



**By Federal Express**

Whois Privacy Corp.  
Ocean Centre, Montagu Foreshore  
East Bay Street  
Nassau, N.P.  
BAHAMAS

To whom it may concern,

We are counsel to Elsevier Inc., the plaintiff in a lawsuit currently pending against the operators of several websites who have anonymously registered their domains using your service. Please find attached the Court's Order, dated October 31, 2015, which requires Whois Privacy Corp. to, upon our request, "disclose immediately to the Plaintiffs all information in [its] possession concerning the identity of the operator or registrant of [the] domain names and of any bank accounts or financial accounts owned or used by such operator or registrant." (*See* pp. 16-17.)

Pursuant to that Order, we hereby request that Whois Privacy Corp. provide to us all information in its possession, including, but not limited to the names, addresses, phone numbers, email addresses, account payment methods and history, and originating IP addresses, concerning the operators or registrants of the following domains:

- Sci-hub.org
- Sci-hub.club
- Libgen.org
- Libgen.info
- Bookfi.org
- Elibgen.org
- Estrorecollege.org.

Attached for your reference are WHOIS records of each of these domain names, retrieved November 18, 2015, indicating that each was registered using your service. We request that you provide this information to us within seven (7) days of receipt of this request. You may send the requested information to me by either postal mail to 99 Park Avenue, Suite 1100, New York, NY 10016, USA, or by e-mail to [dmh@devoredemarco.com](mailto:dmh@devoredemarco.com).



Thank you for your prompt assistance in this matter. If you have any questions, please feel free to reach out to me either by e-mail or by phone at +1 212-922-9499.

Best Regards,

A handwritten signature in black ink, appearing to read 'David M. Hirschberg', written in a cursive style.

David M. Hirschberg