## ALSCHULER GROSSMAN STEIN & KAHAN LLP

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OUR FILE NUMBER 05001-203442

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## **CONFIDENTIAL**

February 10, 2003

Kenneth Adelman c/o californiacoastline.org email: Adelman@Adelman.com

Re: <u>Barbra Streisand/californiacoastline.org</u>

Dear Mr. Adelman:

Our firm is litigation counsel for Barbra Streisand. It has come to our attention that you have been photographing Ms. Streisand's private home and its grounds and that on the Internet website www.californiacoastline.org, you have been displaying photographs of Ms. Streisand's home, identifying her home as the "Streisand Estate," offering photographs of her home for sale, and publishing the location of her home address through latitudinal and longitudinal markings. Please be advised that photographing and identifying Ms. Streisand's home and publishing its location unlawfully violates Ms. Streisand's rights to privacy, and that offering to sell photographs of her home constitutes a violation of California Civil Code Sections 3344 and 1708.8 (the "Anti-Paparazzi Law"). You were contacted regarding these issues and attempts were made to reason with you in an effort to amicably resolve this matter, but you chose to ignore such overtures and refused to acknowledge the concerns of Ms. Streisand and others.

We hereby demand that you immediately cease and desist from photographing and displaying and identifying photographs of Ms. Streisand's home on the website www.californiacoastline.org, from offering photographs of her home for sale, and from publishing the location of her home. If you have not provided us with written confirmation that you have done so on or before February 14, 2003, we will have no choice but to pursue all available legal and equitable remedies on Ms. Streisand's behalf, including without limitation injunctive relief, compensatory and punitive damages, and attorneys' fees and costs. Rest assured that we will pursue these remedies vigorously and to the fullest extent permitted by law.

Please be advised that no part of this letter may be published or disseminated without our prior written consent.

This letter is not intended to constitute a full statement of facts, rights, or claims relating to this matter, nor is it intended to be or should it be construed as a waiver, release, or

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relinquishment of any rights or remedies available to Ms. Streisand, whether legal or equitable, all of which are hereby expressly reserved.

Very truly yours,

John M. Gatti

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