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August 27, 2025

Via E-mail to [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

IMMEDIATE CEASE AND DESIST

Dear Mr. [REDACTED]

As you are aware, this office has been retained to represent Johnson Automotive Group and several of its employees concerning your ongoing defamation and interference with their business opportunities.

My clients were just advised that you recently distributed business cards at the Hackettstown Police Department, directing third parties to visit your website badcadillac.com, which contains vile and defamatory statements made against my clients. Each instance, such as this, where you purposefully direct third parties to view your website will be considered and pursued as a separate unlawful act. See Yeager v. Bowlin, 693 F.3d 1076, 1082 (9th Cir. 2012) (holding that defamatory statement on website is republished when "the statement itself is substantively altered or added to, or the website is directed to a new audience") (cited with approval by Petro-Lubricant Testing Laboratories, Inc. v. Adelman, 233 N.J. 236, 255 (2018)).

You are commanded to immediately cease and desist all unlawful conduct, to remove all offending content from your website badcadillac.com, and to cease any further distribution of business cards or pamphlets directing third parties to visit your website. Your tortious conduct has caused and continues to cause actual damage to the Johnson Automotive Group and its individual employees whom you have defamed. Accordingly, you are commanded to immediately cease and desist all unlawful conduct.

Please be guided accordingly.

Truly yours,

/s/ William H. Pandos

William H. Pandos

cc: John Johnson, III (*Via E-mail*)