

EXHIBIT O

From: William Burck
Sent: Saturday, December 26, 2015 2:49 PM
To: bobcornrevere@dwt.com
Cc: Tariq Al Abdulla; Kevin Reed; William Burck
Subject: Zimmerman Letter to DWT, 12-26-2015
Attachments: 12.26.15 Burck to Corn_Revere _ Zimmerman.pdf; ATT00001.txt

Mr. Corn-Revere:

Please see the attached letter. We understand from promotions your client has run that the story containing the false and defamatory statements about our client will be broadcast tomorrow, Sunday, December 27, 2015 at 9pm ET. We request that you inform us before broadcast of your client's intentions as to whether it will run these statements or otherwise identify our client in connection with the false allegations we understand will be part of your client's story.

Bill Burck

quinn emanuel trial lawyers | washington, dc

777 Sixth Street NW, 11th Floor, Washington, District of Columbia 20001-3706 | TEL (202) 538-8000 FAX (202) 538-8100

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

WRITER'S INTERNET ADDRESS
williamburck@quinnemanuel.com

December 26, 2015

VIA E-MAIL

BOBCORNREVERE@DWT.COM

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:

Further to our letter of December 23, 2015 on behalf of our client Ryan Zimmerman, we now understand that Al Jazeera's false and defamatory putative story alleging that Mr. Zimmerman has used performance enhancing drugs is premised on statements by Charles Sly that were relayed to Al Jazeera by Liam Collins. We are further aware that Mr. Sly has unequivocally advised both you and Deborah Davies in writing that these purported statements are false. Public sources available to Al Jazeera also make clear that Mr. Collins is a known fraudster, who is currently under a 14-year ban imposed by the United Kingdom's Financial Services Agency (the "FSA") from serving as a director of any business entity after the FSA found that he ran what was in effect a Ponzi Scheme that defrauded investors. See, *e.g.*, <http://www.thisismoney.co.uk/money/celebritymoney/article-2409740/Britains-Got-Talent-star-Liam-Collins-handed-bankruptcy-ban-duping-investors-property-scum.html>. Mr. Collins also has a dubious history of publicity seeking, including an announced (but never consummated) bid to purchase Michael Jackson's Neverland Ranch and a campaign to join the UK Olympic bobsledding team. Furthermore, public sources in the UK reported that, post-multi-million dollar bankruptcy, he has even "busked" in Glasgow dressed in an Iron Man costume, purportedly to fund his wedding. See, *e.g.*, <http://www.thescottishsun.co.uk/scotsol/homepage/news/5441426/Iron-Moan.html>.

There can be no conclusion but that the sources for Al Jazeera's statements regarding Mr. Zimmerman's alleged use of performance enhancing drugs are patently unreliable. Moreover, we have no doubt that Al Jazeera is well aware that its sources are untrustworthy and fallacious;

quinn emanuel urquhart & sullivan, llp

LOS ANGELES | NEW YORK | SAN FRANCISCO | SILICON VALLEY | CHICAGO | WASHINGTON, DC | HOUSTON | SEATTLE
LONDON | TOKYO | MANNHEIM | MOSCOW | HAMBURG | PARIS | MUNICH | SYDNEY | HONG KONG | BRUSSELS

indeed, Mr. Sly has explicitly disavowed his statements, which we understand were surreptitiously recorded by Mr. Collins. Al Jazeera's reliance on such sources, and its publication of false and defamatory statements based thereon, would constitute malice. *See, e.g., Biro v. Conde Nast*, ___ F. 3d. ___, 2015 WL 8103736, at *4 (2d Cir. Dec. 8, 2015) (reliance on unreliable sources supports an inference of malice); *Makaeff v. Trump University, LLC*, 26 F. Supp.3d 1002, 1008 (S.D. Cal. 2014) (same).

We, again, demand that Al Jazeera immediately cease and desist from making false, injurious and defamatory statements regarding Mr. Zimmerman's alleged use of performance enhancing drugs. We further request that you confirm you are authorized to accept service of process on behalf of Al Jazeera, Deborah Davies, and Mr. Collins, in the event that Al Jazeera proceeds with publication of these statements, despite its knowledge of their falsity. If you are not authorized to accept service on behalf of Ms. Davies or Mr. Collins, please provide us with the names and contact information of their attorneys as soon as possible.

Mr. Zimmerman expressly reserves, and does not waive, any and all rights and remedies.

Sincerely,

/s/ William A. Burck

William A. Burck