

SENT VIA CERTIFIED MAIL AND EMAIL

Date: [Date]

To:

[Recipient Name]

[Recipient Address]

[City, State, Zip Code]

[Recipient Email]

RE: CEASE AND DESIST; NOTICE OF BREACH OF SEVERANCE AGREEMENT AND DEFAMATION

Dear [Recipient Name],

This law firm represents [Your Name/Company Name] regarding your recent conduct and breaches of the Severance Agreement executed on [Date Agreement Was Signed].

1. Breach of Non-Disclosure and Non-Disparagement Provisions

Under Section [Section Number] of your Severance Agreement, you agreed to maintain strict confidentiality regarding [details of agreement] and agreed to refrain from making any disparaging or defamatory remarks regarding the company, its officers, or its employees. Since your departure, it has come to our attention that you have disclosed protected information to [Third Party Name] and made false statements regarding [specific incident or topic].

2. Defamation

Furthermore, you have made several false and harmful statements, including [list specific false statements made]. These statements constitute defamation per se as they injure my client's professional reputation and business standing. These statements were made with knowledge of their falsity or reckless disregard for the truth.

Demand for Immediate Action

To resolve this matter without formal litigation, we demand that you perform the following by [Deadline Date]:

- Immediately cease and desist from making any further defamatory or disparaging statements.
- Retract all previous false statements made to [Third Parties/Social Media/etc.].
- Confirm in writing that you will abide by the confidentiality obligations of your Severance Agreement moving forward.
- [Optional: Demand for Return of Severance Pay or Damages].

Failure to comply with these demands will leave my client with no choice but to pursue all available legal remedies, including a lawsuit for breach of contract, defamation, and injunctive relief. In such an event, we will seek to recover all damages, as well as attorney's fees and costs as permitted by the Agreement.

Govern yourself accordingly.

Sincerely,

[Your Signature/Lawyer Signature]

[Your Name/Law Firm Name]

[Phone Number]

[Email Address]