



WALKER & ASSOCIATES

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James L. Walker, Jr., Esq.

Admitted in C.T., D.C., G.A., N.Y.

August 11, 2024

CONFIDENTIAL

Mr. Donald J. Trump, Sr.
Donald J. Trump for President 2024, Inc.
Republican National Committee
310 First Street, SE
Washington, DC 20003

Re: Notice of Copyright Infringement -Demand For Payment and Take Down of All Videos.

Dear Mr. Trump and Trump Campaign:

Our firm has been retained by the family and Isaac Hayes Enterprises, who own the copyright to the musical composition and recording “*Hold On (I’m Coming)*” (the “Song”). It has come to our attention that you or the campaign have authorized the illegal public performance of the Song on multiple occasions during various rallies for your political campaign without authorization from the copyright holder, despite being asked repeatedly not to engage in such illegal use by our client.

Upon information and belief, you, your campaign, and/or the RNC and other parties have willfully and brazenly engaged in copyright infringement in violation of several provisions of Title 17 U.S.C., including § 501, of the Copyright Act of 1976, as amended, over one hundred times. We have attached for your convenience a non-exhaustive list attached hereto as **Exhibit A**. As we prepared this letter, there was an additional use in Montana just two nights ago, even with your office apparently aware that you had no permission.

We and the family hereby demand that you cease the continual infringement of our copyright and stop all unauthorized use of the Song. Specifically, we put you on notice that you have not obtained a license or other authorization, thus, we demand the following by **August 16, 2024**:

1. Cease and desist any use of the Song and/or any of the intellectual property of Isaac Hayes Enterprises or the Estate of Mr. Isaac Hayes.



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2. Remove all videos featuring the song on the attached **Exhibit A** and any other websites or similar outlets throughout the entire world, i.e., remove any inference of the song connected to Donald Trump, his campaign, the Republican National Committee or any organization or entity affiliated thereof.
3. Release an official statement by the Trump Campaign and widely distribute amongst its social media platforms an official disclaimer that the family and Estate of Mr. Isaac Hayes have not authorized, endorsed, or permitted use of the Isaac Hayes Enterprises' property at any point, now or in perpetuity throughout the universe.
4. Pay to our client via our offices a certified check or wire collectively in a license fee amount not less than Three Million Dollars (\$3,000,000.00), from the parties named herein, which is a very discounted fee for the normal license fee associated with this many multiple uses. The normal fee for these infringements will be 10 times as much if we litigate, starting at \$150,000 per use.

In addition to the requirements above you are hereby put on notice to take reasonable steps to preserve all evidence, whether physical, printed, or electronic, which is or might become relevant to any related anticipated litigation. This request for preservation includes, but is not limited to, all types of electronically stored information, including, but not limited to, emails, text messages, social media, backed-up records, archived records, legacy information, hidden data, embedded data, and residual-deleted data, whether on separate media, computer networks, standalone computers, and cloud-based storage, whether proprietary or otherwise, etc.

We also expect that corresponding paper documents, records, and real objects will be preserved in accordance with all statutes, common law, and litigation relevant standards that apply. Please be advised that failure to respond or delay in complying with these demands will be deemed evidence of intentional infringement, and we will have no choice but to proceed against all those involved, accordingly. Thus, it is our hope that we can resolve this issue quickly and amicably.

However, given no choice, we will take all legal action required to enforce the infringed upon intellectual property rights, including but not limited to sending third party take down requests and/or federal litigation. If we are forced to file a federal lawsuit because of your continued intentional and unlawful actions, we will seek disgorgement of all profits earned from the unauthorized use, the maximum statutory damages available (as high as One-Hundred-Fifty-Thousand Dollars (\$150,000) per use for willful copyright infringement), and the recovery of all related attorney's fees and costs.



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In closing, the above is not an exhaustive statement of all the relevant facts and law, and we expressly reserve all rights, including the right to seek injunctive relief. We look forward to hearing from you by **August 16, 2024**, and, if not we will proceed with litigation and seek legal fees from all parties here jointly.

Very truly yours,

/s/ James Walker, Jr.

James L. Walker, Jr.

JLW/deh
cc: Mr. Isaac Hayes III
Ms. Liz Garner