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The Amin Law Group, NV. Ltd.

3960 Howard Hughes Parkway, Fifth Floor
Las Vegas, NV 89169
Tel: 702.990.3583 Fax: 702.990.3501
www.aminlawgroup.com

Affiliated Offices: The Amin Law Group, Ltd.
CALIFORNIA/TEXAS

May 14, 2015

VIA U.S. MAIL

Consumer Opinion LLC
1930 Village Center Circle #3-6853
Las Vegas, NV 89134

RE: Second Cease & Desist Notice - Use of Abbey Dental Trade Name
www.pissedconsumer.com

Dear Sir or Madam:

As you are aware, this office serves as counsel for Abbey Dental Center, Inc. ("Abbey Dental"), a dental care facility located in Las Vegas, Nevada. This letter serves as a follow-up to our first (1st) cease and desist letter sent to Consumer Opinion LLC ("Consumer"), on April 6, 2015. Since Consumer, has failed to respond, and because it is apparent from Consumer's website (www.pissedconsumer.com) that Consumer is still engaged in wrongful conduct, please consider this a second and final notice to cease and desist from your improper conduct.

In our prior cease and desist letter, we informed you that, at a minimum, **Consumer's misleading actions amount to deceptive trade practices under Nevada law. See Nevada Revised Statute Section 598.0915.** We further notified you that Consumer's purported affiliation with, and use of Abbey Dental's trade-name, amount to misappropriating Abbey Dental's commercial likeness and trade-name infringement **under Nevada law.** *A.L.M.N., Inc. v. Rosoff*, 104 Nev. 274, 277, 757 P.2d 1319, 1320, 1988 Nev. LEXIS 34, 2 (Nev. 1988); *Randazza v. Cox*, 2014 U.S. Dist. LEXIS 49762, 21, 94 Fed. R. Evid. Serv. (Callaghan) 194, 2014 WL 1407378 (D. Nev. Apr. 10, 2014).

Please note that because Consumer now holds itself out as being "located in Las Vegas, NV," Consumer is subject to the jurisdictional and venue requirements of the state and federal courts located in Clark County, Nevada. Further, and as you should already be aware, Consumer's conduct is subject to the laws of the State of Nevada.

We are fully aware that pissedconsumer.com was previously controlled by Opinion Corp. ("Opinion"), an entity operating out of the State of New York. We are also aware that Consumer and Opinion are related as they share Registered Agents. Because Consumer now holds itself out as located in Nevada, if Consumer fails to comply with Abbey Dental's request, Abbey Dental is fully prepared to file a lawsuit against Consumer in Nevada, alleging the aforementioned Nevada state law claims.

As stated in our prior cease and desist letter, Consumer's unauthorized use of the term "Abbey Dental," for purposes of diverting traffic to Consumer's website, is unacceptable. We notified you that you must immediately cease and desist from utilizing deceptive representations that Consumer is affiliated with Abbey Dental, and to refrain from using the Abbey Dental trade name in the future without obtaining express written consent from Abbey Dental. Consumer has failed to comply with Abbey Dental's request.



A link to Consumer's website continues to appear on the first page of Google organic search results of the term "Abbey Dental." Consumer's link exhibits the term "ABBEY DENTAL" in all capital letters improperly representing an affiliation with Abbey Dental. We are requesting – for the second (2nd) time – that **Consumer immediately:**

- 1) Cease and desist from utilizing deceptive representations that Consumer is affiliated with Abbey Dental in anyway;
- 2) Immediately discontinue the use of the "Abbey Dental" name in or with any metatags or other form of text that refers back to Consumer, or any internet site that Consumer, its parent(s), subsidiaries, affiliated entities, principals, and owners either own, control or otherwise have any interest in;
- 3) Remove from any entity that Consumer, its parent(s), subsidiaries, affiliated entities, principals, and owners either own, control or otherwise have any interest in, all links to any internet site that refers or relates to "Abbey Dental"; and
- 4) Refrain from using the Abbey Dental trade-name in any way, now, or in the future without first obtaining express written consent from Abbey Dental.

Abbey Dental requires that Consumer **immediately contact our office to confirm that you will immediately comply with aforementioned demands.** If Consumer cannot comply **BY THE CLOSE OF BUSINESS ON MAY 27, 2015, Abbey Dental will have no choice but to resort to all legal rights and remedies available** – including, but not limited to civil litigation (alleging at a minimum deceptive trade practices under Nevada law, misappropriation of Abbey Dental's trade-name, and trade-name infringement) as well as seeking equitable relief in the form of specific performance and injunction(s). Please be advised that Abbey Dental will also seek attorney's fees for being forced to litigate a matter which could have been resolved without intervention.

Abbey Dental continues to reserve its rights and nothing contained herein should be construed as a waiver of its rights.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read 'Ismail Amin'.

Ismail Amin, Esq.
THE AMIN LAW GROUP, NV., LTD.