

July 28, 2014



**Via UPS Next Business Day Delivery and
Via E-Mail to David.Hillman@SimonAndSchuster.com**

Mr. David Hillman, Esq.
Executive Vice President and General Counsel
Simon & Schuster, Inc.
1230 Avenue of the Americas
New York, New York 10020

SECOND NOTICE OF COPYRIGHT INFRINGEMENT:
The Invisible Bridge: The Fall of Nixon and the Rise of Reagan,
By Rick Perlstein

Dear Mr. Hillman:

I write to follow up on my letter to you dated July 25, 2014, regarding *The Invisible Bridge: The Fall of Nixon and the Rise of Reagan*, by Rick Perlstein. In that letter, I laid out a few selected passages in *The Invisible Bridge* that infringe the copyright in *Reagan's Revolution: The Untold Story of the Campaign That Started It All*, authored by my client, Craig Shirley.

I also advised you in my July 25 letter that, until we heard from you, our analysis of *The Invisible Bridge* would continue. We have not heard from you, and so our analysis has in fact continued. Regrettably, we have found that the nature and extent of Mr. Perlstein's plagiarism is far worse than our preliminary review had indicated.

Indeed, we have focused on the source notes posted on Mr. Perlstein's website, and determined that even in those instances in which Mr. Perlstein references *Reagan's Revolution* as the source of the material at issue, those references are insufficient to absolve his theft of Mr. Shirley's original expression and ideas.

On this point, here is a sampling of ten more infringing passages from *The Invisible Bridge*. In contrast to the passages I presented in my first letter, which Mr. Perlstein did not attribute to Mr. Shirley in any way whatsoever, Mr. Shirley is referenced in Mr. Perlstein's notes as the source for the passages below. Nevertheless, as you will see, notwithstanding Mr. Perlstein's amateurish attempts to conceal his thefts by altering words and phrases, each of these passages should have been enclosed in quotation marks:

<i>Reagan's Revolution (2004)</i>	<i>The Invisible Bridge (2014)</i>
<p>Page 72: "Whenever he flew, Reagan would sit in the first row so he could talk to people as they boarded the plane. On one occasion, a woman spotted him, embraced him and said 'Oh Governor, you've just got to run for President!' As they settled into their seats, Reagan turned to Deaver and said, 'Well, I guess I'd better do it.'"</p>	<p>Page 539: "When Ronald Reagan flew on commercial flights he always sat in the first row. That way, he could greet passengers as they boarded. One day he was flying between Los Angeles and San Francisco. A woman threw his [sic] arms around him and said, 'Oh Governor, you've got to run for president!' 'Well,' he said, turning to Michael Deaver, dead serious, 'I guess I'd better do it.'"</p>
<p>Page 298: "The hotel's manager, Maurice Bluhm, threatened to cancel the reservation of the state's entire delegation until the man apologized."</p>	<p>Page 770: "The manager threatened to cancel his entire delegation's reservations until the chairman apologized."</p>
<p>Page 111: "All the major Presidential candidates released their medical records in January While arguably unnecessary for the America people to also know that Ford had hemorrhoid surgery or that Democratic contender Senator Frank Church had a testicle removed"</p>	<p>Page 601: "Came the news on the last Wednesday in January that all major presidential candidates had released their medical records, the world apparently needing to know, for instance, about President Ford's hemorrhoid surgery and Senator Church's single testicle"</p>
<p>Page 174: "That night Reagan and his team were in La Crosse, Wisconsin, as he delivered a speech to Ducks Unlimited. Frank Reynolds, covering the campaign for ABC, approached Hannaford and Marty Anderson and asked if they had heard any of the results of North Carolina. The answer from the two depressed aides was, 'no.' 'Well I have,' Reynolds said, 'and your man is winning.'"</p>	<p>Page 648: "The Reagan gang was in LaCrosse, Wisconsin, where the vote was to take place in two weeks. ABC's Frank Reynolds asked two listless handlers who were going through the motions, working for a nearly dead campaign, if they'd heard the results. They hadn't. Why pay attention to another defeat? 'Well, I have, and your man is winning.'"</p>
<p>Page 320: "Adding to Reagan's woes was the CBS News report that had, for the first time in the network's tabulations, placed Ford over the top with 1,132 'firm or committed' delegates."</p>	<p>Page 779: "CBS News reported that for the first time since it had begun counting, Ford was over the top with 1,132 'firm or committed delegates.'"</p>
<p>Page 322: "About the only person in Kansas City who was keeping cool was Reagan himself . . . Reagan, watching on television, dissolved in laughter."</p>	<p>Page 785: "Just about the only person who was calm through the entire thing was Ronald Reagan. He watched it on television in his hotel suite, dissolving in laughter."</p>



Page 327: "Reagan asked Chuck Tyson to make the demonstrators stop, but Tyson replied that there was nothing he could do."	Page 793: "Reagan himself asked one of his staffers to make the demonstration stop. But his deputy answered back that there was nothing anyone could do to make it stop."
Page 328: "Later, after the vote that made Ford's nomination official, Claire Schweiker tearfully told Reagan in his suite at the Alameda Plaza Hotel, 'Oh Governor, I'm so sorry!' Reagan immediately embraced her and said, 'Claire, you really shouldn't be upset about the outcome because it wasn't part of God's plan.'"	Page 794: "Claire Schweiker, the Senator's wife, had tearfully told him, 'Oh, Governor, I'm so sorry.' Reagan embraced her: Claire, you really shouldn't be upset about the outcome because it wasn't part of God's plan."
Page 330: "Nofziger had not even gone to the hall that night."	Page 798-9: "Lyn Nofziger hadn't bothered to go to the arena that night at all."
Page 327: "Around 5:00 Wednesday morning, 'some of us went to Reagan to see if he'd dump Schweiker. We met at the Reagans' suite. Governor Reagan came out and before we could even get started, he shut us down real quick. 'If you could . . . guarantee me the nomination, I still wouldn't do it,' Ernie Angelo recalled. 'And that made us all feel really small for even suggesting it.'"	Page 789: "'Governor Reagan came out and before we could even get started, he shut us down real quick. 'If you could . . . guarantee me the nomination, I still wouldn't do it.' And that made us all feel really small for even attempting it.'"

There are many, many more passages like these throughout *The Invisible Bridge*. Also, it is worth noting that while Mr. Shirley is referenced in the online source notes for these passages, the address at which those notes are posted appears nowhere in *The Invisible Bridge* or on its dust jacket—a fact which further evidences Mr. Perlstein's intent to steal and conceal.

We have given your company an opportunity to rectify this matter in advance of the release of *The Invisible Bridge*. We hope that you will take advantage of it, and agree to Mr. Shirley's demands to withdraw and destroy printed copies of the book, take similar action with respect to digital copies, apologize to him publicly, compensate him for the theft of his work, and credit him properly and fully if you decide to re-issue the book.

If we do not hear from you before the close of business on Wednesday, July 30, however, we will file a lawsuit to vindicate Mr. Shirley's rights and remedies under the law, all of which we expressly reserve and do not waive at this time. To that end, we met this afternoon with litigation counsel to begin the process of transitioning this case to them for a resolution. A trial of this matter would not seem to serve anyone's interest except that of the attorneys involved—and perhaps that of the national media which, as you no doubt have observed, is very interested in plagiarism stories right now.



Mr. David Hillman, Esq.

July 28, 2014

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Please contact me before the close of business on Wednesday, if you wish to settle this matter. Otherwise, I will refer your contact information to Mr. Shirley's trial attorneys.

Sincerely,



Chris Ashby

cc: Mr. Craig Shirley
Ms. Teresa Hartnett, Hartnett Inc.

