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April 28, 2025

VIA FEDEX AND E-MAIL

Andreas Gross

Ing.- Büro Andreas Gross GmbH

Althusweg 12

CH 6315 Morgarten/ZG

Andreas.Gross@Swiss-eCommerce.CH

Re: Unauthorized Use of Scientology Copyrights

Dear Mr. Gross:

This firm represents Church of Spiritual Technology ("CST"), Bridge Publications, Inc. ("BPI"), and New Era Publications ("New Era" and collectively, our "Client"), recipients of your March 2, 2025 correspondence to which we respond as follows.

L. Ron Hubbard authored all the scriptural material associated with the Church of Scientology, which comprises dozens of books, thousands of lectures and more than 10,000 individual writings (the "Works"). Each of the Works has been registered with the U.S. Copyright Office and such registration constitutes prima facie evidence of the validity of the Works. 17 U.S.C. § 410(c). BPI is the exclusive licensee in the United States and New Era is the exclusive licensee in Europe of all copyrights in the Works.

Despite our Client's registration of the Works, in your March 2nd letter, you incorrectly maintain that the works you have published "are in the public domain and are not subject to [our Client's] copyright protection." You provide no substantiation for this assertion because, of course, you cannot. All the Works are protected either 70 years from Mr. Hubbard's passing, which was in 1986, or 95 years from publication. Thus, there can be no doubt as to our Client's valid and subsisting rights in and to the Works.

As you know, you have published at least 20 books that either copy directly and fully the Works with little commentary added or include substantial portions of, or quotes from, the Works (collectively, the "Infringing Works"). Since the Works are exclusively used by the Church of Scientology and you are not authorized to use the Works, you do not have permission to copy, publish, display, offer for sale, sell, distribute, market, and advertise the Infringing Works or any other work on the subject of Scientology. Because you failed to obtain such permission, your publication of the Infringing Works constitutes copyright infringement. See 17 U.S.C. § 501.

You should be aware that the Copyright Act, 17 U.S.C. §§ 502-504, entitles our Client to the following remedies:

- an injunction against further infringement – such as an order preventing you or anyone acting in conjunction with you from future use, copying, or distribution of the Works;
- an accounting for profits;
- impounding or destruction of infringing copies;
- damages, including statutory damages of \$30,000 to \$150,000 (for willful infringement) per work infringed; and
- costs and attorney's fees.

As you know, based on our Client's rights in and to the Works, many online and brick-and-mortar retailers have discontinued your publication of the Infringing Works. Because you have continued to publish some of the Infringing Works, including *Revolt in the Stars*, your continued publication and distribution of the Infringing Works exposes not only you, but also such third party retailers, to liability for contributory infringement.

Accordingly, our Client rejects the demand for "a binding declaration" in your March 2nd letter. In this regard, our Client demands that you immediately cease and desist from all publication or distribution of the Infringing Works and any other materials that infringe our Client's Works. If we have not received an affirmative response confirming your agreement by the close of business on **May 5, 2025**, we will advise our Client to seek the injunctive relief and damages to which they are entitled.

The above is not an exhaustive statement of all the relevant facts and law and constitutes a proposal to resolve this matter without resorting to litigation. Nothing contained in or omitted from this letter shall be deemed an admission of any act or a waiver of any rights or remedies with respect to the subject of this letter, all of which rights and remedies are expressly reserved.

Thank you for your immediate attention to this matter.

Sincerely,



Jeff K. Joyner
of Glaser Weil Fink Howard Jordan & Shapiro LLP

JKJ:lp