Regain, Inc.
Attention:
P. O. Box 3213
Alexandria, Virginia 22302

Re: Unauthorized Display and Disclosure of The Legion of Christ, Inc.’s Copyrighted and Private Unpublished Works

Dear

We represent the Legion of Christ, Inc. (the “Legion”) regarding the unauthorized display of certain of its copyrighted works, and the dissemination of other private unpublished works that were taken from the Legion without authorization. That material has been discovered on web pages at your company’s sponsored, controlled and/or related websites www.regainnetwork.org and www.ex legionaries.com. Such postings are in violation of both state and federal law, and it appears that your company is providing support for these violations.

Specifically, both the www.regainnetwork.org and the www.ex legionaries.com website are allowing, supporting, aiding, abetting and contributing to the posting of unauthorized copies of the Legion's copyrighted and other materials that have been taken without permission from the Legion in violation of both state and federal law. Accordingly, we demand that within five (5) days of the receipt of this letter:

1. you immediately cease and desist from any support of (or otherwise aiding and abetting of) these violations of law by taking down the postings on the www.ex legionaries.com website and that are listed in Exhibit “B”;

2. you immediately cease and desist from any support of (or otherwise aiding and abetting of) these violations of law by taking down the postings on the www.regainnetwork.org website and that are listed in Exhibit “C”;

3. you assist the Legion in identifying and stopping the individuals responsible for the theft, infringement and other tortious acts against the Legion by providing us

1 The list of the Legion’s copyrighted materials in issue are attached as Exhibit “A” (collectively the “The Legion’s Property”).
with the name, address and telephone numbers of the following posters of the Legion's materials on your forum under the screen names:

(4) return all originals and copies of the Legion's Property to the undersigned; and,

(5) if Regain, or any of its employees, officers, directors or agents, has knowledge of the persons who took, secreted or stole any of the Legion's Property, or knows the current whereabouts of any of the Legion's Property, you must provide that information to the undersigned.

Failure to timely and fully comply with these demands following this formal notice will give rise to potential liability against you and your company for violations (both directly and as an aider and abettor) of state and federal law.

As required by the relevant statutes, this will confirm that the information contained in this letter is accurate to the best of our knowledge. This letter shall not waive or prejudice any rights or remedies the Legion may have at law, in equity or otherwise. Any and all such rights and remedies are expressly reserved. Further, I, the undersigned, under the penalty of perjury, state that I am authorized to act on behalf of the Legion in this matter.

Finally, please note that this letter officially puts you on notice of your obligation to preserve any documents and other information, regardless of the form in which it is maintained, that is related to this matter. Further, you are not to further distribute copies of the Legion's Property to any third party. Failure to preserve this information or to further distribute it, may lead to severe legal consequences, including liability for spoliation of evidence.

If you deny any of the facts set forth in this letter, please provide us with a written explanation within five days from your receipt of this letter. If you have any questions regarding this matter please contact me directly. Thank you in advance for your expedited attention to this very important matter.

Very truly yours,

Bruce C. Morris

655915
Exhibit A

The Legion's Copyrighted Works

The Legion owns all rights, titles and interests in and to the following copyrighted works at issue, among others:

2. “Constitutions of the Legion of Christ” – TXu 1-258-830 (unpublished)
4. “Principios y normas de los miembros del tercer grado femenino” – TX 6-232-039
5. “Communicado del primer capitulo ordinario” – TX 6-235-371
6. “Etiquette and Social Formation” – TX 6-233-354

The Spanish version of these and other works, also quoted in some of the posts, are registered in Spain and protected by copyright laws and international copyright agreements.
Exhibit C

The Unauthorized Postings on www.regainnetwork.org

The Legion is fully cognizant of the protections afforded under the First Amendment for a private citizen to comment on a particular subject. However, those protections do not extend to violating the Legion’s copyrights or disseminating its private and proprietary information. Nor does it protect those persons who have in their possession stolen materials. The Legion has reviewed each of the postings on the www.regainnetwork.org website and identified the most blatant violations in which it, in good faith, believes are unauthorized by the Legion, any of its agents, or by law.³


³ The Legion is aware of other lesser violations that it hereby expressly reserves its right to address at a later date.