

**WITHOUT PREJUDICE**

December 13, 2024

Mr. Nika Aldrich  
Schwabe, Williamson & Wyatt, P.C.  
1211 SW 5<sup>TH</sup> Avenue, Suite 1900  
Portland, Oregon 97204

**BY EMAIL:** [naldrich@schwabe.com](mailto:naldrich@schwabe.com)

**RE: Posts on X.com by Josh Tyler**

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Dear Mr. Aldrich,

We hereby acknowledge receipt of your letter dated December 3, 2024, in response to our cease-and-desist letter addressed to your client, Mr. Josh Tyler (the "**C&D Letter**").

While we are familiar with the relevant law, we disagree with your conclusions and reiterate and reassert our position stated in our C&D Letter. Your client's false and misleading statements, taken as a whole, demonstrate a targeted and unsubstantiated campaign of harassment intended to tarnish Valnet Inc.'s ("**Valnet**") reputation by creating a false narrative that Valnet has an unfair advantage over independent publishers or that Google somehow intentionally favors Valnet. Such accusations are conspiratorial, false and defamatory.

Further, your client's numerous articles and social media posts concerning this matter since our C&D Letter (see Exhibit A for a non-exhaustive list) clearly demonstrate that your client does not have any intention to resolve this matter in good faith and is instead doubling down on his false narrative. In fact, your client's continued statements on this matter have served to further defame Valnet as evidenced by a response by another user to one of your client's social media posts following our C&D Letter, in which the user falsely suggests that Valnet pays Google to obtain favors (see Exhibit B). Clearly, your client's targeted campaign is defaming Valnet and damaging its reputation.

In view of the foregoing, Valnet reiterates its demands that Mr. Tyler must:

- a) Immediately cease and desist from making further false and defamatory accusations with respect to Valnet;
- b) Immediately take the necessary steps to remove the posts regarding Valnet from X.com and any other media platforms where they may have been published; and
- c) Immediately withdraw all unfounded and defamatory statements and allegations made, re-posted, or relayed, and confirm to the undersigned once this has been done.

Valnet will continue to monitor your client's articles, social media posts and other public activities, and will not hesitate to take legal action as it deems necessary to protect its rights and interests.



**Confidential**

The present letter is sent without prejudice to Valnet's rights and remedies, and Valnet specifically reserves the right to revise the damages sought, including by claiming extra-judicial fees and legal costs incurred as a result of any potential litigation that it is being forced to institute due to your unlawful actions.

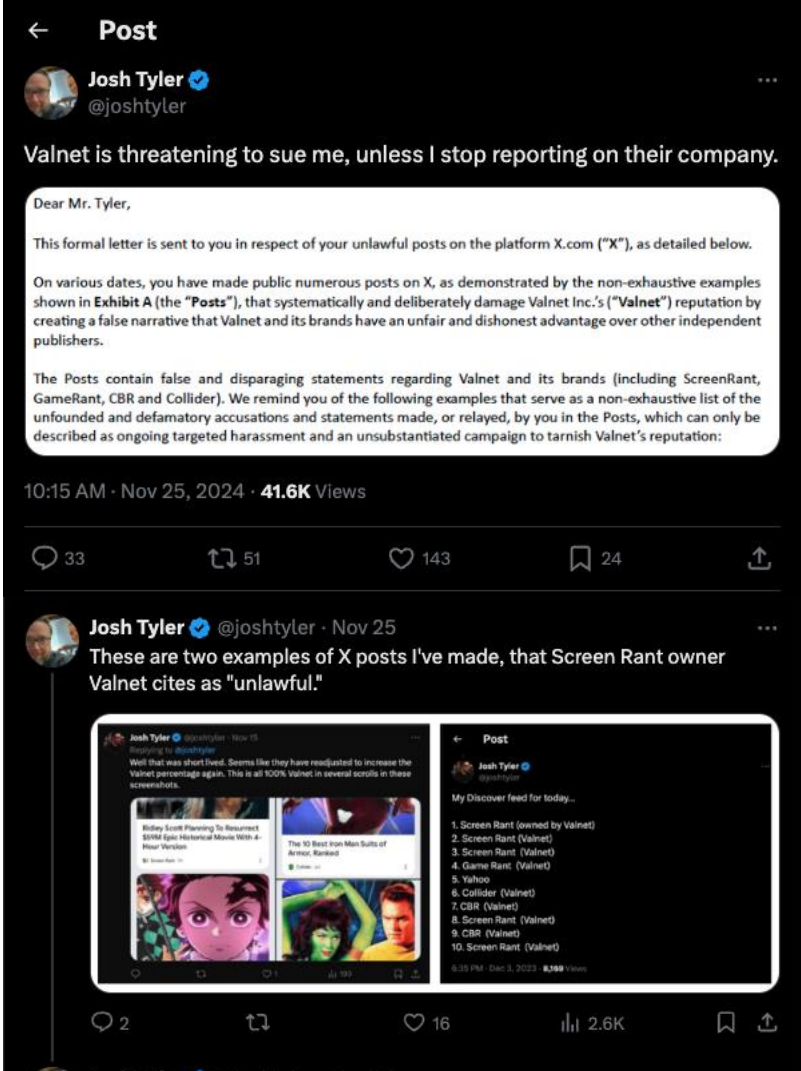
**DO GOVERN YOURSELF ACCORDINGLY.**

**VALNET INC.**

*Miranda Ciavaglia*

Miranda Ciavaglia  
Legal Counsel

EXHIBIT A  
Josh Tyler Posts

Screenshot(s)	URL
	<p><a href="https://x.com/joshtyler/status/1861066207270735989">https://x.com/joshtyler/status/1861066207270735989</a></p>

**Josh Tyler** @joshtyler · Nov 25  
Other posts cited in their Cease & Desist letter include a retweet of a post by @gaganghotra\_

Josh Tyler reposted

**Gagan Ghotra** @gaganghotra\_ · Nov 9  
Replying to @joshtyler  
They do a lot of speculation based content while there isn't any specific answer but based upon 'likely' they write a whole story!!

Same type of content was significantly demoted by HCU and even Google's own guidelines says "Does your content promise to answer a question that

**SCREENRANT**  
Potential season 2

Google Search Central  
Did you decide to enter some niche topic area without real expertise, but instead mainly because you thought you'd get search traffic?  
Does your content promise to answer a question that actually has no answer, such as suggesting there's a release date for a product, movie, or TV show when it isn't confirmed?  
Are you changing the date of pages to make them seem fresh when the content has not substantially changed?  
Are you adding a lot of new content or removing a lot of older content primarily because you believe it will help your search rankings overall by somehow making you seem "fresh"? (No, it won't)

1 3 4 598 2.3K

**Josh Tyler** @joshtyler · Nov 25  
A retweet of an X post from @emiliesyverson

Post

Josh Tyler reposted

**Emilie Syverson** ✨ @emiliesyverson

Screenrant is owned by Valnet. They're a terrible company. Go to /r/freelancewriters and search the sub, they're awful to work with and their rates are *shockingly* low to boot.

Like, seriously, Valnet is trash. I'd bet money that many of the now-shadowbanned sites in the entertainment niche paid fair rates to their writers, and were organized and professional to work with.

8:29 PM · Nov 9, 2024 · 521 Views

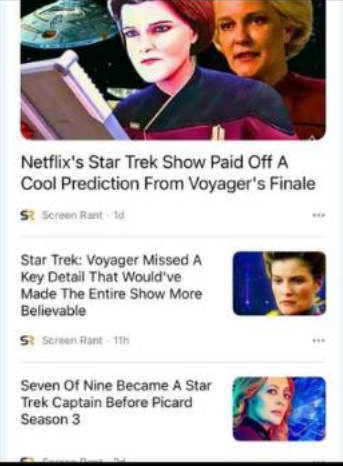
2 1 13 1 1.9K

**Josh Tyler** @joshtyler · Nov 25  
A retweet of an X post from @MasabDF

Josh Tyler reposted

**Masab Farooque** @MasabDF · Nov 9  
Free traffic for screenrant coz google killed every small and mid publisher lol

**Josh Tyler** @joshtyler · Nov 9  
This is Discover right now, now that they've shadowbanned most entertainment sites.



Netflix's Star Trek Show Paid Off A Cool Prediction From Voyager's Finale

Star Trek: Voyager Missed A Key Detail That Would've Made The Entire Show More Believable

Seven Of Nine Became A Star Trek Captain Before Picard Season 3

1 1 2 378 2.1K

**Josh Tyler** @joshtyler · Nov 25  
A reply to a post by @firstshowing

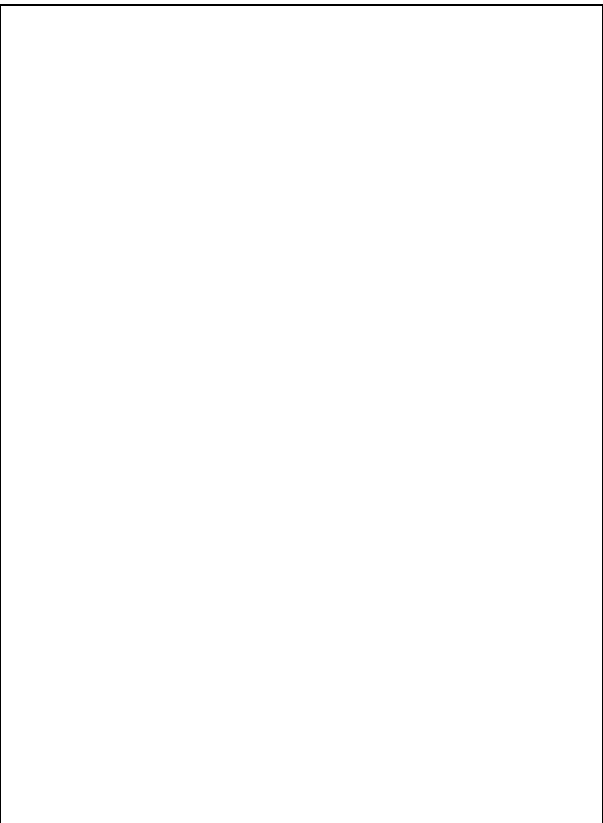
1 5 68

**Josh Tyler** @joshtyler · Oct 17  
Yep. Somehow that's even worse than if they'd mocked me on purpose.  
1 1 58

**Alex B.** @firstshowing · Oct 17  
It is, it really is. Robots pretending to be people.  
1 1 56


**Josh Tyler** @joshtyler **Follow**  
That pretty much sums up every Valent site, I guess. Appropriate.  
4:55 PM · Oct 17, 2024 · 77 Views  
1 2

**Alex B.** @firstshowing · Oct 17  
1 10 1.7K



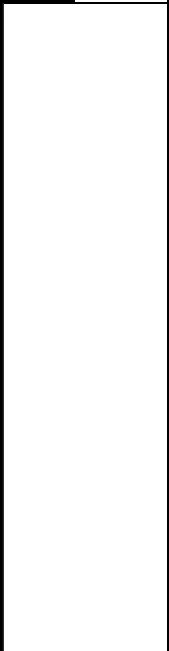
**Post** **Reply**

**Josh Tyler** @joshtyler  
Valnet's full Cease and Desist letter threatening legal action against me, can be read at the link below.

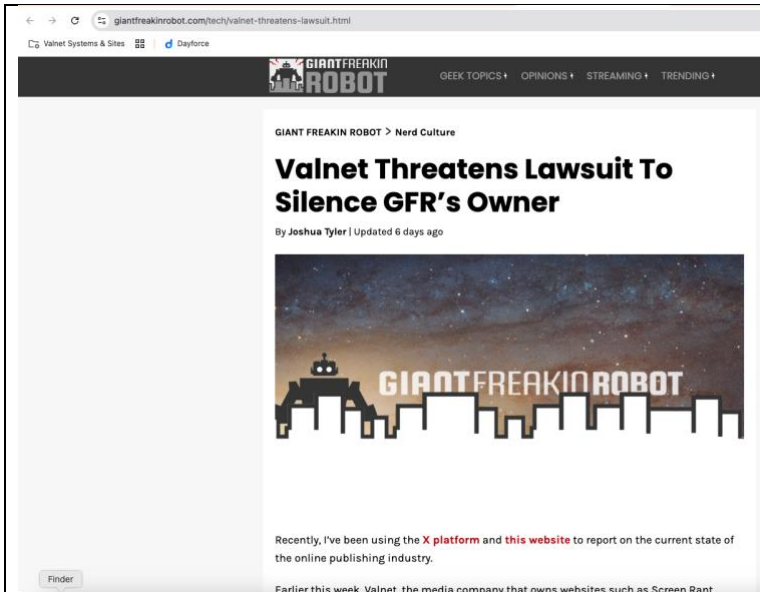


**Valnet Threatens Lawsuit To Silence GFR's Owner**

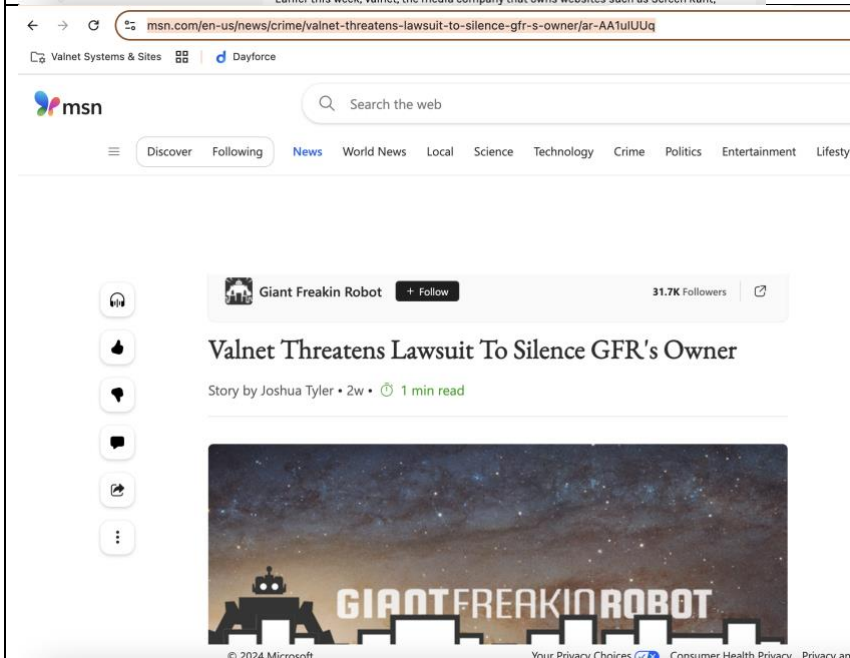
From giantfreakinrobot.com  
10:23 AM · Nov 25, 2024 · 2,177 Views



<https://x.com/joshtyler/status/1861068274479636541>




<https://www.giantfreakinrobot.com/tech/valnet-threatens-lawsuit.html>



<https://www.msn.com/en-us/news/crime/valnet-threatens-lawsuit-to-silence-gfr-s-owner/ar-AA1uIUUq>

← Post

 **Josh Tyler** ✓  
@joshtyler

Working with legal council, I've issued a response to Game Rant owner Valnet's cease & desist letter, threatening to sue me if I don't stop talking about their company.

It reads in part...

"The only thing that is "abundantly clear" is that Mr. Tyler shared his opinions and information that he gathered on the Internet. It is also clear that your letter is an attempt to silence Mr. Tyler, and to prevent open dialogue about Valnet's business practices in the marketplace of ideas."

I will not delete my posts, all of which contain opinions and other protected discourse. I fully assert my right and the right of all Independent Publishers and journalists to freely express opinions and share facts about Valnet or any of its media properties.

10:50 AM · Dec 4, 2024 · 5,790 Views

<https://x.com/joshtyler/status/1864336437904330822>

← Post

 **Josh Tyler** ✓  
@joshtyler

Here's the full response, along with the original cease and desist letter issued by Valnet, at the link below.



From giantfreakinrobot.com

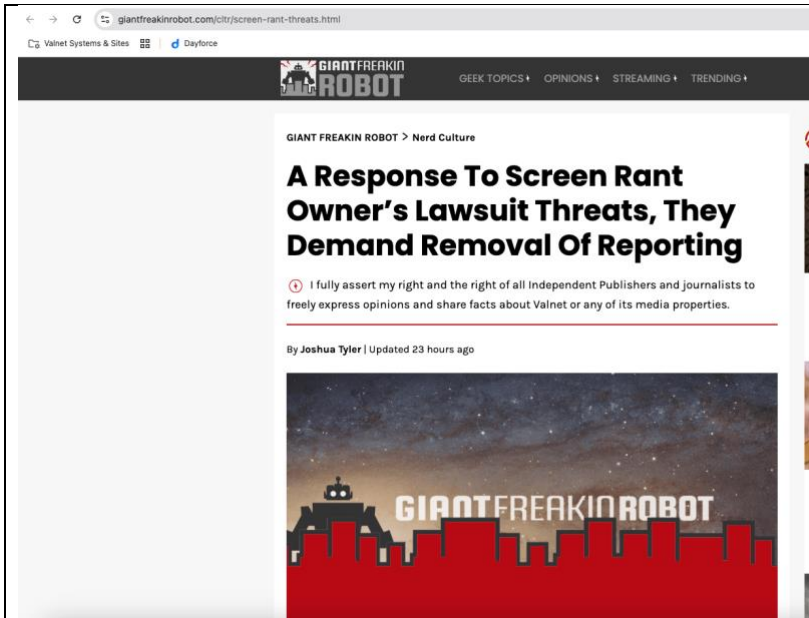
10:51 AM · Dec 4, 2024 · 561 Views

🗨️ ↻️ 2 ❤️ 15 📌 ⬆️

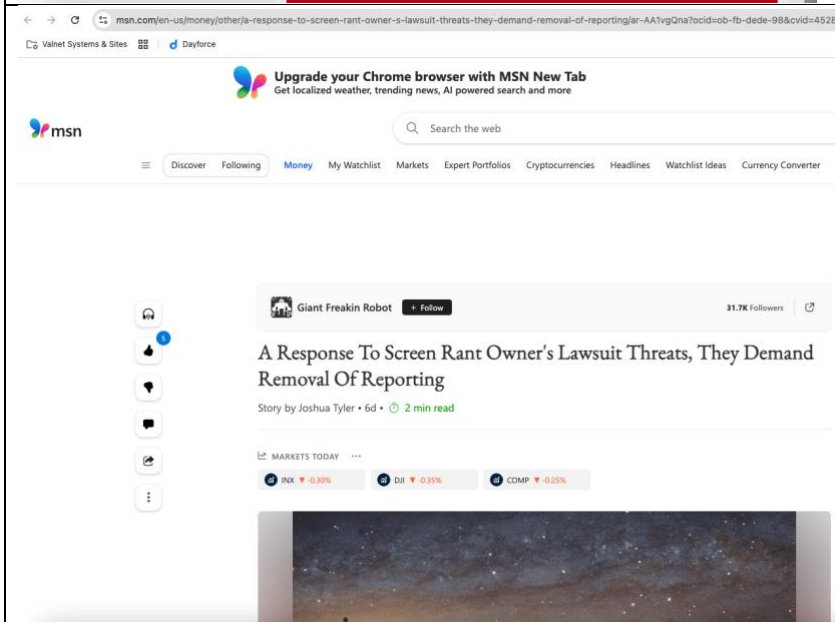
 Post your reply Reply

<https://x.com/joshtyler/status/1864336763906609275>





<https://www.giantfreakinrobot.com/cltr/screen-rant-threats.html>



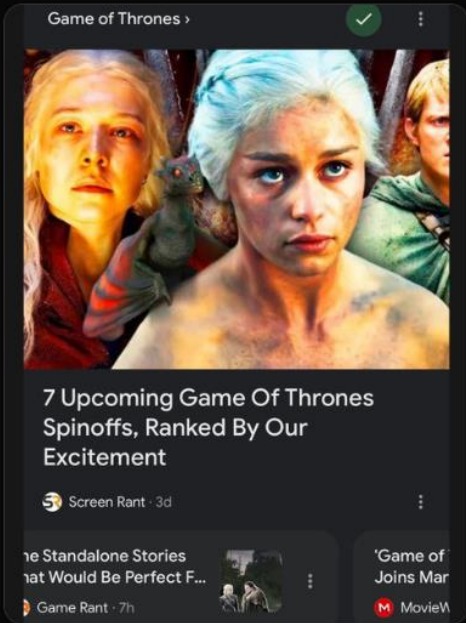
<https://www.msn.com/en-us/money/other/a-response-to-screen-rant-owner-s-lawsuit-threats-they-demand-removal-of-reporting/ar-AA1vgQna?ocid=ob-fb-dede-98&cvid=452814f762974c44c510f2538ece3788&ei=15>



**Josh Tyler** @joshtyler · 8h

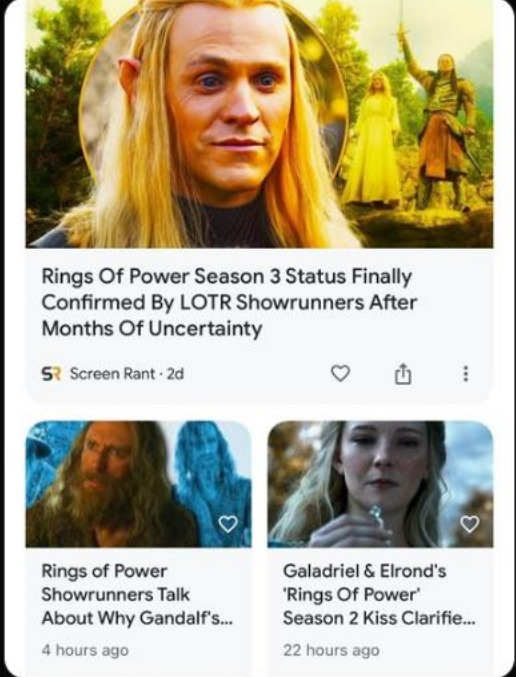
They've also updated their topic carousels that they give Valnet. Now the bottom row only shows one story at a time instead of two, but you can side swipe it to scroll through more from Valnet sites.

Valnet is the only media company I have ever seen get these.

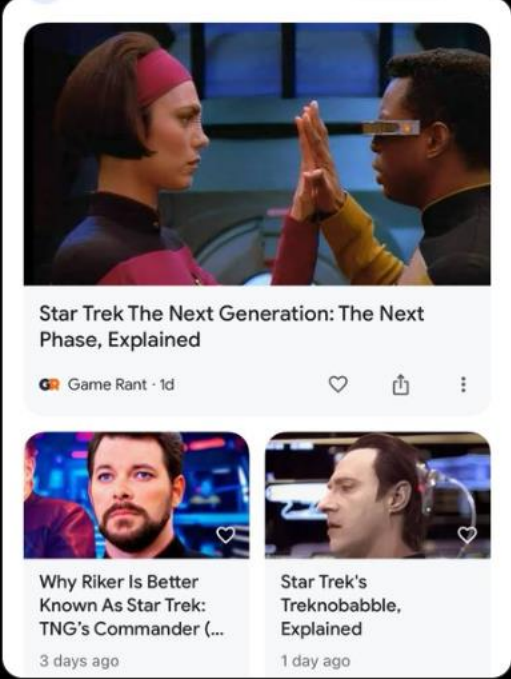


3 comments, 4 likes, 131 retweets

<https://x.com/joshtyler/status/1867467015700824247>

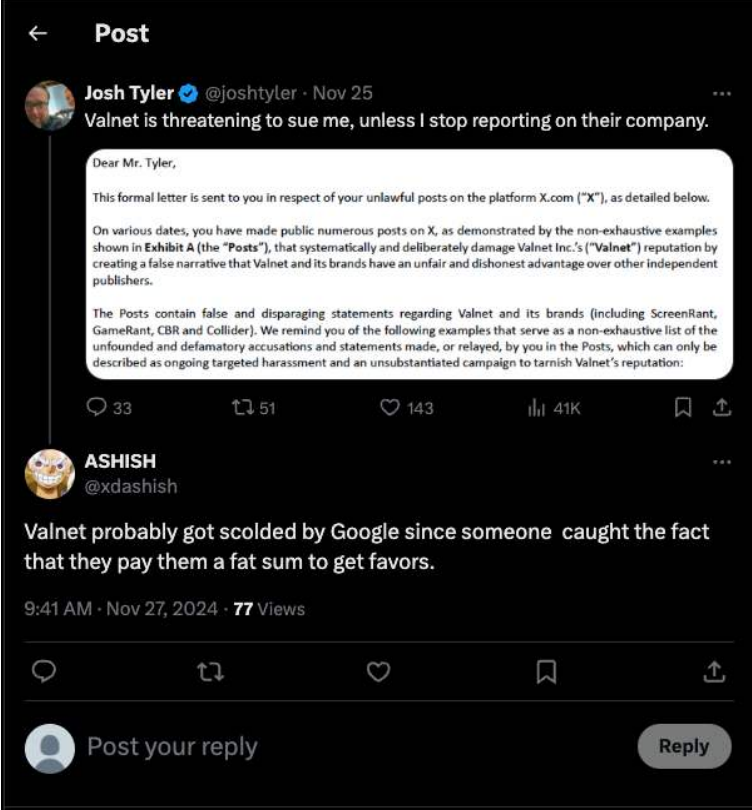
<p><b>Josh Tyler</b> @joshtyler · 21h</p> <p>Interested in Rings of Power? Good news! Google has figured out that the only coverage you need comes from sites that just happened to all be owned by the same big media company.</p> <p>Everyone else can just move on to another topic. That one is theirs.</p>  <p><b>Rings Of Power Season 3 Status Finally Confirmed By LOTR Showrunners After Months Of Uncertainty</b></p> <p>Screen Rant · 2d</p> <p><b>Rings of Power Showrunners Talk About Why Gandalf's...</b> 4 hours ago</p> <p><b>Galadriel &amp; Elrond's 'Rings Of Power' Season 2 Kiss Clarifie...</b> 22 hours ago</p> <p>1   3   18   1K</p>	<p><a href="https://x.com/joshtyler/status/1865903646720061920">https://x.com/joshtyler/status/1865903646720061920</a></p>
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**Josh Tyler** @joshtyler · 22h  
More good news! Google has also now determined that all the best Star Trek coverage just happens come from the same company!



<https://x.com/joshtyler/status/1866241786458603522>

EXHIBIT B  
Third-Party Post

Screenshot	URL
 <p>The screenshot shows a social media post by Josh Tyler (@joshtyler) dated Nov 25. The post text reads: "Valnet is threatening to sue me, unless I stop reporting on their company." Below the text is a screenshot of a letter addressed to Mr. Tyler. The letter states: "This formal letter is sent to you in respect of your unlawful posts on the platform X.com ('X'), as detailed below. On various dates, you have made public numerous posts on X, as demonstrated by the non-exhaustive examples shown in Exhibit A (the 'Posts'), that systematically and deliberately damage Valnet Inc.'s ('Valnet') reputation by creating a false narrative that Valnet and its brands have an unfair and dishonest advantage over other independent publishers. The Posts contain false and disparaging statements regarding Valnet and its brands (including ScreenRant, GameRant, CBR and Collider). We remind you of the following examples that serve as a non-exhaustive list of the unfounded and defamatory accusations and statements made, or relayed, by you in the Posts, which can only be described as ongoing targeted harassment and an unsubstantiated campaign to tarnish Valnet's reputation:"</p> <p>Below the letter screenshot are engagement icons: 33 replies, 51 retweets, 143 likes, and 41K views. A reply by ASHISH (@xdashish) is visible below, dated 9:41 AM - Nov 27, 2024, with 77 views. The reply text reads: "Valnet probably got scolded by Google since someone caught the fact that they pay them a fat sum to get favors." At the bottom of the screenshot is a "Post your reply" prompt and a "Reply" button.</p>	<p><a href="https://x.com/xdashish/status/1861782459018555403">https://x.com/xdashish/status/1861782459018555403</a></p>