

MILLER BARONDESS, LLP

ATTORNEYS AT LAW

www.millerbarondess.com

September 26, 2012

A. SASHA FRID

DIRECT DIAL

VIA E-MAIL AND CERTIFIED MAIL/
RETURN RECEIPT REQUESTED

Mr. Mat Gleason

Re: Defamation of Axl Rose

Dear Mr. Gleason:

The firm is litigation counsel for Axl Rose.

I am writing regarding your posting of blatantly false and defamatory statements on your website – <http://coagulacuratorial.com/html/laura-london.html>.

Specifically, you quote Laura London as saying: “Axl Rose was having a fight with his wife at the time, Erin Everly, and spray painted graffiti of lyrics of one of his most popular songs ‘Sweet Child O’ Mine,’ twisted into sick poetry and instead wrote ‘Sweet Child O’ Die you R 1 of many nothing special.’ I looked at the graffiti and shot a roll of film to document it, even though it is not my usual style of image making. It was just too weird to pass up.” You also state that an “exhibit” will contain “documentary photographs of a circa 1990 graffiti vandalization of the residence of Erin Everly by her then-husband Axl Rose”

These statements are absolutely outrageous, false, fabricated, and highly defamatory. Mr. Rose never spray-painted anything. Your salacious and inflammatory statements are plainly designed to garner attention and line your pockets with money. They were crafted for the malicious purpose of profiting from our client’s fame and popularity at the expense of his reputation. Moreover, you are accusing our client of criminal conduct (i.e. graffiti) which constitutes libel *per se* under California law. Civ. Code § 46.

These statements are false and demonstrate actual malice. Your publication of these outrageous and defamatory falsehoods has severely damaged our client. We hereby demand the following to try to mitigate the substantial damage that your malicious conduct has caused:

- (1) Refrain from further defaming Axl Rose;
- (2) Remove the defamatory remarks from your website;

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- (3) Post an apology and retraction on your website, stating that the statements are false; and
- (4) Cancel all performances of "Once Upon a time ... Axl Rose Was My Neighbor."

We demand that you will comply with these demands immediately. **You are to confirm in writing by 5 p.m. tomorrow, September 27, 2012, that you have complied with the demands listed above.**

If you fail to do so and persist in making such false and damaging statements, our client will immediately commence an action against you for defamation, seeking millions of dollars in compensatory, consequential and punitive damages, injunctive relief and recovery of future earnings.

Nothing contained herein or omitted herefrom shall be deemed to be a waiver or full explication of any of our client's rights, remedies, contentions, damages or defenses with respect to the subject matter hereof, in law, in equity or otherwise, all of which are hereby expressly reserved.

Sincerely,



A. Sasha Frid

ASF:pcf

cc: Laura London (by email *only*)