

MORALITY IN MEDIA

Est. 1962

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*The leading national organization
opposing pornography and
indecency through public education
and the application of the law*

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August 5, 2014

In re: Sevier v. Apple Inc. (Case No. 3:13-cv-00607)

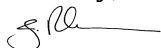
Dear Mr. Sevier:

I am writing to you on behalf of my Client, Morality in Media (MIM). As General Counsel, I am informing you that I represent Mr. Trueman and Ms. Hawkins in their organizational capacity. In two emails to Mr. Trueman and Ms. Hawkins dated July 31, 2014, you have threatened to take actions to damage MIM if they did not comply with your demands. Mr. Trueman and Ms. Hawkins have no interest in any case or controversy that you may be involved in and are not a party thereto.

I note that the Tennessee Bar, of which you are a member and subject to their rules, has a prohibition in Rule 4.4(a)(2), of the Tennessee Rules of Professional Responsibility, stating clearly that, "a lawyer shall not: ... (2) threaten to present a criminal or lawyer disciplinary charge for the purpose of obtaining an advantage in a civil matter. It is my position that your threats that they provide you with written or other declarations or statements to support your civil case or face the prospect of intentional interference with the operation of the organization or a referral to a board of professional responsibility constitute a violation of that Rule. On that basis, I request that you immediately cease and desist from making such threats and having any further contact with them or anyone else at Morality in Media.

Any further contact with Morality in Media, all management and staff, or members of the Board of Directors related to the above-cited litigation should be made directly with me.

Sincerely,



J. Robert Flores, Esq.