

Attorneys

Michael Jaafar
Zakaria Mahdi
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January 25, 2013

DEMAND FOR RETRACTION OF DEFAMATORY STATEMENTS

Via Fax: (313) 581-0808

Via e-Mail: moughni@aol.com

Majed A. Moughni, Esq.
Law Offices of Majed A. Moughni PLLC
16030 Michigan Ave
Dearborn, MI 48126

Dear Mr. Moughni,

It has come to our attention that that you have engaged in unlawful and tortious defamation of our colleague Kassem Dakhallah by publishing false statements on the Facebook page of DEARBORN AREA COMMUNITY MEMBERS ("Facebook Page"). Specifically, on or about January 24, 2013, you caused the following statement to be published on the Facebook Page:

The Law Offices of Majed Moughni, PLLC has retained the services of one of Michigan's best attorneys to intervene on our community's behalf. As you know, a backroom deal was made on behalf of our community where McDonald's was going to pay \$700,000 for selling "Haram" chicken sandwiches and labeling it as "Halal". The current lawyer on the case wants the majority of the money to go to a medical center (\$275,000) and a museum (\$150,000), that lawyer, Kassem Daklallah, wants to pocket \$230,000 and the plaintiff, Ahmed Ahmed will keep \$20,000. We think the money should go to you, the people who were lied to and bought and ate "Haram" chicken sandwiches, not a medical center or a museum who were not injured. If you agree, please hit LIKE, and write your name and your email address in the comment section. We will give this list to the court ASAP. PLEASE DO NOT MAKE ANY COMMENTS, THIS POST WILL BE INTRODUCED AS EVIDENCE IN COURT! Here's the story: http://www.google.com/url?sa=t&rct=j&q&esrc=s&source=web&cd=1&cad=rja&ved=0CDUQqQlwAA&url=http%3A%2F%2Fabcnews.go.com%2FUS%2FwireStory%2Fmcdonalds-settles-mich-suit-islamic-diet-18276943&ei=9IsBUa_JEtP5rAGzspHQDw&usq=AFQjCNFD09COmyOy0-Or7qiR2xikyUXwLw&bvm=by.41248874%2Cd.aWM

The false statements within this publication meet each of the elements of defamation *per se*. See, *Rouch v Enquirer & News*, 440 Mich 238, 251 (1993). Your conduct also gives rise to a number of other tort claims and for violations of the Michigan Rules of Professional Conduct (to which you are subject as an attorney).

We hereby demand that you retract these statement by 5:00 p.m., Friday, January 25; and that you post on the Facebook Page, and anywhere else that you have made these, or similar false statements, the accurate facts concerning the process by which this settlement was reached, including that Mr. Dakhlallah secured the Settlement through arms-length and protracted settlement discussions that were undertaken over the course of one year, including under the auspices of former Chief Judge of the Civil Division of the Wayne County Circuit serving as a mediator, and that after a full hearing in open court on January 18, 2013, the settlement received preliminary approval from the Wayne County Circuit Court judge presiding over the case. A transcript of that hearing is available from the Court. We are available to meet with you to verify these facts, and to provide you with additional accurate facts as you may wish to include in your retraction. As you know, we demanded from you in person yesterday that you retract these statements, and you indicated that you would not. Please be advised that by delivering this letter to you we have satisfied all preconditions for proceeding with claims against you personally. We recommend that you immediately retain counsel and we request that you place your malpractice and/or general liability insurer on notice of these claims.

Sincerely,

JAAFAR & MAHDI LAW GROUP, P.C.

A handwritten signature in black ink, appearing to be 'Michael Jaafar', written over a horizontal line.

Michael Jaafar

LAW OFFICES OF MAJED A. MOUGHNI, P.L.L.C.

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January 25, 2013

Michael Jaafar
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23400 Michigan Avenue, Suite 110
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SENT VIA FAX: (313) 846-3200

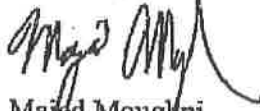
Re: Threats

Dear Mr. Jaafar:

I am in receipt of your letter threatening to sue me for Defamation. When you barraged into my office yesterday, you threatened me by stating that if I did not stop my involvement in the class action lawsuit, I would pay for it. Is this how you are making me pay for it? You specifically stated, "you will get your day". You walked out of my office telling Kassem Daklallah, "Don't shake his hand" with your temper flaring. I felt very threatened by your demeanor and your threats.

My statement on Facebook is 100% true. If you find it Defamatory, I suggest you re-read it again and tell me which part is Defamatory. The only problem you had with my statement was the word, "back room deal", which I have taken out. If your threats are to scare me into withdrawing out of representing hundreds of people, that's not going to work. If there is anything you need, please respond in writing. Thank you.

Very truly yours,



Majed Moughni