Morgan Lewis

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October 10, 2017

VIA FEDEX

Stacy Stern, Esq.
President
Justia, Inc.
1380 Pear Avenue, Suite 2B
Mountain View, CA 94043

Re: *Webpages Violating Justia's Terms of Service* (www.mesothelioma-lawyerblog.com)

Dear Ms. Stern:

We write on behalf of the Western Asbestos Settlement Trust, as well as its outside legal consultant, Mr. Chuck LaGrave, to request the removal of a disparaging and false statement regarding Mr. LaGrave from a website for which Justia is the registrant, www.mesothelioma-lawyerblog.com.

The material at issue was posted by Michael Mandelbrot of the Asbestos Legal Center/Mandelbrot Law Firm, an individual who previously submitted claims with the Western Asbestos Settlement Trust, and can be located at the following URL: https://www.mesothelioma-lawyerblog.com/2017/09/coming-soon-corrupt-women-asbestos-trust-litigation-bad-lawyersbad-people.html

The statement of Mr. Mandelbrot that Mr. LaGrave (as well as many others) engaged in a "massive fraud" is false, actionable, and in violation of Section 3(a) of Justia's Terms of Service, which the Asbestos Legal Center/Mandelbrot Law Firm expressly agreed to, and which prohibit the posting of "harmful, threatening, abusive, inappropriate, harassing, tortious, defamatory, vulgar ... or otherwise objectionable Content." The statements also violate Section 6(e) of Justia's Terms of Service, which bars use of the service to "[d]efame, abuse, harass, stalk, threaten or otherwise violate the legal rights of others."

We ask that the offending content be removed. We also request that, to the extent possible, any cached versions of the URLs be removed. Finally, we ask that you or your counsel contact me within seven days to confirm removal of the above-referenced material.

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If you have any questions or require any additional information, please let me know.

Sincerely,

Benjamin P. Smith

BY DLL

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