

September 16, 2026

VIA EMAIL AND WHATSAPP

Scott Cooper
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917-565-4424

Re: Notice Pursuant to Section 770.01, Florida Statutes — Demand for Retraction and Removal of False and Defamatory Statements Concerning Morgan Edelboim and Edelboim Lieberman PLLC

Dear Mr. Cooper:

This letter constitutes formal notice, pursuant to section 770.01, Florida Statutes, that Morgan Edelboim and Edelboim Lieberman PLLC intend to institute a civil action against you for defamation and related claims, unless the false and defamatory statements identified below are retracted and permanently removed within the time provided by law. This notice is being served on you at least five (5) days before any such action will be instituted, as required by section 770.01.

The false and defamatory statements at issue are the following:

1. Avvo.com. On or about September 15, 2026, a one-star review purporting to be authored by an individual identified only as “Anna” was published on Avvo.com in connection with Morgan Edelboim’s attorney profile [insert exact page URL], stating: *“Morgan Edelboim was Unprofessional. Made sexist inappropriate comments about my figure. Regular use of sexual innuendos during discussions. I was honestly nervous about ever having to be in a situation where i was alone with this man.”*
2. Lawyers.com. A substantially identical review, also purporting to be authored by “Anna,” is published on Lawyers.com in connection with Morgan Edelboim’s attorney profile [insert exact page URL], under the category “Bankruptcy” and identifying Mr. Edelboim as “Hired Attorney,” stating: *“Unprofessional. Made sexist inappropriate comments about my figure. Regular use of sexual innuendos during discussions. I was honestly nervous about ever having to be in a situation where i was alone with this man.”*
3. Google. A substantially identical review, purporting to be authored by an individual identified only as “ST,” was published on or about September 15, 2026, on the Google Business

profile for Edelboim Lieberman PLLC [insert exact listing/review URL], stating: *“Morgan Edelboim was unprofessional. Made sexist inappropriate comments about my figure. Regular use of sexual innuendos during discussions. I was honestly nervous about ever having to be in a situation where i was alone with this man.”*

Each of the foregoing statements is false. Neither “Anna” nor “ST” is a genuine, identifiable client of Mr. Edelboim or the Firm. Mr. Edelboim has never made sexist or otherwise inappropriate comments about any client’s physical appearance, has never used sexual innuendo in discussions with a client, and has never engaged in any of the conduct described in the postings identified above.

We further note that your own prior written communications — including your statements that you would “work to destroy” Mr. Edelboim’s business, that you intended for a false story about him to “write itself,” and your detailed advance description of the substance of a fabricated review nearly identical to those identified above — are being preserved and will be relied upon as evidence of your authorship of, or responsibility for procuring, these publications.

Demand for Retraction and Removal

We hereby demand that, within five (5) days of the date of this letter, you:

- (a) cause each of the postings identified above to be permanently removed from Avvo.com, Lawyers.com, and Google, respectively;
- (b) provide written confirmation of such removal to the undersigned; and
- (c) cease and desist from publishing, or causing or procuring the publication of, any further false or defamatory statement concerning Mr. Edelboim or the Firm.

If the foregoing is not fully satisfied within **five (5) days of the date of this letter**, we intend, without further notice, to file a civil action against you in the Circuit Court of the Eleventh Judicial Circuit, in and for Miami-Dade County, Florida, seeking compensatory damages and permanent injunctive relief.

This letter is sent without prejudice to, and expressly reserves, all rights and remedies available to Mr. Edelboim and the Firm, at law or in equity, including but not limited to claims already accrued as of the date of this letter.

Sincerely,

By: /s/ Morgan B. Edelboim
Morgan Edelboim