

September 1, 2015

To

Mr. Boye Brogeland

Via email

Dear Sir,

Re: Defamation - Warning before the Instituting of Legal Proceedings

On behalf of my clients, Mr. Lotan Fisher and Mr. Ron Schwartz, I hereby write to you in this matter as follows:

- 1. Recently my clients have learned that since your loss in the "spingold" quarterfinal competition which was held on August 14 2015, you have embarked on a smear campaign in which you systematically disseminate offensive defamatory statements against my clients. In this smear claim you are disseminating claims according to which my clients are cheats, who win games by way of improper means.
- 2. You are disseminating the serious defamation through any channel possible, inter alia, in newspaper interviews of the world press and also on a designated internet site which you opened for the purpose of the defamation (at the address: http://bridgecheaters.com/).
- 3. The statements being disseminated by you constitute serious, malicious and offensive defamation which is not supported by one iota of truth and this is indicative of the harsh smear campaign which you have decided to embark upon against my clients, which was born of one reason only your loss in the said competition.
- 4. My clients have learned that you have made a public announcement that you have changed your place of residence to an unknown address and you have explained this by the nonsensical and baseless claim that you fear my clients. My clients completely dismiss this defamatory and offensive claim. The reason why you are hiding away is to prevent the receiving of statements of claim which will be instituted against you in light of your damaging and offensive conduct. In all of your conduct it is you who are the offensive and attacking party and the presenting of fallacious statements cannot alter this.
- 5. Needless to say, that your above stated actions are causing immense damages to my clients and they will insist on their rights in any legal jurisdiction, whether in the USA or outside of the USA. My clients will act rigorously to protect their good name by any legal means available to them.

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- 6. In light of all the above said, considering the heavy damages which have been caused to my clients due to your actions and in order to reduce their damages and to make any court application unnecessary, you are demanded to take the following actions:
 - 6.1. To stop all actions on your part which are harmful to my clients, including publication of any claim which is defamatory against my clients.
 - 6.2. To remove the above mentioned designated internet site, and to ensure that the site will not be quoted nor will appear in any search engines.
 - 6.3. To immediately publish a correction, denial and apology in wording which shall be coordinated with our office, on any platform on which you made the original publications, including on the designated website.
 - 6.4. To compensate my clients. For the sake of compromise and if you are willing to settle the matter prior to the instituting of legal proceedings, my clients will agree to compensation in the sum of one million dollars. It is to be clarified that nothing in this amount expresses anything other than a small part of the damages and mental anguish which has been caused to my clients.
- 7. It is clear that if the above said measures are not taken by you, my clients will be forced to take any legitimate legal measures available to them in order to be paid for their full damages.
- 8. Nothing stated in this letter, or omitted from it, shall exhaust and/or derogate from any claim or demand available to my clients or from any other right available to them in law.

Yours Respectfully,

Adv. Dror Arad - Ayalon