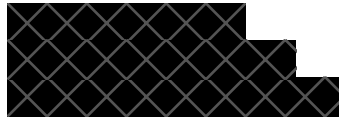


April 18, 2025

VIA CERTIFIED MAIL & E-MAIL

Bettina Cataldi
CBS Media Ventures / Inside Edition
c/o Paramount Global



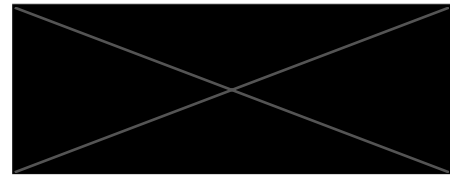
Agent for Service of Process
c/o Paramount Global
2710 Gateway Oaks Drive
Sacramento, CA 95833

**Re: FORMAL RETRACTION DEMAND PURSUANT TO CALIFORNIA CIVIL
CODE § 48a**

Dear Ms. Cataldi,

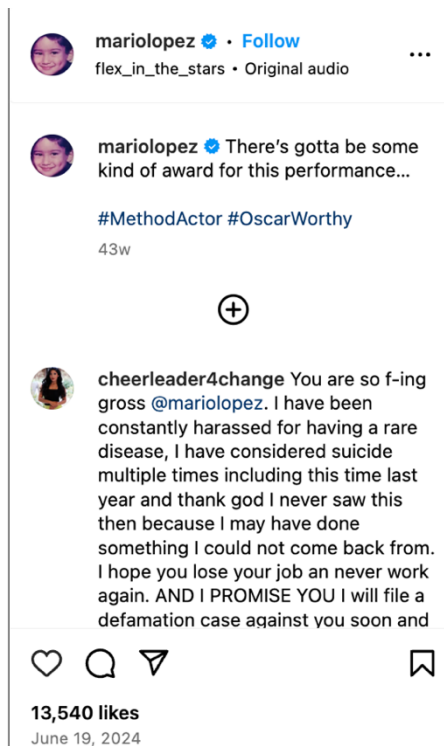
I am writing to submit a formal demand for retraction pursuant to California Civil Code § 48a, in connection with the *Inside Edition* segment published and broadcast by CBS Media Ventures on or about February 3, 2010, and featuring myself, Desirée Townsend (formerly known as Desiree Jennings). The segment remains publicly accessible here: <https://www.insideedition.com/159-flu-shot-woman>. Interestingly, while the accompanying video segment has long since been removed, the originally published article remains readily accessible through a simple Google search. Even the article's headline is demeaning and reductive, referring to me merely as "Flu Shot Woman" rather than acknowledging the complexity of my condition or the fact that I was ultimately diagnosed with a rare neurological disease.

On or about April 10, 2025, I formally requested that your organization remove a related press release, nearly identical in language to the article above, which falsely insinuates that I fabricated a medical condition and that your camera crew captured me in the act of malingering. This implication is entirely refuted by medical records I provided to your journalist at the time of

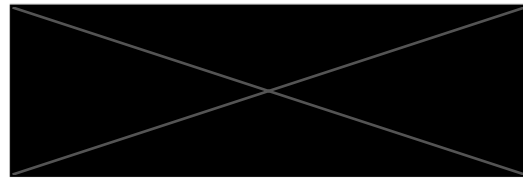


filming, including documentation from my treating physician confirming that I was undergoing legitimate medical treatment and actively prescribed medication during the period in question. These records were intentionally excluded from the final edit, resulting in a broadcast that was incomplete, misleading, and defamatory by omission. Despite being notified of these omissions and of the continued weaponization of your content against me, your organization has failed to issue any clarification, correction, or update to the public record. However, your public relations team did agree to remove the original press release.

Furthermore, your organization has permitted the rampant reproduction and republication of this original, copyright-protected broadcast, which has recently flourished across social media platforms. On or about June 19, 2024, actor and *Access Hollywood* host Mario Lopez republished **your copyrighted content**, accompanied by defamatory commentary, on his personal and verified Instagram account. The post can be viewed here: <https://www.instagram.com/reel/C8Zx0QdpG9c/>.



In an apparent attempt to capitalize on the virality of this inflammatory content, more third parties have recently republished the defamatory material on the social media platform TikTok. On or about April 4 and April 5, 2025, two separate TikTok accounts posted videos that have collectively garnered over 3.5 million views and counting. These videos closely replicate the same defamatory narrative presented in your original segment, **thereby renewing and amplifying the reputational harm caused by your organization**. (See <https://www.tiktok.com/t/ZT2oJ14MG/> for the April 4th video and <https://www.tiktok.com/t/ZT2otJLVA> for the April 5th).



Your organization is well-known for routine enforcement of copyright protections, including aggressive cease-and-desist notices and even federal copyright infringement litigation (e.g. *CBS Operations Inc. v. ComedyMX LLC et al.*). Which makes this **selective inaction** especially troubling. To evaluate your organization's copyright enforcement practices, I personally reposted the segment with minor edits on TikTok and Instagram. Notably, the content did not trigger any copyright enforcement or takedown measures on either platform, unlike with other CBS-owned content, which regularly results in immediate removal. This strongly suggests that CBS is knowingly permitting the ongoing circulation of this segment, thereby allowing renewed public interest and engagement around *Inside Edition* at my expense.

As a direct result of your organization's original segment and its continued republication, I have lost employment opportunities and remain fearful of losing current employment due to the enduring reputational damage. The relentless public mischaracterization has caused severe emotional distress, including episodes of depression, suicidal ideation, and worsening of my neurological autoimmune disease, which had previously been under control. Your refusal to correct or retract the defamatory content is not only prolonging the harm, it is actively exacerbating my medical condition and psychological well-being.

In light of this pattern, your failure to act, or to correct the public narrative, appears to be a conscious and strategic choice, rather than mere oversight. By knowingly permitting the continued public distribution of its copyrighted segment, including through platforms where it has the legal right and technical means to enforce takedown, CBS has facilitated the republication of defamatory content to a new audience. This inaction, following direct notice of harm, constitutes a reckless disregard for the truth and **supports my renewed claims against your organization for defamation, false light, and negligent infliction of emotional distress.**

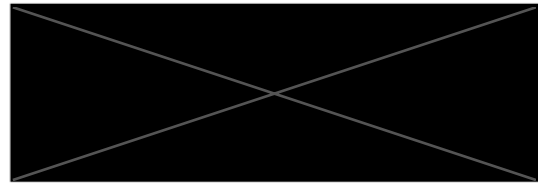
Accordingly, I hereby demand that CBS and Inside Edition:

- **Issue a retraction of the original segment**, publicly acknowledging its misleading nature and omission of critical medical evidence;
- **Publish a correction clearly stating that, at the time of filming, I was under active medical care for a neurological condition which included treating medications** — medical documentation of which was provided to your organization.
- Take all reasonable and timely measures to ensure that the segment is no longer being **distributed, monetized, or publicly accessible without proper correction or clarification by CBS, Inside Edition, or any affiliated entities or licensees** — including the prompt filing of takedown requests with platforms such as Facebook, Instagram, TikTok, and YouTube.



**DESIRÉE
TOWNSEND**

IP & LITIGATION PARALEGAL



Failure to comply with this demand will leave me no choice but to pursue immediate legal action for defamation, false light, intentional infliction of emotional distress, and other applicable torts under California law. Pursuant to California Civil Code § 48a, I am formally requesting that your organization issue a full and adequate retraction and correction. If I do not receive a response **within fourteen (14) days of this letter**, I will proceed with filing a legal Complaint against your organization and will seek general, special, and punitive damages. These special damages include, but are not limited to: loss of employment and future professional opportunities, reputational harm, out-of-pocket medical expenses resulting from the exacerbation of my autoimmune condition, and mental health treatment costs arising from the severe emotional distress caused by your continued inaction.

Nothing in this letter, nor any act or omission to act on my part, or should be deemed to be a waiver, abridgment, alteration, modification or reduction of any right, claims, defenses, and remedies that I may have regarding this matter and all such rights, claims, defenses, and remedies, whether at law or in equity, are hereby expressly reserved.

I urge your organization to take this demand seriously. Should you have any questions or wish to discuss this matter further, please contact me directly.

Sincerely,

Desirée Guerrière Townsend