



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

April 1, 2011

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Richard Branson, CEO
The School House
50 Brook Green
Hammersmith, London W6 7RR
United Kingdom

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

To Whom It May Concern:

It has recently been brought to our attention that on this particular day (April 1st) you and/or your company has begun generating false statements based on false facts and propagating these false statements to others within a limited timeframe (and before the receiving party can verify the false statement) in an attempt to deceive the receiving party. Once the receiving party has "bought in" or has begun to believe the false statements, you inform them that the statement is false. This notification may be audible, through the Internet, through a cellular telephone network or through television or radio broadcasting.

Your company's false statement(s): **That Virgin Group has purchased Pluto and reinstated it as a planet** are clearly untrue for the following reasons:

1. Were this to be possible, the funds required would implicitly be beyond even the ample resources of the Virgin Group.
2. The scientific method by which Pluto's planet status was revoked is objective and controlled, and not subjective to wealth or intention.
3. It is presumptuous for a corporate entity to have purported to purchase a shared abstract, in this instance, a celestial body.

Such a statement(s) is obviously an April 1st jocular ruse.

These actions may have begun recently, or may have been ongoing for some time, however this concept (April 1st-centric jocularinity) 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 use of the above-referenced method is without right or license from Groupon, and includes steps and

April 1, 2011

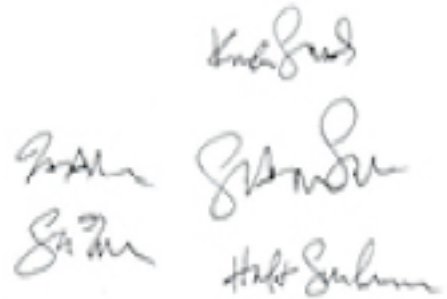
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features that were taken directly from the Groupon Jocular System and Method. In fact, it has come to our attention that you may have already known about the Groupon Jocular System and Method and therefore you have willfully misappropriated Groupon's 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 the unauthorized use of Groupon's Jocular System and Method and, for that matter, from infringing any of Groupon's intellectual property rights. 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 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 block contains four handwritten signatures in black ink. The signatures are arranged in two columns. The top signature is a single name. The middle and bottom rows each contain two signatures side-by-side. The handwriting is cursive and somewhat stylized.

Groupon Legal Dept.