



WEINSTEIN & WEINSTEIN
LLP

Jacob Z. Weinstein, Esq.
Direct: 646-450-3484
E-Mail: Jacob@WeinsteinLLP.com

Israel D. Weinstein, Esq.*
Direct: 212-810-2143
E-Mail: Israel@WeinsteinLLP.com
*Also Licensed In New Jersey

Via E-Mail

January 5, 2020

[REDACTED]

Re: [REDACTED] v. *Congresswoman Alexandria Ocasio-Cortez*

[REDACTED]:

We have been retained by Ms. [REDACTED] in relation to being blocked by your client, Congresswoman Alexandria Ocasio-Cortez, on Twitter. We have been down this road before; you know your client cannot prevail in blocking [REDACTED]

Your client appears to have not learnt the importance of the First Amendment as we had hoped from the *Hikind v. Ocasio-Cortez* matter. It would be a waste of ink to once again layout the myriad of case-law that clearly forbids your client from blocking Ms. [REDACTED]

If you wish to avoid litigation, your client must unblock [REDACTED] by Monday, January 6, 2019, 5:00 P.M. This is a reasonable turn around as all my client is asking for at this juncture is to be unblocked, literally a click of a button. Should the Congresswoman refuse, we will be asking the Court for punitive damages for the clear reckless and callous indifference to Ms. Owen's First Amendment rights. *See Smith v. Wade*, 461 U.S. 30, 56, 103 S.Ct. 1625, 75 L.Ed.2d 632 (1983) (Punitive damages are available "when the defendant's conduct is shown to be motivated by evil motive or intent, or when it involves reckless or callous indifference to the federally protected rights of others.").

We anticipate an expedited response capitulating to this demand.

Sincerely,

Jacob Z. Weinstein
Jacob Z. Weinstein

cc: [REDACTED]