EXHIBIT 21

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April 11, 2022

Via Email (mduffy@mittslaw.com)

Michael J. Duffy
Mitts Law, LLC
1822 Spruce Street
Philadelphia, PA 19103

Re: Unauthorized Use of Paramount Pictures Corporation's Properties – *Coming to America / Coming 2 America*

Dear Mr. Duffy:

As you know, we are counsel to Paramount Pictures Corporation ("Paramount Pictures"). We are writing to you with the understanding that you continue to represent JMC Pop Ups LLC ("JMC"). If that is not the case, please confirm so we can communicate directly with JMC.

As we explained before, Paramount Pictures is the owner of the copyright and other intellectual property rights in and to the motion pictures entitled *Coming to America* and *Coming 2 America* (hereinafter collectively referred to as the "Properties"). *See, e.g.*, U.S. Copyright Registration Numbers PA0000376420; PA0002280086.

In April 2021, you and I exchanged letters and spoke on the phone about JMC's unauthorized pop-up event in Cherry Hill, NJ which was held in April 2021. In these exchanges, we had explained that the Properties' characters, dialogue, imagery, and other Protected Elements attained iconic status and remain fixtures in popular culture. Indeed, this is the very reason your client chose to create a pop-up event and sell products based on the films.

After discussing Paramount Pictures' position that your client's then-proposed event and products would infringe Paramount Pictures' rights, you had proposed some changes to your client's events and I wrote that Paramount Pictures "confirmed that the changes we discussed wouldn't solve the problem. There is no real way for your client to unring the bell here. The very reason they have such interest in the event is because they marketed it and sold it as a McDowell's pop up and repeatedly used Paramount's film to do so. Please confirm that your client will cancel the event." We understand that the event ended on April 25, 2021 and that your client had not repeated the event since.

It has now come to our attention that your client has scheduled *another* pop-up restaurant entitled "McDowell's" in Springfield Town Center, 6500 Franconia-Springfield Parkway, from May 20 through June 5, 2022 (the "Infringing Event"). *See* https://www.instagram.com/p/CZ2NIahOk6k/ and https://www.facebook.com/mcdowellspopup/photos/324556956355024. Again, your client is using the "McDowell's" name and associated elements, including the stylized "Golden Arcs" made popular in the Properties, to promote the Infringing Event and sell associated, unauthorized, merchandise (the "Infringing Products"). Representative images of your client's infringing use of the Protected Elements to promote its forthcoming event are included below for your reference:

https://jmcpopups.com/.



https://galaxyburgerandbeyond.ticketspice.com/mcdowells-dmv?fbclid=IwAR1FIoxHeulekNqDBySihlEO6xXPqejsLakcl-6X18AiRXYv_kKxVww8iqE



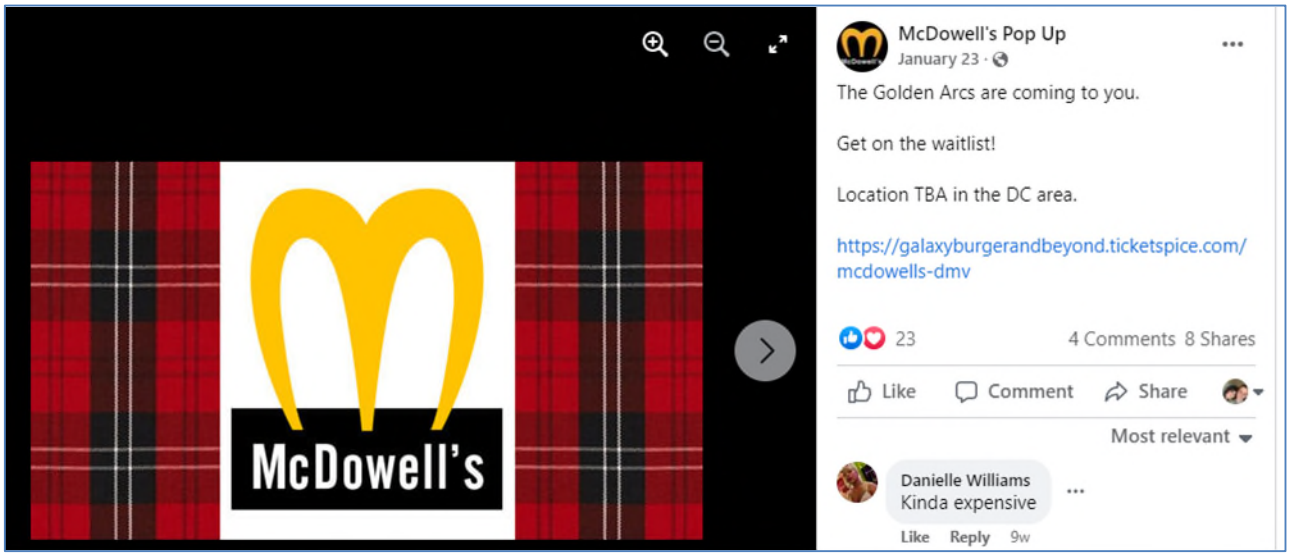
https://www.instagram.com/p/CZ2NIahOk6k/



https://www.instagram.com/p/CZkBsDzueya/



https://www.facebook.com/mcdowellspopup/photos/3111639610276 57



https://www.facebook.com/mcdowellspopup/photos/324556956355024



https://www.facebook.com/mcdowellspopup/



https://www.facebook.com/mcdowellspopup/



As we've previously discussed, this unauthorized use of the Protected Elements constitutes, among other things, copyright infringement and unfair competition in violation of Paramount Pictures' intellectual property rights in the Properties. It is clear that Infringing Event and Infringing Products are improperly trading off the enormous goodwill built up in the Properties and the Protected Elements, which belong exclusively to Paramount Pictures.

Despite our prior discussions, it appears that your client may be under the false impression that its event is a parody protected by the fair use doctrine. *See, e.g.*, https://www.washingtonian.com/2022/03/29/mcdowells-pop-up-coming-to-america-springfield-virginia/. That impression is unsupported by copyright law.

This is not a parody in the context of copyright law as your client is not using McDowell's restaurant in a humorous form of social commentary. Rather, your client's use is an intentional direct infringement and non-transformative use of Paramount Pictures' intellectual property rights: it simply attempts to recreate the McDowell's restaurant as seen in *Coming to America* and *Coming 2 America*. Simply put, the pop-up event does not alter the original McDowell's restaurant with new expressions, meanings, or messages. Moreover, your client has now taken this infringement a step further and attempts to recreate Prince Akeem's apartment, which is prominent in *Coming to America*, and Mr. McDowell's office. For example, see the following statements, which confirm your client's intent to copy the McDowell's restaurant, Prince Akeem's apartment, Mr. McDowell's office, and other Protected Elements from the Properties:

- On February 13, 2022, your client posted "McDowell's is Coming 2 Northern Virginia! Grab a Big Mick, take some photos*, relive the memories, and be inside McDowell's*."
    - *See* https://www.facebook.com/mcdowellspopup/photos/324556956355024.
- On March 13, 2022, your client posted "McDowell's is Coming to the DMV! Home of the Big Mick! Walk into *a re-creation of McDowell's*, Grab a Big Mick, and enjoy the photo ops and times with friends and family.
    - *See* https://www.facebook.com/mcdowellspopup/
- On February 13, 2022, your client posted "Coming 2 the DC area in May!" with a description that stated, "The pop-up will also have photo ops, merchandise, and unique displays and artwork for lovers of *all things "Coming To America."*
    - *See* https://www.facebook.com/mcdowellspopup/
- On March 29, 2022, the Washingtonian quoted your client stating, "'Our experiences are a little different,' McCullough says of his niche in the pop-cultural pop-up world. While many other pop-ups are centered around a selfie wall or branded drinks, McCullough is obsessed with creating *immersive scenes of lifelike accuracy*. '*We try to make it like you're really there*,' he says."
    - *See* https://www.washingtonian.com/2022/03/29/mcdowells-pop-up-coming-to-america-springfield-virginia/ (which your client reposted on his Facebook page - https://m.facebook.com/JMC-Pop-Ups-llc-110938841186894/)
- On March 29, 2022, the Washingtonian stated your client's "McDowell's will be a multi-room installation that includes *not simply the restaurant's order counter* (which serves actual Big Micks), *but also re-creations of the dingy apartment where Prince Akeem lives, and Mr. McDowell's office* (guests can sit at his desk, don his blue blazer, and pick up the cheeseburger phone)."
    - *See* https://www.washingtonian.com/2022/03/29/mcdowells-pop-up-coming-to-america-springfield-virginia/ (which your client reposted on his Facebook page - https://m.facebook.com/JMC-Pop-Ups-llc-110938841186894/))

Your client's unauthorized use of the Protected Elements interferes with Paramount Pictures' ability to exploit its intellectual property rights. Accordingly, Paramount Pictures demands that your client:

1. Immediately cancel the Infringing Event and cease all promotion and/or sales of the Infringing Event and Infringing Products;

2. Immediately remove and permanently cease all use of the Properties and/or any of the Protected Elements, including any creation, distribution, display, performance, promotion, or marketing containing the Properties or the Protected Elements, on your client's website and any social media pages, including but not limited to the sites and pages listed below;

    a. https://www.instagram.com/mcdowellspopup/

    b. https://www.facebook.com/mcdowellspopup/

    c. https://jmcpopups.com/

    d. https://galaxyburgerandbeyond.ticketspice.com/mcdowells-dmv?fbclid=IwAR1FIoxHeulekNqDBySihlEO6xXPqejsLakcl-6X18AiRXYv_kKxVww8iqE

3. Destroy all Infringing Products and all other tangible things displaying the Properties or the Protected Elements, including marketing materials, billboards, signage, products and product packaging, hats, t-shirts, and other apparel, employee uniforms, promotional flyers, posters and mailings in your client's possession and/or control;

4. Provide accounting for the past events;

5. Confirm in writing that your client will not hold the Infringing Event or any other event that infringes Paramount Pictures' intellectual property in the future; and

6. Provide written confirmation that your client has complied with Paramount Pictures' demands by **April 18, 2022**.

I can be reached at dcaplan@kilpatricktownsend.com or by phone at 310-777-3722. I look forward to discussing this matter further with you.

Nothing in this letter constitutes a waiver of any rights, claims or remedies of Paramount Pictures or any of its related entities, all of which are expressly reserved.

Very truly yours,

David K. Caplan