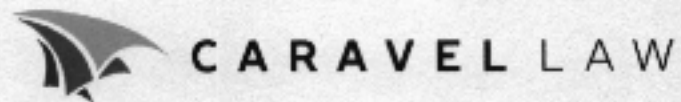We Work, #4-158
240 Richmond Street West,
Toronto ON M5V 1V6
416-348-0313
caravellaw.com

**CARAVEL** L A W

Ellen V. Swan
Practising in Association
416-628-1048
eswan@caravellaw.com

October 31, 2019

**DELIVERED VIA EMAIL AND COURIER**

Renlord Yang
c/o University of Melbourne
Victoria 3010
Australia

Dear Mr. Yang:

**Re:     Infringement of Copperhead Limited's Copyright**

We are counsel to Copperhead Limited (the "**Company**") in connection with the above-referenced matter.

As you are no doubt aware, the Company owns the copyright in the code comprising the CopperheadOS (the "**Code**"). The Company has not authorized your commercial use of the Code nor any relicensing of the Code. The Company has not authorized your commercial use of the Code nor any relicensing of the Code. In particular, the Company has not authorized the relicensing of the Code for commercial purposes. The Company's specific licence terms are readily available.

The Company has learned that you have, in breach of Copperhead's copyright, copied and pasted portions of the Code into GrapheneOS, a competing product. You described this insertion as "cherry-picked from android hardening archive".

Your actions are a breach of the terms of licence of the Code and a breach of the Company's copyright. We hereby demand that you immediately remove all portions of the Code that have been inserted into GrapheneOS or any other non-Company product forthwith, and send the appropriate records evidencing that removal to counsel.

We are also sending a letter to the University of Melbourne to ensure that it is aware that it cannot assert ownership over any Code you have included into any product for that entity, and that you may have used University systems or assets to infringe the Company's intellectual property rights in breach of their policies.

The Company takes this matter very seriously and will not hesitate to pursue all legal remedies available should you not provide the requested response by November 4, 2019.

Yours truly,

Ellen V. Swan
Barrister & Solicitor,
Ellen V. Swan Professional Corporation practicing in Association with Caravel Law

The following is a non-exhaustive list of commits from Renlord Yang that was sent to GrapheneOS that matches Copperhead IP.

graphene: https://github.com/GrapheneOS/platform_bionic/commit/d0caa4f4dde56cc628a0296bb5229ccbb39dade7
copperhead: https://github.com/CopperheadOS/platform_bionic/commit/b528e2dd135559a65d6e0ddb615fac1996c86444

graphene: https://github.com/GrapheneOS/platform_bionic/commit/bdc94c98a9d25477a0940e4b12e5620682af7cf5
copperhead:
https://github.com/CopperheadOS/platform_bionic/commit/22c6b2702eb79057741af6dd2b33baff698c106b

graphene: https://github.com/GrapheneOS/platform_bionic/commit/9a92e6dba0e37c767fdb4bc66960bcdc535f8db1
copperhead: https://github.com/CopperheadOS/platform_bionic/commit/a1cdbada551b5727980cfb9874b17e3d22042dfe

just 3 examples from bionic/
https://github.com/GrapheneOS/platform_frameworks_base/commits/10
half his commits there are copperhead too

example:
graphene:
https://github.com/GrapheneOS/platform_frameworks_base/commit/baa41e529a950308cfa83a02cb05be60cc0aedff

copperhead:
https://github.com/CopperheadOS/platform_frameworks_base/commit/739c74340f9f4843d42c0b9d18e354b802e3eb08