



Groupon Inc.  
600 W Chicago Ave., Ste. 620  
Chicago, IL 60654

April 1, 2011

***CERTIFIED MAIL***

***RETURN RECEIPT REQUESTED***

Heather Harde, CEO  
TechCrunch.com, Inc.  
121 Tanner St.  
San Francisco, California 94122

Re: Infringement of Groupon's Intellectual Property Rights  
Cease & Desist

To Whom It May Concern:

It has recently been brought to our attention that your company has been abusing the intellectual property of Groupon. Your website is fraught with improperly branded mentions of Groupon Presents April Fools' Day™, a subsidiary of Groupon.com.

These actions may have begun recently, or may have been ongoing for some time, however this concept (April 1st-centric jocularly) was developed by Groupon and is a proprietary method owned by Groupon. The Groupon Jocular System and Method, with which you and/or your company is now directly competing, is the subject of a pending U.S. patent application.

This letter is to provide you and/or your company actual notice that your mention of the above-referenced method is without right or license from Groupon, and includes steps and features that were taken directly from the Groupon Jocular System and Method. In fact, it has come to our attention that you may have already known about the Groupon Jocular System and Method and therefore you have willfully misappropriated Groupon's intellectual property, potentially subjecting you and/or your company to increased damages and attorney's fees. Upon the issuance of Groupon's patent, your actions will undoubtedly constitute patent infringement and we believe that your actions, regardless of your previous knowledge of the Groupon system and method, would be subject to an injunction and damages at that time.

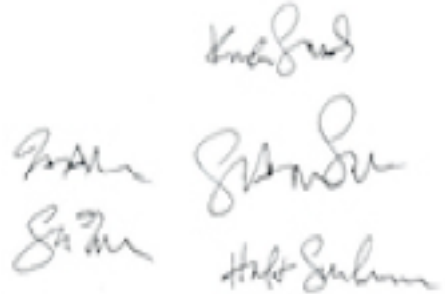
Accordingly, we demand that you immediately cease and desist from mentioning Groupon Presents April Fools' Day™ and remove all previous mentions, or, conversely, properly brand all mentions of the jocular holiday on your site, TechCrunch.com as "Groupon Presents April Fools' Day™". We expect that you will assure us in writing immediately that you have permanently done so.

As you can understand, Groupon must protect its valuable rights in its intellectual property and while it is willing to discuss resolving this matter amicably, any discussion will have to start with your agreement, in writing, that you will discontinue the infringing

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use of the Groupon's intellectual property and enter into a license agreement for past damages and future use of the Groupon System and Method. Accordingly, if we do not hear from you by April 1, 2011, we will assume that you do not wish to resolve this issue amicably and we will be forced to take whatever action we deem necessary to resolve this issue.

Very truly yours,

The image shows five handwritten signatures in cursive script, arranged in two columns. The top signature is on the right side. The second and third signatures are on the left side, and the fourth and fifth signatures are on the right side.

Groupon Legal Dept.