## PHILLIPS, ERLEWINE & GIVEN LLP

ATTORNEYS AT LAW

ONE EMBARCADERO CENTER, 23<sup>RD</sup> FLOOR
SAN FRANCISCO, CALIFORNIA 94III

TELEPHONE (415) 398-0900

FAX (415) 398-09II

WWW.PHILLAW.COM

DAVID M. GIVEN dmg@phillaw.com

March 9, 2004

## BY E-MAIL — RETURN RECEIPT REQUESTED

Mr. Gavin Sheridan Gavin's Blog gavin@gavinsblog.com

Re: Cal. Civ. Code § 48a Demand for Correction

Dear Mr. Sheridan:

This letter demands correction of libels of Dr. John Gray published on your website on November 17, 2003.

The libelous statements were contained in the weblog entry "Men are From Mars...," stating, "[Dr.] John Gray is a fraud," and repeating content appearing on <u>buzz.weblogs.com</u> that "the relationship guru who constantly promotes himself as 'Dr. John Gray' and lists a 'Ph.D.' has only one accredited degree, a high school diploma," and "neither his BA nor his MA is from an accredited institution of higher education."

The foregoing statements are false, unprivileged, and defamatory and their publication is libel <u>per se</u>. The facts, which you knew or should have known when it published the defamatory entry, are as follows:

- 1. Dr. Gray received his Ph.D. from Columbia Pacific University ("CPU") in 1982. The school was then, and continued to be for the next 15 years, a State of California-approved university.
- 2. As reported on the website for the State of California's Bureau for Private Post-Secondary & Vocational Education, Dr. Gray's Ph.D. is legally valid, and credentials received by virtue of that degree are also valid. Dr. Gray is certified by the National Academy for Certified Family Therapists. Dr. Gray fulfills the requirements of a regular member of the American Counseling Association.

Mr. Gavin Sheridan March 9, 2004 Page 2

3. Previously, Dr. Gray received his Master's degree from the Maharishi European Research University ("MERU") in Switzerland in October 1977, where he also obtained his Bachelor's degree.

Pursuant to Section 48a of the California Civil Code, we demand that you immediately remove the foregoing libels from your website and publish a correction immediately retracting the foregoing libels in substantially as conspicuous a manner as they were made and in each and every publication or other media in which the statements were published, but in any event to publish each and every demanded correction no later than three (3) weeks of receiving this letter.

Our client reserves all rights.

Mours very truly,

David M. Given

DMG:dkl

cc: Dr. John Gray (by US mail)