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March 16, 2018

Via Facsimile at (650) 872-8513

Legal Support
YouTube (Google, Inc.)
901 Cherry Avenue
San Bruno, CA 94066

**RE: Demand to Remove or Take Down Video
Algonquin Audio Boosted – Nest Camera – YouTube**

To Whom It May Concern:

By way of introduction, I am the Algonquin Township attorney. It has come to our attention that on January 15, 2018, the Edgar County Watchdogs published a video titled "Algonquin Audio Boosted – Nest Camera", a copy of the page on YouTube is attached to this letter. On July 8, 2017 a protective order was issued in McHenry County, Illinois covering all video produced cameras within the Township. A copy of this order is attached. An additional protective order was entered on November 7, 2018, a copy of which is also attached. This video was subject to the court's protective orders. The video was unlawfully removed from the Township and turned over to a third party. This video may violate the individuals privacy rights.

The video that has been uploaded to your site is in direct violation of the court orders and violates certain privacy rights. This video must be taken down immediately. Failure to take down this video is in violation of the court orders and appropriate steps will be taken to ensure compliance with said court orders.

If you have any questions, please feel free to contact me.

Very truly,


James P. Kelly

Attachments



Algonquin Audio Boosted - NEST Camera

1,560 views

👍 1 🗨️ 0 ➦ SHARE ⋮ ⋮



Edgar County Watchdogs
Published on Jan 15, 2018

SUBSCRIBE 453

Algonquin Audio Boosted - NEST Camera

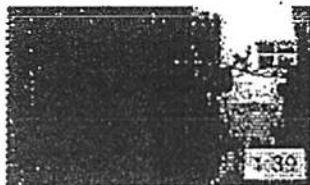
SHOW MORE

Up next

AUTOPLAY



Williamsfield, IL. WCUSD #210 - 18
2018 Public Comment
Edgar County Watchdogs
1.8K views



Dog checks Nest camera before stealing food!
MusicalPhilosophy
41 views



The Smart Home Camera Battle - Amazon CloudCam vs Wyzecam vs
Soumendra Jena
532 views



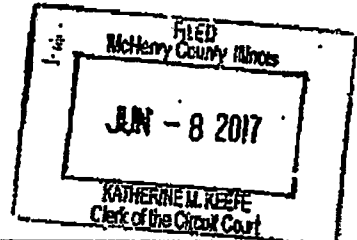
Nest Cam Outdoor 1080p Security Camera Review

IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT

STATE OF ILLINOIS)
) SS
COUNTY OF MCHENRY)

GEN. NO. 17 CH 435
 Jury Non-Jury

Andrew Gasser
vs
Karen Lukasik
vs
Charles Lutzow



Date: 6-8-17 Plaintiff's Attorney: HANLON

Defendant's Attorney: SOECH ZR F&AC

ORDER

This Cause coming onto be heard upon Defendant/Counter Plaintiff, Karen Lukasik, motion having been given and a Verified Complaint having been filed and the Court hearing arguments and being advised in the premises;
IT IS ORDERED that Attorney Joe Gottmoller is appointed by the Court as Receiver to employ the services of a qualified individual or individuals to secure a copy of the videos at Algonquin township as well as copies of any and all hard-drives from all photocopies and scanners at Algonquin township and Mr. Gottmoller shall provide copies of same to all Counsel of Record and shall make up same to the Court and a protective order is entered that no distribution of the information will be made outside of this litigation unless given leave of Court.

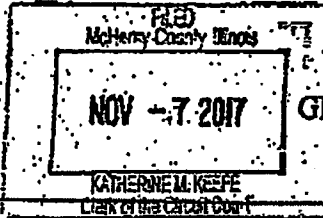
Prepared by: GUMMERSALL
Attorney for: Karen Lukasik

Attorney Registration No.: 3126135

the attorney and parties to
Judge: Michael J. Cavanaugh

IN THE CIRCUIT COURT OF THE 22ND JUDICIAL CIRCUIT

STATE OF ILLINOIS)
) SS
COUNTY OF MCHENRY)



GEN. NO. 17 EH 435
 Jury Non-Jury

Andrew Gaiser

vs.

Kieran Lukaszik

Date: 11/7/17 Plaintiff's Attorney

Defendant's Attorney D. Kelly
D. McKeel

ORDER

This cause coming before the Court on Lukaszik's Motion for Protective Order and argument heard.

It is hereby ordered that:

- 1) The passwords and usernames shall be provided to the attorney for the parties and the Township clerk personally in order for Lukaszik to have full access to the video and audio recordings of the subject camera.
- 2) The protective order previously issued by this court shall apply to video produced by this camera.

Prepared by: James P. Kelly
Attorney for: Internal
Attorney Registration No.:

Judge: Michael J. Caldwell