

**D\*\*\*\* S\*\*\*\* F\*\*\*\*\***  
ATTORNEY AT LAW

**January 25<sup>th</sup>, 2011**

**FOR NEGOTIATION  
AND SETTLEMENT PURPOSE ONLY**

**VIA E-MAIL**

The Heckler  
legal@theheckler.com

Re: **Formal Legal Notice to Cease and Desist Defamatory remarks and Internet Defamatory posts regarding the Lingerie Football League, League players and Mitch Mortaza.**

To whom it may concern:

Please be advised that I have been retained by the Lingerie Football League (hereinafter referred to as "Client"), as counsel for the League, to investigate and take legal action, if necessary, against you for the series of unwarranted and defamatory attacks, remarks and alleged posts on the World Wide Web against my Client, the League and League Players.

Your unwarranted actions and baseless accusations have damaged that reputation and adversely affected my Clients' business. You have personally made willfully false and misleading comments about my Client and its Players through your article titled "Lingerie Football League rocked by sex scandal as several players refuse to pose for Playboy," posted on www.theheckler.com World Wide Web.

The statements made in reference to my Client, the League and League Players, are utterly false and without merit, and they are defamation per se in that they depict my Client, the League and League Players in a false light, disrespect and exploit my Client, the League and League Players.

Your attempts to spread libelous and defamatory material about my client have caused serious and irreparable injury to it, its reputation, and its business. My Client will not stand by and allow this misconduct to continue.

Your unwarranted actions and baseless defamatory attacks, remarks, and alleged internet article posts give rise to a cause of action for defamation, among other things. In addition to being supported by special damages, many of the defamatory and baseless statements rise to the level of defamation per se. This means that such words are actionable on their face, without the need to plead special damages. As such, my Client is entitled to general damages for loss of reputation, shame and mortification. Additionally, my client has claims for punitive damages.

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In light of all this, I hereby demand that you provide me with written confirmation by no later than 5 p.m., Eastern Standard Time on January 28, 2011, assurances that you will:

- a) Cease and desist from any and all defamatory remarks against my Client, the League, the League players, and any affiliated Parties.
- b) Immediately remove and/or retract any Internet postings on [www.thehacker.com](http://www.thehacker.com), including, but not limited, to the article titled "Lingerie Football League rocked by sex scandal as several players refuse to pose for Playboy."
- c) Submit in writing assurances that you will cease and desist from any and all defamatory remarks against my Client, the League, the League players, and any affiliated Parties.

This letter puts you on notice that should you refuse to comply with the enclosed Cease and Desist Letter and my demands by January, 2011, I will have no choice but to recommend that my Client pursue all legal causes of action, including the filing of a lawsuit, to protect its interest. I will pursue both damages and attorneys' fees and costs incurred by my Client as a result of your actions. Any further defamatory remarks, contact or defamatory remarks posted on the World Wide Web will be deemed harassment and grounds for a restraining order against you.

This is a very serious matter that requires your immediate attention. I strongly recommend that you provide me in writing that you will cease and desist from these activities. This letter is your one and only chance to resolve this matter amicably. My Client expressly reserves all legal and equitable rights.

Sincerely,

D\*\*\*\* S. F\*\*\*\*\*, Esq.

cc: Mitchell S. Mortaza, Founder & Chairman of the Lingerie Football League