

HEARST

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April 9, 2026

VIA E-MAIL

Thomas R. Reynolds and Barbara Kate Repa
The New Fillmore
E-mail: editors@newfillmore.com

Diego Ibarguen
Senior Counsel

**Re: Notice of Copyright Infringement
and Demand to Take Down Infringing Content**

Dear Mr. Reynolds and Ms. Repa:

This office represents the *San Francisco Chronicle* (the “Chronicle”), a Hearst newspaper. It has come to our attention that your website at <https://newfillmore.com> has published, without license or permission, three photos (the “Photos”) owned by the Chronicle.

Specifically, your site appears to be infringing on the Chronicle’s copyright in three Photos within an article entitled “Fillmore has 2 of the top 5 restaurants,” available at <https://newfillmore.com/2026/04/06/top-2-sf-restaurants-are-on-fillmore/>. The cover photo of this article, as it appears on your website’s landing page, is credited to Chronicle photographer Santiago Mejia, and was originally published by the Chronicle as the cover photo for its article titled “Top 100 Restaurants in the Bay Area,” available at <https://www.sfchronicle.com/projects/2026/top-100-best-restaurants-san-francisco-bay-area/>.

You also appear to be infringing on the Chronicle’s copyright in the two images used within the article. The first image, captioned “The off-menu hot dog topped with kimchi at The Progress,” is credited to Chronicle photographer Santiago Mejia, and was originally published as part of a Chronicle article entitled “Top 100 Restaurants in the Bay Area,” available at <https://www.sfchronicle.com/projects/2026/top-100-best-restaurants-san-francisco-bay-area/>. The second image in your article, captioned “The Chron’s photo of Copra, at 1700 Fillmore,” is credited to Chronicle photographer Adam Pardee, and was originally published in June 2024 within the Chronicle article entitled “Restaurant fees are here to stay in California,” available at <https://www.sfchronicle.com/food/restaurants/article/restaurant-fee-diner-response-19543436.php>.

* Not admitted or
resident in New York

Although your article attributes the Photos to the Chronicle, we are unaware of any license agreement that authorizes The New Fillmore to use the Photos, attribution notwithstanding. If you believe that you had a license to use the Photos in this manner, please provide us with a copy of the license agreement. If not, then we demand that you **immediately** take down the infringing Photos and that you immediately and permanently cease any further violation of my client's intellectual and copyright interests through such unlicensed use of my client's work.

Please respond to this correspondence by **April 16, 2026**, confirming that you have complied with this demand. This letter is sent without prejudice to the rights of my clients, all of which are expressly reserved.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diego Ibarguen", written over a horizontal line.

Diego Ibarguen