

Charles S. Limandri

From: Charles S. Limandri
Sent: Friday, May 15, 2009 1:50 PM
To: 'Timothy Shields'
Subject: FW: Offers to Carrie Prejean

Tim:

Please find below an e-mail from your client Keith Lewis to my client Carrie Prejean. Ordinarily, I would hope and expect that our clients would not need to communicate through attorneys. It is also my client's preference to perform her duties as Miss California without any unnecessary involvement from attorneys. With respect to the e-mail from your client below, however, I believe that it is essential that my client make her position clear at this level, hopefully for the last time, with regard to even partially nude photos. My client has repeatedly stated that she has not authorized the release of any nude or partially nude photos at any time. Photos of her that were made public showing her in any state of partial nudity were either photoshopped or not authorized by her for publication. Indeed, in the case of the photos released of her by TMZ on Monday, Carrie stated publically that the photographer was not authorized to release any photos of her other than the one the published on the Bliss Magazine cover, in which her breasts were covered by a vest. At the press conference on Monday, she said that it was very "unprofessional" for the photographer to have released any photos of her with her breasts not covered by the vest she was wearing. This is because she specifically told him that she did not wish to have any such photos taken or released, and he agreed that he would not do so.

Carrie's verbatim response to the below e-mail from your client is as follows: "I AM APPALLED he would even offer me this!!!! DECLINE BOTH". Having exactly conveyed Carrie's sentiments, let me add that in light of the foregoing, we can not understand why your client would ask Carrie if she would agree to do a photo shoot with "partial nudity" in Playboy Magazine. Please make it crystal clear to your client that Carrie is not interested in entertaining any offers that would require even "partial nudity". We we are genuinely desirous that the communications between our clients become cooperative and productive. Nonetheless, I can not help but wonder why such an offer would even be conveyed to Carrie now by Keith Lewis, especially after your clients recently publicly accused my client of breaching her contract with them when the previously unauthorized partially nude photos of her were released. We look forward to speaking with you soon toward achieving what we hope will be a genuine effort on the part of your clients to allow my client to fulfill her duties as Miss California without any further issues of this nature having to be addressed. In the meantime, thank you, Tim, for your professional courtesy and cooperation in this important matter.

Chuck

From: Keith Lewis
Date: Fri, May 15, 2009 at 7:17 AM
Subject: Offers
To: Carrie Prejean

Carrie,

I have two offers that have come in that I need to get answers on in writing for our file. Please respond as soon as possible on the second one. I have already declined the first but want the answer in writing.

Thanks

Keith

am a Celebrity....Get me out of here – 3 week shoot schedule, final offer, \$70,000 for a full week and \$140,000 for three weeks – each celebrity is raising money for their favorite charity and lions share goes to the winner. It airs live on NBC 4 nights a week.

layboy – they want to stress that this is not an open offer but would need to take place soon, partial nudity, pick the photographer, input on choosing the final photos \$120,000

Charles S. Limandri

On May 16, 2009, at 5:45 PM, "Charles S. Limandri"

Tim:

Just when I thought that we had hopefully reached a point where the lawyers could finally step aside and let our clients work directly together, Carrie has received yet another unbelievably unreasonable request. Now Keith Lewis actually wants Carrie to attend a pro-gay marriage event in Hollywood. My client is happy to resume her role as a goodwill ambassador representing all Californians. You and I initially discussed how this typically involves her attending events like avocado festivals and Rotary conventions. Carrie can not be expected to allow herself at this point to be continually thrust into the middle of the hotly contested gay marriage debate. Even Mr. Trump would not allow himself to be drawn into that controversial debate at the press conference last Thursday. Carrie's very safety, in the presence of a potentially hostile crowd, could also be placed at grave risk in such a setting.

Therefore, please make it clear to your client that Carrie will not be attending any events concerning the gay marriage controversy (pro or con) in her official capacity as Miss California. Furthermore, as a private individual who is a Christian, she will not compromise her religious beliefs by giving the appearance of supporting gay marriage by attending an event which is being held for that purpose. As you know, not only does her contract require her to act according to "the highest ethical and moral standards", but the Constitutions of California and the United States protect her liberty of speech, religion and association. Therefore, please now make it clear to Mr. Lewis that Carrie will not accept any invitations or offers with respect to the following: (1) photo sessions which would require her to appear totally or partially nude; and (2) any events or programs promoting gay marriage. Of course, Carrie would be happy to attend, upon reasonable notice, all requests for media interviews, community fairs, parades, festivals, events of service and charitable organizations, sporting events, and any other such activities that can be expected to promote and further the intended purposes of Miss California USA.

Finally, I just learned that Keith Lewis will be on "Geraldo at Large" tonight talking about Carrie. We are placing him on notice that those of us concerned with Carrie's welfare do not intend to sit idly by and let any more lies about her be told with impunity. If he intends to say that she has not cooperated in his requests, I hope that he has the integrity to make it clear that those requests included asking her to consider posing nude for Playboy and attending a pro-gay marriage event in Hollywood. I trust that he will also mention Carrie's participation today as Miss California in the Cystic Fibrosis Walk. If Carrie's conduct is misrepresented in the media again, the consequences to your clients stand to be severe, both in a court of law and/or the court of public opinion. We are very confident that both the American public and/or a judge and jury would readily side with Carrie when the truth is brought to light. I trust that we have made ourselves clear and thank you for your anticipated cooperation.

Chuck

From: Charles S. Limandri
Sent: Sat 5/16/2009 10:41 AM
To: tim.shields

Subject: RE: Cystic Frobrosis Walk

Tim:

I just received a copy of this e-mail to you from Carrie's mother. I do not doubt your good faith and professionalism. Nor do I doubt that Mr. Trump wants to see Carrie be the best possible Miss California. It is equally obvious, however, that Shana Moakler still wants to see Carrie be fired or forced to resign, which is why she has continued to unfairly attack her. Now that Shana has herself resigned, however, I understand that you may very well have little or no influence over her. I would hope and expect though that you still have some influence with Keith Lewis.

As you know, Keith Lewis has a duty of good faith and fair dealing in his contractual relationship with Carrie. My client has elected to try to fulfill her duties as Miss California to the best of her ability rather than pursue legal avenues of recourse. For my part, I have tried to help her avoid the time, expense, publicity and stress of litigation. Nonetheless, if the very people that are supposed to be supporting Carrie continue to try to undermine her, and set her up for failure at every turn, then litigation will be unavoidable. The continued claims of contract violations on Carrie's part show extreme bad faith on the part of those making those charges. For example, the attacks against Carrie made by your clients on the Larry King Live Show two nights ago were absolutely inexcusable—especially after Mr. Trump said there were no such contract violations and, as you know, it is his call to make that determination. Likewise, the smear campaign that has been waged against my client by Neal Public Relations, apparently at your clients' direction, is absolutely unconscionable. I can not allow these relentless assaults against my client's character to continue to go unaddressed.

Therefore, if the accusations against my client do not stop now, I will have to advise her to commence litigation and seek substantial damages for breach of contract, intentional infliction of emotional distress, invasion of privacy (public disclosure of private facts), and defamation, as well as substantial consequential and punitive damages. This is still not my client's preferred course of action. That being said, I must do everything that I can to protect her interests if she continues to be the victim of further unjust attacks against her character by the very people that are responsible for promoting her good name and reputation. All we are asking is that Carrie be given a fair opportunity to fulfill her responsibilities. In that regard, it sounds like Carrie's participation in the Cystic Fibrosis walk today in San Diego will be a good opportunity to get things moving in a positive direction. I am sure you can understand our position. Thank you for promptly conveying these concerns to your clients.

Chuck

Sent: Sat 5/16/2009 8:00 AM
To: tim.shields
Cc: Charles S. Limandri
Subject: Fwd: Cystic Frobrosis Walk

Sent: Sat, 16 May 2009 7:16 am
Subject: Cystic Frobrosis Walk

Keith,

This is to confirm our conversation last night that Carrie will be participating in the Cystic Fibrosis walk today in San Diego. I understand from your text to me, that she will be wearing her sash.

I will be staying in communication with you, as well as her father, to protect Carrie from any further lies that are being told about her. BTW...Carrie DID NOT violate the contract by "cancelling" the Larry King Show. She never agreed to do the show. I was with her when the call came in from ALRoss, her publicist. We were at the airport boarding a flight to San Diego. I don't

appreciate the LIES.

Please stop the harassment and lies being told about Carrie.

Regarding the FOX Friends and Family appearance: Mr. Trump is the one that set that up for Carrie. I was witness to this, in his office, as was Miles McPherson. If this was a violation of the contract, I'm sure Mr. Trump would not have set it up. Take it up with Mr. Trump...not Carrie.

Francine