

# EXHIBIT B

**From:** [Aminirad, Shannon](#)  
**To:** [primewire.inbox](#)  
**Cc:** [Klaus, Kelly](#); [Ehler, Rose](#)  
**Subject:** RE: New Domain  
**Date:** Monday, March 14, 2022 7:59:49 PM

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PrimeWire Team:

I received your March 13, 2022 email, which appears to be in response to my service to you of Plaintiffs' papers in support of their Notice to the Court of changes to the PrimeWire websites and the supporting papers, ECF No. 39. As I have said before, in emails sent on December 6 and 7, 2021, we need to know who you are and, if you are represented by counsel, who your lawyer is in connection with this case. We cannot have substantive discussions about the case with people who will not identify themselves.

I do note that your statements about PrimeWire's "motivation" for establishing and migrating users to the PrimeWire.tf domain, and the "intended effect" of the same, cannot be squared with the record. First, as noted, you will not identify who you are or appear before the Court to defend your conduct or respond to our request for relief. Second, PrimeWire changed registrars to Sarek Oy to avoid the PrimeWire.vc and PrimeWire.li (and now PrimeWire.tf) domains being disabled pursuant to the injunction. Third, PrimeWire has previously responded to orders in other jurisdictions by continuing the infringing offerings, including through new domains. Fourth, it is not true, as your email says, that there is "no evidence" that PrimeWire.tf has been used to infringe. As explained in Mr. Van Voorn's March 12, 2022 declaration, which you received, Plaintiffs' investigators were able to stream Plaintiffs' copyrighted works on PrimeWire.tf as recent as last Tuesday. See Dkt. 39-2 ¶ 5.

Further, as we explained in our filing with the Court, PrimeWire's intentions are not sufficient to rebut the case for injunctive relief. PrimeWire has caused substantial and irreparable harm to Plaintiffs, and Plaintiffs have been forced to expend substantial resources in seeking to stop PrimeWire's mass infringement of their works in the U.S. and around the world. The law is clear that Plaintiffs are entitled to (1) damages for the infringement to date, and (2) an injunction that meaningfully safeguards against the potential of further infringement. See Dkt. 39 at 4-5.

If the PrimeWire Team wishes to oppose Plaintiffs' motion for partial default judgment or the scope of the permanent injunction, you or your counsel should appear in the case. Should this occur, we will negotiate a briefing schedule so that PrimeWire may present its position to the Court. Please let us know by this Friday, March 18, 2022 if you will appear before the Court.

Sincerely,  
Shannon

**Shannon Galvin Aminirad** ([she/her/hers](#)) | **Munger, Tolles & Olson LLP**  
350 South Grand Avenue | Los Angeles, CA 90071  
Tel: 213.683.9594 | [Shannon.Aminirad@mto.com](mailto:Shannon.Aminirad@mto.com) | [www.mto.com](http://www.mto.com)

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*without copying it, and notify the sender by separate e-mail so that our address record can be corrected.  
Thank you.*

**From:** primewire.inbox <primewire.inbox@protonmail.com>  
**Sent:** Sunday, March 13, 2022 12:40 PM  
**To:** Aminirad, Shannon <Shannon.Aminirad@mto.com>  
**Subject:** New Domain

Hello,

We would like to clarify our recent actions, and explain the motivation behind them and their intended effect.

We have moved PrimeWire to the new domain, PrimeWire.tf, and we are taking action to comply with the temporary injunction. We have remove all links to external video hosting services, excluding the following:

youtube.com  
archive.org  
vimeo.com  
dailymotion.com

We are only accepting new link submissions from these four services. The rationale for doing this is that these four services have strong proactive copyright protection policies, so the likelihood of unauthorized content being served by them is low. However, we recognize that this is not enough. If the Plaintiff, or any other copyright holder finds links on PrimeWire to unauthorized streams of their works, we invite them to send us a notice of the relevant works, and we will remove the links and disable the submission of any further links. As of March 13th, we have already disabled the submission of new links for all 138 works identified by the Plaintiff.

We support points 2 and 4 of the proposed permanent injunction. However, we would like point 3 to be amended to exclude PrimeWire.tf, as there is no evidence to suggest that any links to unauthorized streams of the Plaintiffs works is being or has ever been distributed over this domain. We would like to note that under point 4, if it ever becomes apparent that links to unauthorized streams of the Plaintiffs works were being distributed on PrimeWire.tf, then it could at that point be added in the injunction to be frozen or seized.

PrimeWire Team

----- Original Message -----

On Saturday, March 12th, 2022 at 11:27 PM, Aminirad, Shannon  
<[Shannon.Aminirad@mto.com](mailto:Shannon.Aminirad@mto.com)> wrote:

To Whom It May Concern:

Please find attached documents filed today in court.

Sincerely,  
Shannon

Shannon Galvin Aminirad ([she/her/hers](#)) | Munger, Tolles & Olson LLP  
350 South Grand Avenue | Los Angeles, CA 90071

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Tel: 213.683.9594 | [Shannon.Aminirad@mto.com](mailto:Shannon.Aminirad@mto.com) | [www.mto.com](http://www.mto.com)

**\*\*\*NOTICE\*\*\***

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