

May 11, 2012

By Email [jwd@cybertriallawyer.com]

John W. Dozier, Jr., Esq.
Dozier Internet Law, P.C.
11520 Nuckols Road, Suite 101
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Re: *World Mission Soc'y Church of God v. Newton*, Case No. 2011-17163

Dear John:

I received your letter dated May 4, 2012, in which WMS offered to drop its baseless lawsuit in exchange for Mr. Newton and Ms. Colon agreeing to remove from the Internet "all references" to WMS and agreeing not to tell anyone about the arrangement. Mr. Newton and Ms. Colon reject your client's offer and are both looking forward to having their day in court.

As you know, Mr. Newton has granted WMS multiple discovery extensions to permit a sufficient opportunity to explore possible settlement and to discuss the possibility of entering into a protective order. At this point, Mr. Newton feels he has waited long enough. As I discussed with Mr. Szego, Mr. Newton will allow WMS until May 16, 2012, to answer the pending Interrogatories and Requests for Production of Documents. I do not expect him to agree to further extensions, so I look forward to receiving your client's responses on or before that date.

Very truly yours,



Lee E. Berlik

cc: Tyler Newton
Michele Colon