



# Pinsent Masons

By Post

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6 January 2014

Dear Sir

## POTENTIAL PROCEEDINGS – ANATOLY S. KARPOV v ALEXANDER LEBEDEV

We refer to our letter dated 27 December 2013.

Our letter referred to various defamatory statements published by you on your Twitter account and on various websites owned by you (the "**Statements**").

In our letter we required you to, amongst other things, "immediately delete the Statements so that they can no longer be read and accessed on Twitter, your personal website, any blogs or on any other form of media".

It is now 10 days since the date of our letter and the Statements continue to be displayed on your Twitter account and on your websites causing further damage to our client's reputation. Furthermore you are yet to reply or even acknowledge receipt of our letter.

In light of the above, we reiterate that we require that you:-

1. immediately delete the Statements so that they can no longer be read and accessed on Twitter, your personal website, any blogs or on any other form of media;
2. provide us with a full explanation as to why you consider that you are entitled to publish the Statements about our client;
3. provide us with undertakings that you will not republish the Statements;
4. provide us with an undertaking that you will not in the future make any disrespectful or disparaging remarks about our client;
5. immediately publish a retraction/apology/correction on twitter and your website in the terms to be agreed;
6. agree to enter into a joint statement in Open Court in terms to be agreed;
7. make a proposal as regards compensating our client for the loss and damage suffered; and
8. agree to reimburse our client's legal fees.

In view of the fact that the publication of the Statements on twitter and your website is ongoing, we require you to confirm that you agree to the above and will carry out the required steps stipulated above.



We must ask you to let us have a reply at once and in the meantime it must be clearly understood that our client reserves all rights in the matter.

In the event that you do not comply with the above, our client will commence formal legal proceedings against you without further reference. In this regard, please confirm in writing whether you have instructed solicitors to accept service of proceedings, failing which the Claim Form will be served directly upon you.

Yours faithfully

*Pincent Masons LLP*

**PINSENT MASONS LLP**