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October 12, 2016

Via E-Mail

Dean Baquet **Executive Editor** The New York Times 620 Eighth Avenue New York, New York 10018

Re:

Demand for Retraction

Dear Mr. Baquet:

We represent Donald J. Trump. We write in response to the libelous article published October 12, 2016 by The New York Times entitled Two Women Say Donald Trump Touched Them Inappropriately.

Your article is reckless, defamatory and constitutes libel per se. It is apparent from, among other things, the timing of the article, that it is nothing more than a politically-motivated effort to defeat Mr. Trump's candidacy. That is why you apparently performed an entirely inadequate investigation to test the veracity of these false and malicious allegations, including why these two individuals waited, in one case, 11 years, and, in another case, more than three decades, before deciding to come forward with these false and defamatory statements. Clearly, The New York Times is willing to provide a platform to anyone wishing to smear Mr. Trump's name and reputation prior to the election irrespective of whether the alleged statements have any basis in fact.

We hereby demand that you immediately cease any further publication of this article, remove it from your website and issue a full and immediate retraction and apology. Failure to do so will leave my client with no option but to pursue all available actions and remedies.

Marc E. Kasowitz