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\* ADMITTED IN CALIFORNIA ONLY

Via Email

June 26, 2012

Kimberly Michelle Pate

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Re: Cease and Desist

Dear Ms. Pate:

We are counsel for Tamar Braxton. It has come to our attention that you have recently made reckless, false and defamatory allegations about Ms. Braxton on Twitter ("Tweets") and in the media, including, without limitation, in an interview with TT Torrez on iPower 92.1 ("Interview"). Your Tweets and the Interview are laden with scandalous and malicious misinformation concerning our client.


In the Interview, you claim, inter alia, that Ms. Braxton sent a tweet to Toya Wright about you in which you claim Ms. Braxton said "Oh have fun and let this girl sell her fairy tale" despite the fact that the tweet in no way referenced you and was in fact sent to Ms. Wright while she was on vacation and referred to Ms. Braxton's wish for Ms. Wright that her vacation be like a fairy tale. Furthermore, in the Interview, you stated "I'm from Memphis, we jump gates! We don't play in them little games. So until the muppet gets it together she needs to stay away from me". Making threats of violence against an individual is a crime and while it is clear that your threats are directed at Ms. Braxton, referring to Ms. Braxton as a "muppet" is defamatory. In an effort to gain celebrity for yourself you have perpetuated and magnified provocative, unsubstantiated allegations while simultaneously making criminal threats.

We hereby demand that you immediately: (1) issue a press release in which you make a public apology to Ms. Braxton; (2) agree to pay for Ms. Braxton to retain a "reputation management" company to relegate the web pages containing your negative comments in connection with searches containing Ms. Braxton's name.

Ms. Braxton vigilantly protects her name and reputation. We are presently investigating all claims and remedies available to Ms. Braxton against you. As you now have written notice of the patent falsity of the information you have been perpetuating, if you fail to comply with these demands, Ms. Braxton will pursue immediate legal action against you for all necessary and appropriate relief, including but not limited to compensatory and punitive damages and shall report your threats of violence to the police.

Nothing contained in or omitted from this letter shall be deemed to be an admission of any fact, a waiver or a complete statement of all of our client's rights, claims or remedies, at law or in equity, concerning this matter, all of which are hereby expressly reserved.

Very truly yours,



Andrew Goldstone

cc: Tamar Braxton  
Vincent Herbert  
Kenneth Meiselas, Esq.