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December 3, 2014

**VIA FEDERAL EXPRESS**

Ms. Amy Berg  
Producer/Director, "An Open Secret"  
c/o Disarming Films  
620 Venice Blvd.  
Los Angeles, CA 90291

Esponda Productions  
Matthew Valentinas and Gabe Hoffman  
c/o Law Office of Matthew Valentinas  
82 Broad Street, Suite 334  
Boston, MA 02110

**Re: "An Open Secret"**

Dear Ms. Berg & Messrs. Valentinas and Hoffman:

This firm is litigation counsel to SAG-AFTRA.

We have reviewed the exchange of correspondence earlier this year between Amy Berg and Pamela Greenwalt, SAG-AFTRA's Chief Communications & Marketing Officer, concerning the above-referenced documentary. Copies of that correspondence are attached to this letter. SAG-AFTRA has received no further communications from Ms. Berg since Ms. Greenwalt sent her letter dated September 18, 2014.

Since that date, however, SAG-AFTRA has received information from individuals who have seen one or more versions of "An Open Secret" that this documentary includes an interview of Michael Harrah overlaid by a chyron that identifies Mr. Harrah as a member of the "SAG [sic] Young Performers Committee." Please be advised that Mr. Harrah is not now (and was not at the time this documentary was screened) a member of or in any other way affiliated with the "SAG-AFTRA Young Performers Committee." Whatever allegations may have been leveled against Mr. Harrah have absolutely nothing whatsoever to do with SAG-AFTRA or any of its committees. However, since this chyron is clearly meant to suggest otherwise, demand is hereby made that any and all versions of "An Open Secret" be immediately re-edited to delete this chyron's reference to "SAG [sic]" and that no other references to "SAG [sic]," to SAG-AFTRA or to any SAG-AFTRA committees be included in any portions of this documentary. **Please provide the undersigned with prompt written confirmation that these actions have been taken.**

In addition, it has likewise come to the attention of SAG-AFTRA that Ms. Berg has repeatedly and deliberately attempted to draw SAG-AFTRA into her publicity and promotional

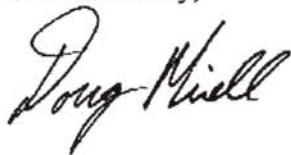
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efforts for “An Open Secret” by telling multiple reporters that they should contact SAG-AFTRA to find out “what we were doing about” the issue of alleged child sexual abuse and exploitation in Hollywood. In particular, Ms. Berg reportedly repeated the misidentification of Mr. Harrah as “a member of the SAG [sic] Young Performers Committee” as part of an interview published online by *Elle* magazine on November 13, 2014 (<http://www.elle.com/life-love/society-career/true-detective>). Similar claims are contained in an online article published by *The Hollywood Reporter* on November 12, 2014 (<http://www.hollywoodreporter.com/news/hollywood-sex-abuse-film-revealed-748375>), and repeated in the November 21 issue of *The Hollywood Reporter* magazine. An even more inflammatory and fallacious reference to Mr. Harrah as “a SAG [sic] committee chief who manages child actors” is contained in an article that appeared in the online edition of the *International Business Times* on November 17, 2014 (<http://www.ibtimes.com/bryan-singer-sex-abuse-accuser-featured-new-documentary-open-secret-q-director-amy-1724777>), and elsewhere in other entertainment industry publications. All such false and misleading statements made in connection with any and all efforts to market, promote, advertise or otherwise publicize “An Open Secret” – including all references to “SAG [sic],” SAG-AFTRA and/or any of its committees – must immediately cease. **Please forthwith provide the undersigned with written representations and warranties to this effect from all of this letter’s addressees.**

This letter is not intended, and should not be construed, as a complete expression of SAG-AFTRA’s factual or legal position with respect to any of the matters addressed herein. Nothing contained in or omitted from this letter is intended, and should not be construed, as a waiver, relinquishment or other limitation upon any of SAG-AFTRA’s rights and/or remedies, all of which are hereby expressly reserved.

This email constitutes a confidential legal communication and may not be published in any manner.

Yours sincerely,



DOUGLAS E. MIRELL OF  
HARDER MIRELL & ABRAMS LLP

Attachments

cc: Ms. Pamela Greenwalt  
David White, Esq.  
Duncan Crabtree-Ireland, Esq.