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October 22, 2018

VIA EMAIL

Mr. Keith Pemrick
Denny Wolff for Congress
P.O. 240
Millville, PA 17846
keith@dennywolff.com

RE: Dan Meuser for Congress

Dear Mr. Pemrick:

I represent Dan Meuser for Congress. I have reviewed your correspondence threatening a defamation action against the campaign and Mike Barley for the campaign's publication of an ad entitled "Mentor." The ad is not defamatory, it will not be taken down, and if you pursue any legal action against the campaign or its employees you will be subject to a Dragonetti action.

Here are the facts: Mr. Wolff signed a promissory note and a guaranty agreement with Northern Central Bank that authorized the entry of a judgment in the full amount of each of the debts in the event of a default. Northern Central Bank filed two separate praecipes to enter judgment against Mr. Wolff. There appears to be no basis in the promissory note or the guaranty agreement for the bank to enter a judgment absent a default. Therefore, the obvious conclusion is that Mr. Wolff twice defaulted on obligations to Northern Central Bank.

I note that in your correspondence to the Meuser campaign you failed to include any evidence from Northern Central Bank attesting that it entered the judgments for some reason other than a default. If you proceed with a defamation action, I will subpoena every record regarding these and any other of Mr. Wolff's questionable transactions. If, as I suspect, the bank records indicate Mr. Wolff in fact defaulted on any of his agreements, I will file a Dragonetti action against you personally (as well as Denny Wolff for Congress).

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Finally, your cease and desist letter is especially brazen, considering your ad “Work For a Living” is *actually* defamatory. By separate correspondence, you will receive a demand to stop running that ad.

Please guide yourself accordingly.

Sincerely,

A handwritten signature in blue ink, consisting of a series of fluid, connected strokes that form a cursive-style name.

Matthew H. Haverstick
Kleinbard LLC

cc: Mike Barley, Dan Meuser for Congress