

LAVELY & SINGER

PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

SUITE 2400

2049 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-2906

TELEPHONE (310) 556-3501

FACSIMILE (310) 556-3615

WWW.LAVELYSINGER.COM

TODD S. EAGAN^Δ
ANDREW B. BRETTLER*
DAVID B. JONELIS
ZEV F. RABEN^Δ
JONATHAN M. KLEIN

ALLISON S. HART
HENRY L. SELF, III
OF COUNSEL

^Δ ALSO ADMITTED IN NY
^{*} ALSO ADMITTED IN NY AND NJ

JOHN H. LAVELY, JR.
MARTIN D. SINGER
BRIAN G. WOLF
LYNDA B. GOLDMAN
MICHAEL D. HOLTZ
PAUL N. SORRELL
MICHAEL E. WEINSTEN
EVAN N. SPIEGEL

November 18, 2014

CONFIDENTIAL LEGAL NOTICE
PUBLICATION OR DISSEMINATION IS PROHIBITED

VIA EMAIL: kate.aurthur@buzzfeed.com

Ms. Kate Aurthur
Chief Los Angeles Correspondent
Buzzfeed

Re: Bill Cosby / Janice Dickinson, et al.

Dear Ms. Arthur:

We are litigation counsel to Bill Cosby. We are writing regarding your planned story regarding Janice Dickinson's new false and outlandish claims about Mr. Cosby in her recent *Entertainment Tonight* interview, asserting that he raped her in 1982 (the "Story"). That Story is fabricated and is an outrageous defamatory lie. In the past, Ms. Dickinson repeatedly confirmed, both in her own book and in an interview she gave to the *New York Observer* in 2002, that back in 1982 my client "blew her off" after dinner because she did not sleep with him. Her new Story claiming that she had been sexually assaulted is a defamatory fabrication, and she is attempting to justify this new false Story with yet another fabrication, claiming that Mr. Cosby and his lawyers had supposedly pressured her publisher to remove the sexual assault story from her 2002 book. That never happened, just like the alleged rape never happened. Prior to publishing this Story with Ms. Dickinson's new defamatory assertions, you should contact neutral third parties, such as her own publisher, to confirm that she is lying.

Neither Mr. Cosby nor any of his attorneys were ever told by Harper Collins that Ms. Dickinson had supposedly planned to write that he had sexually assaulted her, and neither Mr. Cosby nor any of his representatives ever communication with the publisher about any alleged rape or sexual assault story planned for the book. Because you can confirm with independent sources the falsity of the claim that my client's lawyers allegedly pressured the publisher to kill the story, it would be extremely reckless to rely on anything Ms. Dickinson has to say about Mr. Cosby since the story about the publisher is patently false.

Ms. Dickinson completely fabricated the Story of alleged rape. In a transparent effort to justify the glaring contradiction between her new rape claim and what she wrote in her book and what she told to the *New York Observer* in her September 9, 2002 interview "*Interview*

Re: Bill Cosby / Janice Dickinson, et al.

November 18, 2014

Page 2

With a Vamp,¹ she also manufactured the story that my client and my client's lawyers pressured her publisher to take the purported rape story out of her 2002 book. If you contact Harper Collins, the publisher will undoubtedly confirm that Mr. Cosby and his lawyers were never told that Ms. Dickinson claimed she had been raped and intended to write about it in her book. The first Mr. Cosby and his lawyers ever heard of Ms. Dickinson's specious rape allegation was not back in 2002, it was now, in Ms. Dickinson's *Entertainment Tonight* interview, a dozen years after Ms. Dickinson's book was published, a dozen years after she confirmed to the *New York Observer* what she wrote in her book, and more than 30 years after their dinner in Lake Tahoe.

Prior to publication of Ms. Dickinson's book, her publisher sent the pages about Mr. Cosby to his publicist, who responded "good luck." There was no mention of rape or sexual assault whatsoever. Nobody tried to kill any sexual assault or rape story. These facts can be confirmed with the publisher. If you proceed with the false Story when you can check the facts with neutral independent sources who will provide you with facts demonstrating that the Story is false and fabricated, you will be acting recklessly and with Constitutional malice.

It would be extraordinarily reckless to disseminate this highly defamatory Story when Ms. Dickinson herself told an entirely different story in her book, when she confirmed that same entirely different story in an interview with the *New York Observer* a dozen years ago, when you may independently confirm with her publisher the falsity of her new assertion that my client's lawyers supposedly pressured her publisher to delete the alleged rape story from her book, and when her new allegation of rape was made for the first time only now, when it appears that she seeking publicity to bolster her fading career.

More than three decades have passed since the 1982 Lake Tahoe dinner described in Ms. Dickinson's book about how she was *not* intimate with my client, and a dozen years have passed since her book came out and she confirmed that same story to the media. You can easily confirm that the manufactured story that my client's lawyers pressured the publisher to take the rape story out of the book is utterly fabricated. Since at a minimum Ms. Dickinson fabricated the assertion my client's lawyers pressured the publisher more than a decade ago to take out the sexual assault story — a story we heard now for the first time — it would be reckless to rely on Ms. Dickinson in this matter.

Ms. Dickinson's new assertion that she was raped by my client back in 1982 is belied by her own words, which completely contradict her current fabrications. We caution you in the strongest possible terms to refrain from disseminating the outrageous false Story. If you recklessly publish the Story instead of checking readily available information demonstrating its falsity, all those involved will be exposed to very substantial liability.

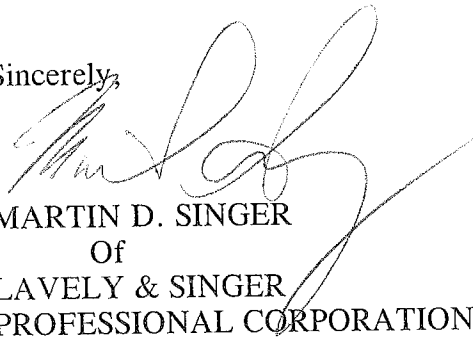
¹ <<http://observer.com/2002/09/interview-with-the-vamp/>>

Re: Bill Cosby / Janice Dickinson, et al.
November 18, 2014
Page 3

You proceed at your peril.

This does not constitute a complete or exhaustive statement of all of my client's rights or claims. Nothing stated herein is intended as, nor should it be deemed to constitute a waiver or relinquishment, of any of my client's rights or remedies, whether legal or equitable, all of which are hereby expressly reserved. This letter is a confidential legal communication and is not for publication.

Sincerely,



MARTIN D. SINGER
Of
LAVELY & SINGER
PROFESSIONAL CORPORATION

MDS/lbg

cc: Mr. William H. Cosby
John Schmitt, Esq. (via email)
Mr. David Brokaw (via email)
Lynda B. Goldman, Esq.