

October 15, 2015

Jed P. White Direct: 310/576-2114 Fax: 310/260-4114 jed.white@bryancave.com

VIA FEDERAL EXPRESS
AND EMAIL palpateit@hotmail.com

Gary Wilson 545 Grandview Ashland, OR 97520

Re: Notice to Cease and Desist Defamatory Statements

Dear Mr. Wilson:

This firm represents Dr. Nicole Prause in connection with the above-referenced matter. You have personally posted many false and misleading statements about our client. Examples of your false and misleading statements include:

- 1. Dr. Prause was fired, terminated, and/or reprimanded by the University of California, Los Angeles.
- 2. Dr. Prause falsified or utilized "bogus" data in her studies.
- 3. Dr. Prause has been, or is currently, funded by pornography organizations.
- 4. Dr. Prause has, herself, appeared in pornography.

The statements made by you regarding Dr. Prause are false, defamatory, and actionable under California law. Cal. Civ. Code §§ 44, 45, 45a. Your defamatory statements have caused injury to Dr. Prause's professional reputation. Accordingly, we demand that you immediately cease and desist your unlawful defamation of Dr. Prause, and immediately remove all defamatory material created by you or others on websites you own or control.

While Dr. Prause would prefer to resolve this matter without further legal action, we will file a lawsuit against you should you fail, despite this formal written notice, to comply timely and fully with the foregoing reasonable and lawful demands. If forced to file suit, we will seek all available

Gary Wilson October 15, 2015 Page 2

remedies and seek all appropriate damages. While we certainly hope this is not necessary, we are prepared to pursue whatever avenues are necessary on behalf of our client to stop the continued defamatory statements made by you against Dr. Prause.

Finally, we remind you of Dr. Prause's no-contact request of April 12, 2013. All correspondence should be directed to our office. Dr. Prause should not be contacted using any method of communication, including email, Twitter, website links, mail, telephone, chat, or other means.

Very truly yours,

Jed P. White

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