

Subject: Notice to Ethiopian Airlines of Infringement of Scott M. Graffius' Intellectual Property and Damages

From: Scott M. Graffius

Via email from scott@scottgraffius.com

To: Ethiopian Airlines, Airport Enterprise Building, Ground Floor, Addis Ababa, Ethiopia

Via email to mesfinta@ethiopianairlines.com, RettaM@ethiopianairlines.com, kassiey@ethiopianairlines.com, EngagementTeam@ethiopianairlines.com, publicrelations@ethiopianairlines.com, webmaster@ethiopianairlines.com, TadesseE@ethiopianairlines.com, customerrelations@ethiopianairlines.com, etauinfo@ethiopianairlines.com, CorporateCommunication@ethiopianairlines.com, legal@ethiopianairlines.com

Date: 28 February 2025

NOTICE TO ETHIOPIAN AIRLINES OF INFRINGEMENT OF SCOTT M. GRAFFIUS' INTELLECTUAL PROPERTY AND DAMAGES

Ethiopian Airlines:

As delineated with incontrovertible and unequivocal evidence in the Details section of this letter, an Ethiopian Airlines publication extensively misused my copyrighted 'Phases of Team Development' property—including numerous instances of blatant verbatim copying—commercially and without permission or attribution. Your infringement constitutes a profound and disgraceful breach of professional ethics, moral standards, and my intellectual property rights.

I demand that you:

1. **Cease Use and Distribution:** Halt all uses, reproductions, distributions, public performances, or displays of your materials in which my copyrighted property appears. This must be done within five calendar days from today. Confirm via email within five calendar days from today that you have complied with this demand.
2. **Remove All Instances:** Remove all electronic copies of your materials containing my copyrighted property from all platforms, including but not limited to websites, social media, and any commercial or promotional applications. If there are hard copies, securely destroy (e.g., by shredding and recycling) all of them. This must be done within five calendar days from today. Confirm via email within five calendar days from today that you have complied with this demand.
3. **Remit Compensation for Damages:** Ethiopian Airlines is liable for all damages resulting from its unauthorized use, reproduction, and distribution of my copyrighted property. Such damages include, but are not limited to, loss of licensing revenue, diminution of market value, unauthorized commercial exploitation, and reputational harm. Ethiopian Airlines must engage in good faith discussions via email within five calendar days from today to negotiate the nature and amount of compensation and deliver said compensation within 15 calendar days from today.

Failure to comply in full will prompt action including proceedings to enforce my rights and recover damages. I expressly reserve all rights in this disturbing and consequential matter.

Sincerely,

Scott M. Graffius

scott@scottgraffius.com

Details

Informed by the research of Bruce W. Tuckman, Ph.D. and Mary Ann C. Jensen, over 100 subsequent studies, and Mr. Graffius' first-hand professional experience with, and analysis of, team leadership and performance, Mr. Graffius created his 'Phases of Team Development.' It presents a unique perspective on the five phases of team development—Forming, Storming, Norming, Performing, and Adjourning—and it's inclusive of the characteristics/features/traits and strategies for each phase. First introduced in 2008 and periodically updated, his work provides a diagnostic and strategic guide for navigating team dynamics. It provides actionable insights for leaders across industries to develop high performance teams. Its adoption by esteemed organizations such as Yale University, IEEE, Cisco, Microsoft, Ford, Oracle, Broadcom, the U.S. National Park Service, and the *Journal of Neurosurgery*, among others, highlights its exceptional utility and value, solidifying its status as an indispensable resource for elevating team performance and driving organizational excellence.

Conference organizers, businesses, professional associations, government agencies, and universities around the world retain Mr. Graffius to deliver compelling talks and workshops. He's presented sessions at 91 conferences and other events across 25 countries, including:

- Armenia,
- Australia,
- Brazil,
- Canada,
- Czech Republic,
- Finland,
- France,
- Germany,
- Greece,
- Hong Kong,
- Hungary,
- India,
- Ireland,
- Lithuania,
- Luxembourg,
- Nepal,
- Netherlands,
- New Zealand,
- Norway,
- Romania,
- Sweden,
- Switzerland,
- United Arab Emirates,
- United Kingdom,
- and the United States.

Mr. Graffius' 'Phases of Team Development' intellectual property is central and key to many of those sessions. His rate card and a listing of his engagements are at <https://scottgraffius.com/resources/Exceptional-PPM-and-PMO-Solutions-Rate-Card-for-2024-2025-v24071607.pdf> and <https://scottgraffius.com/publicspeaker.html>, respectively.

With authorization/license from Mr. Graffius, many organizations around the world have featured and used his copyrighted 'Phases of Team Development' work. Select examples include:

- Adobe,
- American Management Association,
- Amsterdam Public Health Research Institute,

- Bayer,
- Boston University,
- Broadcom,
- Cisco,
- Deimos Aerospace,
- DevOps Institute,
- Erste Group Bank AG (Austria),
- FINAT,
- Ford Motor Company,
- FSU College of Medicine,
- Hasso Plattner Institute (Hasso-Plattner-Institut für Digital Engineering GmbH),
- IEEE,
- Innovify,
- Johns Hopkins University,
- *Journal of Neurosurgery*,
- LeadingEng,
- Life Sciences Trainers & Educators Network (LTEN),
- London South Bank University,
- Manufacturers Alliance,
- Mary Raum (Professor of National Security Affairs, United States Naval War College),
- Microsoft,
- New Zealand Government,
- Oracle,
- Prima Resource,
- Royal Australasian College of Physicians,
- Singapore University of Social Sciences,
- TBS Switzerland,
- Technical University of Munich,
- Torrens University (Australia),
- Tufts University,
- U.S. National Park Service,
- U.S. Tennis Association,
- UC San Diego,
- University of Galway (Ireland),
- University of Graz (Austria),
- University of Waterloo,
- Victorian Institute of Technology (Australia),
- Virginia Tech,
- Warsaw University of Technology,
- Western Sydney University,
- Yale University,
- and many others.

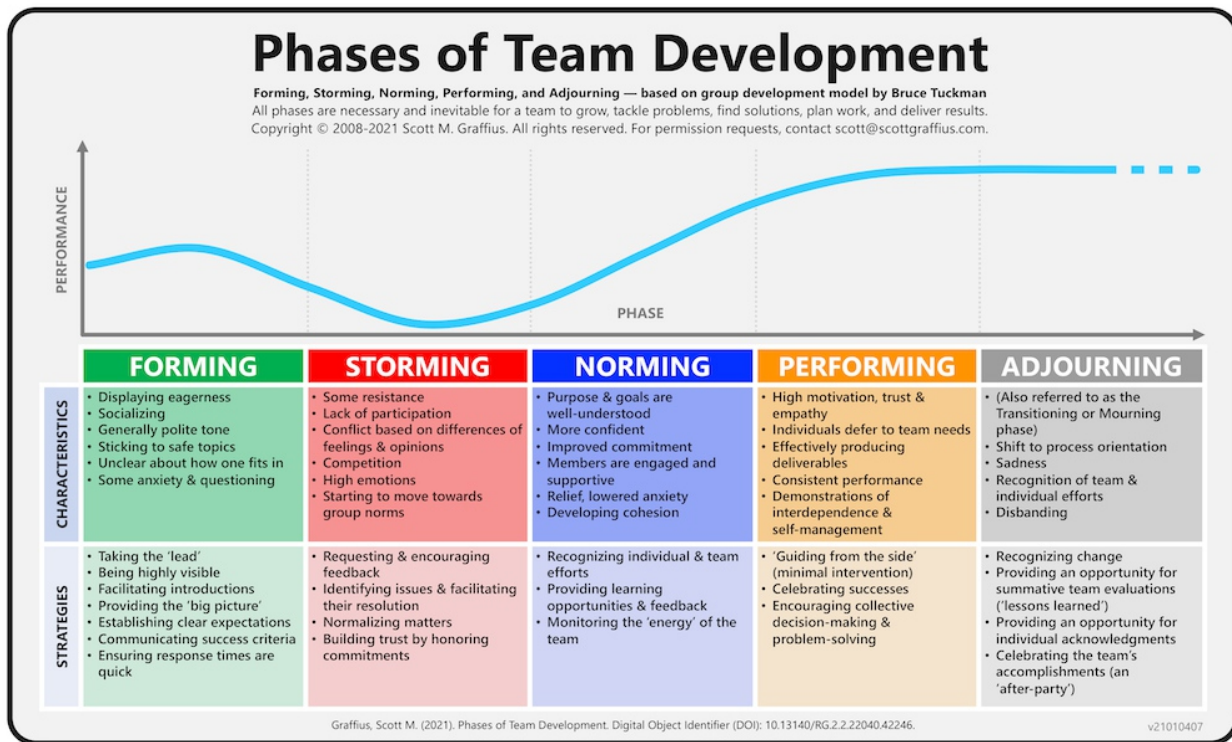
Mr. Graffius initially developed his 'Phases of Team Development' intellectual property in 2008, and he periodically refreshes it.

For this case, the applicable version is the 2021 edition. It's available at

<https://www.scottgraffius.com/blog/files/team-21.html>,

<https://x.com/ScottGraffius/status/1345663009260146690?s=20>,

<http://dx.doi.org/10.13140/RG.2.2.22040.42246>, and additional accounts/locations. The respective visual from Mr. Graffius is shown next.



The above image shows the visual of the respective 2021 edition of Mr. Graffius' 'Phases of Team Development' intellectual property.

Graffius' copyright ownership details are integrated into and appear on his copyrighted property. Specifically, it reads:

"Copyright © 2008-2021 Scott M. Graffius. All rights reserved. For permission requests, contact scott@scottgraffius.com."

Additionally, his respective article include Graffius' copyright ownership information—and this:

"To request permission to use the 'Phases of Team Development' visual, contact Scott M. Graffius. If approved, high resolution JPG and PNG image files will be provided, subject to terms and conditions."

Ethiopian Airlines neither requested nor received permission to use Mr. Graffius' IP. Yet, in blatant plagiarism and copyright infringement, Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' IP, including numerous instances of blatant word-for-word copying in its publication.

Further, Ethiopian Airlines brazenly misused Mr. Graffius' IP commercially for its own business purposes and without attribution to Mr. Graffius—thereby willfully misleading others as to the ownership of the IP. For the aforementioned reasons, Ethiopian Airlines' misuse of Mr. Graffius' IP was absolutely not "fair dealing" nor "fair use" nor otherwise allowed. Ethiopian Airlines clearly plagiarized Mr. Graffius' protected property and infringed on his copyright.

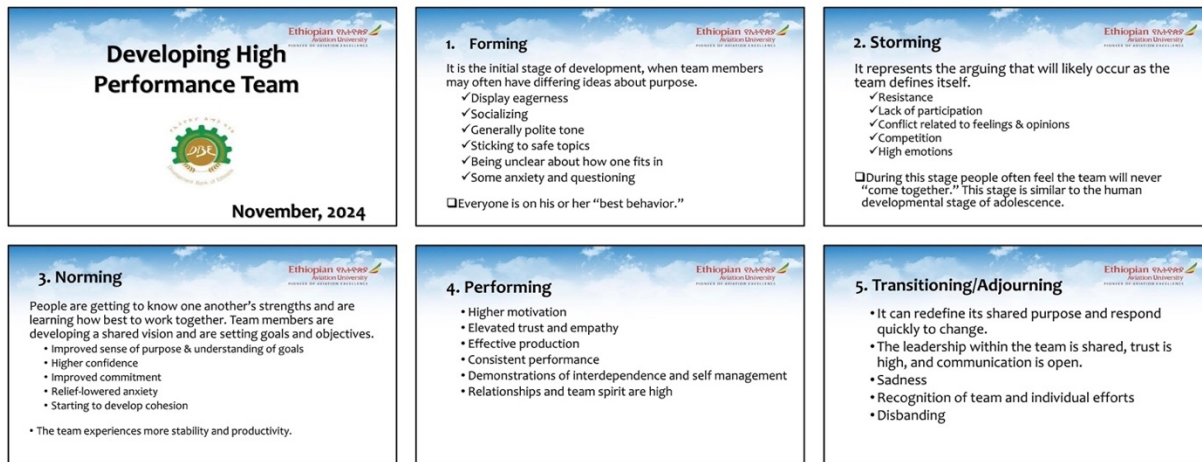
Evidence has been preserved. Information on Ethiopian Airlines' infringing publication and indisputable proof of the violation follow.

Information on Ethiopian Airlines' infringing publication follows:

- Publication markings: Ethiopian Airlines - Aviation University
- Publication title: "Developing High Performance Teams"

- Publication date: Publication notes “November, 2024”
- Publication page count: 57

Indisputable proof of the violation by Ethiopian Airlines follows.



The above exhibit, comprised of limited excerpts from Ethiopian Airlines' infringing publication, shows Ethiopian Airlines' plagiarism and violation of Mr. Graffius' intellectual property. The exhibit is included here under the principles of fair use, fair dealing, and fair practice for purposes of reporting, analyzing, and documenting the violation by Ethiopian Airlines.

Additionally, a comparison of content from Graffius' 2021 copyrighted property and what Ethiopian Airlines has in its infringing 2024 publication is next.

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying in their discussion of the Forming phase. The infringement is pervasive, with too many examples to list. Here are a few.

- Mr. Graffius' 2021 copyrighted property includes: "Displaying eagerness"
- Ethiopian Airlines' infringing 2024 publication has: "Displaying eagerness"
- Mr. Graffius' 2021 copyrighted property includes: "Socializing"
- Ethiopian Airlines' infringing 2024 publication has: "Socializing"
- Mr. Graffius' 2021 copyrighted property includes: "Generally polite tone"
- Ethiopian Airlines' infringing 2024 publication has: "Generally polite tone"
- Mr. Graffius' 2021 copyrighted property includes: "Sticking to safe topics"
- Ethiopian Airlines' infringing 2024 publication has: "Sticking to safe topics"
- Mr. Graffius' 2021 copyrighted property includes: "Unclear about how one fits in"
- Ethiopian Airlines' infringing 2024 publication has: "Being unclear about how one fits in"
- Mr. Graffius' 2021 copyrighted property includes: "Some anxiety & questioning"
- Ethiopian Airlines' infringing 2024 publication has: "Some anxiety and questioning"

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying in their discussion of the Storming phase. The infringement is pervasive, with too many examples to list. Here are a few.

- Mr. Graffius' 2021 copyrighted property includes: "Some resistance"

- Ethiopian Airlines' infringing 2024 publication has: "**Resistance**"
- Mr. Graffius' 2021 copyrighted property includes: "**Lack of participation**"
- Ethiopian Airlines' infringing 2024 publication has: "**Lack of participation**"
- Mr. Graffius' 2021 copyrighted property includes: "**Conflict based on differences of feelings & opinions**"
- Ethiopian Airlines' infringing 2024 publication has: "**Conflict related to feelings and opinions**"
- Mr. Graffius' 2021 copyrighted property includes: "**Competition**"
- Ethiopian Airlines' infringing 2024 publication has: "**Competition**"
- Mr. Graffius' 2021 copyrighted property includes: "**High emotions**"
- Ethiopian Airlines' infringing 2024 publication has: "**High emotions**"

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying in their discussion of the Norming phase. The infringement is pervasive, with too many examples to list. Here are a few.

- Mr. Graffius' 2021 copyrighted property includes: "**More confident**"
- Ethiopian Airlines' infringing 2024 publication has: "**Higher confidence**"
- Mr. Graffius' 2021 copyrighted property includes: "**Improved commitment**"
- Ethiopian Airlines' infringing 2024 publication has: "**Improved commitment**"
- Mr. Graffius' 2021 copyrighted property includes: "**Relief, lowered anxiety**"
- Ethiopian Airlines' infringing 2024 publication has: "**Relief-lowered anxiety**"
- Mr. Graffius' 2021 copyrighted property includes: "**Developing cohesion**"
- Ethiopian Airlines' infringing 2024 publication has: "**Starting to develop cohesion**"

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying in their discussion of the Performing phase. The infringement is pervasive, with too many examples to list. Here are a few.

- Mr. Graffius' 2021 copyrighted property includes: "**High motivation, trust & empathy**"
- Ethiopian Airlines' infringing 2024 publication has: "**Higher motivation**" and "**Elevated trust and empathy**"
- Mr. Graffius' 2021 copyrighted property includes: "**Consistent performance**"
- Ethiopian Airlines' infringing 2024 publication has: "**Consistent performance**"
- Mr. Graffius' 2021 copyrighted property includes: "**Demonstrations of interdependence & self-management**"
- Ethiopian Airlines' infringing 2024 publication has: "**Demonstration of interdependence and self management**"

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying in their discussion of the Adjourning phase. The infringement is pervasive, with too many examples to list. Here are a few.

- Mr. Graffius' 2021 copyrighted property includes: "**Sadness**"
- Ethiopian Airlines' infringing 2024 publication has: "**Sadness**"

- Mr. Graffius' 2021 copyrighted property includes: **"Recognition of team & individual efforts"**
- Ethiopian Airlines' infringing 2024 publication has: **"Recognition of team and individual efforts"**

- Mr. Graffius' 2021 copyrighted property includes: **"Disbanding"**
- Ethiopian Airlines' infringing 2024 publication has: **"Disbanding"**

Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' intellectual property, including numerous instances of blatant word-for-word copying. The infringement is pervasive, with too many examples to list. The preceding listed a few.

Mr. Graffius' copyright ownership details and permission request information are integrated into and appear on his 'Phases of Team Development' intellectual property (IP). Ethiopian Airlines neither requested nor received permission to use Mr. Graffius' IP. Yet, in blatant plagiarism and copyright infringement, Ethiopian Airlines engaged in extensive misuse of Mr. Graffius' IP, including numerous instances of verbatim copying. Further, Ethiopian Airlines brazenly misused Mr. Graffius' IP commercially for its own business purposes and without attribution to Mr. Graffius—thereby willfully misleading others as to the ownership of Mr. Graffius' IP. For the aforementioned reasons, Ethiopian Airlines' misuse of Mr. Graffius' IP was absolutely not "fair use" nor "fair dealing" nor "fair practice" nor otherwise allowed. Ethiopian Airlines clearly plagiarized Mr. Graffius' protected property and infringed on his copyright.

Ethiopian Airlines' violation negatively affected the potential market and value of Mr. Graffius' 'Phases of Team Development' IP and related work.

Intellectual property is a strategic asset that provides significant value. Mr. Graffius rigorously maintains, enforces, and protects his IP rights.

Ethiopian Airlines is expected to rectify this egregious violation with immediate effect. Any failure to comply with the demands outlined in this notice will be considered further evidence of willful infringement and bad-faith conduct, warranting swift and aggressive enforcement action.
