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Keith J. Wesley kwesley@bgrfirm.com

File No. 7865-001

October 14, 2019

Via E-Mail

Mr. Lewis Perdue 811 W. Napa St., Suite G Sonoma, CA 95476 E-Mail: lperdue@ideaworx.com

Re: Wine Industry Insight Posts

Dear Mr. Perdue:

We represent Bryant Vineyards, Ltd. (the "Winery").

We have reviewed your online posts related to lawsuits pending between the Winery, a Winery executive, and a former Winery employee named Lauren Ridenhour, including your post dated October 8, 2019, entitled "Sulser Bryant sues to silence the whistleblower who once saved her \$3 million." Please be aware that certain statements in your posts are false, in fact and/or by implication. Among others, the statements and implications that the Winery knowingly engaged in regulatory violations and the Winery filed a lawsuit against Ms. Ridenhour for an improper purpose are demonstrably false and seemingly serve no purpose other than to disparage and harm the Winery and its representatives.

In fact, the Winery is in full compliance with all applicable regulations, continues to produce vintages recognized as amongst the Valley's finest, and regretfully was compelled to file suit to ensure Ms. Ridenhour ceased breaching her contractual obligations (resulting in a stipulated order prohibiting future disclosures of confidential information by Ms. Ridenhour and those acting in concert with her). Moreover, although we are not counsel of record in Ms. Ridenhour's lawsuit against the Bryants in New York, it is obvious why there has been no substantive response to the allegations therein: A motion to dismiss the Second Amended Complaint on multiple grounds is pending. Ms. Ridenhour's failure to plead a valid claim after three chances is being challenged, and it is therefore both unnecessary and procedurally improper to answer the Second Amended Complaint at this time. That said, I assure you that the inflammatory allegations related to financial impropriety and even fraud in securing a loan are false and outrageous. Indeed, my understanding is that the loan closed seamlessly last spring despite (rather than because of) the actions of Ms. Ridenhour.

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We look forward to the impending day when Ms. Ridenhour's meritless lawsuit against the Bryants will be dismissed once and for all, and when she (and those acting on her behalf and in concert with her) will be held accountable for their ill-advised actions. Until then, however, we request that you retract the aforementioned posts, cease publishing any other false or disparaging content related to the Winery, and allow the courts of law to adjudge the merits of these disputes, without passion, prejudice, or bias.

We reserve all rights and remedies concerning the foregoing.

Thank you in advance for your attention to our requests.

Very truly yours,

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Keith J. Wesley

cc: Jennifer Surprenant, Esq.