

e-commerce law & policy

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User-generated content: website liability

In the first instalment of a two-part article, Michael Vatis and David Retchless, of Steptoe & Johnson LLP, consider website immunity from legal action for infringing content under the Communications Decency Act, examining differing court interpretations of that immunity. The second part of this article will examine protections granted to websites hosting user-generated content in the European Union, under the E-Commerce Directive.

User-generated content is all the rage in web media. Whether it's blogs, photos, videos, or music clips, content created by users is a major force in attracting readers and viewers. The boom in internet-based advertising, accelerated by search engines' continuing perfection of their algorithms for deciding what ads would be of greatest interest to particular viewers, has made user-generated content a tremendously valuable commodity. The more eyes a popular video or blog draws, the more likely it is viewers will see and click on advertisements running on the same page, thus bringing revenues to the site. The best part of it is that the content itself is, in most cases, free - to both the site owner and readers or viewers.

But this golden egg for web media has a rather fragile shell. Part of what makes this business model viable is that websites in the US do not have to police the content that they host in order to make sure it is not illegal or likely to prompt a lawsuit. That is because of section 230(c)(1) of the Communications Decency Act (CDA)¹, which has been interpreted by courts to shield websites and other internet services from liability for content posted by

third parties (with a few important exceptions).

But, just as web 2.0 services have begun to take full advantage of user-generated content, courts in the US have begun to cut back on the scope of this immunity. How far courts will go in trimming back this legal shield remains to be seen. But the trend lines are apparent.

Section 230(c)(1) of the CDA

Section 230(c)(1) of the CDA states that '[n]o provider or user of an interactive computer service shall be treated as the publisher or speaker of any information provided by another information content provider'. US courts have generally held that this statute provides websites with broad protection from liability for most third-party content - the two key statutory exceptions are for criminal liability and intellectual property claims². But recently, several federal courts have questioned the broad application of CDA immunity, launching a debate that may ultimately be decided by the US Supreme Court.

In interpreting section 230(c)(1), US courts have traditionally followed the Fourth Circuit's 1997 ruling in *Zeran v AOL*, which held that the 'plain language' of section 230 'creates a federal immunity to any cause of action that would make service providers liable for information originating with a third-party user of the service'³. The Fourth Circuit specified that this immunity 'precludes courts from entertaining claims that would place a computer service provider in a publisher's role', and thus bars 'lawsuits seeking to hold a service provider liable for its exercise of a publisher's traditional editorial functions - such as deciding whether to publish, withdraw, postpone or alter content'⁴.

Recent decisions, though, call into question just how broad this

immunity is. Most courts have recognized that section 230 immunity does not extend to content that websites create or develop themselves, for which they are considered not only the 'service provider', but also the 'content provider'. Extending this principle, some courts have held that websites that intensively shape, solicit, or edit information submitted by a third party can be regarded as providers of the content, and thus not immune. Noting that the CDA's definition of an 'information content provider' includes any entity that 'is responsible, in whole or in part, for the creation or development of information', these courts have found that websites can lose their section 230 immunity if they contribute extensively to the development of putatively 'third-party' content.

Encouraging and shaping

One key factor that may lead to a loss of immunity is a website's involvement in encouraging and shaping objectionable third-party content through the use of questions, drop-down menus, and other processes and structures. A prime example is the April 2008 ruling by the US Court of Appeals for the Ninth Circuit in *Fair Housing Council of San Fernando Valley v Roommate.com, LLC*. There, the *en banc* Ninth Circuit held that Roommate - which 'operates a website designed to match people renting out spare rooms with people looking for a place to live' - was not immune for allegedly discriminatory profiles created by its members, which expressed preferences based on race, gender, religion or other prohibited factors⁵. The court reasoned that Roommate was at least partly a content provider because it had contributed to the development of the discriminatory

profiles by requiring members to choose from a small set of answers to specific profile-creation questions⁶. The court also held that Roommate could not claim immunity for its search system or its email notification system, since those features of the site were ‘designed to steer users based on discriminatory criteria’⁷.

Recognizing that its ruling could make any website a co-developer of information that is generated using the site’s drop-down menus or search services, the Ninth Circuit stressed that it considered the term ‘development’ to ‘refer[] not merely to augmenting the content generally, but to materially contributing to its alleged unlawfulness’⁸. The court also offered websites the following reassurance: ‘If you don’t encourage illegal content, or design your website to require users to input illegal content, you will be immune’⁹.

Other recent cases, though, make clear that a website can retain its immunity if its structure and processes are neutral, and do not encourage or shape the posting of objectionable content. In *Chicago Lawyers’ Committee for Civil Rights Under Law, Inc., v craigslist, Inc.*¹⁰, for example, the Seventh Circuit held that the CDA barred the plaintiff’s claim that craigslist (a website that allows users to post classified ads) had both published discriminatory housing ads and ‘caused’ the ads to be published¹¹. The court found that the CDA clearly barred the first claim, since it treated craigslist as the publisher of the ads, even though the ads were posted by third parties¹². The court rejected the claim that craigslist ‘caused’ the ads’ publication, noting that it did not ‘induce[] anyone to post any particular listing or express a preference for discrimination’, but simply provided ‘a place where people could post’¹³. The principal

difference with the Roommate.com case, it seems, is that craigslist generally allows users to post whatever content they like, without shaping that content with drop-down menus or profile questions.

Similarly, the First Circuit in *Universal Communication Systems, Inc., v Lycos, Inc.* turned away plaintiffs’ contention that ‘the construct and operation of Lycos’s websites contributed to the proliferation of misinformation’, finding that Lycos’ choice of ‘registration process’ and ‘link structure’ was ‘an editorial decision’ protected by § 230¹⁴. The court found that while the website’s registration process and link structure ‘may have made it marginally easier for others to develop and disseminate misinformation’, these features did not ‘prompt[]’ the misinformation, since they were ‘standard elements of websites ‘with [both] lawful and unlawful potential’¹⁵.

Likewise, in *Doe v Friendfinder Network, Inc.*, a district court found that a website was immune from liability for an allegedly false sexual profile created by a third party that appeared to describe the plaintiff. The court held that the defendants did not lose immunity by allowing users to select from a ‘pre-set menu of ‘sexual responses’ when creating profiles on an adult, sexually oriented personals website, since the complaint was based on information ‘contained entirely in the responses provided by the user’¹⁶. The court also found that defendants were not liable for ‘encouraging the anonymous submission of profiles or ... failing to verify that a profile corresponded to the submitter’s true identity’¹⁷.

Soliciting

Other decisions that have narrowed the scope of CDA immunity have focused on

websites’ efforts to solicit the objectionable content from third parties. This factor is similar to the encouraging and shaping discussed above, but focuses more on the website’s pre-posting conduct in soliciting information rather than on the manner in which the site organizes the information. In *FTC v Accusearch, Inc.*, for instance, a district court ruled that the CDA was no defense against the Federal Trade Commission’s charges that Accusearch had engaged in ‘unfair’ business practices by ‘obtaining and selling confidential customer phone records without the affected customers’ authorization’¹⁸.

Although the phone records were originally ‘created’ by telephone companies, and Accusearch made ‘few changes’ to these records before providing them to consumers, the court found that ‘by soliciting requests for such phone records and purchasing them for resale’, Accusearch had ‘participat[ed] in the creation or development of [the] information’, and therefore did not qualify for section 230 immunity¹⁹.

In *Hy Cite Corp. v badbusinessbureau.com, L.L.C.*, another district court took a similar tack, ruling that section 230 might not protect a defendant from liability for reports that third parties had submitted to its website²⁰. The court noted that the defendant had allegedly ‘solicit[ed] individuals to submit reports with the promise that individuals may ultimately be compensated for their reports’²¹. The court found that this allegation ‘could support a finding that Defendants [were] ‘responsible... for the creation or development of information’ provided by individuals submitting...[r]eports in response to Defendants’ solicitation’²².

Editing

Another key issue in determining

the scope of section 230 immunity has been how much editing websites can do of third-party content before they become content providers and thus lose their immunity. Website operators often exercise some editorial control over what others post, deleting or editing content that is obscene, profane, too long, or that violates some country's content restrictions. Section 230(c)(2) expressly immunizes a website's actions to restrict access to content that it considers to be 'obscene, lewd, lascivious, filthy, excessively violent, harassing, or otherwise objectionable'²³. Nevertheless, if a website does not simply block offensive or objectionable material but edits it in way that changes the content, such editing can turn a website owner into a 'content provider' and thus deprive it of section 230 immunity. The key question is how much editing will take a website across the line into the realm of content provision.

Most courts have held that a minor amount of editing will generally not result in loss of immunity. In *Friendfinder*, for example, the court held that section 230 protected the operators of the personals website from liability for their alleged 're-posting' of a profile, with 'slight' modifications, to other websites²⁴. The court found that section 230 immunity for 'a publisher's traditional editorial functions' covered these minor alterations, especially since the plaintiff did not allege that the changes 'contributed to [the] injurious character' of the profile²⁵. Similarly, in *Batzel v Smith*, the Ninth Circuit held that making 'minor alterations' to defamatory email before posting it to a website and sending it to numerous recipients through a listserv²⁶ does not 'rise to the level of 'development'' necessary for liability under section 230²⁷.

Editing can turn a website owner into a 'content provider' and thus deprive it of section 230 immunity

Other courts, though, have held that editing can deprive a website of CDA immunity if it materially changes the content of someone else's posting. In *Anthony v Yahoo, Inc.*, for instance, a district court in California ruled that the CDA did not shield Yahoo! from the plaintiff's claim that Yahoo!'s dating service sent 'profiles of actual, legitimate former subscribers whose subscriptions had expired and who were no longer members of the service, to current members of the service'²⁸. Although the court noted that 'third parties created these profiles', it nonetheless held that Yahoo! could be held liable for its allegedly fraudulent 'manner of presenting the profiles', since Yahoo! - and not the third parties who had submitted the profiles - created the false impression that the profiles were valid²⁹.

These rulings collectively suggest that a website will likely retain section 230 immunity for user-generated content as long as the website does not actively encourage, shape, or solicit the objectionable content, or engage in editing that materially changes the content. But exactly how much encouraging, shaping or editing is permissible is far from clear. What is apparent, though, is that courts in the US have been steadily cutting back on section 230 immunity, and that the promise of broad immunity for third-party content that seemed on strong footing only a few years ago seems very much in doubt. Meanwhile, market incentives and government pressures - such as the need to maintain decency standards in social networking sites, pressure to help the government fight the proliferation of child pornography, or the desire to solicit and shape the most popular content - are leading websites to engage in more active control of the content posted

on their networks. Websites that thrive on user-generated content therefore need to take extreme care in how they exercise that control, lest they make themselves liable for objectionable content.

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1. 18 USC. § 230(c)(1).
2. 18 USC. § 230(e)(1), (2). Courts have disagreed over the scope of the exception for intellectual property law. In *Perfect 10, Inc. v CCBill LLC*, the Ninth Circuit held that this exception applies only to federal intellectual property claims, not state claims. See *Perfect 10, Inc. v CCBill LLC*, 488 F.3d 1102, 1119 (9th Cir. 2007). Thus, section 230 immunity applies to claims based on state intellectual property law, but does not apply to federal IP claims. However, in an unpublished decision in *Doe v Friendfinder Network, Inc.* a district court in New Hampshire disagreed, ruling that the intellectual property exception applies to all intellectual property claims, state and federal. See 540 F. Supp. 2d 288, 302 (2008).
3. *Zeran v America Online, Inc.*, 129 F.3d 327, 300 (4th Cir. 1997).
4. *Id.*
5. *Id.* at 1161.
6. *Id.* at 1166.
7. *Id.* at 1167.
8. *Id.* at 1167-1168.
9. *Id.* at 1175.
10. 519 F.3d 666 (7th Cir. 2008).
11. *Id.* at 671-672.
12. *Id.* at 671.
13. *Id.* at 671-672.
14. 478 F.3d 413, 422 (1st Cir. 2007).
15. *Id.* at 421.
16. 540 F. Supp. at 295.
17. *Id.*
18. No. 2:06-cv-00105-WFD, 2007 US Dist. LEXIS 74905, at *2 (D. Wyo. Sept. 28, 2007).
19. *Id.* at *16 (quotations omitted).
20. 418 F. Supp. 2d 1142 (2005).
21. *Id.* at 1149.
22. *Id.*
23. 47 USC. § 230(c)(2).
24. 540 F. Supp. at 297.
25. *Id.* at 298.
26. Listserv is an electronic mailing list software application.
27. 333 F.3d 1018, 1031 (2003).
28. 421 F. Supp. 2d 1257, 1263 (N.D. Cal. 2006).
29. *Id.*

User-generated content: website liability

In the second instalment of a two-part article, Michael Vatis and David Retchless, of Steptoe & Johnson LLP, consider website immunity from legal action for infringing user-generated content under the French law for Confidence in the Digital Economy (LCEN). They conclude that like the US courts covered in part one of this article, French courts are also willing to find websites liable for infringing user-generated content, if their structure suggests that they are acting as a 'publisher' rather than a mere 'service provider'.

Our initial article on websites' legal immunity for user-generated content examined how courts in the United States are cutting back on the immunity afforded by section 230(c) (1) of the Communications Decency Act¹. A similar phenomenon appears to be happening in Europe, particularly in France. In this article, we study how a series of French court decisions have limited the liability protections available to websites operating in that country. While US courts have generally been cutting around the edges of the immunity shield without undermining its basic rationale, recent decisions by French courts cut close to the core of the legal defenses.

In the European Union, as in the United States, websites are supposed to enjoy legal protection from suits over content provided by third parties. In the EU, these protections generally derive from Article 14 of the EU E-Commerce Directive². Article 6-I-2 of the French Law for Confidence in the Digital Economy (LCEN), which mirrors Article 14 of the E-Commerce Directive, states that public providers of 'communications services' cannot be held liable for 'information

stored at the request of a recipient of those services' if the provider 'did not have actual knowledge of [the] illegal nature' of the information, or if the provider 'acted expeditiously to remove the data or make access impossible' after learning of its illegality.

But a series of recent decisions by French courts suggest that Article 6-I-2 of the LCEN might not provide websites with nearly as much protection as its language suggests.

In three related decisions issued in June 2008, the Tribunal de Commerce in Paris held that eBay could not claim protection from liability under Article 6-I-2 of the LCEN for allowing illegal online auctions of counterfeit LVMH handbags, couture, and perfumes³. The court found that eBay had injured LVMH by failing to ensure that its auctions were not illegally bypassing the limited number of distributors that LVMH had authorized to sell products bearing its marks. The court suggested that these illicit sales should have been apparent to eBay, since the relevant auction pages contained the names of the LVMH brands and often indicated that the products up for auction were fakes.

In rejecting eBay's LCEN defense, the court held that eBay's provision of hosting services was too closely tied to its brokering of auctions, for which it could not claim the Article's protections. The court noted that eBay hosted users' auctions with 'the sole aim' of mediating between buyers and sellers. It also found that even if eBay were simply a 'provider' or 'host' of the auctions, its 'knowledge and control of information transmitted over its sites' would undermine its claim to Article 6-I-2 protection, since eBay had 'recognize[d] that fraud exists' - as suggested by its educational initiatives for users and its 'VeRO

Program' for the protection of intellectual property - but had done 'nothing' to prevent illegal sales. It also held that eBay played a 'very active role' in its users' commercial transactions, by placing 'tools specifically intended to ensure the promotion and development of sales' on its websites.

Earlier this year, in *Olivier M. v Bloobox Net*, the Paris Court of First Instance held that the defendant - Bloobox.net - was not immune for hosting a user-submitted link on its Fuzz.fr service, which pointed to an article that described a relationship between actor and plaintiff Olivier Martinez and a female singer⁴. Fuzz.fr allows users to submit headlines and associated links for display on the Fuzz.fr website. Fuzz.fr automatically determines the page position (and apparently font size) of these stories based on their relative popularity among users. The court concluded that the linked-to article violated Martinez's privacy rights. Even though the link to the article was submitted by a user and not by Bloobox, the court ruled that the link 'proceeded from a deliberate decision of the defendant company, which contribute[d] to the spread of illegal information entailing its liability as an editor'. The court also found that Bloobox had exercised an 'editorial choice' by displaying the headline associated with the link in a large type, classifying it under the heading 'People' and otherwise determining the 'organization and presentation of the site'. In addition, the court noted that Bloobox's Managing Director stated on one of his websites that he 'edited' Fuzz.fr. Accordingly, the court found that Bloobox could be held liable for its editorial decisions as 'a publisher' of the link and headline, and could not claim immunity as a communications

service provider under Article 6-I-2 of the LCEN.

The court's opinion did not recite any deliberate decisions that Bloobox had made about the link in question, but appeared to be referring to the general structure of the site and how it ranks and displays links. If such prior decisions alone are enough to make a provider responsible as a publisher or editor of specific user-generated content that the provider knows nothing about, then the immunity provided by the LCEN may offer little meaningful protection.

In a similar ruling in February, the Court of First Instance in Nanterre ruled that aadsoft.com could be held liable for an allegedly tortious article that an RSS feed had automatically linked to its Dico du Net website, since aadsoft.com acted as a publisher by subscribing to the RSS feed⁵. The court found that aadsoft.com was a publisher within the meaning of the LCEN, since it decided how to organize the various sources of information that made up the Dico du Net website - including by placing the link to the article under the heading 'news / personalities'. The court pointed out that the link was accompanied by the article's title and a brief summary. The court also noted that the website contained advertisements from which Aadsoft apparently profited.

In 2007, the Paris Court of First Instance held that social networking site MySpace was liable for infringing videos of a French comedian posted by a MySpace user⁶. According to the court, MySpace was not only a host of the infringing videos but also a publisher, since it structured the presentation of the videos, retained control over their posting and diffusion and profited from the advertising displayed thereby.

In another ruling last year, the same Paris court found in Nord-

Websites that operate in France will need to take caution in how they solicit, organize, and present third-party content

Quest Production v S.A. DailyMotion, that video website DailyMotion was liable for clips of a French film that users posted to the site⁷. Although the court concluded that DailyMotion was not a publisher - it noted that all video content was user-provided, and was not swayed by the fact that the site contained commercial advertising - it nonetheless held that DailyMotion was liable as a hosting provider, since the film's producers had sent the plaintiff a formal letter notifying it of the infringing videos. Article 6-I-2 of the LCEN does not shield a provider from liability if it is 'aware' of the illegal activity or content on its site.

The court went further, though, and found that while French law does not generally require providers to monitor their services for illegal activity (indeed, Article 15 of the EU Directive prohibits Member States from imposing general obligations to monitor content), prior controls are necessary where infringement is created or induced by the provider itself. Since DailyMotion had neither blocked access to copies of the film already posted nor taken steps to prevent users from posting additional copies, the court found that the video site had infringed upon the producers' copyright.

These rulings suggest that courts in France, like those in the US, are willing to find websites liable for third-party content if the structure of their sites other aspects of their presentation of the content, or their actions to induce or profit from the content, make them appear to be more of a 'publisher' of the content than a mere service provider. Moreover, the court in the Daily Motion case went so far as find that a website may have an affirmative duty to monitor for illegal content - Article 15 of the E-Commerce Directive and French

law notwithstanding - where the site induced infringement. As in the US, then, websites that operate in France will need to take caution in how they solicit, organize, and present third-party content lest they lose the legal immunity that has so greatly contributed to the robust exchange of creative material on the internet.

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1. 47 U.S.C. § 230(c) (1).
2. Article 14 of the EU E-Commerce Directive provides: '1. Where an information society service is provided that consists of the storage of information provided by a recipient of the service, Member States shall ensure that the service provider is not liable for the information stored at the request of a recipient of the service, on condition that: (a) the provider does not have actual knowledge of illegal activity or information and, as regards claims for damages, is not aware of facts or circumstances from which the illegal activity or information is apparent; or (b) the provider, upon obtaining such knowledge or awareness, acts expeditiously to remove or to disable access to the information. 2. Paragraph 1 shall not apply when the recipient of the service is acting under the authority or the control of the provider. 3. This Article shall not affect the possibility for a court or administrative authority, in accordance with Member States' legal systems, of requiring the service provider to terminate or prevent an infringement, nor does it affect the possibility for Member States of establishing procedures governing the removal or disabling of access to information.'
3. *Louis Vuitton Malletier v eBay Inc.*, *eBay International AG*; *Christian Dior Couture v eBay Inc.*, *eBay International AG*; and *Parfums Christian Dior et autres v eBay Inc.*, *eBay International AG*. Tribunal de Commerce de Paris 1ère chambre B, Jugement du 30 Juin 2008.
4. Tribunal de Grande Instance de Paris, Ordonnance de Référé, 26 Mars 2008.
5. *Olivier D. v aadsoft.com*, Tribunal de Grande Instance de Nanterre, Ordonnance de Référé, 28 Février 2008.
6. *Jean Yves L. dit Lafesse v MySpace*, Tribunal de Grande Instance de Paris, Ordonnance de Référé 22 Juin 2007.
7. Tribunal de Grande Instance de Paris, Ordonnance de Référé, 13 Juillet 2007.



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