

## Exhibit 3

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**GARBARINI FITZGERALD P.C.**

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March 16, 2019

**NOTICE OF LITIGATION AND  
DEMAND TO PRESERVE DOCUMENTS**

**SUBJECT TO FRE 408**

**VIA EMAIL to [info@usany.amity.edu](mailto:info@usany.amity.edu)  
and CERTIFIED MAIL**

Amity University  
1 Campus Rd.  
Staten Island, N.Y. 10301

Re: ***Yesh Music, LLC adv. Amity Univ.***  
**Unauthorized Synchronization of the Copyrighted Recording “Equinox”**

Amity Univ.:

I represent Yesh Music, LLC the beneficial owner of all rights to the recording “Equinox by the band The American Dollar – U.S. Copyright Registration SR 713-239 (the “Copyrighted Recording”). Amity Univ. synchronized my client’s Copyrighted Recording to an advertisement titled Amity University Dubai Overview located at <https://www.youtube.com/watch?v=6QI1JkHBtTw>. At no time did Amity Univ. have any license or authority for this use.

This use was done with the reckless disregard or willful blindness to my client’s rights as set forth in the Copyright Act, 17 U.S.C. § 106, entitling my client to enhanced statutory damages of up to \$150,000, but not less than \$30,000 pursuant to 17 U.S.C. § 505(c). Further, Amity Univ. failed to include information which identified the Copyrighted Recording, the author of the Copyrighted Recording, the owner of any right in the Copyrighted Recording, or information about the terms and conditions of use of the Copyrighted Recording in violation of the Digital Millennium

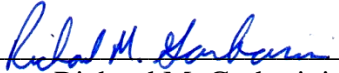
Copyright Act, 17 U.S.C. § 1202(b), entitling my client to a statutory award of up to \$25,000 pursuant to 17 U.S.C. § 1203.

Amity Univ. was previously contacted by my client on March 3, 2019 by email sent to info@amityuniversity.ae; Amity Univ. refused to respond. If Amity Univ. has any interest in avoiding litigation, contact me by Wednesday, March 20, 2019. Should Amity Univ. elect to ignore this notice, a complaint will be filed at 5:00 pm EST on March 20, 2019, in the Federal Court for the Eastern District of New York.

In the interim, Amity Univ. is obligated to retain all documents, including email, in their original condition concerning this matter. Should Amity Univ. fail to adequately retain relevant documents, it will result in a claim of spoliation.

I can be reached at 212.300.5358, feel free to contact me. The above may come off as cold, but I can assure you my client is pragmatic, and we can easily resolve this matter without having to resort to litigation.

GARBARINI FITZGERALD P.C.

By:   
Richard M. Garbarini