

# Hall Declaration Exhibit B

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Mr. David M. Zeff  
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1388 Sutter Street, Suite 820  
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Dear Mr. Zeff,

This is a demand letter. On behalf of my client, I intend to file for Rule 11 sanctions against you for:

- Filing a baseless anti-SLAPP motion to cause unnecessary delay and needless increase in the cost of litigation;
- Offering defenses and other legal contentions in connection with that anti-SLAPP motion that are not warranted by existing law or by a nonfrivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
- Offering, as facts, contentions in connection with that anti-SLAPP motion which are clearly false and have no evidentiary support, nor are likely to have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- Offering denials of factual contentions in connection with that anti-SLAPP motion that are not warranted on the evidence.

Specifically, Mr. Jacobsen has pointed out to numerous lies in the declarations that you have offered. You have failed to correct them. Furthermore, Mr. Jacobsen produced the evidence which forecloses any reasonable argument that litigation privilege applies because of the overwhelming evidence of fraud on the Patent Office that your client and Mr. Katzer committed. You continue to argue it. In addition, the argument that filing a FOIA request constitutes a statement before an official proceeding is baseless since only activities constituting petitioning the government for redress of harms are protected. The evidence clearly shows that your client and Mr. Katzer had no intention of "warning" or complaining to the U.S. Department of Energy via that FOIA request.

Thus, we demand that you withdraw your anti-SLAPP motion. If you do not do so, we will file a motion for Rule 11 sanctions at the earliest possible time permitted by the Federal Rules of Civil Procedure.

*Victoria K Hall*