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## **EXHIBIT 4**

## Megan Kerr

From:	Megan Kerr
Sent:	19 May 2022 22:29
То:	Copyright Agent
Cc:	Mathew Forde; Kerry Thomas
Subject:	DMCA Notification - Our Client: Christopher Boomer
Attachments:	DMCA request - 17 May 2022.pdf; DMCA Declaration - 19 May 2022 pdf.pdf

## REQUEST PURSUANT TO THE DIGITAL MILLENNIUM COPYRIGHT ACT 1998 (DMCA)

Dear Sirs,

We write further to our correspondence dated 17 May 2022 (attached) ('Our Letter').

Our Letter refers to persistent infringement of our client's copyrighted games on Roblox by a group called Estatic Studios. We have since discovered another game which infringes the copyright in our client's games Weight Lifting Simulator 2, Weight Lifting Simulator 3 and Muscle Legends (details of which are referred to in Our Letter). We believe that this game has been published by the individuals responsible for the Estatic Studios group.

You can view the infringing game at the following link: https://www.roblox.com/games/7033249035/Weight-Lifting-Simulator-3

The game at the link has taken artwork, code and assets from our Client's games without the consent of our Client, who is the copyright holder, and therefore the publication of this game amounts to copyright infringement.

The infringing game is published by a group called "17\_Qv Studio". There is evidence of a link between the two as the owner account "Lo\_ok" (<u>https://www.roblox.com/users/879879423/profile</u>) is also the owner of other "Estatic Studios" groups, "Estatics" (<u>https://www.roblox.com/groups/5617490/Estatics#!/about</u>) and "Estatic Networks" (<u>https://www.roblox.com/groups/13730430/Estatic-Networks#!/about</u>). Furthermore, the same developers are credited on each group. The account "Mark" is the admin on the 17\_Qv Studio group and is also a developer for the Estatic Studios group.

The purpose of this correspondence is to request that:

- 1. The infringing game is taken down pursuant to the Digital Millennium Copyright Act 1998 ('DMCA') and in accordance with Roblox Terms and Conditions.
- 2. The accounts and individual(s) responsible for the groups/infringing games are investigated in the context of the Roblox repeat infringer policy.

We enclose signed declaration on behalf of our client. Should you require any further information, please do not hesitate to contact us.

Kind regards

Megan Kerr Paralegal, Intellectual Property | T +44 20 7074 7621

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

- 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') and email dated 19 May 2022. This declaration should be read in conjunction with Our Letter, the attachments therein, and our email of 19 May 2022.
- 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/groups/10504780/17-Qv-Studio#!/about

- 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:

Lawis Silkin (NI)

Dated: 19 May 2022

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