



Neil E. Meyer
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VIA E-MAIL

LipStick Alley
the.admin@lipstickalley.com

Re: Notice of Demand to Cease and Desist the Publication of Fraudulent and Defamatory Statements and Unauthorized use of Chris Evans' Name and Identity

To Whom It May Concern:

Please be aware that this law firm represents the prominent actor, Chris Evans.

It has come to our attention that you have re-published on your blog/website false and defamatory statements about Mr. Evans which were originally published on Carrie Milburn's Glam Media network blog, Celebrity Smack – to wit, statements that Mr. Evans has sought treatment for Gonorrhoea, a sexually transmitted disease.

Such series of accusations were published fraudulently, intentionally, without regard for their veracity and without any attempt to contact Mr. Evans, or to verify their substance.

You re-published such accusations, (along with a photograph of Mr. Evans,) without Mr. Evans' knowledge, instruction or approval and have therefore misappropriated his name and good will for purposes of increasing the readership/circulation of your blog/website thereby increasing the rates you can charge for the sale of advertising space on such blog/website.

Mr. Evans is an esteemed and accomplished actor and these statements constitute defamation per se and a flagrant violation of Mr. Evans rights and property. By re-publishing or linking to those allegations, you have caused and continue to cause immeasurable damage to his name and reputation, both personally and professionally.

Your actions also constitute an unauthorized exploitation of Mr. Evans' right of publicity in violation of, without limitation, her common law right of publicity and California Civil Code §3344. You are clearly using Mr. Evans' name, voice and likeness solely to promote your blog/website and your company.

These statements (and your re-publication of those statements), were made with actual malice and/or reckless disregard of the truth, and falsely and fraudulently mislead your

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Lip Stick Alley
June 13, 2012
Page 2

readership and the general public. This fraud must immediately cease and be rectified or it will be reported to the proper authorities.

Based on the foregoing, demand is hereby made that you immediately and permanently remove any mention of Mr. Evans or the aforementioned report from your blog, and all links to the original story on Celebrity Smack, and confirm in writing that you will make no further public or private reference to either going forward.

Please confirm in writing that you have removed all references, photographs or reports related to Mr. Evans from your blog, no later than 8:00 pm this evening, Wednesday, June 13, 2012. Time is of the essence and any failure to so correct such misrepresentations will result in continuing fraud and damage to Mr. Evans.

Absent your written confirmation, Mr. Evans will be forced to take all actions, legal and equitable, to protect and enforce all of his rights and remedies. This letter is not intended to constitute a complete or exhaustive statement of all facts or law relevant to this matter, nor is it intended, nor should it be construed, as a waiver, release or relinquishment of any of the rights or remedies available to Mr. Evans, whether legal or equitable, all of which are hereby expressly reserved.

This letter is a confidential legal communication and you are specifically prohibited from publishing any portion of it or reporting publicly on its substance in any way.

Sincerely,

Dictated but not read

Neil E. Meyer
of Stone, Meyer, Genow, Smelkinson & Binder, LLP

NEM:ls
3297.0-720700

cc: Chris Evans
Megan Moss