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ATTORNEYS AT LAW

A PROFESSIONAL CORPORATION

MCCUSKER • ANSELMINI

ROSEN • CARVELLI

805 Third Avenue, 12th Floor

New York, New York 10022

Tel: 212.308.0070 • Fax: 917.677.8978

www.marc-law.com

BRUCE S. ROSEN

Director

brosen@marc-law.com

December 19, 2011

Via Registered Mail RRR

Matthew Chan
1639 Bradley Park Dr.
Suite 500, PMB 110
Columbus, GA 31904
Phone: (762) 359-0425

Oscar Michelen
Cuomo LLC
9 East 38th Street, 3rd floor
New York, NY 10016
Office: 212-448-9933

Re: Julie Stewart/ Blackline Art + Entertainment Law

Dear Sirs:

This law firm represents Julie Stewart and her law firm Blackline Art + Entertainment Law of Toronto, Canada. This letter is in relation to published actionable defamatory statements made with respect to my clients of which, upon information and belief, one or both of you are the author, publisher, and/or republisher in relation to your roles with the website extortionletterinfo.com," as well as the ELI Discussion Forum on the extortionletterinfo.com website (the "ELI Forum") as well as the Facebook page: [facebook.com/extortionletterinfo?sk=info](https://www.facebook.com/extortionletterinfo?sk=info), and affiliated with the user name 'extortionletterinfo' on Scribd.com.

Several postings currently on the extortionletterinfo.com, Facebook and Scribd websites state, infer or allege that Ms. Stewart has been or is currently engaging in criminal activity and the unauthorized practice of law. These statements are defamatory, false and we believe were made with actual malice, that is, with knowledge of or with serious doubts as to their falsity. In addition, these statements also portray Ms. Stewart in a false light that would be outrageous to a reasonable person.

Just for your information, and contrary to what you repeatedly published, Ms. Stewart has never sought settlement on behalf of a client in an amount greater than what a Canadian court would award for damages for innocent infringement plus 1 or 2 hours of legal fees (typically under \$1,000 total); she has never taken on files where the infringing party is an individual (blogger etc.), non-profit, or even small business.

As you are aware, it is both illegal and unethical for a lawyer, or any person, to engage in the act of extortion. To make a public, written statement that Ms. Stewart has done so is libelous. In doing so, you have acted maliciously to injure Ms. Stewart and her law firm. As such, the statements

are defamatory per se. Your voluminous postings have lowered her reputational standing within the community within which it was generated and interfered with the business and contractual relations of Ms. Stewart and her law firm, far exceeding the bounds of the First Amendment, causing damages. Your portrayal of her in a false light caused emotional distress. As such, these statements are actionable and expose you both to compensatory as well as punitive damages.

Below, we have noted some instances of defamatory postings made by one or both of you and/ or posted on the various websites under your control:

ELI FORUM

The following post was published on the ELI Forum as:

“New Canadian Settlement Demand Letter by Attorney Julie Stewart of Blackline Law” (originally posted as “New Canadian Extortion Letter by Attorney Julie Stewart of Blackline Law”).

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2303.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2303.msg3487.html#msg3487>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2303.msg3599.html#msg3599>
<http://www.extortionletterinfo.com/forum/index.php/topic,2303.msg3689.html#msg3689>
<http://www.extortionletterinfo.com/forum/index.php/topic,2303.msg3806.html#msg3806>
<http://www.extortionletterinfo.com/forum/index.php/topic,2303.msg3821.html#msg3821>

The following post was published on the ELI Forum as:

“Brandon Sand & Julie Stewart resumes removed by Scribd” on November 16, 2011, 11:38:32 PM.

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2364.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2364.msg3822.html#msg3822>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2364.msg3824.html#msg3824>. In particular, these posts contain personal information including personal address information, and past employers' names, which names are also now associated with the criminal act of extortion, including Kate Henderson, and her law firm Kate Henderson Entertainment & Intellectual Property Law; David Asper and the David Asper Centre For Constitutional Rights; The University of Toronto; The Canadian Civil Liberties Association; A. Alan Borovoy; the University Of Windsor; Richard Moon (University of Windsor faculty member); Professor Rod Strickland (University of Windsor faculty member) and Noel Harding (internationally renowned artist)

<http://www.extortionletterinfo.com/forum/index.php/topic,2364.msg3826.html#msg3826>

The following post was published on the ELI Forum as:

“DMCA complaint regarding Julie Stewart thread of discussion” on November 16, 2011,
08:50:52 AM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2360.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3778.html#msg3778>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3779.html#msg3779>
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3789.html#msg3789>
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3790.html#msg3790>
(suggests Ms. Stewart is involved in a “seedy "extortion letter" business”)
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3818.html#msg3818>
<http://www.extortionletterinfo.com/forum/index.php/topic,2360.msg3820.html#msg3820>

The following post was published on the ELI Forum as:

“ELI Contacted by Canadian Attorney Julie Stewart of Blackline Law”

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2346.0.html>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3688.html#msg3688>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3694.html#msg3694>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3695.html#msg3695>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3699.html#msg3699>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3700.html#msg3700>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3701.html#msg3701>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3702.html#msg3702>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3705.html#msg3705>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3708.html#msg3708>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3711.html#msg3711>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3712.html#msg3712>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3713.html#msg3713>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3719.html#msg3719>
<http://www.extortionletterinfo.com/forum/index.php/topic,2346.msg3720.html#msg3720>

The following post was published on the ELI Forum as:

“ Blackline Lawyer Julie Stewart Successfully Cleans ELI Scribd Account” on November 17,
2011, 03:45:28 AM.

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2366.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3836.html#msg3836>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3838.html#msg3838>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3841.html#msg3841>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3845.html#msg3845>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3848.html#msg3848>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3850.html#msg3850>
<http://www.extortionletterinfo.com/forum/index.php/topic,2366.msg3943.html#msg3943>

(provides a link to Ms. Stewart's personal resume and personal contact information)

The following post was published on the ELI Forum as:

"Canadian Lawyer Julie Stewart has Never Tried an IP Case that I can find..." on November 14, 2011, 01:21:28 AM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2352.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2352.msg3710.html#msg3710>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2352.msg3714.html#msg3714>
<http://www.extortionletterinfo.com/forum/index.php/topic,2352.msg3717.html#msg3717>
<http://www.extortionletterinfo.com/forum/index.php/topic,2352.msg3718.html#msg3718>

The following post was published on the ELI Forum as:

"We have a new facebook fan" on November 21, 2011, 07:53:17 AM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2383.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3891.html#msg3891>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3892.html#msg3892>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3893.html#msg3893>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3895.html#msg3895>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3896.html#msg3896>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3897.html#msg3897>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3900.html#msg3900>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3901.html#msg3901>
<http://www.extortionletterinfo.com/forum/index.php/topic,2383.msg3911.html#msg3911>

The following post was published on the ELI Forum as:

"Defense Against Claim of Defamation from the term "Extortion"" on November 13, 2011, 10:15:07 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2350.0.html>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2350.msg3703.html#msg3703>

<http://www.extortionletterinfo.com/forum/index.php/topic,2350.msg3716.html#msg3716>

<http://www.extortionletterinfo.com/forum/index.php/topic,2350.msg3734.html#msg3734>

The following post was published on the ELI Forum as:

“Hawaiian Art Network LLC's list of Lawyers Used Thus Far” on November 13, 2011,
06:35:25 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.0.html>

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg3690.html#msg3690>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg3869.html#msg3869>

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg4027.html#msg4027>

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg4030.html#msg4030>

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg4031.html#msg4031>

<http://www.extortionletterinfo.com/forum/index.php/topic,2347.msg4032.html#msg4032>

The following post was published on the ELI Forum as:

“Hawaiian Art Network Settlement Demand Letter Collection” on November 14, 2011,
10:42:35 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.0.html>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3725.html#msg3725>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3727.html#msg3727>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3736.html#msg3736>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3739.html#msg3739>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3743.html#msg3743>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3750.html#msg3750>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3781.html#msg3781>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3792.html#msg3792>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3804.html#msg3804>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3809.html#msg3809>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3810.html#msg3810>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3812.html#msg3812>

<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3813.html#msg3813>
<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3815.html#msg3815>
<http://www.extortionletterinfo.com/forum/index.php/topic,2353.msg3816.html#msg3816>

The following post was published on the ELI Forum as:

“Attorney Peter T. Holt's Letter to Oscar Michelen & ELI website” on November 15, 2011,
08:35:03 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2357.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3752.html#msg3752>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3753.html#msg3753>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3755.html#msg3755>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3757.html#msg3757>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3762.html#msg3762>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3763.html#msg3763>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3764.html#msg3764>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3765.html#msg3765>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3769.html#msg3769>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3770.html#msg3770>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3771.html#msg3771>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3772.html#msg3772>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3774.html#msg3774>
<http://www.extortionletterinfo.com/forum/index.php/topic,2357.msg3796.html#msg3796>

The following post was published on the ELI Forum as:

“Cool new Extortion Letter Videos Courtesy of Google Video Tools” on November 19, 2011,
03:59:05 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2377.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2377.msg3884.html#msg3884>
And replies to this post can be accessed by way of the following links:
<http://www.extortionletterinfo.com/forum/index.php/topic,2377.msg3885.html#msg3885>

The following post was published on the ELI Forum as:

“ELI Financial Issues” on November 13, 2011, 07:40:07 PM

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.0.html>
<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3696.html#msg3696>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3738.html#msg3738>

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3749.html#msg3749>

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3756.html#msg3756>

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3799.html#msg3799>

<http://www.extortionletterinfo.com/forum/index.php/topic,2348.msg3837.html#msg3837>

The following post was published on the ELI Forum as:

“New Settlement Demand Letter by Attorney Peter T. Holt of Roseville, CA” on October 31, 2011, 05:56:06 PM”

The post, which currently remains on the ELI Forum, can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.0.html>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3534.html#msg3534>

And replies to this post can be accessed by way of the following links:

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3535.html#msg3535>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3539.html#msg3539>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3540.html#msg3540>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3544.html#msg3544>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3545.html#msg3545>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3575.html#msg3575>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3584.html#msg3584>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3724.html#msg3724>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3731.html#msg3731>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3733.html#msg3733>

<http://www.extortionletterinfo.com/forum/index.php/topic,2313.msg3754.html#msg3754>

FACEBOOK

Facebook page: <http://www.facebook.com/extortionletterinfo?sk=info>

<http://www.facebook.com/extortionletterinfo/postings/173991462693870>

<http://www.facebook.com/extortionletterinfo/postings/224085420995520>

SCRIBD

<http://www.scribd.com/doc/70625769/Blackline-Settlement-Demand-Letter> (originally posted with the title "Extortion Letter")

<http://www.scribd.com/doc/72747335/Oscar-Michelen-s-Reply-to-Blackline-Lawyer-Julie-Stewart>

<http://www.scribd.com/doc/72744163/Blackline-Lawyer-Julie-Stewart-Email-Notice-to-ELI>

<http://www.scribd.com/doc/72964099/DMCA-Counter-Notification-Letter-to-eApps-Julie-Stewart>

Many of these postings have been previously brought to your attention. Your failure to remove them and republication of similar statements after notice of their falsehood constitutes evidence of malice.

This letter is to demand that you **IMMEDIATELY CEASE and DESIST** from posting links or references that are defamatory to Ms. Stewart and/ or her law firm in any way and remove and take down all existing postings. If you do not do so, Ms. Stewart will proceed, at her option, to pursue any and all of her legal remedies in a court and jurisdiction of her choosing. Ms. Stewart further reserves her rights as to all causes of action that may have accrued to the point at which she files an action.

Along those lines, potential litigation would include discovery into your Internet activity. **THEREFORE IT IS IMPERATIVE THAT YOU DO NOT DESTROY ANY COMPUTER FILES YOU PRESENTLY HAVE ON YOUR HOME OR WORK COMPUTERS OR MAKE ANY EFFORT TO DESTROY OR HIDE EVIDENCE. YOU MAY BE LIABLE FOR THE TORT OF SPOILATION OF EVIDENCE IF YOU DO SO.** As it appears that you have recently removed or altered relevant content from the various websites referred to in this letter, you may wish to note that we have retained relevant screenshots to preserve as evidence.

PLEASE BE ADVISED ACCORDINGLY. If there are further instances of defamation, Julie Stewart may, at her option, take legal action without further warning. If you are interested in discussing an amicable settlement, please contact me at your earliest convenience.

Very truly yours,



Bruce S. Rosen

BSR/ckc

cc: Julie Stewart, Esq.