FICTIONAL SAMPLE · DRAFTED BY FREE DEMAND WRITER FROM A MADE-UP CASE FILE · NOT LEGAL ADVICE

PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- Only 8 of the 23 text messages (Sept. 3 to Oct. 20, 2025) are in the file. Confirm the full set of screenshots before sending, and check whether the other 15 add anything or contradict the 8 quoted [text_messages.pdf p.1].
- The Oct. 4 hay-shed entry comes from Ms. Abernathy's log description of gate-camera footage, which we have not seen. The log says two hay bales were cut open but not who cut them. The letter does not accuse Mr. Hollins of that. Confirm the footage is preserved [incident_log.pdf p.1].
- Boarders are not named in the letter, to avoid exposing them to further contact. Decide whether to name any. The log does not give a reason for the Kessler family's Oct. 31 move-out, so the letter draws no causal link.
- The Sept. 27 statements to a boarder and the Oct. 13 text may fit a more specific letter type (false statements about our client, or interference with contracts). The log is Ms. Abernathy's account of what the boarder told her. Nothing in the file says the statements are false.
- The Oct. 12 incident: the log says Mr. Hollins followed the car from the gate to the road, and the sheriff report says about half a mile. The letter uses the report's wording. The report number is listed only as "on file" [ADD: sheriff report number].
- The Oct. 19 and Oct. 20 conduct is described as occurring on the road shoulder and "the road." Confirm whether that area is a public right-of-way. The demand about the entrance is limited to approaching boarders, not presence on a public road.
- Ms. Abernathy's written "do not contact" instruction is dated Oct. 13, 2025. The no-trespass notice covers entry only. Confirm there is no earlier no-contact instruction.
- Items marked [VERIFY: North Carolina rule on ...] need attorney review. Also review the wording of the reservation of rights and law-enforcement references.
- Per the firm notes, no money is demanded and no demand amount appears. Still to be added: firm address, recipient address, delivery method, response deadline, and deed book/page.

Whitaker Lowe PLLC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

Wade Hollins
[ADD: Wade Hollins street address]
[ADD: city, state ZIP]

Re: Cease and Desist: Hollow Pine Stables LLC, 7740 Tanager Mill Road, Belwick, North Carolina

Dear Mr. Hollins:

Introduction

We represent Hollow Pine Stables LLC ("Hollow Pine"), owned by Corinne Abernathy [firm notes]. This letter demands that you stop entering Hollow Pine's property, stop contacting Ms. Abernathy, and stop approaching Hollow Pine's boarders.

Background

Hollow Pine owns the property at 7740 Tanager Mill Road, Belwick, North Carolina, about 34 acres. The deed was recorded January 12, 2025 [trespass_notice_and_sheriff_report.pdf p.1]. [ADD: deed book and page]

You worked as Hollow Pine's barn manager from March 2025 until your employment ended on August 29, 2025 [incident_log.pdf p.1].

On September 2, 2025, Hollow Pine gave you a written notice that you are no longer permitted to enter the property, including the barns, pastures, driveway and parking area, for any reason. You signed the notice that day, and it was witnessed [trespass_notice_and_sheriff_report.pdf p.1]. Your personal items were returned to you the same day [trespass_notice_and_sheriff_report.pdf p.1; incident_log.pdf p.1].

On October 12, 2025, a sheriff's deputy spoke with you by phone and advised you that the property owner has issued a no-trespass notice [trespass_notice_and_sheriff_report.pdf p.1].

On October 13, 2025, at 9:02 a.m., Ms. Abernathy texted you: "Do not contact me again. Do not come to the farm. Do not talk to my boarders." [text_messages.pdf p.1]

The conduct

The records show the following, in date order.

Date	Conduct	Evidence	Source
September 3, 2025, 10:12 to 10:31 p.m.	Texts to Ms. Abernathy, including "You think a piece of paper keeps me off that farm? I built half those stalls," "Answer me," and	Text messages	[text_messages.pdf p.1]

Date	Conduct	Evidence	Source
	"Fine. Ill come by and we can talk in person."		
September 14, 2025, about 9:40 p.m.	Your gray pickup was parked inside the front gate. You walked into the main barn and said you were "checking on his horses." None of the horses are yours.	Ms. Abernathy's log; a boarder witnessed it	[incident_log.pdf p.1]
September 15, 2025, 12:05 a.m.	Text: "Saw your light on. You should of talked to me."	Text message	[text_messages.pdf p.1]
September 27, 2025, 7:15 a.m.	You stood at the gate and told a boarder that the farm "is going under" and that the boarder should move a horse to "a real barn."	Ms. Abernathy's log, based on the boarder's report to her	[incident_log.pdf p.1]
October 4, 2025, 11:02 p.m.	You climbed the side fence by the hay shed and were on the property about 20 minutes. Two hay bales were cut open.	Gate camera, as described in Ms. Abernathy's log	[incident_log.pdf p.1]
October 5, 2025, 1:20 a.m.	Text: "Hope the hay holds up this winter."	Text message	[text_messages.pdf p.1]
October 12, 2025	A gray pickup followed a boarder from the stable gate for about half a mile, and the driver, whom she knows as you, shouted at her at a stop sign. You told the deputy you were "just driving."	Sheriff's office incident report; Ms. Abernathy's log	[trespass_notice_and_sheriff_report.pdf p.1; incident_log.pdf p.1]
October 13, 2025, 8:44 a.m.	Text: "Your boarders are going to find out what kind of place you run."	Text message	[text_messages.pdf p.1]
October 19, 2025, 6:30 to 8:00 p.m.	Your truck was parked on the shoulder at the farm entrance, and you waved boarders down as they left.	Ms. Abernathy's log	[incident_log.pdf p.1]
October 20, 2025, 11:58 p.m.	Text, after Ms. Abernathy's October 13 instruction: "Its a free country. I can stand on the road all I want."	Text message	[text_messages.pdf p.1]

Ms. Abernathy has recorded 23 messages from you between September 3 and October 20, 2025, and has kept screenshots of all of them [text_messages.pdf p.1]. Three boarders have told her

they are worried about safety at the barn, and one boarder family moved its horse out on October 31, 2025 [incident_log.pdf p.1].

Demand

On behalf of Hollow Pine, we demand that you:

- Not enter or remain on the property at 7740 Tanager Mill Road, Belwick, North Carolina, including the barns, pastures, driveway, parking area, fences and outbuildings, for any reason.
- Not contact Ms. Abernathy in any way, whether by text, phone, in person, or through another person.
- Not approach, follow, stop, wave down, or speak to Hollow Pine's boarders at the farm, at its entrance, or as they come and go.
- Confirm in writing by [ADD: response deadline] that you will comply with each demand above.
- Preserve all documents and data related to these events, including text messages, call logs, photographs, videos, social media messages and posts, and location data from your phone and vehicle.

Reservation of rights

Hollow Pine reserves all rights and remedies. If the conduct continues, Hollow Pine may pursue further steps available under North Carolina rules, including seeking a protective order, relying on the written no-trespass notice, and filing a civil action. [VERIFY: North Carolina rule on civil harassment orders]

State rules

Hollow Pine's September 2, 2025 written notice is the basis for its demand that you stay off the property. [VERIFY: North Carolina rule on trespass notice] Hollow Pine will also look to the remedies North Carolina provides for unwanted contact and repeated unwelcome conduct. [VERIFY: North Carolina rule on harassment and no-contact remedies]

Please direct all communication about this matter to me, and not to Ms. Abernathy or Hollow Pine's boarders.

Sincerely,

Simone A. Whitaker
Whitaker Lowe PLLC