



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

April 1, 2011

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Salar Kamangar, CEO  
YouTube.com  
1000 Cherry Ave.  
San Bruno, California 94066

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

Sir:

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.

You/your company's false statement(s) and/or action(s): **That your website, Youtube.com, has existed as a video sharing site for 100+ years and features "viral videos" from 1911** is clearly jocular for the following a reasons:

1. Nearly all technology necessary for Youtube.com or any other video website to function including the Internet, computers, speakers, and video sharing software were invented far after the purported advent of Youtube.com
2. Much of the content on your site that poses as video material from the era is clearly modern video which has been doctored to appear antiquated
3. Contrary to your website's claim of being over 100 years old is the fact that Youtube.com is listed on many documents, both private and public as being founded in February of 2005

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 jocular) 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.

April 1, 2011

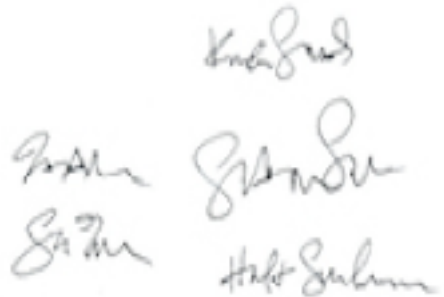
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This letter is to provide you and/or your company actual notice that your use of the above-referenced method is without right or license from Groupon, and includes steps and features that were taken directly from the Groupon Jocular System and Method. 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 five handwritten signatures in cursive script, arranged in two columns. The top signature is on the right side. The middle two signatures are on the left side. The bottom two signatures are on the right side.

Groupon Legal Dept.