

# EXHIBIT E

(SUBJECT TO MOTION  
TO FILE **UNDER SEAL**)



**CRUMILLER**  
The Feminist Litigation Firm

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*We won't cease. We won't desist.*

Abusers and enablers: you think you can silence us.

**You are wrong.**

And now, we are coming after you.

Be guided accordingly.

**#wontceasewontdesist**

### MICHAEL BONGIOVANNI / CHAUDHRY LAW PLLC

My firm has long cast shade upon attorneys who unethically try to create a conflict between their adversaries and their adversaries' client. We've represented other lawyers in these scenarios but I always felt a little left out that I had never gotten a bullshit C&D of my own. UNTIL NOW!!!!!!

**Michael Bongiovanni**, a current New York law student, raped our client. **Chaudhry Law PLLC** represents rapist **Michael Bongiovanni**.

We sued him civilly. On January 20, we taped a television segment on which our adversary, **Chaudhry Law PLLC**, was present. **Chaudhry Law PLLC** lied three times:

1. **Chaudhry Law PLLC** claimed that **Michael Bongiovanni** had been "exonerated" by Fordham in the Title IX proceeding, which is a lie;
2. **Chaudhry Law PLLC** claimed that **Michael Bongiovanni** had not been criminally prosecuted because the police "found [my client] not to be credible" which was a **flat-out fucking lie**. In fact the police said to her face they believed that **Michael Bongiovanni** had raped her, but they were hindered by an awful legal loophole that prevented them from prosecuting because she was voluntarily intoxicated.



because she was voluntarily intoxicated.

- 3. **Chaudhry Law PLLC** claimed that our client had made a one million dollar demand, by her attorneys. This didn't happen, although the weird thing is, who cares if it had?

I called **Chaudhry Law PLLC** out on these three lies and their response was to threaten me with defamation for item (3) although they remain strangely silent on (1) and (2)!

**Chaudhry Law PLLC** might not know the first thing about defamation laws, or else they wouldn't make this completely frivolous threat; they also obviously don't know that I literally teach classes on defamation and anti-SLAPP and won possibly the first anti-SLAPP fees motion in the state? Too bad for their client **Michael Bongiovanni** who they've weirdly chosen to drag into this additional nonsense!

Thank you **Chaudhry Law PLLC** for bringing even more attention to your client **Michael Bongiovanni** being a rapist, and for sending me what might actually be [one of the dumbest such letters that we've received to date](#).

**What do you think is the most embarrassing part of Chaudhry Law PLLC's letter?**

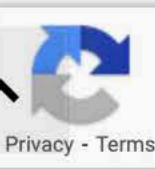
- That they are factually wrong about what transpired
- That they think it would be shameful for a rape survivor to make a monetary demand in the course of pre-litigation negotiations, if such a demand had been made (it's a quite reasonable demand, had it been made)
- That they appear to have zero knowledge of defamation laws
- That they actually think they can intimidate this firm and our client with this nonsense
- Trotting out a woman who's had no involvement in the case just so they can try to weaponize her gender
- READER SUBMISSION::** Their misuse of the word "brandishing"

**VOTE!**

Reach out to us if you have any other suggestions!!



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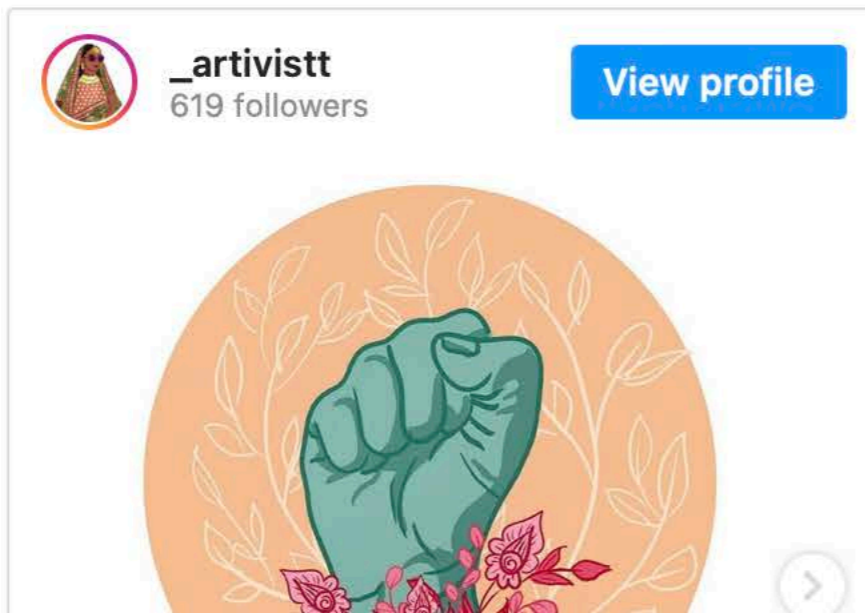
### SAADI OUAZZ / THE MULLEN LAW FIRM

Today's thank you goes to **The Mullen Law Firm** for helping us to publicize the multiple stranger rapes committed by their client, **Saadi Ouazz**. **The Mullen Law Firm** was a little gutsier than some of our other favorite idiotic-letter senders; [just look at that gigantic font!!](#) And they even included a lengthy "agreement" for our client to sign!!

Our client had put these issues with the rape committed by **Saadi Ouazz** in the past, but thanks to **The Mullen Law Firm**, now she's hired us and realizes that she can sue him under the GMVA! As can his other survivors who we can't wait to talk to & figure out if they want to pursue justice against **Saadi Ouazz**! I wonder if **The Mullen Law Firm** will represent **Saadi Ouazz** in our civil lawsuit against him or if **The Mullen Law Firm** was only hired to write this bullshit letter!!!

Thanks **The Mullen Law Firm** 😊😊

### DR. FERDOUS KHANDKER

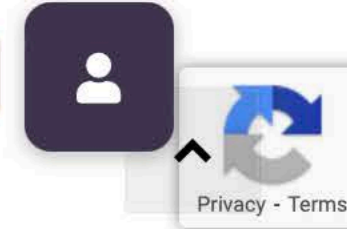


When Dr. Ferdous Khandker was publicly accused by dozens of women of sexually assaulting them, his response was to sue them for defamation.

It is safe to say that **Dr. Ferdous Khandker's** attempt to bully and intimidate his patients into silence has backfired spectacularly. His defamation case was dismissed, and [now he must pay our clients' legal fees](#). He is also now under investigation by the Office of Professional Medical Conduct. All due to his own decision to bring MUCH more attention to his own conduct!

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Thank you **Dr. Ferdous Khandker** for bringing your misconduct to our attention. As a thank you, we have filed a [class action lawsuit against you under the Child Victims Act](#). [If you have your own experience with](#)







@\_artistt

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Add a comment... 

[under the Child Victims Act. If you have your own experience with Khandker, please contact us.](#)

Love,  
Crumiller

P.S. Funnily enough, it was our old friends over at **Lewis & Lin LLC** that first filed the summons with notice suing our clients for defamation in this case. Thank you, **Lewis & Lin LLC** for being willing to take money from any sexual abuser who shows up at your doorstep!



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### BULL DEMPSEY

After professional wrestler and amateur serial sexual harasser **Bull Dempsey a/ka Bull James** was [outed as a serial sexual harasser](#), he filed one of these [dumb-ass "Bull"-shit defamation cases](#). Now he is facing three (and counting) motions to dismiss the case and seeking an award of attorney's fees under the anti-SLAPP statute.

Thank you **Bull Dempsey a/k/a Bull James** for drawing even more attention to your own misconduct, and for your [pathetic attempt to silence your accusers](#). We're looking forward to the cascading effects of your poor decision, including but not limited to the money you will end up paying to our client!

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### BORIS SANTOS

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## BORIS SANTOS

Welcome to Crumiller’s Hall of Shame! We present our inaugural entry courtesy of **Boris Santos**. According to his attorneys **Lewis & Lin LLC**, Santos was accused by multiple women of sexually inappropriate conduct. [Read the idiotic “cease and desist” letter Boris’s attorneys sent our client here.](#)

Douchebags like **Boris Santos**, and their attorneys like **Lewis & Lin LLC**, think they can intimidate and silence our clients by sending them formal-sounding letters which spew nonsense and falsely wield the threat of legal action. They are wrong. Crumiller would like to thank **Boris Santos** and **Lewis & Lin LLC** for helping bring wider attention to our client’s story. **Boris Santos** was not originally named in the supposedly-offensive post. So, it is especially generous of him to help amplify it, by means of his dumb-ass letter.

**We encourage you to read our client’s post**, a thoughtful and well-written examination of the difficulties and nuances in finding accountability for victims of sexual misconduct. Her words ring especially true today:

*“The process of reporting sexual misconduct will always be difficult, and the process for those on the outside to not look away will undoubtedly come with some amount of pain. That cannot be undone. What we can do is be thoughtful and compassionate with one another, with a very clear understanding that if we are to improve the way we treat victims, if we are to create a situation where we have fewer victims each year, it takes all of us – all of us – making the same commitment to transparency, accountability, compassion, consent, and the destruction of the toxic aspects of masculinity.”*

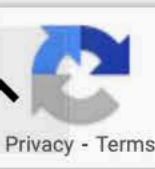
We will never cease, and never desist from, speaking out against sexual harassment. Please reach out to us, anytime, for any help, if you have a story to tell, even anonymously, or if you are threatened or afraid. **We’re not afraid.** And we’re here for you.

**In your opinion, what was the dumbest part of the letter?**

- NYC "Premiere Defamation Attorney" does not appear to know the statute of limitations for defamation claims
- "Tortious interference with contractual relations" (???)
- Extensive use of the passive voice, indicating they know full well that their threats are bullshit
- "Please note that a copy of this letter and a record of its delivery will be stored." » Literally what does this mean
- "Incidences"... or, you know, "incidents" (*Reader Suggestion!*)

VOTE!

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VOTE!



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