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October 8, 2012

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED,
REGULAR U.S. MAIL AND EMAIL

LIPSTICK ALLEY
C/O GNAX Abuse
Global Net Access, LLC
1100 White Street SW
Atlanta, Georgia 30310
abuse@gmax.net

LIPSTICK ALLEY
C/O Secured Servers
2353 W University Building A
Tempe, Arizona 85281
legal@securedservers.com

Re: Erroneous Posts Regarding Mayor Kasim Reed on Lipstick Alley

To Whom It May Concern:

This Firm represents the Honorable Kasim Reed, the Mayor of the City of Atlanta. DEMAND IS HEREBY FORMALLY MADE that Lipstick Alley (www.lipstickalley.com) immediately cease and desist publishing any and all statements about Mayor Reed that are false, defamatory, and cause significant harm to his reputation and good name. Lipstick Alley's unwarranted actions and baseless allegations have caused and are causing irreparable damage.

Lipstick Alley has published the following false, malicious and libelous statements, among others, about Mayor Reed:

- On September 11, 2012, Lipstick Alley published the statement that Mayor Reed "is sleeping with like 4 chicks in his cabinet and they all think he is going wife them. Staci Jae was at a party saying she had the Mayor in check and then drove drunk and was forced to resign, His communications director divorced her husband as did Jovita Moore. He has them trained like a pimp." (See Exhibit A to this letter);
- On April 25, 2012, Lipstick Alley published the statement that Mayor Reed "requires girl on girl action. He is also a freak." (See Exhibit A to this letter); and

- On January 20, 2012, Lipstick Alley published the statement “[Sarah Elizabeth Langford] is in the picture for sure but [Mayor Reed] has [had sexual relations with] every woman in that picture with them all sitting at the table at the park. Its funny to hear Sonji issue statements about his dating status considering their sexual history. Does anyone think Sarah is bi-sexual? I heard that is a desire. That might explain her in the group photo with all them women he been with.” (See Exhibit A to this letter).

The statements, representations, and false light published by Lipstick Alley are categorically false. There is no factual basis for them. Instead the facts establish that they are NOT true.

At this point, any further republication by Lipstick Alley, after receipt of this letter, is a knowing publication of untrue statements, and as such, deliberately defamatory communications. Further republication includes failure to delete the link and/or publish a correction.

Toward this end, DEMAND is hereby made that Lipstick Alley remove from its website any false and defamatory statement regarding Mayor Reed’s personal life (including, but not limited to, those referenced above) and take aggressive steps to ensure that Lipstick Alley does not publish any false statements of this sort in any subsequent blog posts or other forums on Lipstick Alley.

To the extent that Lipstick Alley relies on any source of such statements, please forward this correspondence to them as well so that they are on proper notice or identify the person so that such demand can be sent to them. Under applicable law, there is no available protection for you because you relied on a third party once you have been on notice of falsity. This DEMAND is effective immediately.

CONCLUSION AND LEGAL DEMAND FOR RETRACTION

The purpose of this letter is to put Lipstick Alley on actual notice regarding any further publication of the false and defamatory allegations regarding Mayor Reed. As such, any dissemination or publication of such statements or any of their inaccurate content to the general public will be considered to be made with full knowledge of their falsity, with reckless disregard for the truth, and with a willful desire to defame, thus exposing the offending party or parties to liability for both libel and false light invasion of privacy. In turn, we subsequently demand that the recipients of this correspondence immediately correct any falsehoods regarding Mayor Reed contained on the Lipstick Alley website, issue appropriate public retractions, and refrain from publishing or broadcasting any future defamatory statements against Mayor Reed. Lipstick Alley’s failure to comply with this demand by October 18, 2012, will leave us no choice but to recommend that Mayor Reed pursue all legal causes of action that he might have, which include litigation in which Mayor Reed would pursue damages, attorney’s fees, and costs.

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Please understand that neither Mayor Reed nor this Firm in any way attempt to restrict or stifle legitimate free speech, particularly on the Internet. To the contrary, both Mayor Reed and this Firm encourage and value truthful and accurate free speech that is not malicious, defamatory, or false. Lipstick Alley's published statements cross the line.

Please govern your actions in accordance with the demands set forth herein. We look forward to receiving your prompt reply to this correspondence and request that any questions regarding its contents be directed to my attention. This letter is your only chance to resolve this matter amicably.

Sincerely,

J. Randolph Evans

Attachments

cc: The Honorable Kasim Reed
ATLANTA:5419070.2