

LAW OFFICES OF MALONEY, MOLARI & ASSOCIATES

10 South Street, Suite 201

Attleboro, MA 02703

Phone: (508) 214-4500

Fax: (815) 642-8351

September 18, 2015

VIA PROCESS SERVER

Matthew A. Roman, M.D.
Nature's Way Medicine
1224 N. King Street
Wilmington, DE 19805

RE: Matthew Roman and Nature's Way Medicine v. CannaCare

Dear Dr. Roman,

You are a former employee of CannaCare Docs, a division of Medeval Corp. ("CannaCare"). It has come to our attention that you have taken actions in violation of agreements you entered into while an employee of CannaCare. This includes competing with CannaCare and using information gained while an employee of CannCare after the end of your employment with the company. As you know, you entered into both a Non-Compete and Non-Solicitation Agreement ("Non-Compete Agreement") and a Proprietary and Confidential Information Agreement ("Confidentiality Agreement"), each dated August 18, 2015. In the Non-Compete Agreement you agreed that for a period of one (1) year following the termination of this Agreement for any reason, you would not establish, manage, operate in any manner or in any capacity, directly or indirectly, for yourself or for any other person or entity (whether as an owner, partner, director, officer, joint venture, principal, agent or otherwise), a facility or medical practice engaged in the business of making recommendations for the legal use of medical marijuana. In the Confidentiality Agreement you agreed that at all times, both during your employment with the Company and after its termination, you would keep in confidence and trust and not use to the detriment of the Company or for the benefit of yourself or any third party, all Proprietary Information. This is defined in the Confidentiality Agreement to include "patient information".

It has come to our attention that you have taken actions that violate both the Non-Compete Agreement and the Confidentiality Agreement. This includes you working for Nature's Way Medicine, consulting with CannaCare patients and current business associates and/or using information gained while an employee of CannaCare. These are serious acts for which you are responsible, they are not acceptable and will not be tolerated. It is direct contravention of agreements you agreed to.

Matthew A. Roman, M.D.
Page 2 of 2


Please **immediately cease and desist** from all of these activities. You are in breach of your obligations to CannaCare which are in place even after your termination of employment with us. We take these agreements very seriously. If you do not comply with this cease and desist demand, CannaCare is entitled to seek monetary damages and equitable relief for your actions. In the event you fail to meet this demand, please be advised that CannaCare has asked us to communicate to you that they will pursue all available legal remedies, including seeking monetary damages, injunctive relief, and an order that you pay court costs and attorney's fees. Your liability and exposure under such legal action could be considerable.

This letter is written without prejudice to CannaCare's rights and remedies in this matter, which are expressly reserved. If you have any questions, please do not hesitate to contact me.

Very truly yours,


Michael Maloney




From: **Marta Downing** marta@cannacaredocs.com 
Subject: please see section 9.9
Date: **August 21, 2015 at 11:48 AM**
To: Matthew A. Roman, MD atorvastatin20mg@gmail.com
Cc: Maggie Fauver Maggie@cannacaredocs.com



Employment Agreement
- Doctor Delaware.docx

Marta Downing
Canna Care Docs
a division of MedEval, Corp
Cannacaredocs.com
781-382-8053
Mobile-603-781-8046

From: **Mike Maloney** mike@maloneymolari.com 
Subject: RE: Your Facebook page
Date: August 25, 2015 at 2:25 PM
To: Matthew Roman, MD atorvastatin20mg@gmail.com



There is

Thank you for your prompt response.

Regards,
M

On Aug 25, 2015 12:26 PM, "Matthew Roman, MD" <atorvastatin20mg@gmail.com> wrote:
Of course. Is there reference to Canna care docs there?

Matthew Roman, MD

----- Original message -----

From: Mike Maloney <mike@maloneymolari.com>

Date: 8/25/2015 7:50 AM (GMT-05:00)

To: atorvastatin20mg@gmail.com

Subject: Your Facebook page

Hello Matthew,

My name is Mike Maloney, I'm counsel for Canna Care.

I'm writing to kindly request you remove any reference to Canna Care on your Facebook page.

Kindly let me know if you have any question.

Regards,
M