

GRAEF RECHTSANWÄLTE
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registered mail return receipt

Mr.
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First by e-mail

Hamburg, April 2, 2025
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Network Movie, Studio Zentral ./ Lo-Fang

Dear Lo-Fang,

We are getting back to your various correspondence.

1. You repeatedly ask us to resend our legal correspondence to your Portuguese address. There is no reason to do so as we have been communicating with you via e-mail and you received all necessary documentation from us. However, for the sake of judicial escalation we will now also serve you our previous document (Annex 1) and this current document on your Portuguese address.

DR. RALPH OLIVER GRAEF LL.M. (NYU)

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2. We had put you on formal notice to stop any libelous or slanderous statements about our clients vis-à-vis third parties.

It has now come to our attention that you have contacted various employees of Degeto, WDR, ARD Mediathek and Landesanstalt für Medien NRW such as Thomas Schreiber, Stefanie Sauer, Thorsten Scheidemantel, Mirjam Sprey, Christoph Pellander, Kirsten Frehse, Alexandra Görges and Nadine Gericke (all Degeto), former employee of Degeto Hans-Wolfgang Jurgan, Christine Gerlach (WDR) and as well as Dr. Tobias Holzmüller, Anja Kathmann and Michael Duderstädt from GEMA and claim that no valid contract was concluded between yourself and Studio Zentral. This statement is false. It violates our client's personality rights and is highly detrimental to its public image. Our clients have agreed with you on a contract and paid you accordingly. The contract was signed in text form according to § 126 b German Civil Code (BGB).

We therefore put you again on formal notice to

- Refrain from contacting directly all of the above mentioned people and all other employees of the above mentioned institutions as well as these institutions themselves as long as you claim (i) that there is no valid contract between you and Studio Zentral for the use of the Song “You’re the Friend I Need” in the series “Schwarze Früchte” and (ii) that you are entitled to retroactive licensing, public performance penalties and willful infringement damages
- Refrain from contacting directly all of the above-mentioned people and all other employees of the above-mentioned institutions and ordering them to take down the episode of the series “Schwarze Früchte” containing the song “You’re the Friend I Need”
- Refrain from obstructing the exploitation of the episode in the series “Schwarze Früchte” containing the song “You’re the Friend I Need”

3. Our clients are entitled to claims for omission and damages against you due to your libelous and slanderous statements. Moreover, the unjustified initiation of notice and takedown proceedings triggers claims for damages. We will advise our clients to seek immediate legal relief against you if you do not stop this. We will also claim damages due to your unlawful behavior.

4. In a last attempt to settle this matter, we send you the contract that was agreed between you and Studio Zentral back in May 2024 without the additional terms referring to unknown types of use. This contract allows Studio Zentral to exploit the series “Schwarze Früchte” on online platforms such as ARD Mediathek or to air it on TV. We attach this document – agreed by you in text form - for your reference. Feel free to sign this contract for documentation purposes. This will give you the chance to put this matter to rest or we will advise our clients to escalate this matter to the courts.

Kind regards,



Dr. Ralph Oliver Graef, LL. M. (NYU)
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Fachanwalt für Urheber- und Medienrecht
Fachanwalt für gewerblichen Rechtsschutz