

June 14, 2018

VIA PERSONAL SERVICE AND EMAIL ([kam468@cornell.edu](mailto:kam468@cornell.edu), [dp346@cornell.edu](mailto:dp346@cornell.edu), and [sean.illing@vox.com](mailto:sean.illing@vox.com))

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Professor Derk Pereboom, Chair  
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Mr. Sean Iling  
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New York, New York, USA  
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Dear Professor Manne, Professor Pereboom, Mr. Iling, and VOX Media:

**Re: Libel Notice Pursuant to s. 5(1) of the *Libel and Slander Act*, RSO 1990, c L.12**

This letter will serve as a Notice of Action(s) pursuant to s. 5(1) of the *Libel and Slander Act*, RSO 1990, c L.12, regarding the following libelous statements made by Professor Manne on the website "[www.vox.com](http://www.vox.com)" in respect of Mr. Jordan Peterson. On June 6, 2018, the following libelous statements by Professor Manne were published on the website below:

- a) "I also think the way Peterson cherry-picked the few more dignified-sounding sentences from the diary of one of the Columbine killers, Eric Harris, was downright dishonest."

- b) "I also suspect that for many of Peterson's readers, the sexism on display above is one tool among many to make forceful, domineering moves that are typical of misogyny."
- c) "He said that subsequently, in a New York Times piece, I believe, in response to the point that school shooters are often sexually, romantically, and socially frustrated young men. This suggestion is classic, straight-up misogyny."
- d) "(Peterson) measures himself by the size of his celebrity. The idea of winning or dominating others as an end in itself."
- e) "(Peterson says) some really eyebrow-raising, authoritarian-sounding, and even cruel things."
- f) "(Maybe Peterson's client) was effectively undermined or even gaslit by her therapist."
- g) "It doesn't seem accidental that his skepticism about objective facts arises when it's conveniently anti-feminist."

<https://www.vox.com/conversations/2018/6/6/17409144/jordan-peterson-12-rules-for-life-feminism-philosophy>

Please immediately retract all of Professor Manne's defamatory statements, have them immediately removed from the internet, and issue an apology in the same forum to Mr. Peterson. Otherwise, our client will take all steps necessary to protect his professional reputation, including but not limited to initiating legal proceedings against all of you for damages, including punitive damages, based upon the international reach and permanent circulation of internet publication.

If legal proceedings are initiated, the action will be against VOX Media, Professor Manne, and Mr. Iling, as well as Cornell University, which is vicariously liable for Professor Manne's defamatory statements. As the Supreme Court of Canada has made clear, liability can be imputed to employers due to damages caused by their employees and/or officers. See: *John Doe v. Bennett*, 2004 SCC 17.

Yours very truly,

**Levitt LLP**

Howard A. Levitt  
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