

June 8, 2011

**VIA E-MAIL**

Regina Daniels  
[REDACTED]

Re: Bret Lockett's Publication of False Statements Regarding Kim Kardashian

Dear Ms. Daniels:

We are litigation counsel for Kim Kardashian. It is our understanding that you are Bret Lockett's publicist. As I am sure you are aware, Mr. Lockett has been engaging in a publicity campaign, making numerous false, defamatory and injurious statements regarding Ms. Kardashian. I write to demand, pursuant to California Civil Code section 44 *et seq.*, that Mr. Lockett immediately cease and desist from making, giving, publishing, disseminating, and/or distributing any and all further statements, remarks or comments regarding Ms. Kardashian and any purported relationship between Mr. Lockett and Ms. Kardashian.

To put it very plainly and clearly, and as Mr. Lockett knows, there is not now, and never has been such a relationship. Ms. Kardashian does not know and has never even met Mr. Lockett. Nonetheless, Mr. Lockett, personally and through his associates, has disseminated the following false statements, among others (the "Statements"), which were repeated in the cover story titled "Kim Caught Cheating!" (the "Story") in the June 20, 2011 edition of IN TOUCH WEEKLY magazine, published on or about June 8, 2011, and other outlets which picked up the Story:

1. That he and Ms. Kardashian secretly had a five-month affair, during the time that Ms. Kardashian has been in a relationship with her fiancé, Kris Humphries;
2. That Ms. Kardashian engaged in "sexting" and phone sex with Mr. Lockett during that time;
3. That Ms. Kardashian sent sexually explicit pictures of herself to Mr. Lockett;
4. That Ms. Kardashian pursued Mr. Lockett and initiated the supposed affair with him;

Bardia Ghahremani  
Adelqui J. Boue  
June 8, 2011  
Page 2

5. That Ms. Kardashian hid her relationship with Mr. Humphries from Mr. Lockett and “used” Mr. Lockett;
6. That Ms. Kardashian makes a practice of “using” or “toying” with people;
7. That Ms. Kardashian’s marriage to Mr. Humphries will not last.

Further, Mr. Lockett has apparently been disseminating these and similar false statements regarding Ms. Kardashian today to various media outlets, including without limitation [www.nesn.com](http://www.nesn.com/2011/06/ret-lockett-says-tabloid-story-about-relationship-with-kim-kardashian-is-true.html) (<http://www.nesn.com/2011/06/ret-lockett-says-tabloid-story-about-relationship-with-kim-kardashian-is-true.html>).

As Mr. Lockett knows, each of these statements is false, defamatory, and injurious to Ms. Kardashian, pursuant to California Civil Code Section 44 *et seq.* Indeed, Ms. Kardashian’s representative and attorney, and Lauren London’s attorney, all confirmed the falsity of Mr. Lockett's account related in the Story to IN TOUCH WEEKLY. Further, the attorney for Ms. London, whom Mr. Lockett credits with introducing him to Ms. Kardashian, has confirmed that Ms. London does not know Mr. Lockett and has never introduced him to Ms. Kardashian.

We are aware that Mr. Lockett is spreading these false and malicious statements about Ms. Kardashian in an attempt to garner publicity, including to promote his musical aspirations. We hereby demand that Mr. Lockett immediately and from this time forward cease and desist from making, issuing, publishing, distributing and/or disseminating any and all factually untrue and unsubstantiated statements regarding Ms. Kardashian, including but not limited to the Statements described above, since these statements are, at a minimum, false, damaging, defamatory, and an invasion of her privacy. We further demand that Mr. Lockett issue, publish and broadcast (a) a retraction of the Statements, and (b) an apology to Ms. Kardashian and Mr. Humphries.

I will expect an immediate email confirmation from you that Mr. Lockett will comply with this demand. Please be advised that if Mr. Lockett fails to do so, or if he persists in making false, defamatory and injurious statements regarding Ms. Kardashian, we will pursue litigation on Ms. Kardashian’s behalf, and Mr. Lockett may be liable for general, special, and exemplary damages. We take this issue very seriously and will defend Ms. Kardashian’s rights, and pursue all available remedies, to the fullest extent of the law. If Mr. Lockett is represented by counsel, we ask that you forward a copy of this letter to his counsel, or provide us with his counsel's name and contact information so that we may do so.

Bardia Ghahremani  
Adelqui J. Boue  
June 8, 2011  
Page 3

This letter is not intended as a complete statement of all facts concerning this matter. Nothing contained herein shall constitute a relinquishment of any of Ms. Kardashian's rights, remedies, causes of action or claims for relief at law or in equity, all of which are expressly reserved.

Sincerely,



Michael J. Kump

MJK:LDC

cc: Dennis A. Roach, Esq.

