

Groupon Inc.
600 W Chicago Ave Suite 620
Chicago IL 60654



April 1, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: INFRINGEMENT OF GROUPON'S
INTELLECTUAL PROPERTY RIGHTS
CEASE & DESIST

Sam Tarantino, CEO
201 SE 2nd Ave Ste 209
Gainesville, Florida 32601

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, Grooveshark.com, has adopted a three-dimensional presentation** is clearly jocular for the following a reasons:

1. Grooveshark.com's business model is heavily reliant on audio rendering the timing of this entirely visual feature's release suspect
2. Only a small percentage of Grooveshark's user base owns 3-D glasses, making such a presentation restrictive and unprofitable.

3. Grooveshark.com 's images remain in the second dimension. Any pretense of a third dimensions is merely an optical illusion.

Such an undertaking is obviously an April 1st jocular ruse.

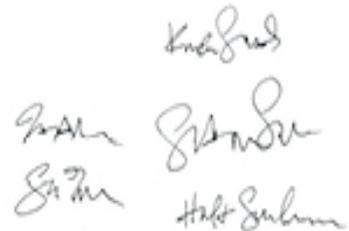
These actions may have begun recently, or may have been ongoing for some time, however this concept (April 1st-centric joculariry) was developed by Groupon and is a proprietary method owned by Groupon. The Groupon Jocular System and Method, with which you and/or your company is now directly competing, 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 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 top signature is the most legible, appearing to read 'Kraus'. Below it are three other signatures, which are more stylized and difficult to decipher, but appear to be initials or names of legal staff.

Groupon Legal Dept.