

— HBJ LEGAL —

VIA COURIER SERVICE

National Registered Agents Inc.
150 South Perry ST
Montgomery, AL 36104
USA

Insub LLC
To the attention of Mr. Farmer
PO Box 163
Albert Park
Victoria 3206
AUSTRALIA

Amsterdam, the Netherlands, May 26, 2011

Re: notice to cease and desist copyright infringement

Dear Mr. Farmer,

Please be advised that our firm has been retained by Yoast B.V., a private limited liability company formed under Dutch law, to represent its legal interests in the following matter.

It has come to our attention that Insub LLC through WPMU DEV is offering for sale a WordPress plugin named WPMU DEV SEO, which provides customers a one-stop solution for optimizing their WordPress site to achieve the highest search engine rankings possible.

As you are aware, the GNU General Public License governs the copying, distribution (together: propagation) and modification of WordPress software and all derivative works including plugins. Pursuant to the terms and conditions of this license agreement a copyright holder of a covered work grants a non-exclusive, worldwide, royalty-free license to propagate and modify the source code of his software.

This license is not without limits: the license to propagate modified copyrighted software is void and terminated automatically if the licensee does not add the appropriate legal and copyright notices to the source code in a conspicuous manner.

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Such is the case here. The WPMU DEV SEO plugin contains source code, which is part verbatim copy, part modified version of the source code used in the Wordpress SEO plugin by YOAST.¹ The copyright holder of the source code for this plugin is Yoast B.V.

In light of the above, we demand that Insub immediately ceases and desists the distribution of the WPMU DEV SEO plugin until Insub has taken the necessary steps to credit the infringing source code in the manner required by the GNU General Public License agreement.

Insub license to propagate and modify the copyrighted source code will be reinstated if Insub confirms in writing within ten days after the receipt of this letter that it has ceased the distribution of the copyrighted material and credited the infringing source code in the appropriate manner.

If Insub refuses to comply with this demand we will pursue further all legal causes of action, including the filing of a lawsuit, to stop this copyright infringement and to recover damages from Insub for the loss suffered by Yoast B.V. as a result of the infringing conduct.

This is written without prejudice to our rights, all of which are hereby expressly reserved.

Yours faithfully,

J. Lucas, Esq.

¹ <http://wordpress.org/extend/plugins/wordpress-seo/>