

[REDACTED]

May 25, 2022

Via Text & U.S. Mail

[REDACTED]
[REDACTED]
[REDACTED]

RE: [REDACTED]

DEMAND FOR REMOVAL OF DEFAMATORY REVIEW
For Settlement Purposes Only

Dear [REDACTED]:

Please be advised that our firm represents [REDACTED], relative to the fake 1-star Google Review you left for the [REDACTED] Google My Business page on or about May 20, 2022:



[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

As you know, you are not, and have never been, a customer of [REDACTED]. The Review was left for the sole purpose of harming [REDACTED] and her business. The false impression this 1-

star Review is currently leaving for the public is that an actual customer of [REDACTED], i.e., a parent who entrusted the care of their child or children to [REDACTED] had such a bad experience the customer felt compelled to leave a negative Google review. Nothing like that has happened as you have never been a customer of [REDACTED].

Your conduct, [REDACTED], subjects you to civil liability. The publication of the fake Review has caused and continues to cause reputational and economic harm to our clients. [REDACTED] and [REDACTED] retained our firm to defend their professional reputations to the fullest extent allowable under the law. Our firm's specialty is online defamation, in all of its shapes and forms. That includes the tortious interference with [REDACTED] existing and prospective business relations and customers via fake 1-star Google reviews for the business left by non-customers.

In light of the above, you are hereby ordered to cease and desist all future tortious interference and/or defamation against [REDACTED] and [REDACTED]. You are also hereby ordered to immediately delete the Review in question and referenced herein. Please know that our clients prefer to resolve this situation as amicably as possible and without seeking any sort of Court intervention. That said, if you do not delete the Review by **Friday May 27, 2022, at 12:00 p.m. EDT**, our client will be left with no choice but to pursue all available remedies allowable under the law to protect their reputations.

Upon deletion of the Review, my clients have authorized me to send you a Proposed Non-Disparagement and No-Contact Agreement. The purpose of this Agreement would be to formally resolve this dispute so that all parties involved can move forward with peace of mind as to the finality of the matter.

Should you have any questions or require any clarification, I am happy to make myself available to you at your convenience to discuss this situation further. If you are represented by legal counsel, please forward this correspondence to their attention.

I look forward to hearing from you soon.

Sincerely,

[REDACTED]

[REDACTED], Esq.