

[Your Name/Company Name]  
[Your Address]  
[City, State, Zip Code]  
[Email Address]  
[Phone Number]

[Date]

[Opposing Counsel Name]  
[Law Firm Name]  
[Address]  
[City, State, Zip Code]

**RE: Notice of Intent to Enforce Class Action Waiver and Challenge Mass Arbitration Filing**

Dear [Counsel Name],

This letter is in response to your correspondence dated [Date] regarding the intent to file [Number] individual arbitration demands against [Company Name] on behalf of [Description of Claimants].

Please be advised that [Company Name] intends to strictly enforce the Class Action and Representative Action Waiver contained within our Terms of Service, which all claimants affirmatively accepted. The mass filing of identical or substantially similar claims constitutes an attempt to circumvent the contractual agreement to resolve disputes on an individual basis.

Furthermore, we formally notify you of the following positions:

- **Enforceability of Waiver:** The arbitration agreement explicitly prohibits collective, consolidated, or representative proceedings. Your proposed strategy violates the "individual" nature of the agreed-upon arbitration process.
- **Batching Requirements:** Under the applicable [AAA/JAMS/Other] rules and our agreement, we demand that these claims be batched and sequenced to ensure administrative feasibility and to prevent the abuse of the arbitration process through "fee-shifting" pressure.
- **Condition Precedent:** We contend that the claimants have failed to satisfy the mandatory pre-dispute informal resolution requirements as set forth in the agreement.
- **Filing Fees:** [Company Name] objects to the immediate assessment of administrative filing fees for all claims simultaneously and will seek a stay of proceedings until the threshold issue of waiver enforceability is determined by a court or arbitrator of competent jurisdiction.

We invite you to engage in a meet-and-confer session to discuss a structured protocol for resolving these claims or to discuss a global settlement. Should you proceed with the mass filing

without addressing these contractual limitations, we reserve all rights to seek injunctive relief in court to compel compliance with the individual arbitration agreement.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title/Company]