

January 13, 2023

VIA EMAIL

Paliare Roland Rosenberg Rothstein LLP
155 Wellington Street West, 35th Floor
Toronto, Ontario M5V 3H1

Attention: Ren Bucholz

Dear Sir:

Re: Citizen Lab Report (the “Report”)

We are in receipt of your letter of January 12, 2023.

As you are aware from the statement issued by PortaOne on January 11, 2023 (the “**PortaOne Statement**”), PortaOne appreciates the work being done by Citizen Lab and Prof. Deibert. We were thus surprised that, instead of responding to our request for a copy of the Report to enable PortaOne to provide a meaningful response, Prof. Deibert engaged litigation counsel. Your letter does not explain his surprising unwillingness to engage with PortaOne directly and provide the Report, which he had already provided to the media (along with our request). We appreciate your confirmation that the PortaOne Statement will be included in the Report, and look forward to receiving a copy of same.

In response to the three points in your letter:

1. Prof. Deibert’s January 4, 2023 letter included PortaOne’s mailing and email address, but, as we noted in our email, did not indicate a manner in which it was sent. In contrast, your letter included this information: “VIA EMAIL (sbatkin@fraserlitigation.com)”. PortaOne had not received and seen the letter until it was provided with a copy of same by CBC. Subsequently, it was discovered that Prof. Deibert’s email was caught in PortaOne’s spam filter.
2. PortaOne only found out about the assertion regarding its website on January 11, 2023, from a reporter’s question, and addressed it in the PortaOne Statement, the receipt of which you have confirmed. This assertion was not mentioned in Prof. Deibert’s letter.
3. The email attached to your letter has already been addressed in the PortaOne Statement.

The assertion in the concluding paragraph of your letter that PortaOne's statement had "evolved" from its position in our email to Prof. Deibert is inaccurate and inflammatory.

Yours truly,

Fraser / Batkin / Tribe LLP

Per:

Seva Batkin

* Incorporated Partner

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