

Jesse R. Binnall

PARTNER

D: 571-467-6566 **E:** jesse@binnall.com

March 21, 2024

BY ELECTRONIC MAIL

Mr. Jeff A. Taylor Executive Vice President and General Counsel Fox Corporation 2121 Avenue of the Stars Los Angeles, California 90067 Email: jeff.taylor@fox.com

Re: Retraction Demand and Document Hold And Preservation Notice

Dear Mr. Taylor,

This firm represents Anthony Bobulinski and Stefan Passantino. We write to you regarding defamatory statements made on air by Jessica Tarlov on "The Five" yesterday, March 20, 2024. Specifically, Ms. Tarlov stated that Mr. Bobulinski's legal fees are being paid by a Trump Super PAC. This is unequivocally false and defamatory. Indeed, no Trump Super PAC has ever paid Mr. Bobulinski's legal fees. In fact, Mr. Bobulinski has paid over \$500,000, in legal fees to numerous lawyers in law firms out of his own pocket since 2020. We write to demand the immediate retraction, on air, today, of this maliciously blatant lie. Let me be perfectly clear. We will immediately file a defamation lawsuit against Fox, and Ms. Tarlov, if this lie is not retracted by Ms. Tarlov on air today, March 21, 2024. Consistent with her pattern of previous conduct, Ms. Tarlov's comments were intended to be, and are, extremely damaging, making her immediate retraction of the utmost importance.

This letter also serves as a records identification and preservation demand and hold notice. In this context, "documents and data" is used in the broadest sense and means all hard copy and electronically stored writings, information (including emails and text messages), spreadsheets, drawings, graphs, charts, photographs, videos, scripts and other retrievable data (whether recorded, taped, or coded electronically, electrostatically, electromagnetically or otherwise), including the original and any non-identical copy and every draft and proposed draft of all correspondence (including emails and text messages), scripts, memoranda, notes of meetings, facsimiles, voice mail, reports, transcripts or notes of telephone conversations, notebooks, minutes, notes, tests, reports, analyses and studies, all together with any attachments and enclosures.

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Documents and data of any type, whether hard copy or electronic, draft or final, should not be discarded, destroyed, modified, or altered in any way and should be identified, held and preserved in their current format until litigation, if necessary, is resolved. Normal document retention policies must be immediately suspended. If there is any question about whether any hard copy or electronic document, data or file as further addressed herein is related to this matter, for the sake of good order, you should assume the broadest possible application of this hold to your client's materials mandated by current legal standards of preservation such that you should identify, hold and preserve it.

It was a mistake to believe Ms. Tarlov's defamatory comments are without consequence. We will be watching today's show.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Jesse R. Binnall