

5 Hutton Centre Drive, Suite 1000 Santa Ana, California 92707 (714) 542-1800 Ext. 5213 (714) 542-3592 Fax tscarborough@klinedinstlaw.com

Tiffany P. Scarborough, Esq.

Internet: www.klinedinstlaw.com

February 12, 2015

## VIA EMAIL, CERTIFIED U.S. MAIL AND U.S. MAIL

Antelope Valley Times
42225 10th Street West #101
Lancaster, CA 93534
EDITOR@THEAVTIMES.COM and ADMIN@THEAVTIMES.COM

Re: Mission Animal Hospital and Ayman S. Ibrahim, DVM

Our File No.: 2224-5028

Dear Publisher of the Antelope Valley Times:

This office represents the Mission Animal Hospital and Dr. Ibrahim regarding the article you published on February 9, 2015. The Mission Animal Hospital would like to provide a detailed response to Linda M. Monson-Cianciosi's February 9, 2015 article regarding the care of her dog, "Max." Unfortunately, Mission Animal Hospital is bound by confidentiality requirements from publicly disclosing specific information about the treatment of Max without the owner's approval. We presume Ms. Monson-Cianciosi will want to provide the necessary authorization so that misinformation provided in the article can be clarified. We ask that you provide her signed authorization to us immediately so that Mission Animal Hospital can provide a detailed response regarding the treatment provided to Max.

There are numerous false statements in the February 9, 2015. We demand that her article be retracted immediately and that you cease and desist from publishing any further, defamatory articles regarding Mission Animal Hospital or the veterinarians who work there. Providing false statements regarding private individuals in a private veterinary practice is defamatory. It appears that little, if any, due diligence was done to confirm whether the facts contained in the article are true, including confirming the truth of the facts with Mr. Cianciosi (the person the article states had all actual contact with Mission Animal Hospital regarding the treatment of Max).

Mission Animal Hospital stands behind the care and treatment provided, under the circumstances and in light of Max's medical condition. Mission Animal Hospital could easily explain Max's diagnosis, the treatment provided, and his condition thereafter. I do invite you to look at the photographs that were produced in the article. One can see that Max does still have his genitalia, as his penis is visible. He was clearly not turned "into a girl" as falsely stated. You should ask Mr. Cianciosi whether Max was previously neutered.

Los Angeles • Orange County • Sacramento • San Diego

Antelope Valley Times **RE: Mission Animal Hospital and Ayman S. Ibrahim, DVM** February 12, 2015 Page 2

Ms. Monson-Cianciosi mentioned in her February 11, 2015 update that Max had bladder stones, not kidney stones. You will likely find this link related to such a surgery helpful:

http://www.vetsurgerycentral.com/ug canine urethrostomy.htm.

The fourth paragraph in the section entitled "Potential Complications" relating to bleeding and urination is particularly enlightening.

As you can see from the comments to the article, Mission Animal Hospital and its owner and the veterinarians who practice there have already suffered tremendously due to the publishing of Monson-Cianciosi's false article. Further harm will ensue when a protest occurs in front of Mission Animal Hospital this weekend, as a direct result of the defamatory article that you published. Again, we demand that you immediately retract Ms. Monson-Cianciosi's article. Should you choose not to retract the false statements, we will consider all possible legal action.

Very truly yours,

KLINEDINST PC

TIFFANY P. SCARBOROUG

TPS:jmy

cc: Ayman S. Ibrahim, DVM

16128396v1