

Our Ref: PNQS/JT/IAAFF.0006

9 March 2015

Hajo Seppelt

BY EMAIL
mail@hajoseppelt.de

Dear Sir

IAAF - CONFERENCES

We act for the International Association of Athletics Federations. You have previously been in correspondence with our office in Hamburg.

It has come to our attention that you are due to speak at two conferences this month on subjects which will or may concern our client. We understand that on 18 March 2015 you are due to speak at the World Sports Law Report conference entitled "Tackling Doping in Sport 2015" under the subject of "Documentary Screening and Q&A – Doping in Russia". We further understand that you are due to speak at the WADA Symposium on 24 March 2015 as part of a Round Table entitled "Can the Media Help Your Work?".

Our client is fully committed to stamping out doping in athletics. It very much welcomes your contribution to the public debate in relation to the investigation and prevention of doping, and is grateful for your fearless approach to seeking to root out drug-taking in sport generally.

That said, there have been occasions in your recent reporting when, as you know, our client considers that you have made serious factual errors which, in some cases, risk significantly undermining your credibility. Our client also has a duty to ensure that its employees and officials are not personally singled out for baseless criticism.

With regard to the World Sports Law Report conference, we understand from the event program that you will be screening a documentary which focuses on doping in Russia. We should be grateful if you would confirm whether this will involve a retransmission of the ARD documentary entitled "Top Secret Doping – How Russia Makes its Winners" (an English transcript of which is available here: https://presse.wdr.de/plounge/tv/das_erste/2014/12/pdf/English-Skript.pdf).

Alternatively, if you are proposing to broadcast new footage, we should be grateful if you would provide an outline of the matters to be covered.

With regard to the ARD documentary, we note that the matters raised by your work are already the subject of a full WADA investigation, as well as an analysis by our client's ethics committee. We would urge you not to do anything to prejudice the outcomes of those investigations.

Bird & Bird

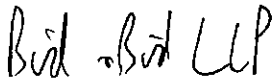
Turning to the WADA conference, it does not appear from the description of the Round Table that the session is designed to cover matters relating to our client such as those referred to above, but we should be grateful if you would let us know if that is not the case.

Finally, and with regard to both conferences and generally, we would refer you to the correspondence you received from our Hamburg office in December 2014. In that correspondence we set out our client's concerns about your retention and dissemination of highly confidential and private information consisting of the results of athlete blood tests carried out by our client. We would remind you in the strongest terms possible that any reference to or use of that information would be a very clear infringement of our client's rights and the rights of the athletes concerned. Should our client learn that you have communicated information of this nature to any third party of any kind (other than WADA or relevant anti-doping bodies), we will be instructed to take legal action against you without further notice.

As you would expect, given the nature of the conferences, representatives of both this firm and our client will be present.

We look forward to hearing from you.

Yours faithfully

A handwritten signature in black ink that reads "Bird & Bird LLP". The signature is written in a cursive, slightly stylized font.

Bird & Bird LLP