

From: **Twitter Support** <support@twitter.com>
Date: Mon, 7 Oct 2019 at 16:17
Subject: About your Twitter report 0128462708 [ref:00DA000000K0A8.5004A00001n0811:ref]
To: owen.boswarva@gmail.com <owen.boswarva@gmail.com>

Hello,

The following material has been removed from your account in response to the DMCA takedown notice copied at the bottom of this email:

- Tweet: <https://twitter.com/owenboswarva/status/1173117620847071232> - @ldodds @edent @pjgeng @ultrazool @MarkGoodge Somebody has released a "free and #opensource, compatible implementation of the #What3Words geocoding": <https://t.co/Su9RhV7i7j> | "a clean-room implementation of the software algorithms" | discussion <https://t.co/WqGCgkQSdB> | HT @Anonymaps | #geospatial #ipr

If you wish to contest this removal, you may seek retractions from the original reporter, or file a counter notification.

Retractions are not guaranteed, and must be submitted by the original reporter to copyright@twitter.com. You can request a retraction by using the reporter's contact information found in the copy of the original DMCA notice located at the bottom of this email.

If you believe the material has been removed as a result of mistake or misidentification, you may submit a counter-notification of your objection pursuant to 17 U.S.C. § 512(g)(3).

Please include the following in your counter-notification:

- Your full legal name, complete mailing address (including country), telephone number, email address and Twitter username.
- Identification of the material that has been removed or to which access has been disabled and the location at which the material appeared before it was removed or access to it was disabled. (Must include specific URLs)
- The following statement: "I swear under penalty of perjury that I have a good faith belief that the material was removed or disabled as a result of mistake or misidentification of the material to be removed or disabled".
- Your physical or electronic signature. You may type the full legal name of the individual responsible for this account in order to meet this requirement.

- A proper jurisdictional consent statement in the form of:

(If your address is in the United States)

"I consent to the jurisdiction of the Federal District Court for the judicial district in which my address is located and I'll accept service of process from the person who provided notice under 17 U.S.C. 512 (c)(1)(C) or an agent of such person."

OR

(If your address is outside of the United States)

"I consent to jurisdiction in any judicial district in which Twitter may be found and I'll accept service of process from the person who provided notice under 17 U.S.C. 512 (c)(1)(C) or an agent of such person."

Please send your counter-notification to us as a response to this message, or as a new email to copyright@twitter.com.

We will forward a copy of your counter-notification, including the information required in item 1 above, to the complainant and Chilling Effects. BY SENDING US A COUNTER-NOTIFICATION, YOU CONSENT TO THIS DISCLOSURE OF YOUR PERSONAL INFORMATION.

Please note that repeat violations of this policy may result in suspension of your account. In order to avoid this, do not post additional material in violation of our Copyright Policy and immediately remove any material from your account for which you are not authorized to post.

Dear Sirs,

I am writing to you from J A Kemp LLP, a firm of IP-specialist lawyers and attorneys based in London, UK.

We refer to your copyright policy which states as follows (emphasis added):

Twitter will respond to reports of alleged copyright infringement, such as allegations concerning the unauthorized use of a copyrighted image as a profile or header photo, allegations concerning the unauthorized use of a copyrighted video or image uploaded through our media hosting services, or Tweets containing links to allegedly infringing materials. Note that not all unauthorized uses of copyrighted materials are infringements (see our fair use article for more information).

My firm acts for What3words Ltd ("W3W") a well-known geolocation company based in London. I am writing to notify you of a series of Tweets that link to websites at whatfreewords.com and whatfreewords.org that infringe our client's copyright. Many of the Tweets (those by @Anonymaps and @ReallvanSanchez in particular) are intended to assist with the unauthorised distribution of our client's copyright work to third parties by promoting those sites. Sometimes the

domain names/links are abbreviated as wfw .org and wfw .com.

The Tweets that link to or refer to the infringing sites are:

https://twitter.com/_sabas/status/1175346439943262208?s=20

<https://twitter.com/owenboswarva/status/1173117620847071232>

<https://twitter.com/Anonymaps/status/1172941198752919553?s=20>

<https://twitter.com/Anonymaps/status/1176081790680928257?s=20>

<https://twitter.com/Anonymaps/status/1173666046135427072?s=20>

<https://twitter.com/Anonymaps/status/1175850028553965570>

<https://twitter.com/Anonymaps/status/1173667818950340610>

<https://twitter.com/ReallvanSanchez/status/1174683580632637440?s=20>

<https://twitter.com/ReallvanSanchez/status/1174284580435767296?s=20>

<https://twitter.com/ReallvanSanchez/status/1176089139143483392?s=20>

<https://twitter.com/ReallvanSanchez/status/1176088088952680448?s=20>

<https://twitter.com/ReallvanSanchez/status/1175072720956076033?s=20>

<https://twitter.com/ReallvanSanchez/status/1174280009101598721>

<https://twitter.com/ReallvanSanchez/status/1178670759977324544?s=20>

<https://twitter.com/ReallvanSanchez/status/1175018518481387520>

<https://twitter.com/ReallvanSanchez/status/1175048140963110914?s=20>

<https://twitter.com/JohnSMcCrae/status/1173271493217869826?s=20>

<https://twitter.com/hntweets/status/1172887740435836928>

<https://twitter.com/newsycombinator/status/1172903266415448065?s=20>

<https://twitter.com/petzlux/status/1172945122285248512?s=20>

<https://twitter.com/StevenFeldman/status/1172985050423599104?s=20>

<https://twitter.com/somebitsLinks/status/1173678104352612352?s=20>

<https://twitter.com/mousebirdc/status/1172951620293820417?s=20>

<https://twitter.com/jtruk/status/1174697709057531904>

<https://twitter.com/hncynic/status/1172885626389241856?s=20>

<https://twitter.com/newsyc50/status/1172945474082476032?s=20>

<https://twitter.com/webuproar/status/1173871408474140672?s=20>

<https://twitter.com/angsuman/status/1176515034714783744?s=20>

<https://twitter.com/angsuman/status/1172891274828898312?s=20>

<https://twitter.com/PinPopular/status/1174029292415508480?s=20>

<https://twitter.com/420Cyber/status/1172886857069105152?s=20>

<https://twitter.com/PekkaPuhakka/status/1172886086336598017?s=20>

https://twitter.com/hn_frontpage/status/1172885590393741313?s=20

<https://twitter.com/RichardLaksana/status/1172878814260711424?s=20>

<https://twitter.com/ShowHNDaily/status/1172877818763632640?s=20>

The infringement is detailed in the attached two takedown notices (one under the DMCA, one under the European E-Commerce Directive), including clear explanations of the material infringed.

Please note that the person/persons responsible for the .org continue to move the site to new hosts and it remains possible for the same to be done in respect of the .com. Twitter is both a repository for and a persistent source of ongoing promotion of the infringing conduct.

Given the multifaceted nature of the infringement we felt it would be easier for Twitter to consider and assess the matter by way of this e-mail, rather than through its online copyright complaint form which does not provide for detailed explanations or attachments. With this said, in terms of the requisite information for DMCA purposes:

- i) an identification of the owner's copyrighted work is set out in the attached letters;
- ii) the reference links to the infringing conduct are above;
- iii) our contact information is herein/below;
- iv) we confirm that, on our client's instruction, we have a good faith belief that the infringing material is not authorized by the copyright owner, the copyright owner's agent or law;
- v) we confirm that to the best of our knowledge, information and belief this notice is accurate and, under penalty of perjury, that we are authorized to act on behalf of the copyright owner.

Please kindly advise whether you will remove the Tweets that link the infringing websites, as well as all related re-Tweets. Please contact me with any questions.

Yours faithfully,

A Newell for J A Kemp LLP (signed)

Aaron Newell
Partner, Solicitor
For J A Kemp LLP

+44 20 3077 8600
anewell@jakemp.com
www.jakemp.com

[cid:LinkedIn_7d136288-2cd3-4d88-b969-f9bc10b21ff6.png]

"Recommended" in The Legal 500 and World Trade Mark Review 1000

[cid:EmailSignatureLogo-01_d8f81c9c-eea0-48cc-af11-6bb56a21dd0f.png]

The firm is ranked in the top tier by Chambers & Partners, The Legal 500, IAM Patent 1000 and MIP IP Stars
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Twitter, Inc. 1355 Market Street, Suite 900 San Francisco, CA 94103