

VIA US Mail and Email hafnarfjordur@hafnarfjordur.is

August 15, 2019

Ms. Kristinn Andersen President of the City Council Hafnarfjörður Town Hall Strandgata 6 - 220 Hafnarfjörður Iceland

Re: Unauthorized Use of the Hollywood Walk of Fame Mark in Connection with the Icelandic Stars in Hafnarfjörður, Iceland

Dear Ms. Andersen:

Pursuant to its agreement with the Hollywood Chamber of Commerce (the "Chamber"), the legal entity which owns and controls all rights in and to various trademarks and service marks associated with the Hollywood Walk of Fame (collectively, the "Property"), Global Icons, LLC ("Global Icons") serves as the Chamber's exclusive, worldwide merchandising and licensing agent. Among other things, Global Icons administers and enforces existing licenses relating to the Property as well as protects and enforces the Chamber's proprietary rights in and to the Property.

We recently have been informed that the City Council of Hafnarfjörður (the "Council") has impermissibly utilized the Property, and/or a derivative thereof, in connection with its Icelandic stars project (the "Icelandic Stars"). More specifically, the Icelandic Stars features "replica" stars that bear substantially similar iconography and likeness of the Property. In addition, various news articles have referenced the Hollywood Walk of Fame in connection with the Icelandic Stars. An image of the use at issue as well as URLs of the news articles have been included at the end of this letter for your ease of reference (the "Unauthorized Use").

Such Unauthorized Use and exploitation of the Property without the prior consent of the Chamber may represent an unlawful attempt to associate the Council/town of Hafnarfjörður with the Property and improperly indicates the Chamber's endorsement and/or approval of, and association with, the Icelandic Stars. Such conduct may also constitute an infringement of the Chamber's proprietary rights, including the Chamber's rights under state, federal, and international trademark law, and may constitute unfair competition.

Accordingly, the Chamber hereby demands that the Council immediately cease and desist from any and all further exploitation and use of the Property and contact Global Icons to discuss an amicable resolution of this matter. As a demonstration of good faith, please provide Global Icons with the following documents and/or information within ten (10) business days from the date of receipt of this letter:



- 1. A detailed report specifying each and every use of the derivative Property in connection with the Icelandic Stars and/or any affiliated businesses, events and/or websites.
- 2. Samples of any and all web screenshots, advertising and promotional materials, and documents/logos which utilize the Property; and
- 3. Assurance that all use and exploitation of the Property by the Council or any person or entity acting on behalf of or under an agreement with the Council has ceased.

After receiving the foregoing information, we will discuss with our client an acceptable resolution of this matter. Please be advised that in the event that Global Icons does not receive a response to this letter, including the foregoing documents as requested above, within ten (10) business days receipt hereof, the Chamber will have no other option but to pursue all available rights and remedies.

Should you have any questions or concerns, I may be reached directly at christine.sovich@globalicons.com or at the address and/or fax # listed on this letterhead.

Finally, this letter should not be construed as a full recitation of the facts supporting the Chamber's claims, and nothing contained herein is intended to, or does, constitute a waiver of any right, remedy or claim of the Chamber, each and all of which are expressly reserved.

Very truly yours,

Chistin M. Stich

Christine M. Sovich Of Counsel

cc: <u>Hollywood Chamber of Commerce:</u> Rana Ghadban, CEO/President

Global Icons:

Mr. Jeff Lotman, CEO

Mr. George Kviloria, Manager, Licensing Administration



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