



John W. Amberg
Direct: 1-310-576-2280
Fax: 1-310-576-2200
jwamberg@bryancave.com

July 6, 2007

VIA FACSIMILE AND OVERNIGHT MAIL

G. Richard Green, Esq.
Green & Marker
1875 Century Park East
Suite 1880
Los Angeles, California 90067

**Re: Nivie Samaan v. Joseph Zernik
Los Angeles County Superior Court, Case No. SC087400**

Subject: CEASE AND DESIST

Dear Mr. Green:

As you know, we are attorneys for Countrywide Home Loans, Inc. and related companies ("Countrywide"), and its officers and employees, who are the targets of a campaign of harassment by Joseph Zernik directed at them and at their personal associates. Please provide this letter to your client.

During the past several months, Dr. Zernik has repeatedly contacted Countrywide officers and employees concerning this lawsuit, despite express notice to Dr. Zernik that these individuals are represented by counsel and despite numerous requests that Dr. Zernik direct all communications concerning the case to Todd A. Boock of the Countrywide legal department or other designated counsel. Dr. Zernik has blatantly ignored these requests and his continued practice of directly contacting represented persons is improper and harassing.

Furthermore, Dr. Zernik has contacted personal associates of the employees regarding his claims, including the charity Bet Tzedek where one of Countrywide's officers is President, a rabbi at the synagogue attended by the same officer, other religious leaders, a retired Superior Court judge, and "others in the legal and Jewish community in Los Angeles," according to Dr. Zernik. Recently, we learned that Dr. Zernik has also contacted individual members of the Bet Tzedek board of directors. None of these third parties has anything to do with this lawsuit, and the only

Bryan Cave LLP
120 Broadway, Suite 300
Santa Monica, CA 90401-2386
Tel: (310) 576-2100
Fax: (310) 576-2200
www.bryancave.com

Chicago
Hong Kong
Irvine
Jefferson City
Kansas City
Kuwait
Los Angeles
New York
Phoenix
Shanghai
St. Louis
Washington, DC

And Bryan Cave,
A Multinational Partnership,
London

G. Richard Green, Esq.
July 6, 2007
Page 2

Bryan Cave LLP

conceivable purpose for your client's contacts was to **embarrass Countrywide's officer** in an attempt to pressure Countrywide.

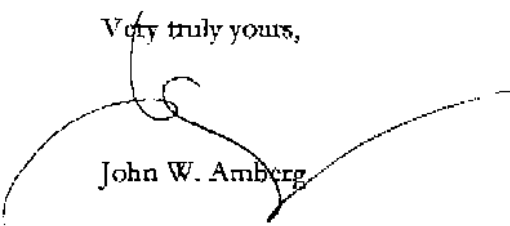
Dr. Zernik has published scurrilous attacks on Countrywide and its officers to third parties, bringing their business practices into **disrepute by falsely accusing them of real estate fraud, mortgage fraud, and wire fraud, and of colluding with the plaintiff.** These communications are defamatory, outrageous, and malicious.

On behalf of Countrywide and its officers and employees, we hereby demand as follows:

1. That Joseph Zernik immediately cease and desist from contacting represented Countrywide officers and employees, and shall communicate solely with Countrywide's designated legal counsel regarding this case in the future;
2. That Joseph Zernik immediately cease and desist from **contacting any personal associates of Countrywide's officers and employees about this case or the business practices of Countrywide and its officers and employees;**
3. That Joseph Zernik retract the **false and malicious statements that he has published to third parties, including but not limited to his defamatory statements that Countrywide and its officers and employees have committed fraud and colluded with plaintiff.** Retraction should be made in the same form and to the same persons to whom the defamatory statements were made, and proof of the retractions shall be provided to the undersigned; and
4. That Joseph Zernik **refrain from publishing any new defamatory statements** about Countrywide and its officers and employees.

Countrywide and its officers and employees reserve all of their rights against Joseph Zernik.

Very truly yours,


John W. Amberg

JWA:jcc