred to in (3) above and use of my client's copyrighted material as set out at (2) above is not authorized by my client, his agents or the law.

5. I confirm, under penalty of perjury, that I am instructed to act on behalf of the copyright owner.

6. I confirm that the information provided in this notice is accurate.

Signed:



Dated: 17 May 2022