

## DEMAND LETTER

2023-10-20

VIA CERTIFIED MAIL AND EMAIL

Redwood Software Group Inc.  
Attn: General Counsel

Re: Demand for Misappropriation Of Trade Secrets ? Immediate Action Required

Dear Counsel:

This firm represents Halcyon Data Systems Corp. ("Client") in connection with your client's misappropriation of trade secrets.  
We write to demand immediately cease use and return all materials.

### STATEMENT OF FACTS

Halcyon Data Systems Corp. and Redwood Software Group Inc. entered into a binding agreement pursuant to which Redwood Software Group Inc. undertook specific obligations. Despite repeated attempts to resolve this matter informally, Redwood Software Group Inc. has failed to comply with its obligations, causing substantial harm to Halcyon Data Systems Corp..

### LEGAL BASIS

Redwood Software Group Inc.'s conduct constitutes misappropriation of trade secrets under applicable law. Our client has been damaged in an amount not less than \$550,000, and those damages continue to accrue. We reserve all rights to seek additional damages, attorneys' fees, and injunctive relief as appropriate.

### DEMAND

We hereby demand that Redwood Software Group Inc.: (1) immediately cease use and return all materials; and (2) confirm in writing within 21 days of this letter that you will comply with the foregoing.

Failure to respond within 21 days will result in Halcyon Data Systems Corp. pursuing all available legal remedies without further notice, including the commencement of litigation seeking compensatory damages, injunctive relief, and attorneys' fees.

This letter is a litigation hold notice. Redwood Software Group Inc. must immediately preserve all documents, communications, and data relating to this matter.

Very truly yours,

Davis Polk & Wardwell LLP

By: \_\_\_\_\_  
Partner

cc: Halcyon Data Systems Corp.