

LAW OFFICES OF
CARROLL, GUIDO & GROFFMAN, LLP

ROSEMARY CARROLL^o
ELLIOT J. GROFFMAN^o
MICHAEL GUIDO^o
JANINE SMALL^o
ROB COHEN^o
GILLIAN R. BAR^o
PAUL S. GUTMAN^o
RENEE L. KARALIAN^o
ELIZABETH PAW^o

^oADMITTED IN CALIFORNIA
^oADMITTED IN NEW YORK

1790 BROADWAY, 20TH FLOOR
NEW YORK, NEW YORK 10019
TELEPHONE (212) 759-2300
FACSIMILE (212) 759-9556

9111 SUNSET BOULEVARD
LOS ANGELES, CALIFORNIA 90069
TELEPHONE (310) 271-0241
FACSIMILE (310) 271-0775

WWW.CCGGLAW.COM

August 13, 2010

[REDACTED]

Zack Taylor

[REDACTED]

Dear Mr. Taylor:

It has come to our client's attention that your website, www.zacktaylor.ca (the "Website"), contains false representations and libelous statements with respect to our client, Joseph Jonas, which were posted by you on August 11, 2010 (the "Post").

The Post infers that our client and Ms. Demi Lovato are involved in an illicit relationship, an inference that is substantiated by numerous postings from visitors to the Website. This implication is completely false, offensive and defamatory in nature. We understand that you have posted a number of similar blogs on the Website over the last few months -- all of which contain fabricated stories about our client and his brothers, Nicholas Jonas and Kevin Jonas -- in what appears to be a desperate attempt to promote the Website through the unlawful exploitation of their names and likenesses. Your repeated posting of fabricated stories regarding our client must be viewed as evidence of your willful or reckless disregard of the truth and reflect a malicious attempt to attack and devalue our client's good name and reputation.

Demand is hereby made that you: (i) immediately remove the Post and all similar defamatory posts regarding our client and his family from the Website; and (ii) cease and desist from any further posts of this nature or any other infringement of our client's rights in the future. We will be monitoring your site and will be advising our client of his legal options, including, but not limited to, the filing of a lawsuit against you for defamation, should these requests not be met.

This letter is not intended to constitute a full recitation of all facts, circumstances, rights or claims relating to this matter, nor is it intended to constitute, nor should it be construed as a waiver, release or relinquishment of any rights or remedies, which are available to our client, whether legal or equitable, all of which are hereby expressly reserved. This letter is a private communication and is not intended for publication.

Very truly yours,


Rob Cohen

cc: Kevin Jonas
Philip McIntyre
Elliot J. Groffman, Esq.

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