



Barry F. Soalt
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June 19, 2007

Via Email (bill@waterproofdeckcoatingadvice.com)

Bill Leys
WaterProofDeckCoatingAdvice.com

Re: **Unlawful Use of Paul Koury's LIFEDECK Domain Name Link and Mark**

Dear Mr. Leys:

It is not clear to me what your objectives are in airing the Life Paint/Life Deck legal dispute between Life Paint and Paul Koury, but whatever your motivations are, your facts should at least be accurate.

Paul Koury conceived of the LIFE DECK brand, developed and tested most of the product formulations and derived the test data for the ICC or ICBO product evaluations.

Life Paint attempted to register Paul Koury's LIFE DECK mark. Paul Koury has been using LIFE DECK as a mark on products and exclusively as a trade name and service mark for his installation services, and is known throughout Southern California as Life Deck, in advertisements and throughout the industry. He has recently introduced the new WESTCOAT brand of products as part of his efforts to separate his business endeavors entirely from Life Paint. There are pending legal actions between the parties with respect to the LIFE DECK issues.

Notwithstanding the adoption of the new WESTCOAT brand, Paul Koury has not abandoned the use of LIFE DECK in connection with his business. The confusion lies in Life Paint attempting to announce to the world that it is now Life Deck when its company identity has always been, and is Life Paint. LIFE DECK is merely a brand of product that it sells. The ICBO evaluated the product "Life Deck AL." Mr. Koury's "Westcoat ALX" product is identical to the original ICBO evaluated "Life Deck AL" formulation, with the exception of the top coat.

I am not sure what your interests are in fielding the legal dispute between the parties, but one thing is perfectly clear. Your website is utilizing a link to my client's www.lifedeck.com domain name and that active domain name link is directing website traffic to the Life Paint website at the url www.lifepaint.com. This is an illegal use of my client's domain name and

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mark, and is an attempt, either on your part, or on the part of the party who fed you the information, to cause a likelihood of confusion between the two entities.

I ask that you immediately close that active link on your website or otherwise direct traffic to Paul Koury's domain name and website under the URL www.lifedeck.com and/or www.westcoat.com. If you are intending to direct traffic to Life Paint Corp., I believe its domain name is www.lifepaint.com. Paul Koury, and not Life Paint is the owner of the lifedeck.com domain name. Check the ownership records. Please take the appropriate action immediately and confirm your correction of this improper active link. I do not understand why you are so interested in intermeddling in this matter.

I will assume there is no intentional unlawful activity on your part, for now.

Very truly yours,



Barry F. Soalt, of
Procopio, Cory, Hargreaves &
Savitch LLP

BFS/pal
cc: Paul Koury