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December 19, 2014

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VIA EMAIL: [REDACTED]

VIA EMAIL: [REDACTED]

Mr. Jeffrey Zucker
President
CNN

David Vigilante, Esq.
Senior Vice President, Legal
Cable News Network, Inc.
[REDACTED]

Re: Bill Cosby
Our File [REDACTED]

Dear Mr. Zucker and Mr. Vigilante:

We are again writing to CNN as litigation counsel to Bill Cosby. We continue to be shocked by CNN's outrageous ongoing refusal to investigate and run balanced stories about my client. While airing untested stories from accusers who have seemingly been subject to little or no vetting, CNN takes the opposite approach with anyone who comes forward with relevant information undermining accusers' claims or with relevant information supporting Mr. Cosby. Sources with information supportive of my client are entirely ignored or, worse still, are met with hostility when they fail to go along with the narrative being perpetuated by CNN.

As you know, yesterday when you informed us that CNN was interviewing Beverly Johnson concerning her claims about Bill Cosby, we notified you of the identity of two individuals who should be interviewed in connection with your broadcast. We gave you their names and telephone numbers and told you that they would corroborate that the statements made by Ms. Johnson were completely contradicted by her own conduct. We were shocked and dismayed to find out earlier today that CNN tried to get Mark Burk, Beverly Johnson's former live-in boyfriend of several years from 2006 to 2009, to change his story about Beverly Johnson's statements about Bill Cosby.

In particular, Mr. Burk started out his phone conversation today with producers and others at CNN telling them that Beverly Johnson never said a negative statement about Bill Cosby throughout their entire four year relationship. Mr. Burk told CNN that, to the contrary, *Ms. Johnson stated that she was an admirer of Bill Cosby and only said great things about Mr. Cosby.* Your producers did not want to have Mr. Burk make those statements to CNN since

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that would contradict CNN's preconceived agenda of only making negative statements about Mr. Cosby. In fact, Mr. Burk's statements made it clear that Beverly Johnson's conduct and statements about Mr. Cosby in the mid to late 2000's, long after her alleged claims of what occurred with Mr. Cosby, completely contradict her story.

CNN tried to manipulate and coerce Mr. Burk into lying and making up false statements about Beverly Johnson's statement about Mr. Cosby. We were notified that the CNN producers asked leading questions to try to get Mr. Burk to go along with Beverly Johnson's claims. However, *Mr. Burk denied that Ms. Johnson ever told him Bill Cosby drugged or assaulted her.*

When he did not give the answers the reporters wanted to their questions, they ended the conversation and refused to interview him for your program. When CNN heard the denials, the reporters abruptly terminated the conversation with Mr. Burk since he did not tell them what they wanted to hear.

In addition, when Mr. Burk would not agree with your self-serving statements trying to corroborate Ms. Johnson's story, which he denied, CNN's reporters then tried to attack Mr. Burk and his background. CNN was not receptive to interviewing Mr. Burk so that CNN would have a balanced story about what Beverly Johnson has told people who are close to her during her lifetime. Instead, CNN continued to pressure Mr. Burk in an attempt to get him to corroborate Ms. Johnson's statements about Mr. Cosby. When your reporters were unsuccessful, they abruptly ended the conversation. I am pretty confident that CNN will not be publishing Mr. Burk's statements on your broadcast. Mr. Burk also offered to send you documents and provided you with his email address, and he informed us that CNN never followed up with him.

CNN has engaged in reckless and malicious conduct. Mark Burk informed you that Ms. Johnson repeatedly spoke highly of Mr. Cosby and said that she respected him and considered him a mentor. Mr. Burk informed us that when he told CNN's reporters that Beverly Johnson told him that she referred to Mr. Cosby as a respected mentor, CNN engaged in conduct attempting to lure, manipulate and coerce Mr. Burk into saying something negative about Mr. Cosby, and tried to get him to corroborate Ms. Johnson's claims, which is reprehensible.

This reckless approach to "journalism" is outrageous. Accusers are being given a national platform by CNN without first exercising the most rudimentary journalistic investigation as to their claims and motivations. In contrast, CNN disregards or attacks sources with anything positive to say about my client or with relevant information undermining allegations that have been made.

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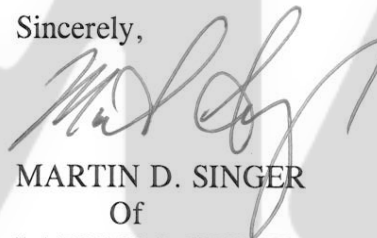
This is further evidence that CNN has abandoned journalistic rigor on this story, blindly ignoring and deterring exculpatory information while essentially becoming a willing broadcast agent for any allegation about my client, seemingly from any accuser, without the slightest threshold or standard.

CNN should stop its one-sided reporting. If CNN wants to be viewed as a leader in unbiased, thorough reporting around the world, it should start acting like one.

Govern yourselves accordingly.

This does not constitute a complete or exhaustive statement of all of my client's rights or claims. Nothing stated herein is intended as, nor should it be deemed to constitute a waiver or relinquishment, of any of my client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved. This letter is a confidential legal communication and is not for publication.

Sincerely,



MARTIN D. SINGER
Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

MDS/lbg

cc: Mr. William H. Cosby

