



July 31, 2019

VIA FEDERAL EXPRESS

Huan Zhao, CEO
Notion Labs, Inc.
925 Guerrero Street, #12
San Francisco, CA 94110

Notion Labs, Inc.
930 Alabama Street
San Francisco, CA 94110

Notion Labs, Inc.
c/o CT Corporation System
818 West Seventh Street, Suite 930
Los Angeles, CA 90017

**Re: Misappropriation of Verisign Trade Secrets
Cease and Desist**

Dear Mr. Zhao,

I am writing on behalf of VeriSign, Inc. ("Verisign"). According to publicly available "Whois" data, Notion Labs ("Notion") is the registrant of the domain name <notion.so>. I am writing to you to request your assistance in the removal of certain Verisign confidential and trade secret information that is publicly accessible on your website and has been misappropriated.

Specifically, the web page located at <https://www.notion.so/Get-The-Facts-Single-Character-COM-Domain-Names-030345e431fa4471af0cdbe6e3fcdfad> includes the following document: *Second Amendment to .COM Registry Agreement UNREDACTED (3/27/2019).pdf* (the "Second Amendment"). Exhibit A to the Second Amendment ("Exhibit A"), which is clearly marked as "Confidential", includes confidential and proprietary information belonging to Verisign, and has been placed on your website without our authorization and in violation of law.¹

We do not know how you came into possession of Exhibit A, but given that it is stamped "Confidential," the operator of the above-identified webpage clearly was on notice that it was confidential and trade secret information that it had no right to disclose, including making it available on its website. Continuing to make Exhibit A available on the website is a misappropriation of Verisign's confidential and trade secret information.

¹ See California Uniform Trade Secrets Act, CAL CIV CODE §3426

Therefore, we demand that within five (5) days of the date of this letter, Notion provide Verisign with written assurances that it has removed Exhibit A from its website and is not engaging in any conduct that may be deemed as inducing or benefitting from the misappropriation of Exhibit A.

Specifically, we request that Notion confirm in writing:


- a) that it has removed Exhibit A from its website;
- b) the source(s) of Exhibit A, including the identity of the person or persons that provided it to you and on which date(s);
- c) that it has not engaged and will not engage in any future conduct that utilizes Exhibit A, or any other Verisign confidential and trade secret information;
- d) that it has taken measures to prevent the use, copying, solicitation or disclosure of Exhibit A; and
- e) that it has not benefitted from the use, copying, solicitation or disclosure of Exhibit A.

Verisign takes the protection of its intellectual property very seriously. If necessary, it will take all appropriate steps to prevent any misappropriation or disclosure of Exhibit A, any breach of its contracts, any tortious interference with its business relationships, or any diminution of its corporate activities.

Lastly and consistent with its obligations under the Federal Rules of Civil Procedure, Notion should now take reasonable and good faith efforts to preserve and not destroy, conceal or alter any information in its possession, custody or control that relate to Exhibit A or <https://www.notion.so/Get-The-Facts-Single-Character-COM-Domain-Names-030345e431fa4471af0cdbe6e3fcdfad> and all communications and contact that Notion has had with any third parties about it, wherever that information is located and regardless of its format. I will also ensure that members of my staff are available to discuss any technical details of Notion's preservation activities, the scope of the information to be preserved and any specific sources of electronically stored information that Notion believes is relevant to this issue.

Verisign reserves all other rights and remedies it may have and this letter shall in no way limit or waive such rights and remedies. We look forward to hearing from Notion on this matter and should you have any questions, please do not hesitate to contact the undersigned.

Best regards,



Kirk Salzman
Senior Director & Senior Corporate Counsel
VeriSign, Inc.

cc: Thomas Zaccaro, Esq., Paul Hastings
Ronald L. Johnston, Esq., Arnold & Porter