

**SHULMAN
ROGERS
GANDAL
PORDY &
ECKER, P.A.**

Lawrence A. Shulman
Donald R. Rogers
Karl L. Ecker†
David A. Pordy+
David D. Freishtat
Martin P. Schaffer
Christopher C. Roberts
Jeffrey A. Shane
Edward M. Hanson, Jr.
David M. Kochanski
James M. Kefauver†
Robert B. Canter
Daniel S. Krakower
Kevin P. Kennedy
Alan B. Sternstein
Nancy P. Regelin
Samuel M. Spiritos+
Martin Levine

Worthington H. Talcott, Jr.+
Fred S. Sommer
Morton A. Faller
Alan S. Tilles
James M. Hoffman
Michael V. Nakamura
Jay M. Eisenberg+
Douglas K. Hirsch
Ross D. Cooper
Glenn C. Etelson
Karl J. Protil, Jr.+
Timothy Dugan+
Kim Viti Fiorentino
Sean P. Sherman+
Gregory D. Grant+
Jacob S. Frenkel•
Rebecca Oshway

Michael J. Froehlich
William C. Davis, III
Patrick M. Martyn
Sandy David Baron
Christine M. Sorge
Michael L. Kabik
Jeffrey W. Rubin
Simon M. Nadler
Scott D. Museles
Karl W. Means
Michelle R. Curtis•
Mimi L. Magyar
Glenn W.D. Golding+
Michael J. Lichtenstein
Bruce A. Henoch
Jeremy W. Schulman
Debra S. Friedman•
Matthew M. Moore+

Eric J. von Vorys
Gary I. Horowitz
Heather L. Howard
Stephen A. Metz
Hong Suk "Paul" Chung
Patrick J. Howley
Carmen J. Morgan•
Kristin E. Draper•
Heather L. Spurrier•
André L. Brady
Melissa G. Bernstein
Patricia Teck
Jacob A. Ginsberg
John D. Sadler
Marc E. Pasekoff
Erin J. Ashbarry
Alexis H. Peters•
Meredith S. Abrams

John D. Adams
Michael T. Ebaugh
David B. Kramer
Lauren J. Pair
Of Counsel
Larry N. Gandal
Leonard R. Goldstein
Richard P. Meyer•
Larry A. Gordon•
David E. Weisman
Lawrence Eisenberg
Deborah L. Moran
Scott D. Field
Jeannie Eun Cho
Special Counsel
Philip R. Hochberg•
Maryland and D.C. except as noted:
+ Virginia also ° D.C. only
• Maryland only † Retired

Writer's Direct Dial Number:

(301) 230-5217
bdavis@srgpe.com

November 28, 2005

PERSONAL AND CONFIDENTIAL

**WITHOUT PREJUDICE
FOR SETTLEMENT PURPOSES ONLY**

Mr. Michael Allen
School of History, Technology, and Society
D. M. Smith Building
Georgia Institute of Technology,
Atlanta, GA 30332-0345
404 894-3196
mike.allen@hts.gatech.edu

Re: Edwin Black vs. Allen, et al
Our File No. 06-134-901

Dear Mr. Allen:

This law firm and the undersigned have been retained by Edwin Black to pursue claims against you for false light, libel and other causes arising from your false and malicious article about the award-winning *IBM and the Holocaust* which appeared in an early 2002 issue of the *Technology and Culture* an article we only discovered some weeks ago. Despite numerous opportunities to correct the record, or respond to recent questions you have declined to do so.

My client greatly respects *Technology and Culture* which he feels was victimized by your fallacious reporting of the contents of his book, and sloppy recitation of the historical facts. Mr. Black's sole interest is correcting the record and undoing the damage caused by your obviously false and malicious article.


You should know that you are subject to the jurisdiction of the courts in Montgomery County, Maryland where your false report was circulated; *Technology and Culture* is published in Maryland. As an expert on the economic and commercial history of the Reich writing in a journal of expertise, you will of course be held to the highest standard. If my client does not hear from you within five business days that you are willing to correct the record, this firm has been authorized to take such legitimate reasonable additional steps as provided by law.

Mr. Michael Allen
November 28, 2005
Page 2

In any potential litigation, your "state of mind" will be at issue. Accordingly, formal demand is hereby made upon you to take all necessary steps to preserve and otherwise safeguard all communications with any person relative to these claims. This includes drafts, emails, bulletin board exchanges and/or any other written or recorded communications between you and any other scholars and even IBM, all of which constitute discoverable material under applicable law and may be subpoenaed. Any attempts to destroy any of the foregoing documents will likewise be discoverable, and may be separately actionable. If you have counsel, please have him or her contact me immediately.

Very truly yours,

SHULMAN, ROGERS, GANDAL,
PORDY & ECKER, P.A.

By: 
William C. Davis, III

WCD/mls