

EXHIBIT N

WRITER'S DIRECT DIAL NO.
(202) 538-8120

WRITER'S INTERNET ADDRESS
williamburck@quinnemanuel.com

December 23, 2015

VIA EMAIL AND U.S. MAIL

Robert Corn-Revere
Davis Wright Tremaine LLP
Suite 800
1919 Pennsylvania Avenue NW
Washington, D.C. 20006-3401

Re: Al Jazeera

Dear Mr. Corn-Revere:

We are writing further to our e-mail of December 18, 2015 regarding Al Jazeera's planned broadcast of the false, unfounded, and defamatory allegation that our client Ryan Zimmerman has used a performance enhancing drug named "Delta 2." As we previously stated, our client unequivocally and emphatically denies that he has used Delta 2 or any other performance enhancing drug.

Should Al Jazeera publish this false and defamatory accusation, our client will suffer grave and irreparable harm to his reputation and to his existing and future business relationships. This falsehood constitutes, at the least, defamation, *see, e.g., Pacquiao v. Mayweather*, 803 F. Supp. 2d 1208, 1211-13 (D. Nev. 2011) (false statements that boxer used performance enhancing drugs support claim for defamation *per se*); tortious interference with contract, *see NCRIC, Inc. v. Columbia Hosp. for Women Med. Ctr., Inc.*, 957 A.2d 890, 901 (D.C. 2008); and tortious interference with prospective economic relations, *see PM Servs. Co. v. Odoi Associates, Inc.*, No. CIV.A. 03-1810 (CKK), 2006 WL 20382, at *35 (D.D.C. Jan. 4, 2006) (citing *Bennett Enter., Inc. v. Domino's Pizza, Inc.*, 45 F.3d 493, 499 (D.C. Cir.1995)). Further, your refusal to identify the sole alleged source of this spurious charge or to provide any other information regarding the basis for this allegation demonstrates that Al Jazeera has no interest in getting to the truth of this matter. It is, therefore, clear that any false, defamatory, and destructive statement related to this matter that Al Jazeera publishes will be published with actual knowledge of its falsity or with reckless disregard as to its truth or falsity.

We hereby demand that Al Jazeera immediately cease and desist from making false and injurious statements regarding Mr. Zimmerman's alleged use of performance enhancing drugs. If you refuse to do so, our client will take any and all appropriate steps to protect his rights and

interests, including, but not limited to, commencing litigation against Al Jazeera and Deborah Davies seeking monetary damages (including punitive damages), injunctive relief, and any other legal remedies available at law or in equity. Nothing contained herein shall be construed as a waiver of any of our client's legal or equitable rights or remedies with respect to these matters, all of which rights and remedies are hereby expressly reserved.

We ask that you contact me at (202) 538-8120 or on my cell phone at [REDACTED] at your earliest convenience and in no event later than Thursday, December 24, 2015, to confirm that Al Jazeera will not broadcast these inaccurate and defamatory claims. If you are unable to reach me, please contact my colleague, Kevin Reed, at (212) 849-7160 or on his cell phone at [REDACTED].

Sincerely,



William A. Burck