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August 4, 2020

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VIA EMAIL: Edavid@brookspierce.com
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Eric M. David, Esq.
Elizabeth E. Spainhour, Esq.
BROOKS PIERCE
150 Fayetteville Street
1700 Wells Fargo Capital Center
Raleigh, North Carolina 27601

Re: **Michael Shillaker / Foundation for Financial Journalism, William D. Cohan, et al.**
Our File No.: 6552-2

Dear Mr. David and Ms. Spainhour:

As you are aware, our firm is U.S. litigation counsel to Michael Shillaker, and I am writing concerning the follow-up email of Roderick Boyd dated August 1, 2020, in furtherance of the threat by your clients, Mr. Boyd, William Cohan and the Foundation for Financial Journalism (“FFJ”), to publish an absolutely false and highly defamatory story about my client (the “Story”). We previously disclosed detailed undisputed facts to your clients in our July 19, 2020 letter that completely confirm that there is no basis for FFJ to publish a Story that my client drugged and sexually assaulted Amy Walker.

Your clients are well aware of the fact that Mr. Cohan has been unsuccessful in peddling this defamatory Story with any reputable publications over the past two years. Among the reputable publications who have refused to publish this baseless ten year old Story are the *New York Times* and *Vanity Fair*.

There is no reason for your clients to request additional information from my client since they are aware based on the undisputed facts that our client did not engage in this alleged criminal conduct. The information sought by your clients has nothing to do with the fact that the accusations against my client are false and defamatory. We previously confirmed that Credit Suisse acknowledged that my client’s dismissal was unfair, and Credit Suisse agreed to compensate my client in full in relation to his unfair dismissal. The amount of compensation my client received is private and Mr. Boyd, Mr.

Eric M. David, Esq.

Elizabeth E. Spainhour, Esq.

Re: Michael Shillaker / Foundation for Finacial Journalism; William D. Cohan, et al.

August 4, 2020

Page 2

Cohan and FFJ have no right to this information.

It is absurd for Mr. Boyd to request a copy of my client's "police statement" when Mr. Cohan knows very well that such a thing does not exist. As was very clearly explained to Mr. Cohan in 2018, my client did not make any form of written statement. My client fully cooperated with all investigations (both by the police and Credit Suisse) in 2010 and thereafter. Because my client was never charged with any wrongdoing, he was never provided with a transcript of his interviews with police. Legally, my client is not entitled to access them. Indeed, the fact that your clients are continuing to ask for a document that does not exist two years after Mr. Cohan was told that does not exist demonstrates Mr. Cohan's lazy, irresponsible and reckless approach to reporting the Story, and how little care has been taken to establish truthful facts.

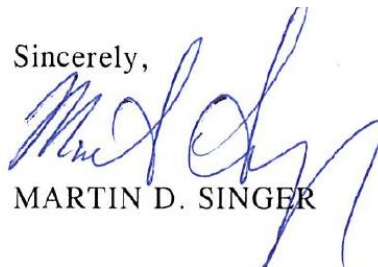
There is simply no basis for Mr. Boyd to seek the information sought in the written questions posed in his August 1, 2020 email to my client. All of this information was either already discussed at length with Mr. Cohan in his 2018 interview with my client, or is immaterial to the issue whether my client engaged in criminal conduct.

We have provided your clients with more than sufficient facts and law to show that the Story is false, fabricated and defamatory of my client who is a private figure. There is no reliable source for the Story and no evidence corroborating Ms. Walker's outlandish false claims. The fact that FFJ purports to be a non-profit will not insulate it, Mr. Cohan or Mr. Boyd from liability should they recklessly proceed to publish this bogus and highly defamatory Story. If the Story is published, your clients and all those involved in the publication of the Story will be sued, and will face liability in multiple jurisdictions.

Please instruct your clients to govern themselves accordingly.

This does not constitute a complete or exhaustive statement of all of my client's rights or claims. Nothing contained herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of our client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved. This is a confidential legal communication and is not intended for publication.

Sincerely,



MARTIN D. SINGER

MDS:ash

cc: Mr. Michael Shillaker
Charlotte Harris, Esq.
Allison S. Hart, Esq.