

Re: Clifford v. Trump, et al.
Case No. 18-cv-02217-SJO-FFM

Dear Mr. Avenatti:

As you know from our meeting earlier this week, this law firm is litigation counsel for Michael Cohen in the above-referenced matter. I am writing in connection with the false and defamatory statements you and your client, Stephanie Clifford a.k.a. Stormy Daniels, made on 60 Minutes this evening regarding Mr. Cohen, namely that he was responsible for an alleged thug who supposedly visited Ms. Clifford, while she was with her daughter, and made an alleged threat to Ms. Clifford.

In truth, Mr. Cohen had absolutely nothing whatsoever to do with any such person or incident, and does not even believe that any such person exists, or that such incident ever occurred. You and your client's false statements about Mr. Cohen accuse him of criminal conduct and constitute, among other claims, libel per se and intentional infliction of emotional distress. It would also appear that your statements of alleged criminal conduct are being made to obtain an advantage in a civil dispute, which is also improper.

I hereby demand that you and your client cease and desist from making any further false and defamatory statements about my client, that you immediately retract and apologize to Mr. Cohen through the national media for your defamatory statements on 60 Minutes, and make clear that you have no facts or evidence whatsoever to support your allegations that my client had anything whatsoever to do with this alleged thug.

Most of what you have been stating to the press, particularly these baseless allegations of criminal conduct, have absolutely nothing to do with the underlying contract dispute between Ms. Daniels and Essential Consultants LLC. Moving forward I would ask that you refrain from any further false accusations and litigate this case in court on the actual merits.

This letter is not intended as a full or complete statement of all relevant facts or applicable law, and nothing herein is intended as, nor should it be deemed to constitute, a waiver or relinquishment of any of my client's rights, remedies, claims or causes of action, all of which are hereby expressly reserved.

March 25, 2018
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Should you have any questions regarding the foregoing obligations, please do not hesitate to contact me.

Sincerely,



BRENT H. BLAKELY