

JAMES R.K. DUGGAN, Ad. E.
Duggan, Avocats – Lawyers

1100 Avenue des Canadiens-de-Montréal
Windsor Station, 9th Floor
Montreal, Quebec, H3B 2S2

Tel.: 514-879-1459
Fax: 514-879-5648
e-mail: james@dugganavocats.ca

Montreal, the 15th of May, 2018

BY BAILIFF AND BY EMAIL
WITHOUT PREJUDICE
PERSONAL & CONFIDENTIAL

Mr. Glen Kirkland
RE/MAX VALLEYVIEW REALTY
1040 Princess Avenue
Brandon, MB
R7A 0P8

Re: Libel Notice
Our file: 3312-JD

Dear Sir,

We represent Ms. Christine Moore, Member of Parliament for Atibiti-Témiscamingue who has instructed us to send this letter, which also constitutes notice under the applicable legislation for libel and slander.

We are informed that you have publicly and repeatedly spread slanderous and libellous statements that you know to be false concerning our client.

More specifically you claimed publicly and through various media to have been the “victim” of improper sexual conduct by our client who you allege used her “power imbalance” over you to coerce you into consuming alcohol and then having sexual relations and that our client thereafter pursued and harassed you.

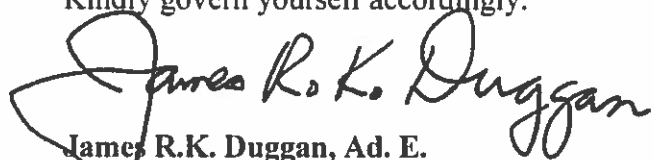
Our summary investigation reveals that your allegations are a tissue of lies apparently intended to harm our client while aggrandizing yourself.

Be advised that you are hereby put on notice to immediately cease making false allegations against our client. Be also advised that you are hereby also put on notice to immediately and publicly retract your allegations and apologize unreservedly. You are also put on notice to publish your retraction and apology in all the news media you gave statements to concerning our client, the whole in order to mitigate the damages you have caused and continue to cause.

Finally, you are hereby put on notice to preserve all evidence whatsoever concerning this matter, including but not limited to any written statements, correspondence, photographs, notes, texts, telephone bills and travel receipts.

Be further advised that the whole is under reserve and without prejudice to our client's rights to exercise all appropriate remedies including legal action the whole without further notice or delay.

Kindly govern yourself accordingly.

A handwritten signature in black ink that reads "James R. K. Duggan". The signature is fluid and cursive, with the first name "James" being the most prominent.

James R.K. Duggan, Ad. E.

JRKD/ok

C.c. Ms. Christine Moore