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July 21, 2005

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VIA FEDERAL EXPRESS

Ms. Wanda Schindley
Dallas Publishing
1028 Country Road 11475
Mt. Pleasant, Texas 75455

Mr. Petar Makara
1036 Shannon Boulevard
Niskayuna, New York 12309

Re: Memory Film Productions et al. v. Makara et al.

Dear Ms. Schindley and Mr. Makara:

We are counsel for Memory Film Productions, Barry Lituchy, Joe Friendly, Aleksandar Masic and Jasenovac Research Institute, Inc. ("JRI") (collectively, "Plaintiffs"). On Plaintiffs' behalf, we write to inform you that we are in the process of filing the enclosed Complaint and Jury Demand against you for your systematic and unauthorized exploitation of our clients' copyrighted materials and for your nationwide distribution of books which brazenly exploit our clients' copyrighted materials.

As detailed in the Complaint, and as you are well aware, our client Memory Film Productions created the video record of the First International Conference Exhibition on the Jasenovac Concentration Camps (the "Conference") in October 1997. That unique copyrighted video record contains the only authorized record of the events and discussions at the Conference, and contained versions of the copyrighted scholarly articles which conference participants delivered on that occasion. Many of those articles have not been published anywhere else. As you also well know, JRI has been finalizing its book version of the events at the Conference, and has negotiated exclusively with Memory Film Productions and the various Conference participants for use of their copyrighted materials in JRI's book.

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During the time you were members of JRI's board of directors, you became aware of this project and of JRI's intent to recoup its expenses in creating and transcribing the video record of the Conference via sales of such a book. Despite your resignations of members of the board of directors of JRI, and your explicit statements that you would not exploit JRI's, and the other Plaintiffs' rights by publishing such a book yourselves, you have proceeded to publish a book version of the Conference proceedings. That book, which Plaintiffs did not authorize, incorporates and thus infringes on Plaintiffs' copyrighted materials. You have published your infringing book surreptitiously, even though the book itself indicates that you used our clients' video record to create it. You have therefore violated Plaintiffs' rights willfully.

Unless you undertake in writing by close of business on Wednesday, July 27, 2005 to cease all production, publication and distribution of the Infringing Book, account for all sales thereof to date, disgorge the illegal proceeds of your infringements, and deliver up all infringing copies, our client will see no alternative but to apply to the Court for immediate injunctive relief against your continued exploitation of Plaintiffs' proprietary materials. The law also provides for the recovery of costs and attorneys fees incurred in pursuing remedies for copyright infringements, and rest assured that our clients will seek all remedies available to them at law.

This letter is written without prejudice to, and without waiver of our clients' rights and remedies at law and in equity, all of which are hereby expressly reserved.

Very truly yours,



Toby M.J. Butterfield

TMJB/sn

Enclosure

Cc: Barry Lituchy (w/encl.)
Joe Friendly (w/encl.)
Mr. Aleksander Mosaic (w/encl.)
Mr. Antun Miletic (w/encl.)
Dr. Thomas Popovich (w/encl.)
Timothy J. DeBaets, Esq. (w/encl.)