

June 7 2016

Dear [redacted] and The Spoiling Dead Fans site,

I am intellectual property litigation counsel for AMC Film Holdings LLC and its subsidiaries and affiliated companies ("AMC") which owns the rights in and to the television series "The Walking Dead."

This is an urgent matter.

AMC is aware that The Spoiling Dead Fans site is promoting your claims that you have received copyright protected, trade secret information about the most critical plot information in the unreleased next season of The Walking Dead. You also state that you plan to distribute this purported highly confidential information despite your knowledge that such distribution, if the information is indeed accurate, is unauthorized and will greatly damage AMC, distributors of The Walking Dead as well as Walking Dead fans awaiting the new seasons' release who wish to watch their favorite show unspoiled.

The release of plot summaries and particularly the types of crucial plot elements that you have stated you intend to release, have been found to constitute copyright infringement. Specifically in *Twin Peaks Productions v. Publications International*, the Court ruled that publishing a work that "recounts for its readers precisely the plot details" of a fictional work constitutes copyright infringement.

AMC protects its intellectual property rights in its creative works, including by employing careful and intricate security for its plot information, scripts, sets, production facilities and post production houses. By advertising the illegal disclosure of intricate plot details of an unreleased episode of The Walking Dead without authorization you will willfully and intentionally impair the commercial viability of the show and thus AMC's ability and incentive to continue to produce creative works such The Walking Dead.

In light of the above, we demand that you repudiate your intent to leak the "Lucille Victim" by confirming that you will cease and desist from that illegal disclosure and/or assisting others in the illegal disclosure. Should you fail to do so, AMC will file a lawsuit against you to enjoin your harmful illegal activities and seek to obtain money damages and injunctive relief to address your conduct.

Nothing contained in this letter constitutes an express or implied waiver of any rights, remedies or defenses of AMC, all of which are expressly reserved.

Very truly yours,

Dennis L. Wilson
Kilpatrick Townsend & Stockton LLP