MOSHE KAHN ADVOCATES



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January 5, 2012

The Info Underground DomainsByProxy.com VIA E-MAIL

Re: <u>Libelous Publication Regarding Global CST and Mr. Israel Ziv on</u>
<u>www.theinfounderground.com</u>

Dear Sir or Madam,

On behalf of our clients, Global CST and Mr. Israel Ziv, we would like to refer you to the following:

- You have cited an article containing libelous content which was previously published by the
 Israeli newspaper Haaretz, titled Inside Intel/ Commies and a Pinko on
 www.theinfounderground.com website on the link below
 http://theinfounderground.com/forum/print_post.php?f=28&p=47830&sid=2e397c5d7b02
 fbe128eb82e75fe76dd5.
- 2. As part of an out of court settlement agreement reached between Global CST, Mr. Ziv and Haaretz, this article was removed, in its entirety, from Haaretz's website.
- 3. Since this article, containing libelous content, has been entirely deleted by Haaretz, we request that you remove the article itself titled **Inside Intel/ Commies and a Pinko** by Yossi Melman and its content as well as any links, direct or indirect references to our clients, from your website.

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- 4. We would also like to emphasize that relying on an article containing libelous content published by a third party does not constitute a legal defense, *especially* in the case where it was removed by its originator.
- 5. Furthermore, we would also like to mention that the publication of the article containing libelous content has caused, and continues to cause, unwarranted severe economic and reputational damage to our clients.
- 6. In the event that our request as set forth in Section 3 above will not be fulfilled within 5 days of the date of this letter, our clients will pursue the legal actions and remedies available to them under any applicable law and jurisdiction, including without limitation the initiation of legal proceedings by local counsel in the competent courts of law in the United States.
- 7. Nothing in the above shall exhaust the claims and actions of our clients and/or constitute an admission and/or waiver of any claim and/or demand whatsoever and/or waiver of any remedy and/or relief available to them and they reserve all of their rights under any law.

Sincerely,

Moshe Kahn, Adv.