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February 23, 2024

VIA FEDERAL EXPRESS

Mr. Isaac Cady
1445 Woodland Hills Drive
Atlanta, Georgia 30324

RE: Defamation against Michael Morrison

**CEASE AND DESIST DEMAND
DEMAND FOR FULL RETRACTION**

Dear Mr. Cady:

As you are aware, I represent Michael Morrison. The purpose of this correspondence is to address recent postings you have made on the “Next Door” website concerning my client. Specifically, you have posted numerous false, misleading and defamatory statements concerning Mr. Morrison designed to intimidate, harass and cause harm to him and his family.

I am enclosing a screenshot of your recent publication. Among other things, you accuse my client of the following:

- Of being a smut peddler;
- General degenerate;
- Blackmailer;
- Trespasser;
- Stalker;
- Falsifier of evidence;
- Falsifier of police reports against you;
- Being a Narcissistic Sociopath; and
- Pathological Liar.

You also falsely published that Mr. Morrison is “currently under police investigation for battery against [you], stalking and trespassing on [your] property.” Such statement is false and defamatory as no law enforcement entity (federal, state, county, municipal) is currently investigating Mr. Morrison as you falsely allege. Instead, it is you

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that is conducting a one-man “investigation/stalking” and harassment against him. In fact, you are fully aware that the Superior Court of DeKalb County has dismissed, on at least two occasions, your stalking petitions against Mr. Morrison.

Your above-described conduct constitutes electronic stalking within the meaning of O.C.G.A. § 16-11-39.1 and defamation in accordance with O.C.G.A. § 51-5-5 *et seq.* Your false and defamatory statements against Mr. Morrison are so egregious and so calculated to cause harm and infamy against him that it constitutes libel *per se* under O.C.G.A. § 51-5-5, meaning damages are inferred and need not be proven.

Based upon the above and foregoing, my client demands an immediate full written retraction of the above-described published statements on the Next Door website. Demand is hereby made that you publish a retraction by Friday March 1, 2024, and provide the undersigned counsel with a copy of the same. The retraction should advise the public that all of your previous statements and allegations against Mr. Morrison are FALSE and you retract all of said statements against him.

Demand is further made that you cease and desist from making any further false and defamatory statements against Mr. Morrison and cease and desist from any further electronic or personal stalking of him and his family.

Your failure to take the above-described actions shall result in Mr. Morrison initiating a defamation/stalking complaint against you in a court of competent jurisdiction where he will seek a full measure of damages against you, punitive damages and attorney’s fees.

Govern yourself accordingly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Donald L. Cook, Jr.", is written over the typed name.

Donald L. Cook, Jr.

Enclosure
Copy to:
Mr. Michael Morrison
DLC:tvh