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March 17, 2014

Via fax (310) 979-8701 & first class mail

Loren Beck
Affeld Grivakes Zucker LLP
2049 Century Park East, Ste. 2460
Los Angeles, CA 90067

Re: ZOA/Klein v. Goldberg

Dear Ms. Beck:

Thank you for your letter received March 10, 2014.

The purpose for which Mr. Goldberg was using the website is obviously a question of fact. We believe that Mr. Goldberg has not only used the website for his own financial advantage, but in fact has sought to financially advantage his clients, those he has referred to other lawyers and your own firm as a result of the statements made concerning employment issues. One cannot examine the impersonated website without concluding that your client seeks to position himself and his clients in a financially advantageous position, to say the least.

Further, Mr. Klein's name has substantial financial significance and hence your client's attempt to appropriate it.

Finally, Mr. Goldberg has publicly stated that many of his statements are "wrong" and others are easily rebutted by his own words, the documentary evidence, and those who formally supported him.

Free speech was raised in the New York matter of *People v. Golb*, which was a criminal case. Mr. Golb was convicted, which conviction was upheld.

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Mr. Golb took the position that he was asserting his free speech rights, had no particular financial interest in impersonating Dr. Schiffman, and that there was no defamation.

Please bear in mind and advise your client that the Golb prosecution was criminal. Although we have not yet provided the information at our disposal to the District Attorney's Office in New York County, this certainly is an option should your client persist in his conduct.

Once again, please advise as to whether your client will voluntarily take down the website, as well as the blogs attacking Mr. Klein?

Your client asserted, publicly, that his interest is the well being of ZOA, and that he harbored no personal malice against Mr. Klein. This is perhaps the last opportunity for your client to show that he is sincere in that regard.

Very truly yours,

RIEDERS, TRAVIS, HUMPHREY, HARRIS,
WATERS, WAFFENSCHMIDT & DOHRMANN

Cliff Rieders

Clifford A. Rieders, Esquire

CAR/jss

cc: Morton Klein

Pending: 2 weeks