

2 September 2015

The Proprietor
UnhappyFranchisee.com

By email to UnhappyFranchisee@gmail.com

Partner Sylvia Fernandez
Direct Line (02) 8083 0408
Email sylvia.fernandez@holdingredlich.com
Our Ref SZF 14680036

Dear Unhappy Franchisee

Letter of demand for the removal of defamatory material from 'Unhappy Franchisee' blog

We act for Expense Reduction Analysts (**ERA**).

It has been brought to ERA's attention that your blog currently hosts an article described as having been submitted by Armstrong Consulting Pty Ltd (**AC**) entitled '*ERA EXPENSE REDUCTION ANALYSTS Franchise Fraud Allegations*', located at 'www.unhappyfranchisee.com/era-expetnse-reduction-analysts-franchise-fraud-allegations' (sic) (**Article**).

For your benefit, you should be aware that AC is one of three related plaintiffs in proceedings in the Supreme Court of New South Wales against a number of ERA entities and directors. The plaintiffs are former shareholders in the ERA group who assert in the legal proceedings, among other things, breaches of various agreements governing their shareholdings in the group. Their claims do not concern the franchising aspects of ERA's business. These legal proceedings have been on foot since 2011 and concern many of the matters raised in the Article. The hearing of these legal proceedings has yet to occur and as such, many of the statements made by AC in the Article pre-judge without foundation matters that will ultimately be determined by a court in relation to what is essentially a dispute between shareholders.

We have also drawn to the attention of the firm of solicitors representing AC in these legal proceedings the defamatory nature of the Article and have demanded on behalf of ERA that AC immediately procure the Article to be removed from your blog. A copy of our letter is **enclosed** for your reference.

As you are now on notice of the defamatory nature of the Article, its irrelevance to the matters which appear to be the subject of your blog and its tendency to pre-judge matters that will ultimately fall to be determined by a court, ERA demands that you remove the Article from your blog immediately and that you undertake not to host the Article or any similarly defamatory publications which concern ERA or any of its directors or associates in the future.

ERA's rights are strictly reserved. ERA will rely on this letter on the question of its costs in the event that litigation ensues.

Yours faithfully



Holding Redlich

Sydney . Melbourne . Brisbane

Level 65 MLC Centre 19 Martin Place Sydney NSW 2000 DX 529 Sydney
GPO Box 4118 Sydney NSW 2001 T +61 2 8083 0388 www.holdingredlich.com