

From: Seva Batkin <SBatkin@FraserLitigation.com>

Subject: PortaOne and Citizen Labs Report

Date: January 11, 2023 at 3:39:39 PM EST

To: [REDACTED], [REDACTED], [REDACTED],[REDACTED], "r.deibert@utoronto.ca" <r.deibert@utoronto.ca>

Cc: Oleksandr Kapitanenko <Oleksandr.Kapitanenko@portaone.com>, "Andriy Zhystenko" <andriy.zhystenko@portaone.com>

Hello,

We represent PortaOne.

Yesterday, PortaOne was contacted by CBC about a report being published by Citizen Labs on January 12, 2023, and provided with a letter dated January 4, 2023, from Citizen Labs concerning that report. PortaOne had not received and had not seen that letter until that time. We requested Citizen Labs to provide a copy of its report (or the portions that refer to PortaOne) and the underlying emails, but Citizen Labs has not responded.

It is our view that PortaOne has not been given a reasonable and fair opportunity to consider and respond to these matters, particularly as the report and the underlying documents have been provided to the media, but not to PortaOne. Nevertheless, in the very limited time given to it, PortaOne conducted an internal investigation concerning the matters in the Citizen Labs report as paraphrased in media inquiries, and is preparing a statement that will be released shortly. Please do not submit or publish any stories concerning this matter until you have received and had an opportunity to review the statement, and it will be incumbent on you to expressly refer to and link to the statement in your stories.

Kind regards,

Seva

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