

THIRD DMCA TAKEDOWN NOTICE - November 21, 2011 + appendix

My name is Sarah Vaughter and I am the owner of Vaughter Wellness Ltd. A website that your company hosts (according to WHOIS information) is infringing on copyrights owned by my me and my company. Copyright is inherent without registration and guaranteed worldwide by the Berne Convention.

In spite of repeated warnings, many of my writings are currently published on your servers without my permission. Attached is an overview with five examples of the offending material. My copyrighted writings appear on:

<http://scientiaroller.ipage.com/skin-care-essentials-samples.html>

<http://scientiaroller.ipage.com/dermarolling.html>

<http://scientiaroller.ipage.com/before--after.html>

<http://scientiaroller.ipage.com/derma-rollers.html>

This letter is official notification under [Section 512\(c\)](#) of the Digital Millennium Copyright Act ("DMCA"), and I seek the removal of the aforementioned infringing material from your servers. I request that you immediately notify the infringer of this notice and inform them of their duty to remove the infringing material immediately, and notify them to cease any further posting material that infringes upon our rights to your server in the future.

Please also be advised that law requires you, as a service provider, to remove or disable access to the infringing materials upon receiving this notice. Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify ongoing copyright infringement. If service providers do not investigate and remove or disable the infringing material this immunity is lost. Therefore, in order for you to remain immune from a copyright infringement action you will need to investigate and ultimately remove or otherwise disable the infringing material from your servers with all due diligence should the direct infringer, your client, not comply immediately.

I am providing this notice in good faith and with the reasonable belief that rights I and my company owns are being infringed. Under penalty of perjury I certify that the information contained in the notification is both true and accurate, and I have the authority to act on behalf of the owner of the copyright(s) involved.

I will seek legal recourse if you do not remove my copyrighted work, and will demand penalties and damages available by national and international laws, including criminal proceedings against principals.

Should you wish to discuss this with me please contact me directly.

A copy of this email will be sent to you by registered mail.

/s/Sarah Vaughter

sarah@owndoc.com

Vaughter Wellness Ltd., Zürcherstrasse 161, CH-8010 Zürich, Switzerland.

APPENDIX

List of infringing sections

1. <http://scientiaroller.ipage.com/skin-care-essentials-samples.html>

Facial mask with large concentration of GHK-Cu copper peptides and B vitamins, to promote collagen production. To be used after dermarolling (parts of) the face with any needle length. Improves signs of aging, wrinkles and fine lines. Can also be used if you don't use a dermaroller. The absorption will be less but because of its high strength it will still do the face a lot of good. Also recommended after rolling pigmentation spots and acne scars. Protects renewing skin from free radical damage and supplies provenly beneficial copper peptides to the regenerating skin. Recommended to be used once a week. Can be used with any length dermaroller.

40 ml liquid in a facial mask, to be put on the face and left on for ten minutes. Please note that this is not a cream - it is an occusive mask made of an absorbing layer drenched in a "cosmeceutical" lotion, with an occlusive plastic layer complete with holes for eyes, nose and mouth.

This is an identical copy of my text here:

http://webshop.owndoc.com/index.php?main_page=product_info&cPath=1&products_id=25

2. <http://scientiaroller.ipage.com/dermarolling.html>

These are general, conservative guidelines. Males generally have thicker skin and can roll a bit more frequently. Some parts of the body such as the back and buttocks have thicker skin than other areas, and there you can shorten the interval somewhat.

Copied literally from <http://dermaroller.owndoc.com/dermaroller-instructions.pdf>

3. <http://scientiaroller.ipage.com/dermarolling.html>

dermaroller for under the eyes or upper lip. 0.5 mm needles can be used once or twice a week on the same skin area. (Picture is of the 2 mm narrow roller so the needles are much shorter but the model is the same.) 64 needles in total (4 x 16). The needles are made of surgical steel, 0.25 mm thick at their base, with a long taper.

Copied literally from http://webshop.owndoc.com/index.php?main_page=product_info&products_id=17

4. <http://scientiaroller.ipage.com/before--after.html>

No, they are not "Photoshopped" and yes, there are even better examples to be found on the net.

Copied literally from

<http://www.owndoc.com/dermarolling/dermaroller-pictures-before-and-after-acne-stretchmarks-pigmentation/>

(the rest of the sentence is identical except one word - "stretch marks" instead of "acne scars".

5. <http://scientiaroller.ipage.com/derma-rollers.html>

The entire page is a derived work, based on the articles in our web store. Example:

0.5 mm dermaroller to enhance absorbtion of skin products, to improve skin texture and against pigmentation spots. 0.5 mm needles can be used once or twice a week on the same skin area.

192 needles in total (8 x 24). The needles are made of surgical steel and are 0.25 mm thick at their base, with a long taper.

This is an identical copy of my text here:

http://webshop.owndoc.com/index.php?main_page=product_info&cPath=1&products_id=16