

KING, HOLMES, PATERNO & BERLINER, LLP

HOWARD E. KING
KEITH T. HOLMES
PETER T. PATERNO
JILL H. BERLINER**
LAURIE L. SORIANO
STEPHEN D. ROTHSCHILD
EILEEN LYON
LESLIE E. FRANK
SETH MILLER
MADGE S. BELETSKY
CHARLES LOZOW*
STEPHANIE KIKI***
JOSEPH M. CARLONE
MARJORIE GARCIA
JOSEPH W. HALBARDIER
KATHERINE E. AVERY

OF COUNSEL
NIKKI WOLONTIS
JEFFREY P. SILBERMAN

WRITER'S DIRECT DIAL:
[REDACTED]

November 18, 2013

*ADMITTED IN NEW YORK ONLY
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AND WASHINGTON, DC
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GEORGIA AND NEW YORK

VIA E-MAIL, CERTIFIED MAIL
AND FIRST CLASS MAIL

Hooman Karamian
aka Nik Lamas-Richie
aka Nik Richie
[REDACTED]

VIA E-MAIL, CERTIFIED MAIL
AND FIRST CLASS MAIL

Re: *Demand for Retraction and Removal of Libelous and Privacy Violating
Posts Regarding Andre Young p/k/a Dr. Dre*

Gentlemen:

This law firm is counsel for Andre Young p/k/a Dr. Dre. Your website has published grossly libelous and privacy violating stories purporting to be about our client, including stories initially posted on October 28, 2013, October 31, 2013 and November 6, 2013, URL's <http://thedirty.com/tag/dr-dre/>, <http://thedirty.com/2013/10/dr-dres-mistress-kili-anderson/>, <http://thedirty.com/2013/11/dr-dre-is-allowed-to-have-numerous-relationships/>, and <http://thedirty.com/2013/10/why-does-society-accept-that-all-black-men-are-cheaters/>. This letter serves as a formal demand that you immediately remove all such statements concerning our client from your website, and that you post a retraction and apology that is at least as prominent as the offensive material prior to its removal.

The posts contain scandalous, false accusations of misconduct by our client. Among other lies, the posts falsely declare that Mr. Young, a loving husband and father, has a mistress with whom he is having an affair, that he is leaving his wife, that he stayed with this alleged mistress in the house you show and that he gave her the ring you have pictured. Each of these statements are demonstrably false and libelous. The posts are far more egregious than those reported recently in *Sarah Jones v. Dirty World Entertainment, LLC, et al.*, United States District Court, Eastern District of Kentucky Civil Action No. 09-219-WOB.

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In the absence of immediate removal of all defamatory and privacy-violating posts concerning our client and a prompt, conspicuous and meaningful apology and retraction, our client has instructed us to commence formal legal proceedings against each of you individually and against each of your entities, including, but not limited to, for defamation and invasion of privacy. Such actions will result in our client's recovery against each of you of compensatory damages, punitive damages, injunctive relief, attorney fees and costs of litigation.

We have no doubt that, in view of your past misconduct as reported in the *Sarah Jones* case and elsewhere, the courts will not hesitate to award our client substantial damages, including punitive damages, against each of you individually and collectively.

Nothing contained herein shall be deemed an admission of any fact or a waiver of any rights or remedies.

Very truly yours,



Howard E. King
of King, Holmes, Paterno & Berliner, LLP

HEK:dw