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October 21, 2015

VIA CERTIFIED MAIL AND EMAIL

WPGH
750 Ivory Avenue
Pittsburgh, PA 15116

Re: Pennsylvanians for Judicial Reform False and Defamatory Advertisement

Dear Station Manager:

This office represents the Honorable Anne Covey, a candidate for the Pennsylvania Supreme Court. I write to notify you that an advertisement paid for by Pennsylvanians for Judicial Reform broadcasted, and/or contracted to be broadcast, by your station contains inaccurate, deceptive, and defamatory statements concerning the publication record of Judge Covey. Specifically, the advertisement states that Judge Covey lied about authoring numerous published legal articles. This claim is demonstrably false and defamatory.

As this defamatory advertisement was sponsored by Pennsylvanians for Judicial Reform and not by any candidate for office, your station is neither obligated to broadcast the advertisement nor immune from liability for its broadcast. *See Felix v. Westinghouse Radio Stations*, 186 F.2d 1, 6 (3d Cir. 1950) *cert denied*, 314 U.S. 909 (1950); *see also* FCC Public Notice, 24 F.C.C.2d 832 (1970). To the extent your station has aired this advertisement, you may be liable for any resulting damages. To mitigate further damages, your station should immediately cease and desist broadcasting or otherwise distributing this advertisement or any similar defamatory material regarding Judge Covey.

Please contact Brooke Cohen or William Trask of this office at (215) 561-7681 to confirm that this advertisement will not air on your station and with any questions regarding this letter. Thank you for your immediate attention to this matter.

Sincerely,



Richard A. Sprague

RAS:bsc

cc: Hon. Anne Covey