

April 4, 2023

Via email: MKim@mathewsdinsdale.com

Jeffrey Goodman & Matthew Kim
Mathews, Dinsdale & Clark LLP
The Well, 35th Floor
8 Spadina Avenue
Toronto, Ontario, Canada M5V 0S8

Dear Jeffrey and Matthew:

RE: Jivani v Bell Media Corporation – Cease and Desist

As you are aware, we act as counsel for Mr. Jamil Jivani with respect to his lawsuit against Bell Media.

On March 22, 23 and 24, 2023, my client hosted the Canada Strong and Free Network's (the "CSFN") annual conference in Ottawa.

Seventy (70) members of the media were accredited to cover this event. While Bell chose not to attend the event and was therefore an outlier, I suspect that my client's ongoing lawsuit against Bell played a role in this decision.

It has recently come to my attention that despite not obtaining accreditation, CTV Television Network ("CTV News") engaged in coverage of the conference as follows:

- the unauthorized reproduction in full of the copyrighted works of CSFN on CTV News' official YouTube channel (see: "Harper says that Canada needs 'Conservative renaissance' | FULL DISCUSSION" – <https://www.youtube.com/watch?v=FfhpuMVsi6U>)
- coverage of CSFN's annual conference by CTV News journalist, Glen McGregor, in tweets posted to his public Twitter account on or about March 22, 2023 (see: https://twitter.com/glen_mcgregor/status/1638612786178580482?cxt=HHwWhlCzybbpwR0tAAAA). Notably, his tweets were misleading.

Our client is an outspoken advocate of free speech. However, CTV News' above-described conduct may only be characterized as a blatant and transparent attempt to intimidate our client and prejudice the just resolution of the above-described legal action.



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Kathryn Marshall
Partner

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We demand that CTV News, Bell Media, and all related affiliates, agents and representatives immediately cease and desist from any and all conduct designed to intimidate our client and/or prejudice the just resolution of our client's legal action.

In the spirit of free speech, we encourage Bell to avoid intimidation tactics and conduct journalism like its peer media companies and seek appropriate accreditation and permissions in the future.

Regards,

A handwritten signature in black ink, appearing to read "Kathryn Marshall".

Kathryn Marshall
Partner
KM/ns