

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

STEVEN MATTEO d/b/a)	
STEVE MATTEO PHOTOGRAPHY,)	
)	
Plaintiff,)	
)	07 CV 2536
v.)	Judge Kendall
)	Magistrate Judge Ashman
HOWARD RUBIN, an individual,)	
)	
Defendant.)	
)	

MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

COUNT ONE

Now comes the Defendant, HOWARD RUBIN (“RUBIN”), by and through his attorneys Schaffner, Rabinowitz, & Feinartz P.C. and moves this court to dismiss Count One of Plaintiff, STEVEN MATTEO’s (“MATTEO”), complaint pursuant to Fed. R. Civ. P. 12(b)(6).

In support of this motion, the Defendant states as follows:

1. On May 7, 2007, MATTEO filed a complaint against RUBIN, with a cause of action arising from alleged copyright infringement of pictures that MATTEO took of RUBIN’s daughter’s wedding. (Attached as Exhibit A).

2. MATTEO claimed that RUBIN, without MATTEO’S permission, copied MATTEO’s works by reproducing, displaying, and disseminating them via the internet. MATTEO alleged that RUBIN were for his own use and benefit and infringed upon MATTEO’S exclusive copyrights in the works.

3. There is no material issue of fact, because the infringement of copyright in Plaintiff's complaint involves a contract to photograph Defendant's daughter's wedding between MATTEO and Defendant's wife in which MATTEO granted her reproduction rights to all images from the wedding. (Attached as Exhibit B, see "Exhibit B" of Plaintiff's complaint). Defendant's wife granted the reproduction rights to RUBIN, who posted 11 out of the 1500 pictures taken by Plaintiff at his daughter's wedding on the internet. There is no allegation that RUBIN financially or economically benefited from the reproduction, display, or dissemination of the pictures that he posted on the internet. Furthermore, the federal copyright that MATTEO alleges RUBIN violated in Paragraph 21 of his complaint, was acquired nearly two months after RUBIN originally posted the pictures on the internet.

WHEREFORE, Defendant requests that this Court grant its motion to Dismiss for failure to state a claim upon which relief can be granted.

COUNT TWO

Now comes the Defendant, HOWARD RUBIN ("RUBIN"), by and through his attorneys Schaffner, Rabinowitz, & Feinartz P.C. and moves this court to dismiss Count Two of Plaintiff, STEVEN MATTEO's ("MATTEO"), complaint pursuant to Fed. R. Civ. P. 12(b)(6).

4. On May 7, 2007, MATTEO filed a complaint against RUBIN, with a cause of action for defamation per se arising from RUBIN's captions of wedding pictures taken by MATTEO at RUBIN's daughters wedding on the internet.

5. MATTEO complained RUBIN'S various internet postings and email messages to third parties communicated false and defamatory statements intending to be attributed to MATTEO, and that RUBIN made the statements with knowledge that these statements were false, or with reckless disregard as to their truth, or falsity, or negligently.

6. There are no issues as to the material facts in dispute because RUBIN's statements were merely a reflection of his own personal dealings with MATTEO, and were not intended to communicate any false or defamatory statement with regards to RUBIN'S opinion of MATTEO'S photography. The per se category does not include a broader scope of liability for expressions of subjective opinion. *Sullivan v. Conway*, 157 F.3d 1092, 1097 (C.A.7 Ill 1998). Furthermore, the posting of his statements were only available to interested parties who sought reviews on photographers. Consumers have a right to receive information and opinions about potential photographers before they hire one.

WHEREFORE, Defendant requests that this Court grant its motion to Dismiss for failure to state a claim upon which relief can be granted.

COUNT THREE

Now comes the RUBIN ("RUBIN"), by and through his attorneys Schaffner, Rabinowitz, & Feinartz P.C. and moves this court to dismiss Count Three of MATTEO's complaint pursuant to Fed. R. Civ. P. 12(b)(6).

7. On May 7, 2007, MATTEO filed a complaint against RUBIN, with a cause of action for false light invasion of privacy arising from RUBIN's captions of wedding pictures taken by MATTEO at RUBIN's daughters wedding on the internet.

8. MATTEO complained that RUBIN's actively gave or participated in giving, publicity to false and defamatory statements of and concerning MATTEO, and were widely disseminated through the world via the internet, thereby placing MATTEO before the public in a false light. MATTEO also alleges that he has been caused to and has suffered embarrassment, indignity, and divers nervous shocks and mental pains.

9. There are no issues as to the material facts in dispute because RUBIN's statements were merely a reflection of his own personal dealings with MATTEO, and were not intended to communicate any false or defamatory statement with regards to RUBIN'S opinion of MATTEO'S photography. *See Sullivan*, 157 F.3d 1092, 1097.

WHEREFORE, Defendant requests that this Court grant its motion to Dismiss for failure to state a claim upon which relief can be granted.

Count Four

Now comes RUBIN by and through his attorneys Schaffner, Rabinowitz, & Feinartz P.C. and moves this court to dismiss Count Four of MATTEO's complaint pursuant to Fed. R. Civ. P. 12(b)(6).

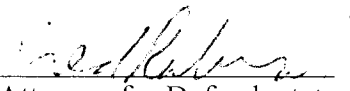
10. On May 7, 2007, MATTEO filed a complaint against RUBIN, with a cause of action for interference with prospective economic advantage stemming from RUBIN's captions of wedding pictures taken by MATTEO at RUBIN's daughters wedding posting on the internet.

11. MATTEO alleges that RUBIN intentionally interfered with and prevented MATTEO'S expectancies from ripening and/or continuing as valid business

relationships, and that as a result of the interference, MATTEO has suffered and sustained, and/or will continue to suffer and sustain substantial economic harm.

12. There are no issues as to the material facts in dispute RUBIN merely published his opinion on a website intended for reviews. Unless someone actively sought RUBIN'S opinion by looking at his internet review page, RUBIN could not interfere with any of MATTEO's clientele or future business.

WHEREFORE, Defendant requests that this Court grant its motion to Dismiss for failure to state a claim upon which relief can be granted.


Attorney for Defendant

Schaffner, Rabinowitz, & Feinartz P.C.
118 North Clinton Street, Suite 425
Chicago, Illinois 60661
312-346-0048
Attorney # 2272866

RECEIVED

MAY 07 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MICHAEL J. ...
CLERK, U.S. DISTRICT COURT

STEVEN MATTEO, d/b/a)
STEVE MATTEO PHOTOGRAPHY,)
)
Plaintiff,)
-vs-)
)
HOWARD RUBIN, an individual;)
)
Defendant.)

JURY DEMANDED

NO. 07C 2530

JUDGE KENDALL
MAGISTRATE JUDGE

COMPLAINT

Plaintiff, STEVEN MATTEO d/b/a STEVE MATTEO PHOTOGRAPHY ("MATTEO"), by his attorney, MARK H. BARINHOLTZ, P.C., complains against the defendant, HOWARD RUBIN ("RUBIN"), an individual, and alleges:

Jurisdiction and Venue

1. This Court has jurisdiction over this case under 28 U.S.C. § 1338. Venue is properly laid in this District under 28 U.S.C. § 1391(b).
2. The state law claims are predicated upon this court's supplemental jurisdiction, under 28 U.S.C. § 1367.

The Parties

3. Plaintiff MATTEO is an experienced professional photographer, a sole proprietorship located in Chicago, Illinois; at all times relevant herein, MATTEO has been engaged in the business of commercial photography including the photography of weddings.
4. Defendant, RUBIN, on information and belief is the father of the bride in the wedding scenario hereinafter described, and is located or may be found in this District.

Background

5. At or about December 2005, MATTEO was contacted by Melanie Rubin to photograph her wedding. She was familiar with MATTEO's documentary style of photographing weddings, since MATTEO had photographed her brother's wedding. Exhibit "A" hereto.

6. At or about January 2006, MATTEO entered into a contract with Daryl Rubin, Melanie's mother, to photograph Melanie Rubin's wedding. Exhibit "B" hereto.

7. At or about August 2006, pursuant to the agreement to do so, MATTEO attended the wedding of Melanie Rubin, and created approximately 1,500 digital photographic images depicting the wedding event. (hereinafter "the wedding photos")

8. Melanie and Daryl requested MATTEO to show them all of the wedding photos, unedited. At or about September 2006, MATTEO furnished copies of all of the wedding photos taken by MATTEO to Melanie Rubin, for her limited use only.

9. Shortly thereafter, MATTEO was contacted by the father of the bride, RUBIN, who purported to complain on his daughter's behalf about the quality of the wedding photos. MATTEO attempted to contact Melanie Rubin but she never responded.

10. Approximately November 9, 2006, RUBIN lodged a complaint with the Better Business Bureau concerning his purported grievances. Subsequently, that organization closed the matter after determining that MATTEO had made a reasonable offer to resolve the issues, but that RUBIN would not accept the offer. Exhibit "C" hereto.

11. Thereafter, during approximately January 2007, and continuing through the date hereof, RUBIN embarked upon a campaign to defame MATTEO and interfere with and undermine his ability to conduct business with prospective clients.

12. Approximately January 24, 2007, RUBIN created various Web site pages entitled "Why Not To Hire An Inept Photographer." The Web pages were located within or linked to several Web sites, including one at <http://imageevent.com/howardrubin/disgrace> that can be found on the Internet. ("RUBIN's Web pages") Exhibit "D" hereto (shown in B&W).

13. In addition to branding MATTEO as "inept," RUBIN's Web pages selectively uploaded, reproduced, displayed and disseminated eleven (11) outtakes of the wedding photos MATTEO had taken depicting the Melanie Rubin wedding (the "11 online photos"). RUBIN did not seek nor obtain any license or permission from MATTEO to do so.

14. The 11 online photos, which are a sub-set of the approximately 1,500 total wedding photos which were delivered to Melanie Rubin, as reproduced and displayed on RUBIN's Web pages, each have a caption calculated by RUBIN to impugn the abilities, competence and integrity of MATTEO as a professional photographer.

15. RUBIN's Web pages feature words and pictures posted by RUBIN on the Internet which are intended to and plainly do communicate to the world the statements that MATTEO is a photographer who is "inept," lacking in the ability to perform in his profession, and that he lacks professional integrity.

16. That in addition to falsely and recklessly defaming MATTEO, defendant RUBIN has declared in his Internet postings that it is RUBIN's express purpose to harm MATTEO's business, and in furtherance of doing so has communicated over the Internet as follows:

"... I have now dedicated the rest of my life to make sure I can save other unsuspecting newlyweds the pain and suffering he put us through. I work with computers, so writing daily reviews is of no bother whatsoever. The best part about Yelp is that I can change my review as many times as necessary. I will update my review every day as long as he's in business. At last count I saved 4 couples from him. My goal is 1000."

17. That RUBIN has thereby boasted that he has prevented and interfered with at least four prospective photography clients for which MATTEO's services would otherwise have been engaged. Exhibit "E" hereto.

18. Plaintiff demands trial by jury.

COUNT I
(Copyright Infringement)

19. Plaintiff incorporates by reference and realleges each and every allegation contained in Paragraphs 1 through 18 hereof.

20. The eleven online photos (hereinafter "Works") contain substantial material wholly original with MATTEO, and constitute copyrightable subject matter under the copyright laws of the United States of America.

21. MATTEO complied with all registration and deposit requirements of the federal copyright laws, and obtained copyright registration for the Works under No. VA 1-396-327. A copy of that registration is attached hereto as Exhibit "F".

22. No license was granted by MATTEO to RUBIN for the reproduction, display, dissemination and/or use of the Works, or any of them, in the accused Web pages.

23. That defendant RUBIN has, without the permission of plaintiff, thereby unlawfully copied MATTEO's Works by reproducing, displaying and disseminating them to the world via the Internet.

24. That such acts aforesaid by RUBIN were for his own use and benefit and infringed upon MATTEO's exclusive copyrights in the Works.

25. That such copyright infringement aforesaid, or substantial parts thereof, has continued through the date of filing hereof, and/or is threatened to continue.

26. That by virtue of the acts hereinabove alleged, defendant RUBIN has infringed MATTEO's copyrights, and said plaintiff has been caused to and has thereby suffered and sustained irreparable harm and economic injury.

COUNT II
(Defamation Per Se)

27. Plaintiff realleges paragraphs 1 through 26 of his complaint as and for paragraphs 1 through 26 of this Count II.

28. At no time during the creation of the wedding photos, nor during the transmittal of the approximately 1,500 digital images to Melanie Rubin, nor in attempting to resolve the client's concerns, did MATTEO ever conduct himself in other than a professional and competent manner or communicate other than in good faith, either through words, acts or pictures, of and concerning Melanie Rubin's wedding photos. Despite the fact that such circumstances were known by the Rubin family to be true, HOWARD RUBIN set out to brand MATTEO as an incompetent and

lacking in integrity. Further, that the intended result of RUBIN's acts and omissions herein alleged, was to impugn MATTEO's competence and integrity with respect to his performance and discharge of his professional activities.

29. That RUBIN intentionally and recklessly gave wide dissemination to his vengeful purpose, by employing a potent means whereby the false and defamatory statements herein set forth would be widely communicated; namely, via the Internet, and that RUBIN intended to and did effect widespread dissemination of the defamatory statements, thereby causing injury to MATTEO, and particularly within Chicago, Illinois, where MATTEO's business is located.

30. That the defendant RUBIN deliberately and intentionally ignored the truth about MATTEO, and the true facts of his role in photographing Melanie Rubin's wedding, in order to create and communicate the false imputations set forth herein.

31. That RUBIN's online statements evidence his vengeful motive and the spite and ill will harbored by RUBIN toward MATTEO in doing the acts complained of herein.

32. That the aforesaid Internet postings by RUBIN were conceived, laid out, edited and prepared for uploading to the Internet by the defendant RUBIN with knowledge that the false statements were, in fact, not true, namely, *inter alia* (i) that MATTEO was an "inept" photographer, (ii) that MATTEO's work was fairly represented by the 11 outtakes which were posted on the Internet, (iii) that MATTEO did not arrive at the wedding with sufficient and proper technical equipment with which to accomplish the task, (iv) that MATTEO did not take any reasonable steps to resolve the client's concerns, and (v) that it is reasonable to characterize MATTEO's professional abilities as those of "a butcher."

33. That RUBIN's various Internet postings and e-mail messages to third parties communicated the false and defamatory statements aforesaid intended to be attributed to MATTEO, including, *inter alia*:

- a. that it was imputed to MATTEO that he was lacking in integrity in discharging the duties of his employment;

- b. MATTEO was impugned and disparaged in his trade and business, as it was imputed that he lacked ability in his profession or business;
- c. MATTEO was impugned and disparaged in his trade and business, as it was imputed that he was unable to perform in his professional employment;
- d. and MATTEO was otherwise maligned and prejudiced in his trade, profession and business by the defamatory statements.

34. That these defamatory statements aforesaid were false, but were nonetheless calculated by defendant RUBIN to be believed as true in the minds of the Internet audience and others to whom the Internet postings and third party e-mails were disseminated.

35. Defendant RUBIN displayed and disseminated, or contributed to the display and dissemination of, the defamatory statements with knowledge that they were false, or with reckless disregard as to their truth or falsity, or negligently.

36. As a direct and proximate result of defendant RUBIN's dissemination of the above described false and defamatory statements, MATTEO has been injured and suffered humiliation, mental anguish and damage to reputation.

COUNT III
(False Light Invasion of Privacy)

37. Plaintiff realleges paragraphs 1 through 36 of the complaint as and for paragraphs 1 through 36 of this Count III.

38. By virtue of the aforesaid premises, defendant RUBIN, actively gave, or participated in giving, publicity to the false and defamatory statements of and concerning MATTEO, and same were widely disseminated throughout the world via the Internet, thereby placing MATTEO before the public in a false light.

39. That the false light in which MATTEO was placed would be highly offensive to a reasonable person.

40. That defendant RUBIN, had knowledge of or acted with reckless disregard as to the falsity of the publicized matter and the false light in which MATTEO would be placed.

41. That in addition to injuries heretofore alleged, and as a direct and proximate result of the false light invasion of privacy, MATTEO has been caused to and has suffered embarrassment, indignity, and divers nervous shocks and mental pains.

COUNT IV
(Interference With Prospective Economic Advantage)

42. Plaintiff realleges paragraphs 1 through 41 of the complaint as and for paragraphs 1 through 41 of this Count IV.

43. That said defendant, by virtue of the premises, has intentionally interfered with and prevented plaintiff's expectancies from ripening and/or continuing as valid business relationships, by his acts aforesaid which have directly affected, and were thereby directed toward, plaintiff's prospective economic advantage.

44. That as a direct and proximate result of said interference, plaintiff has been caused to and has thereby suffered and sustained, and/or will continue to suffer and sustain substantial economic harm.

COUNT V
(Attorney Fees & Exemplary Damages)

45. Plaintiff incorporates by reference and realleges each and every allegation contained in Paragraphs 1 through 44 hereof.

46. Plaintiff seeks to recover the cost of enforcement of this legal action, in part including attorney fees, and exemplary damages, on the grounds hereinafter alleged.

47. For the infringement of copyright in the 11 online Works as allowed pursuant to 17 U.S.C. § 412(2), plaintiff is entitled to the recovery of his costs of enforcement, including attorney fees, because the effective date of registration of MATTEO's said Works sued upon

herein was made before three months after the commencement of the unauthorized, but infringing, publication of the accused RUBIN Web pages.

48. Defendant's deliberate and wilful conduct has required plaintiff to employ legal counsel to file this action for violations including of the Copyright Act of the United States.

49. That the Copyright Act, § 504(c) thereof, provides, *inter alia*, that willful infringement of copyright is punishable by an award of statutory damages in amounts up to and including \$150,000 for each work infringed.

50. That RUBIN's acts of defamation, false light invasion of privacy and interference with prospective economic advantage are tortious acts, engaged in by RUBIN willfully, and for which the court should allow the award and imposition of punitive damages.

51. Therefore, defendant RUBIN is liable to plaintiff for such reasonable attorney fees, and exemplary damages, incurred in this action as may be allocated to the applicable photographic Works, and otherwise.

WHEREFORE, plaintiff MATTEO prays that this court enter judgment in his favor and against the defendant, HOWARD RUBIN, and enter findings of infringement, and award plaintiff compensatory damages and punitive damages, as follows.

A. That defendant be required to pay to plaintiff such compensatory damages as plaintiff has sustained in consequence of defendant's tortious acts of defamation, false light invasion of privacy, and interference with prospective economic advantage.

B. That defendant be required to pay to plaintiff such actual damages as plaintiff has sustained in consequence of defendant's infringements, and to account for all gains, profits and advantages derived by defendant therefrom, or such statutory damages for all infringements as shall appear proper within the provisions of the copyright laws.

C. That such damages assessed be increased if such tortious acts and infringements are found to be committed willfully.

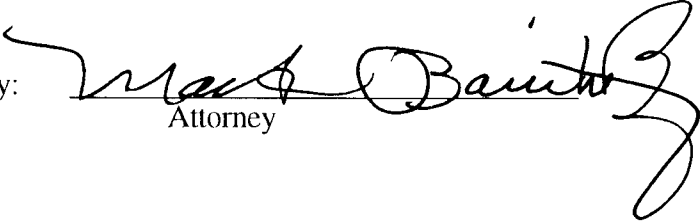
D. That the Court grant such other and further relief as is reasonable to remedy such tortious acts and infringements in any manner, either at law or in equity, including injunction, impounding and reasonable disposition of all infringing articles.

E. Together with interest, plaintiff's costs and reasonable attorney fees.

PLAINTIFF DEMANDS TRIAL BY JURY

STEVEN MATTEO, d/b/a
STEVE MATTEO PHOTOGRAPHY,
Plaintiff.

By:


Attorney

Mark Barinholtz
MARK H. BARINHOLTZ, P.C.
Attorney for Plaintiff
55 West Monroe Street
Suite 3330
Chicago, IL 60603
(312) 977-0121

Exhibit "A"

From: Melanie and Daryl Rubin <brideandmom@gmail.com>
Subject: **[SPAM] August Wedding**
Date: December 31, 2005 12:35:19 PM CST
To: steve@stevematteo.com

Dear Steve,

Hi, my name is Melanie Rubin. I got engaged last Friday to be wed on Saturday evening of August 12, 2006. I am very interested in having you as my wedding photographer. In fact, I'd be elated. My brother got married last October 29 at which you served as his photographer. It was the Michael Rubin/ Pam Telfer wedding at Allgauer's. I saw your photographs of the wedding, and they were amazing. Moreover, they raved about how wonderful it was to work with you. In fact, I met you at their wedding. I was my brother's bridesmaid. You are amazing, but I understand you are very busy. Would it be possible you could hold a spot for me? I would love to work with you and would be disappointed if I couldn't.

You can reach me by telephone (217-778-3544) or email (brideandmom@gmail.com). I hope you have a wonderful holiday.

Thank you for your consideration,
Melanie Rubin

Exhibit "B"

Exhibit "C"



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BBB Reliability Report

The Better Business Bureau® Serving Chicago and Northern Illinois

330 N Wabash Avenue Suite #2006
Chicago, IL 60611
(312) 832-0500
www.chicago.bbb.org

Steve Matteo Photography

36 S Ashland Ave Apt 304
Chicago, IL 60607-1828
Telephone: (312) 719-3939

The BBB reports on members and non-members. If a company is a member of the BBB, it is stated in this report.



Principal: Steve Matteo

Customer Contact: Steve Matteo - (312) 719-3939

File Open Date: November 2006

BBB Membership: This company is not a member.

The Bureau has requested basic information from this company. The Bureau has not received a response. Without this information, the Bureau may not have current information concerning such things as the company's management or its nature of business.

Customer Experience

When considering complaint information, please take into account the company's size and volume of transactions, and understand that the nature of complaints and a firm's responses to them are often more important than the number of complaints.

The Bureau processed a total of 1 complaint about this company in the last 36 months, our standard reporting period. Of the total of 1 complaint closed in 36 months, 1 was closed in the last year.

Service Issues

Administratively Closed.

- 1 - BBB determined the company made a reasonable offer to resolve the issues, but the consumer did not accept the offer.

Report as of February 14, 2007

Copyright© 2007 Better Business Bureau®, Inc.

If you choose to do business with this company, please let the company know that you contacted the Better Business Bureau for a report.

BBB CASE#: 94093115

Complaint filed by:	Howard Rubin (More)
Complaint filed against:	Steve Matteo Photography (More)
Complaint status:	Case Closed AJR (More)
Case Description:	On January 25, 2006 a contract was entered between myself and Steve Matteo Photography to photograph my daughter's wedding which... (More)
Category:	Service Issues
Case opened date:	11/09/2006
Case closed date:	11/30/2006
Desired Resolution:	\$1,000 and an apology for ruining my daughter's wedding pictures.... (More)

Download a copy of this complaint so you can print it for your records

*** This complaint has been closed. If you have more information to provide to the bureau regarding this complaint, please click [here](#). ***

Exhibit "D"



• Public Gallery • Help

• Join Now! • Log In • Feature Tour

Why Not To Hire An Inept Photographer

Click on each thumbnail for 2 enlargements. The second is available at the bottom of the first.

Posted Jan 24, 2007 Photos by Steve Matten 1 - 11 of 11 Total 47 Visits

Start Slideshow Email Photos



Lighting

It would have been nice to see her face.



Framing

One of the better ones of the group.



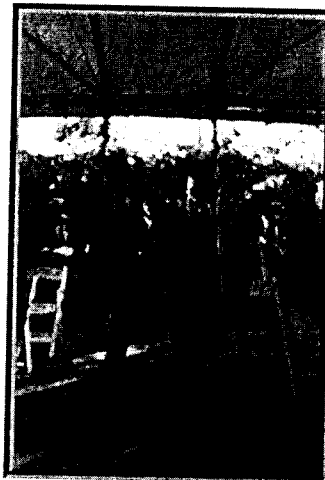
Centering

Is this how a groomsman is supposed to be photographed?



Lighting

Another flash malfunction



Lighting



Lighting

Since when do you photograph INTO background light with a faulty flash?



17

Lighting

This could have been a great shot. Too bad we'll never know.



8

Lighting

Overexposure at it's finest!



9

Lighting

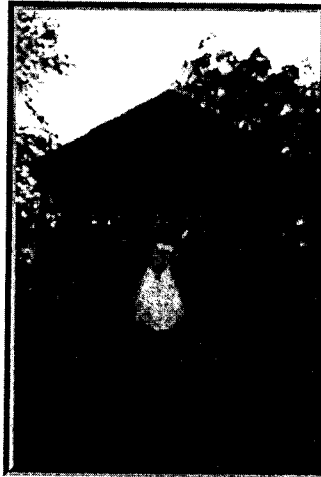
The picture speaks for itself.



10

Lighting

More flash malfunctions



11

Distance and Lighting

There wasn't 1 cloud in the sky!

12 View All

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Exhibit "E"

From ? Howard R.

Sent 1 day ago

I TRIED to work things out. He ignored my phone calls and letters I sent. He even ignored a registered letter I sent. When I did finally reach him he offered to "fix" the mistakes he admittedly made. To do that I would have to do the wedding all over again. Obviously that's not an option.

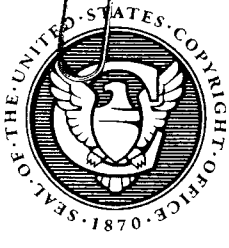
You're a newlywed and obviously don't have any children yet that you would be taking precious pictures of. But you hopefully will! Can you imagine taking pictures of your child's first birthday party which included yours and your husband's family from out of town, other guests and relatives, and all the pictures were either too dark or out of focus? It's fair to say you'd be rightfully upset. Well, in my case it was my daughter's wedding pictures. She was so upset with her pictures she was crying for 2 straight days. She now lives out of town so I drove down to her to console her. She deserves far better than what this butcher provided her and her new husband.

Because of his callous attitude I have now dedicated the rest of my life to make sure I can save other unsuspecting newlyweds the pain and suffering he put us through. I work with computers, so writing daily reviews is of no bother whatsoever. The best part about Yelp is that I can change my review as many times as necessary. I will update my review every day as long as he's in business. At last count I saved 4 couples from him. My goal is 1000.

----- Original Message -----

Exhibit "F"

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 Register of Copyrights, United States of America

SHORT FORM VA
 For a Work of the Visual Arts
 UNITED STATES COPYRIGHT OFFICE

VA 1-396-327



Effective Date of Registration

MAR 19 2007

Application Received
MAR 19 2007

Deposit Date
MAR 19 2007 TW

Fee Received

Examined By

Yfb

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

1

M. Rubin Wedding Series A (online work, 11 photos)

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

2

Steve Matteo
 36 S. Ashland Ave. #304
 Chicago, IL 60607

Nationality or domicile: USA
 Phone, fax, and email:

Phone (312) 7193939
 Email

Fax ()

Year of Creation:

3

2006

If work has been published, Date and Nation of Publication:

4

a. Date ca. January 24 2007 (Month, day, and year all required)
 Month Day Year
 b. Nation USA

Type of Authorship in This Work:
 Check all that this author created.

5

3-Dimensional sculpture Photographs Map
 2-Dimensional artwork Jewelry design Text
 Technical drawing

Signature:

6

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

Author Authorized agent

Steve A Matteo 3/12/07

Registration cannot be completed without a signature.

OPTIONAL

Name and Address of Person to Contact for Rights and Permissions:
 Phone, fax, and email:

7

Check here if same as #2 above.

Phone ()
 Email

Fax ()

8

Certificate will be mailed in window envelope to this address:

Name ▼	Mark H. Barinholtz	Atty-at-Law
Number/Street/Apt ▼	55 West Monroe Street,	Suite 3330
City/State/ZIP ▼	Chicago,	Illinois 60603

Complete this space only if you currently hold a Deposit Account in the Copyright Office.

9

Deposit Account # _____

Name _____

DO NOT WRITE HERE

Page 1 of 1 page

*17 U.S.C. § 508(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

