

# Morgan Lewis

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October 10, 2017

## VIA FEDEX

Stacy Stern, Esq.  
President  
Justia, Inc.  
1380 Pear Avenue, Suite 2B  
Mountain View, CA 94043

Re: *Webpages Violating Justia's Terms of Service* ([www.mesothelioma-lawyerblog.com](http://www.mesothelioma-lawyerblog.com))

Dear Ms. Stern:

We write on behalf of the Western Asbestos Settlement Trust, two of its employees (Ms. Sara Beth Brown and Ms. Laura Paul), and its outside general counsel, Ms. Jeanine Donohue, who are being disparaged, defamed and/or harassed on a website for which Justia is the registrant, [www.mesothelioma-lawyerblog.com](http://www.mesothelioma-lawyerblog.com). Because the postings on pages of this website are unlawful and in violation of Justia's Terms of Service, we request that the offending material be removed.

The material at issue was posted by Michael Mandelbrot of the Asbestos Legal Center/Mandelbrot Law Firm, an individual who previously submitted claims with the Western Asbestos Settlement Trust. The specific pages identified below contain defamatory, false, and/or harassing statements regarding Ms. Paul, Ms. Brown, and Ms. Donohue (among many other individuals), including statements that these individuals are "liars to the core to protect their male superiors," participants in a purported conspiracy to "misappropriate" billions of dollars, and either a "slut," "troll," or "incompetent":

- <https://www.mesothelioma-lawyerblog.com/2017/05/asbestos-trust-mafia-corrupt-lawyers-country.html>
- <https://www.mesothelioma-lawyerblog.com/2017/09/coming-soon-corrupt-women-asbestos-trust-litigation-bad-lawyersbad-people.html>
- <https://www.mesothelioma-lawyerblog.com/2017/07/pioneers-asbestos-trust-fraud-steven-kazan-alan-brayton-david-mcclain.html>

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These postings of Mr. Mandelbrot, containing false, sexist, and racist comments, violate Section 3(a) of Justia's Terms of Service, which the Asbestos Legal Center/Mandelbrot Law Firm expressly agreed to, and which prohibit the posting of "harmful, threatening, abusive, inappropriate, harassing, tortious, defamatory, vulgar ... or otherwise objectionable Content." The statements also violate Section 6(e) of Justia's Terms of Service, which bars use of the service to "[d]efame, abuse, harass, stalk, threaten or otherwise violate the legal rights of others." The statements made by the Asbestos Legal Center/Mandelbrot Law Firm are also legally actionable as they are defamatory and false.

As such, we ask that this offending content be removed. We also request that, to the extent possible, any cached versions of the URLs be removed. Finally, we ask that you or your counsel contact me within seven days to confirm removal of the above-referenced material.

If you have any questions or require any additional information, please let me know.

Sincerely,



Benjamin P. Smith

BPS/dll

BY ALL