

KENNINGTON R. GROFF
PARTNER | BEKIARES ELIEZER, LLP
kgroff@founderslegal.com
(404) 835-4015

February 10, 2025

Neighbor to Neighbor – Big Canoe
Attn: Cindy Farrington
Attn: KA Worrell Millholland
Attn: Olin Gillis
Attn: Jean Tripi

Via Facebook Messenger Only

Re: Notice and Demand for Preservation of Evidence

Dear Cindy, KA Worrell, Olin and Jean:

This firm represents Big Canoe Brokerage, LLC (“Big Canoe Brokerage” or “Client”) in connection with its various matters of general and special representation, including intellectual property matters. As you have been made aware via the Big Canoe Property Owners Association (“POA”), Big Canoe Brokerage has been negotiating in good faith with the POA regarding the Trademark License Agreement for use of the 1) BIG CANOE mark, 2) Three canoe triangle logo and 3) CANOE LIFE mark. Our Client has retained us to manage and resolve the matter. Please direct any and all future correspondence and communications to the attention of our firm at the address provided below.

As used herein, “you” and “your” refer to you individually, your Facebook page titled “Neighbor to Neighbor – Big Canoe” and any predecessors, successors, divisions, or affiliates.

This letter shall act as formal notice that you are required to preserve and not destroy all material, including electronically stored information, that may reasonably relate to issues in this matter. This affirmative obligation includes immediately suspending all document destruction, whether manual or electronic, and whether part of a normal procedural destruction process or otherwise.

Specifically, we demand that you take all steps to preserve related documents in native form and adhere to the following:

1. Retain all documents in relation to Big Canoe Brokerage or the Big Canoe Property Owners Association, including but not limited to, all posts made by members of “Neighbor to Neighbor – Big Canoe”.

February 10, 2025

2. Maintain all correspondence, including emails, databases, PDF files, electronically stored files, calendars, instant messages, text messages, Facebook messages, Facebook posts, memos, voice messages, online posts, or any other means of correspondence.

The destruction of any evidence carries with it serious consequences. Preservation of these documents requires not only that you refrain from actively destroying or disposing of documents, but also that you affirmatively prevent loss due to routine operations.

Please confirm for us today that you have received this message. Thank you for your attention to this matter. Please feel free to contact us directly should you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Kennington R. Groff".

Kennington R. Groff, Esq.
Partner | Bekiares Eliezer, LLP

Main: (404) 537-3686 Ext. 834
Direct: (404) 835-4015
E-mail: kgroff@founderslegal.com