

PUBLIC CITIZEN LITIGATION GROUP

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BY EMAIL TO [REDACTED]

August 22, 2016

Stuart J. Oberman, Esquire
Oberman Law Firm
Walton Place
147 Lee Byrd Road
Loganville, Georgia 30052

Dear Mr. Oberman:

Thanks for your letter today. The gist is that you agree that the lawsuit against Matthew Chan was a fraud, but you contend that not only Chan but Mitul Patel as well is a victim of the fraud. In effect, you are contending that I was tricked by this fraud into wrongly portraying your client, Mitul Patel, as being responsible for the suit.

I am glad to post your letter on our blog, as you request. I'll also put you in touch with Matthew Chan's lawyer so that you can stipulate to having the injunction vacated and the lawsuit dismissed.

I was not persuaded, however, by your suggestion that I should "retract" the blog post or apologize for it. After all, you acknowledge that much of what I had to say on the blog was true. But I also have qualms about your assertion that, before my blog post was published, Patel had no knowledge of the lawsuit in Baltimore, for two reasons. First, in the course of investigating before I published my article, I obtained from Yelp copies of emails from Mitul Patel to Yelp, attaching the Baltimore court order and asking that Chan's Yelp comments be deleted. I attach the copies of these emails. Yelp has told me that Patel used [REDACTED] the same email address that [REDACTED]. Unless the email addresses were spoofed, those emails suggest that your client knew about the court order and was trying to take advantage of it.

Moreover, before I posted my article on the blog, I placed two telephone calls to Patel's dental clinic to try to speak with him about the lawsuit; I told his receptionist why I was calling. In addition, on Wednesday, August 17, I sent your client an email message mentioning his lawsuit against Chan and spelling out my concerns. Although he did not call me back and did not reply to the email, I trust he saw the messages before I published my article on Friday.

Finally, I am glad to hear that your client disavows the fraudulent lawsuit that was filed on

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his behalf, but I am struggling to figure out who, or what company, would have an incentive to sue on your client's behalf, to pay a filing fee of \$165, and then to send copies of the court order to Yelp as well as to the various other companies where Chan's criticisms were posted with a request that reviews criticizing your client be deleted. It occurs to me that your client might have hired some reputation management or search engine optimization outfit which committed this fraud on your client's behalf without ever sharing the dirty details with him. I'd appreciate your finding out from your client whether he ever retained a reputation-management or search engine optimization company. If so, which one?

Sincerely yours,


Paul Alan Levy