

September 29, 2023

**VIA E-MAIL**

Alex Halperin  
WeedWeek

*Re: WeedWeek Inquiry to Eaze Technologies, Inc.; WeedWeek's Threat to Disclose Eaze Privileged and Confidential Documents*

Mr. Halperin:

The Norton Law Firm PC is counsel to Eaze Technologies, Inc. I am aware that you have been in touch with Eaze's CEO, Cory Azzalino, about your forthcoming story and that you asked that we send this letter directly to you.

You should, of course, publish any story about Eaze, on any topic, that is of interest to you and the public. You should diligently and properly investigate your story and publish the facts you learn through those efforts, whether Eaze likes them or not, and whether Eaze agrees with you or not. The purpose of this letter, which I explain in greater detail below, is to demand that, when you publish your work, you **not** publish or otherwise disclose the privileged and confidential documents that were leaked to you unlawfully.

- There is no privilege, under the First Amendment or otherwise, for any person or media entity to publish information that was stolen, which is the case here. *See Bartnicki v. Vopper*, 532 U.S. 514 (2001). As a result, and for good reason, publication of Eaze's privileged or confidential information by you would expose both you and your publication to liability.
- Furthermore, the person who unlawfully leaked Eaze's privileged and confidential information to you clearly intends to cause Eaze harm. Your publication of that stolen information – having now been placed on notice that it is in fact stolen – would constitute aiding and abetting that bad actor.

- Publication of leaked privileged and confidential information also serves no legitimate journalistic purpose. The company cannot respond and comment on the privileged communication without risking waiver of other privileged communications on the same subject. For the same reason, the company cannot share other communications with its counsel that provide additional context or different views from the particular document you have. Basing a story on privileged communications is unfair – your source gets to selectively choose what to feed you for their own purposes, and the company is prevented from responding in full. A responsible journalist would question why he would allow himself to be manipulated into that role; a responsible citizen would not knowingly further the crime.

On September 26, 2023, you sent Mr. Azzalino an email asking him to comment on allegations made by the plaintiffs in the lawsuit *Leder et al. v. Eaze Technologies, Inc., et al.*, pending in San Francisco Superior Court. Your email to Mr. Azzalino also included the text of an email that you described as having been sent from Dan Kramer, the general counsel of Eaze on May 2, 2023, and a response by Mr. Azzalino that includes additional company lawyers. The text you quoted bore a prominent heading, “\*\*\*\*\*PRIVILEGED AND CONFIDENTIAL\*\*\*\*\*.” As is clear from the participants, the heading, and the text of the email, this was a privileged and confidential communication between company legal counsel and Mr. Azzalino. The company has not authorized its disclosure and whoever provided it to you did so in violation of the law. In brief, it was stolen.

Your message to Mr. Azzalino also attached three Management Agreements between Eaze and third parties. Each of those agreements states that it is confidential. Once again, the company has not authorized the disclosure of those contracts and whoever provided you those documents did so in violation of the law. Those documents, and the information they contain, were stolen.

On September 27, 2023, you sent another email to Mr. Azzalino, this time attaching an Excel spreadsheet that you said “was shared with me.” This too is a proprietary and confidential document and Eaze did not authorize its disclosure outside the company. It too was stolen.

Eaze is investigating the source of these thefts and has narrowed the likely suspects to a small number of persons, including specific individuals who were not originally on the email message you shared with Mr. Azzalino. We will continue to aggressively pursue this matter and expect to find the source – or sources – of the leaks and hold them accountable. That should not be necessary, and we expect and demand

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that you provide us with the name of the person or persons who has wrongfully disclosed these documents to you.

Given the subject matter of this unauthorized disclosure, the theft and leak of these documents is also relevant evidence in the ongoing San Francisco lawsuit in which Lisa Leder, Alexander Levine, and Andrew Levine have sued Eaze and its officers and directors. Consequently, please take notice that you have a legal obligation to preserve all evidence, documents, and communications that concern any privileged, confidential, or proprietary documents or information of Eaze, including information concerning the identity of the source. Destruction or deletion of any of that evidence knowing that it is relevant to the lawsuit would constitute spoliation of evidence, which is itself unlawful.

Very truly yours,

A handwritten signature in cursive script that reads "Fred Norton".

Fred Norton  
THE NORTON LAW FIRM PC