

URGENT

Mr William Finnerty

By Email: williamfinnertygalway@gmail.com

Our Ref: JOM/DTB

Date: 19 August 2019

**RE: Our Client: Conor MacGuill
Traitor Republic Facebook Page**

Dear Mr Finnerty

We refer to your email dated 13 August 2019.

We note that do not have any recollection of being asked to be a team member or moderator of the “*Traitor Republic*” Facebook page. In order to be listed as a team member for a Facebook page, you have to log in through your personal Facebook account, gain access to the page in question and click on a button to add yourself as a team member. You cannot be added as a team member without your consent or without actively taking steps to become a team member. While you may not have any recollection of adding yourself as a team member, you are listed as a team member on the “*Traitor Republic*” Facebook page and therefore must have actively added yourself as a team member.

With regard to the contents of our letter of 29 July 2019, please note that our client is not alleging that you were directly involved in the events of 14 January 2019, nor that you met with or communicated directly with Mr Markey, Mr Kavanagh or our client. Our client does however say that you are responsible for the posting and/or failure to remove two posts from the “*Traitor Republic*” Facebook account.

As set out in the letter of 29 July, one of these posts was removed by Facebook and the other remains on the “*Traitor Republic*” Facebook page. We note that you are requesting the URL for this post. We have previously provided you with the time, date, location and content of the post, therefore the post is quite easily identifiable by you. However, for the avoidance of doubt, the URL for the post that remains on Facebook is:

<https://www.facebook.com/SnakesOutNow/photos/a.908938515861528/2098793683542666/?type=3&theater>

Please immediately remove this post, together with all comments below the post, from the “*Traitor Republic*” Facebook page and confirm to us when this has been done.

Please note that while the removal of this post may serve to reduce the loss and damage suffered by our client, it does not resolve the dispute entirely as our client has already suffered considerable loss and damage as a result of your actions. Our client therefore requires that, in addition to removing the post, you



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provide details of how you propose compensating our client for this loss and damage. Unless an adequate proposal is received and agreed by our client within the timeframe set out in our letter of 29 July 2019 (i.e. on or before Monday 19 August 2019) we are instructed to issue proceedings against you without further notice to you.

Yours faithfully

A handwritten signature in black ink that reads "Hayes". The letters are cursive and connected.

Hayes solicitors