Case 2:21-cv-09317-MCS-SK Document 42-2 Filed 03/22/22 Page 1 of 3 Page ID #:2467

## EXHIBIT A

From:	primewire.inbox
То:	Aminirad, Shannon
Subject:	New Domain
Date:	Sunday, March 13, 2022 12:40:10 PM

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> 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 LLP350 South Grand AvenueLos Angeles, CA 90071Tel:213.683.9594Shannon.Aminirad@mto.comwww.mto.com

## \*\*\**NOTICE*\*\*\*

This message is confidential and may contain information that is privileged, attorney work product or otherwise exempt from disclosure under applicable law. It is not intended for transmission to, or receipt by, any unauthorized person. If you have received this message in error, do not read it. Please delete it without copying it, and notify the sender by separate email so that our address record can be corrected. Thank you.