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December 17, 2019

Cloudflare, Inc.
c/o Registered Agent Solutions, Inc.
1220 S. Street, Suite 150
Sacramento, CA 95811

Re: Copyright and Trademark Infringement

Dear Legal Counsel,

We are intellectual property counsel for the American Petroleum Institute (“API”), the leading trade association for the petroleum industry in the United States, and perhaps the world. For decades, API has authored standards for the safety and quality of products in the petroleum and gas industry. As author, API owns the copyright in these standards and has registered the copyrights with the U.S. Copyright Office. The copyrighted standards constitute a very valuable asset to API. Indeed, sales of the API standards to petroleum and gas industry professionals create considerable income for API. API also owns exclusive rights to its API logos which appear on the standards and are used in advertising to promote the standards, as well as API’s other goods and services. The API logos are registered with the U.S. Patent and Trademark Office (Reg. Nos. 3,285,891 and 1,264,555), and API additionally owns numerous foreign trademark registrations for the API logos.

To protect its valuable rights, API objects to unauthorized and confusing uses of its copyrighted works and its trademarks. An entity doing business at a website located at <e-standardstore.org> provides over 1,700 PDF versions of API’s standards and other publications. Further, the <e-standard.org>, <e-stds.org>, and <pdfstandards.org> domain names all redirect users to the <e-standardstore.org> website. See screenshots attached as Exhibit 1.

The domain names associated with the <e-standardstore.org> website resolve to the following IP addresses provided by the application platform delivery service, currently shown as:

Domain	IP Address
<e-standardstore.org>	104.26.4.2
<e-standard.org>	104.26.12.243
<e-stds.org>	104.31.76.81
<pdfstandards.org>	104.27.130.67

This company is not an authorized distributor of API’s standards. Despite not being an authorized distributor, these links display images of API’s logos. This unauthorized use of API’s logos falsely suggests to consumers that this company is an authorized distributor of API standards. Additionally, API does not permit sales of its standards in PDF format (or any other

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electronic format) by anyone. Therefore, the sale of downloadable or e-mailed copies of API's standards are clearly sales of unauthorized copies or scans of API's publications. This unauthorized and confusing use of the API standards and the API logo constitute, among other things, copyright and trademark infringement under the laws of the United States and other countries.

Accordingly, API demands that Cloudflare:

1. Immediately terminate its services associated with these domain names; and
2. So that API may take further steps to protect its valuable intellectual property rights, provide us with all contact information for the website owners/operators of the <e-standardstore.org>, <e-standard.org>, <e-stds.org>, and <pdfstandards.org> domain names in your possession, custody, or control, including:
 - a. The method(s) of payment used by these registrants to pay for Cloudflare's services, including, without limitation, any credit/debit card number, checking account, or PayPal account number used;
 - b. The name(s) and contact information associated with those accounts;
 - c. The banks or institutions processing payment for these registrants;
 - d. Any other identifying information related to payment by these registrants for Cloudflare's services.

We hereby certify that we: (1) are authorized to act on behalf API; (2) have provided an e-mail address to contact the undersigned; (3) have identified the infringing materials; (4) have a good-faith belief that use of the copyrighted and trademarked material described above is not authorized by the owner, its agent, or the law; and (5) swear, under penalty of perjury, that the information in this notification is accurate to the best of our knowledge.

Any correspondence related to this matter may be directed to the undersigned at the email and address provided above. We thank you for your immediate attention to this serious matter.

Very truly yours,

/s/ B. Brett Heavner

B. Brett Heavner

Finnegan, Henderson, Farabow, Garrett
& Dunner, LLP

Exhibit 1

Screenshots from <e-standardstore.org>

https://www.e-standardstore.org/index.php?main_page=index&cPath=55

American Petroleum Institute x +
e-standardsstore.org/index.php?main_page=index&cPath=55

	API TR 980-2018 PDF API TR 980-2018 Monolithic Refractories: Installation and Dryout - FIRST EDITION 66Page(s)	\$12.00 DETAILS	PDF(Electronic... \$15.00
	API TR 977-2018 PDF API TR 977-2018 ASTM C704 Test Variability Reduced to Allow Further Optimization of Erosion-resistant Refractories for Critical Oil Refining...	\$10.00 DETAILS	
	API TR 942-B-2017 PDF API TR 942-B-2017 Material, Fabrication, and Repair Considerations for Austenitic Alloys Subject to Embrittlement and Cracking in High Temperature...	\$12.00 DETAILS	

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American Petroleum Institute x +
e-standardsstore.org/index.php?main_page=index&cPath=55&sort=2d&page=12

	API TR 10TR2-1997(R2002) PDF(ELECTRONIC COPY) API TR 10TR2-1997(R2002) Shrinkage and Expansion in Oilwell Cements - First Edition 58 Page(s)	\$8.00 DETAILS	
	API TR 10TR2-1997 PDF FORMAT(ELECTRONIC COPY) API TR 10TR2-1997 Shrinkage and Expansion in Oilwell Cements - First Edition 58 Page(s)	\$8.00 DETAILS	
	API TR 10TR2 RUSSIAN-1997(R2002) PDF(ELECTRONIC COPY) API TR 10TR2 RUSSIAN-1997(R2002) SHRINKAGE AND EXPANSION IN OILWELL CEMENTS - First Edition 68 Page(s)	\$8.00 DETAILS	

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10:01 AM 12/17/2019

The screenshot displays a web browser window with the URL e-standardstore.org/index.php?main_page=product_info&cPath=55&products_id=40089. The main content area features a product titled "API TR 6AF1-1998 PDF FORMAT(ELECTRONIC COPY)" with a price of \$24.50. A prominent red banner states "free shipping! To your email after payment!". Below the price is an "Add to Cart" button showing a quantity of 1, and a larger red "ADD TO CART" button. The product description includes "ADOBE ACROBAT PDF FORMAT" and "API TR 6AF1-1998 Technical Report on Temperature Derating on API Flanges under Combination of Loading - Second Edition 245 Page(s)". Navigation buttons for "PREV", "ALL", and "NEXT" are visible at the bottom of the product section. The right sidebar contains sections for "FAQ", "SEARCH" (with a search box and "SEARCH" button), "SHOPPING CART [MORE]" (stating "Your cart is empty."), and "NOTIFICATIONS". A "TOP" button and a "Leave a message" icon are also present. The footer contains a cookie consent notice: "This website uses cookies, as described in the e-standard store Privacy Policy. By clicking on the 'Accept All Cookies' button, or by continuing to use our website, you consent to all cookies." The Windows taskbar at the bottom shows the date and time as 10:02 AM on 12/17/2019.