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JOEL L. WOHLGEMUTH

TELEPHONE (918) 583-7571

October 10, 2008

Ms. Julie Hall 504 S. Allegheny Tulsa, OK 74112

RE: Councilor Eric Gomez

Dear Ms. Hall:

This firm represents Councilor Eric Gomez. We have reviewed numerous emails which you have disseminated in the Tulsa area. You are a lawyer and either know, or should know, that the false statements which you have published regarding Councilor Gomez are defamatory under Oklahoma law. Any communication which improperly charges a public official with a neglect of official duty, incompetence, or malfeasance is libelous *per se*. Under these circumstances, actual damages are presumed and punitive damages may also be assessed.

I am fully aware of federal and Oklahoma law regarding the First Amendment and matters of public concern. However, your email campaign is reckless and malicious, and has exceeded all legal boundaries. There are no statutory or constitutional protections that apply to your libelous activities.

By this letter, I am requesting that you confirm in writing on or before October 14 at 5:00 p.m., that you will immediately discontinue the distribution of defamatory statements regarding Councilor Eric Gomez. If you fail to provide the requested confirmation, I have been authorized to file litigation against you, and any and all persons or entities acting in concert with you, in the District Court of Tulsa County. In that event, we shall pursue all available remedial measures, including actual and punitive damages as authorized by applicable law.

This letter places you on notice to hold and preserve all information, including electronically stored information, regarding or relating to (directly or indirectly), the matters described in this letter. You are obliged to take affirmative steps to prevent anyone with access to your data, systems and archives from seeking to modify, destroy or hide electronic evidence on network or local hard drives (such as by deleting or overwriting files, using data shredding and overwriting applications, defragmentation, reimaging or replacing drives, encryption, compression, steganography or the like).

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I look forward to hearing from you.

Sincerely,

Joel L. Wohlgemuth

JLW/psg

c: Councilor Eric Gomez