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December 29, 2011

VIA E-MAIL

Meanith Huon Huon Law Firm
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Re: Meanith Huon v. Gawker Media et al.

Mr. Huon,

Having reviewed the numerous documents you have filed with the court in your continuing litigation against Gaby Darbyshire, Iris Carmon, Nick Denton, Gawker.com and Jezebel.com (collectively “the Gawker Defendants”), we must now draw your attention to Rule 11 of the Federal Rules of Civil Procedure.

Rule 11 provides in relevant part:

(b) Representation to Court. By presenting to the court a pleading, written motion, or other paper—whether by signing, filing, submitting, or later advocating it—an attorney or unrepresented party certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

- (1) it is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- (2) the claims... are warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
- (3) the allegations and other factual contentions have evidentiary support or, if specifically so identified, are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery.

Therefore pursuant to the “safe harbor” provisions of FRCP Rule 11(c)(2), the Gawker Defendants hereby advise you that they will be seeking sanctions pursuant to Rule 11 if

you opt not withdraw your claims against them within 21 days of the date of this letter.¹

In addition to the issues raised in our motion and reply, we draw your attention to the following:

- (1) There is neither factual support nor any legal basis for the claims filed personally against Mr. Denton and Ms. Darbyshire. Quite simply your claims against them are neither warranted by existing law nor by a nonfrivolous argument for the extension, modification, or reversal thereof.
- (2) Your invented claim for cyberstalking does not and cannot sound.
- (3) Your allegations of conspiracy are deficient and have no basis in law or fact.
- (4) Your claims concerning the Gawker defendant's liability for comments posted on the site has no basis in law nor is there a nonfrivolous argument for the extension, modification, or reversal thereof.
- (5) Your suggestion of a connection between the Gawker defendant's and the criminal case filed against you in Cook County is invented and without factual support or any good faith basis in law or fact.
- (6) Your conduct in this case and your history of filing defamation suits that are without merit suggest an intent to harass and needlessly increase the costs of litigation.

For the foregoing reasons and for those set forth in Defendant's Motion to Dismiss and subsequent documents in support of the Motion including Defendant's reply, we request that you voluntarily withdraw your claims against the Gawker Defendants.

Best,

David Feige
/s/ David Feige

cc: All Counsel of Record

¹ Contemporaneous with this letter, we have filed our reply to your response to our motion to dismiss, all of which is incorporated by reference herein.