

EXHIBIT U

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December 28, 2015

VIA E-MAIL AND FEDEX

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 write on behalf of our client Ryan Zimmerman concerning a documentary film entitled *The Dark Side*, which your clients Al Jazeera and Deborah Davies published yesterday despite our clear warnings in prior correspondence that it contained defamatory falsehoods about Mr. Zimmerman that had been recanted in writing by their sole source. This letter constitutes a formal demand for retraction by your clients of all defamatory statements in *The Dark Side* that concern Mr. Zimmerman **by 5:30 p.m. on December 30, 2015**.

As you recall, our December 18 and 23 correspondence with you put Al Jazeera and Ms. Davies on notice that their publication of assertions that Mr. Zimmerman had used any performance enhancing drug, including the so-called Delta 2, would constitute actionable defamation against Mr. Zimmerman. Three days later, on December 26, we wrote to you concerning the fact that your clients' lone source for these outrageous falsehoods had advised both you and Ms. Davies in writing that these statements were false and the information he provided to Liam Collins (which Mr. Collins surreptitiously recorded) was unreliable. We did not receive any response from you. That same day, Huffington Post reporter Ryan Grim posted a video to YouTube in which Mr. Sly publicly recanted all of the statements Mr. Collins surreptitiously recorded, and stated clearly that "any recordings or communications that Al Jazeera plans to air are **absolutely false** and incorrect . . . and **there is no truth to any statement of mine** that Al Jazeera plans to air."

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Al Jazeera then released *The Dark Side* to the public on the world wide web and by televised broadcast, choosing to ignore our multiple warnings that *The Dark Side* contained false and defamatory statements about Mr. Zimmerman, that Mr. Sly was an unreliable and untrustworthy source, and indeed, choosing to ignore Mr. Sly's own unequivocal statements that nothing he said about Mr. Zimmerman in *The Dark Side* was true.

As we made clear prior to Al Jazeera's publication of *The Dark Side*, the documentary indeed contained ludicrous falsehoods about Mr. Zimmerman. Portraying Mr. Sly as a "doctor of pharmacy" who claimed to have dispensed a drug named "Delta 2" to several "football players . . . and a bunch of baseball players," *The Dark Side* characterizes Delta 2 as a "steroid" that MLB had recently banned and which had "already [been] banned in baseball and football." The narration states: "Back in Texas, the pharmacist Charlie Sly named more sportsmen he claims are linked to Delta 2 in baseball and football. He says he coached them on what to take and how to avoid testing positive. In a series of conversations crisscrossing Texas, we primed Liam with questions to dig into the claims." Depicting a photograph of Mr. Zimmerman with his name displayed across it, *The Dark Side* then included the following exchange between Messrs. Sly and Collins, which asserted that Mr. Zimmerman used Delta 2:

Collins: How long have you known Zimmerman?

Sly: Probably six years. I worked with him in the offseason. That's how I get him to change some stuff.

Collins: Is he on the D2 as well?

Sly: Yeah.

Collins: What does he think of the D2?

Sly: It does its job.

Collins: Does he notice a lot of power or not?

Sly: Yeah, I think some guys have just kinda gotten used to it you know what I mean. It's just the new normal.

These statements (the "Defamatory Statements") are unquestionably defamatory. Not only do these statements assert that Mr. Zimmerman used a banned performance enhancing drug, but the Defamatory Statements also assert that some of his hard-earned athletic accomplishments resulted from his purported use of the drug. Mr. Zimmerman denies these accusations in their entirety – as does Al Jazeera's sole source for the information.

We demand on Mr. Zimmerman's behalf that not later than 5:30 p.m. on December 30, 2015, Al Jazeera and Ms. Davies publish a full and fair retraction in as equally a conspicuous manner as the Defamatory Statements themselves were published. The retraction must include

an unequivocal statement that the Defamatory Statements were false and without basis, as well as an apology to Mr. Zimmerman for publishing them. Additionally, Al Jazeera must remove all references to Mr. Zimmerman from *The Dark Side*, including the entirety of the clips in which Mr. Sly discusses Mr. Zimmerman's alleged use of Delta 2.

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

Sincerely,

/s/ William Burck

William A. Burck
Robert L. Raskopf
Kevin S. Reed