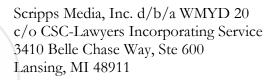
## **DONOVAN S. ASMAR**

DASMAR@BODMANLAW.COM 248-743-6033

November 8, 2023

## Via U.S. Mail

BODMAN PLC SUITE 500 201 W. BIG BEAVER ROAD TROY, MICHIGAN 48084 248-743-6002 FAX 248-743-6000



Re: Litigation Hold Letter

Dear Scripps Media, Inc.:

As you know, this firm represents WADL-TV and its principal owner, Kevin Adell. By letter dated November 7, 2023, you were informed of a dispute between WADL and Scripps Media regarding Scripps Media's agreement to carry The CW Network without compensation and with knowledge of WADL's agreement and business relationship with Mission Broadcasting.

WADL continues to evaluate its potential claims against you. Due to the potential of litigation, the law requires that you preserve all documents (paper and electronically stored information) and other evidence that are, or may be, relevant to the dispute between you and WADL regarding The CW Network. For this reason, it is essential that you immediately preserve and retain all potentially relevant evidence in hard copy, electronic (computer) or any other form of media.

To comply with applicable law, you must immediately institute a "legal hold" to retain potentially relevant documents and records. A litigation hold ensures that the documents relating to the dispute are not destroyed and are available for the discovery process when required or requested.

Preservation should be interpreted broadly to accomplish the goal of identifying all potentially relevant documents, maintaining the integrity of the documents as they currently exist, and ensuring that they are not altered, deleted, destroyed, or otherwise modified. If you have any doubt as to whether a document or category of documents is covered by this notice, please err on the side of preservation. Your obligation to preserve extends to all potentially relevant documents in your possession, custody, or control.

You have a duty to ensure, to the highest degree possible, that all potentially relevant documents are not destroyed. This hold also must be directed at all persons who you reasonably believe have information relevant to the dispute. The failure to preserve evidence could result in the imposition of court-ordered sanctions or penalties against



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you. The penalties could include monetary fines, reimbursement of the opponent's litigation costs, or inferences against the party failing to meet discovery obligations.

If you have any questions about any of the information in this notice, please contact me, and/or schedule a call to discuss further. If you have engaged an attorney to represent you, please provide this letter to the attorney.

Thank you for your cooperation with respect to this important matter.

Respectfully,

Donovan S. Asmar

DSA: