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Gmail

Martin McNeil <[redacted]>

Request for information

Martin McNeil <[redacted]> 25 July 2024 at 23:13
To: Geez FX <[redacted]>

Dear Mr. Antsaar,

Apologies for the late hour of this message - I have been busy compiling documents relating to the copyright infringement matter over the last few days and, in doing so, I would appreciate any comment you may have on disclosures made to me by Mr. Saif Ibraheem. A full copy of these disclosures is attached to this message for your convenience, though only three of them touch on matters where your comments would be relevant.

Firstly, in their response no. 5(a), Mr. Ibraheem states the following, quoted below:

> *The work in question, a throwback photo commemorating Conor McGregor's 10-year anniversary of his KO win against Marcus Brimage, was conceived as part of normal social media preparation practices at UFE. Witness 2, who routinely planned social media posts a week in advance, specifically scheduled April 6th for this anniversary post. About a week before this date, Witness 2 requested Witness 1 to prepare a throwback photo to highlight this historic moment.*

In the above context, Witness 2 is an individual that Mr. Abraham has claimed to be a Siri Abraham, and Witness 1 is you. Can you confirm if the above statement is accurate or, if not, whether you have an alternate recollection? Additionally, if you have any copies of documents that evidence communication between you and Siri Abraham, in either the broad sense described by Mr. Ibraheem, or the more specific sense of the creation of the McGregor/brimage graphic, I would appreciate those being provided in tandem.

Moving on, in their response no. 6, Mr. Ibraheem states the following, quoted in part below.

> *UFE believed that the upload of the photo in question was fair use, as Witness 1 and Witness 2 managed all aspects of UFE's social media content.*

Again, In the above context, Witness 1 is you, and Witness 2 is Siri Abraham; can you confirm if the above statement is accurate, i.e., is it true that you and Siri Abraham jointly managed all aspects of UFE's social media content? Again, any copies of documents either confirming the above, or refuting the statement, would be appreciated.

Lastly, in their response no. 16(1), Mr Ibraheem states the following:

> *UFE asserts that it never directly conceived or published the disputed photo. Witness 1 independently conceived the creative work, and Witness 2, in their role managing UFE's social media, published the work without UFE's direct instruction to infringe the claimant's work. Throughout the process, UFE had a reasonable belief that the work did not infringe upon any existing copyrights. The actions of Witness 1 and Witness 2 were not directed or authorized by UFE to infringe upon the claimant's rights.*

Again, in the above context, Witness 1 is you, and Witness 2 is Siri Abraham; can you confirm if the above statement is accurate? I ask because Mr. Ibraheem appears to be distancing themselves from any connection, or liability, regarding either you or the other social media manager, Siri Abraham.

I ask these questions because in the course of your voluntary disclosures yesterday, you believed that Mr. Saif Ibraheem asked you directly, via telephone or other voice call, to create the McGregor/Brimage artwork that was published to the UFE / Ultimate Fan Experience branded social media accounts on 6 April 2023.

In closing: I appreciate that it may take some time for you to either respond to these requests, or to locate relevant documents that would be supportive of any reply you make; I only ask that you remain mindful that any such documents or statements must be passed to me no later than end-of-day on 30 July 2024, being this coming Tuesday, so that I can in turn comply with the Board's rules regarding such materials.

Thank you in advance for considering my questions, and I look forward to your reply.

Sincerely,

Martin McNeil

Proof of Delivery

I hereby certify that on Thursday, October 17, 2024, I provided a true and correct copy of the Reply Testimony Exhibit C to the following:

Experience the Fight Media LLC, represented by saif ibraheem, served via ESERVICE at saifibraheemwrestling@gmail.com

Signed: /s/ Martin McNeil