

July 6, 2023

t 305.349.2333
f 305.349.2310
MDJoblove@Venable.com

VIA FEDEX & ELECTRONIC MAIL

Mr. Sean Kelly
Relentless, Inc.
2221 New Holland Pike
Lancaster, Pennsylvania 17601
E-mail: unhappyfranchisee@gmail.com

Re: Posts Regarding PIRTEK USA, LLC

Dear Mr. Kelly:

As you know, we represent PIRTEK USA, LLC (“PIRTEK”) in connection with its litigation against JBL Hose Service, LLC and James Lager (collectively “Lager”). The purpose of this letter is to demand that Relentless, Inc. and you personally (together “you”) refrain from your continued posts relating to PIRTEK and/or its officers, employees and agents which are false, defamatory and disparaging.

You are well aware that Lager has contractual obligations to refrain from disparaging or defaming PIRTEK. Yet, at his behest, you have posted untrue and defamatory content about PIRTEK on your website www.unhappyfranchisee.com (the “Unhappy Franchisee Website”). Your posts pretend that you are a journalist and that your posts are protected by the First Amendment. Your position is belied by the fact that you are being paid \$5,000.00 a month to write about and help Lager in his self-described “battle” against PIRTEK. In other words, you are engaged in paid advertising, not journalism, and are not entitled to the First Amendment protections afforded to actual journalists.

Further demonstrating the fact that you are not an unbiased journalist is the April 15, 2021, agreement that you entered with Lager to split amounts Lager hoped to recover from PIRTEK through litigation. For your convenience, that e-mail exchange is pasted below.

Sean Kelly
July 6, 2023
Page 2

REDACTED

Thus your posts are no more than an attempt to extort a settlement to your economic advantage. You are not a journalist, but a hired gun. And, your posts regarding PIRTEK percolate at each time that a judicial decision is made on Lager's litigation with PIRTEK.

PIRTEK will not tolerate your defamatory posts about the company or its directors, officers, employees or agents. PIRTEK hereby demands that you cease and desist from posting further defamatory and disparaging content about PIRTEK on the Unhappy Franchisee Website, or elsewhere.

Demand is hereby further made that you not destroy, conceal, or alter any paper or electronic files and other data generated by and/or stored on your computers, storage media, storage systems and any other electronic data, related to PIRTEK. Your failure to comply with this demand can result in severe sanctions being imposed by a Court and liability in tort for spoliation of evidence or potential evidence.

In short, you are instructed to CEASE and DESIST from your aforementioned misconduct.

Sean Kelly
July 6, 2023
Page 3

By sending this letter PIRTEK is in no way waiving any rights or remedies to which it is already entitled. Additionally, PIRTEK is not interested in corresponding with you. Any correspondence intended for PIRTEK should be directed to me.

PLEASE GOVERN YOURSELF ACCORDINGLY.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael D. Joblove".

Michael D. Joblove

cc: Aaron Blynn, Esq.