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Michael H. Perry	Max R. Hoffman, Jr.	Norbert T. Madison, Jr.	James R. Davis
Brandon W. Zuk	Thomas L. Sparks	Melisa M. W. Mysliwiec	(1918-2005)
Thomas J. Waters	Paula J. Manderfield	Aaron L. Davis	Mark R. Fox
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August 31, 2018

*Via Fax 757/622-0457 and U.S. Mail*

Ms. Ingrid Newkirk  
President  
PETA  
501 Front Street  
Norfolk, VA 23510

Re: Our Client: Oswald's Bear Ranch

Dear Ms. Newkirk:

This law firm represents Oswald's Bear Ranch in Newberry, Michigan. It has come to our attention that beginning on or about August 28, 2018, a PETA mobile billboard with the message "Your ticket. Your fault. Cubs are suffering for photo ops at Oswald's Bear Ranch" with a photograph of a bear behind bars began traveling through Northern Michigan which PETA's press release asserts is an effort to "persuade viewers never to support Oswald's cruel and exploitative use of bear cubs in photo ops."

Contrary to the message contained in both PETA's mobile billboard and its press release, Oswald's Bear Ranch does not abuse bear cubs. The bear cub depicted on the mobile billboard is not an Oswald's Bear Ranch bear. Additionally, the bears at Oswald's Bear Ranch are not kept behind bars as depicted in your mobile billboard. PETA's false statements about Oswald's Bear Ranch and its misrepresentation regarding the bears at Oswald's Bear Ranch are defamatory as a matter of law and hold Oswald's Bear Ranch out to the public in a false light.

The purpose of this letter is to demand that PETA immediately cease and desist from having its mobile billboard travel throughout the Newberry, Michigan area. Additionally, pursuant to MCL 600.2911(2)(b), upon behalf of Oswald's Bear Ranch this letter requests PETA to immediately retract the statements made in both its billboard and its press release.

Ms. Ingrid Newkirk  
August 31, 2018  
Page 2

Please e-mail me a copy of the press release retracting your false statements and a photograph of the mobile billboard with a new message which retracts your false statements by 12:00 noon on Saturday, September 1, 2018. My e-mail address is mperry@fraserlawfirm.com. PETA's failure to retract its statements in both its press release and on its mobile billboard by Saturday, September 1, 2018 at 12:00 noon shall subject PETA to an award of punitive damages in favor of Oswald's Bear Ranch.

Thank you for your immediate attention to this matter.

Very truly yours,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.

A handwritten signature in black ink, appearing to read "Michael H. Perry". The signature is fluid and cursive, with the first name "Michael" and last name "Perry" being the most prominent parts.

Michael H. Perry

MHP:dlc

cc: Mr. David Perle  
Oswald's Bear Ranch