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December 22, 2017

### **BY E-MAIL & FEDEX**

David Carl Drummond, Esq.  
Chief legal officer & Senior Vice President of Corporate Development  
Alphabet Inc.  
1600 Amphitheatre Parkway  
Mountain View, California 94043

Re: Joy-Ann Reid- Defamatory and Fraudulent Material in blog.reidreport

Dear Mr. Drummond:

My firm represents Joy-Ann Reid. We have discovered that numerous fraudulent entries were posted on blog.reidreport (the "Blog" or "reidreport"), Ms. Reid's former blog, for the period prior to January 1, 2008, when the Blog was maintained by blogger.com. We require your immediate assistance in determining how, when and by whom the Blog was hacked and the fraudulent posts entered. I am copying Anthony Cochenour, our security consultant, on this letter.

As you may know, Ms. Reid is a political analyst for MSNBC and is the host of AM Joy, which airs Saturdays and Sundays on the network. She is also a best-selling author and a columnist for the Daily Beast.

From 2004 through 2008, Ms. Reid published the reidreport, a respected and popular liberal blog. The Blog is no longer active or public. As a result of a recent controversy about legitimate blog posts that Ms. Reid had published, Ms. Reid began reviewing her prior Blog postings on archive.org. Disturbingly, she found numerous fraudulent and defamatory posts inserted into the legitimate content of the reidreport throughout 2006 and 2007.

We have attached, as one of numerous examples, a printout for January 10 and 11, 2006, where we have highlighted the malicious posts. There are entire posts, such as "Best Love Life Ever: Celebrity Wife-Swap Edition," tags, and headings such as "Brokeback Committee Room" that were not posted or written by Ms. Reid.

Even more insidiously, there are fraudulent additions to legitimate posts. For example, in Ms. Reid's January 10, 2006 blog post regarding the Samuel Alito confirmation hearing, Ms. Reid wrote a lengthy post regarding Judge Alito's position on the legality of torture at 10:18 a.m. There are then two fraudulent posts at 10:40 a.m. and 11:10 a.m., making sexual innuendos about Senator Orrin Hatch. The legitimate posts begin again at 11:21 a.m. when Ms. Reid starts reporting on Senator Kennedy's questions.

It is evident that the Blog is corrupted for the following reasons, among others:

(i) Ms. Reid is a well-known liberal journalist. The fraudulent posts show her supporting conservative and racist positions and figures such as Lou Dobbs, a notorious anti-immigration advocate. For example, a fraudulent post from April 10, 2006, begins "I love Lou Dobbs."

(ii) The writing style in the fraudulent posts is completely different from Ms. Reid's. Throughout Ms. Reid's writings -- in her Blog, books, columns and articles -- you will not see the offensive terms and slang used in the fraudulent posts.

(iii) There are jarring changes in style and substance within posts on the same day.

(iv) There are no public comments on the fraudulent postings. If the fraudulent posts had been contemporaneously written, there would have been substantial comments and blow back.

(v) The fraudulent posts have uncharacteristic HTML/graphics formatting, and font selection, such as quote offsets, paragraph separators.

(vi) It would have been physically impossible for Ms. Reid to have made many of the posts. Some have dates and times when Ms. Reid was doing her radio show and could not have been blogging. Posting times also show that Ms. Reid could not have made many of the posts. For example, on January 10, 2006, Ms. Reid posted about the Alito confirmation hearing at 10:18 a.m., 11:34 a.m. and 11:41 a.m. The Blog, however, also shows a lengthy, fraudulent entry, "Things people say when they're on the Fox News Channel," supposedly posted right in the midst of this, at 11:28 a.m. Ms. Reid did not have the superhuman blogging skills needed to do all of these posts simultaneously.

As you can well imagine, the fraudulent posts, which can still be seen on archive sites, have the potential to cause significant damage to Ms. Reid's reputation and career. They were apparently posted by a person seeking to cause Ms. Reid substantial harm. Accordingly, we need your immediate assistance in determining how the malevolent entries can be posted.

Please let us know by the end of next week, December 29<sup>th</sup>, if there was anomalous access to the Blog such as repeated, failed logins, logins at odd times and logins outside of Florida where Ms. Reid lived and worked.

We also need the following information, which we ask that you provide us by January 5<sup>th</sup>.

- Full account login metadata, including failed attempts, for the life of the [EMAIL] account. Including, but not limited to, source Internet Protocol (IP) addresses, source device information, timestamps, request URI, document identifiers, email headers, relevant server logs, and password change history.

Mr. David Carl Drummond

December 22, 2017

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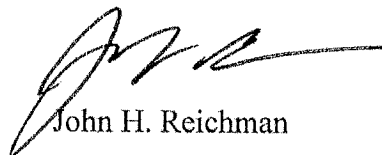
- Full [EMAIL] account content, including but not limited to, emails, email attachments, photos, data files, relevant server logs, relevant site metadata, relevant marketing, and site usage statistics over the life of the account.
- Full [EMAIL] account backups for the life of the account, including full, partial, and differential backups.
- Lastly, we are requesting [EMAIL] account security notifications, account support cases, and any financial service statements.
- Lists of any past, or present employees who had, or have, administrative access to read, write, or modify any content on the Blog.

Please give this matter the highest priority and handle it, discreetly so as not to amplify the reach of the fraudulent posts.

While we understand the Holidays are rapidly approaching, we nevertheless ask that you acknowledge immediately receipt of this letter and provide us with to have of a contact person early next week, given the urgent need to find the source of the defamatory material.

This letter is written without waiver of or prejudice to Ms. Reid's rights, remedies and claims not set forth in this letter, all of which are expressly reserved.

Very truly yours,



John H. Reichman

JHR/eat

