



Banxso (Pty) Ltd  
117 Strand Street  
Cape Town  
South Africa

To: **Dynadot Inc**

**Immediate Matrix**

Email: [abuse@dynadot.com](mailto:abuse@dynadot.com)  
[abuse@cloudflare.com](mailto:abuse@cloudflare.com)

Date: 14 February 2024

To whom it may concern

**Subject: Cease and Desist Notice for Unauthorized Use and Misrepresentation**

This letter serves as a formal notice from Banxso, a licensed and reputable financial service provider, to the operators of [immediatematrix.io](https://immediatematrix.io), as well as its hosting service and domain registrar. It has come to our attention that your website has been engaging in activities that unlawfully associate your operations with our company, Banxso, without our permission or authorization.

**Allegations:**

1. **Unauthorized Association:** Your website, [immediatematrix.io](https://immediatematrix.io), has been redirecting users to our homepage, creating a false impression of a partnership or endorsement by Banxso.
2. **Misrepresentation:** This redirection and the overall presentation on your website suggest an affiliation with Banxso, which is entirely unfounded and misleading to the public.
3. **Potential Harm:** These actions have the potential to damage Banxso's reputation, mislead consumers, and infringe upon our brand integrity.

**Demands:**

We hereby demand that you immediately:

1. **Cease and Desist:** Stop all use of Banxso's name, branding, and any content that suggests an association with our company.
2. **Remove Content:** Take down any material, links, or references that imply a relationship between [immediatematrix.io](https://immediatematrix.io) and Banxso from your website and any other platforms or marketing materials.
3. **Confirmation:** Provide written confirmation within five (5) business days from the date of this letter that you have complied with these demands.





**Legal Action:**

Please be advised that failure to comply with these demands will compel Banxso to take further legal action to protect its interests. This may include but is not limited to seeking injunctive relief, damages, and legal costs associated with these proceedings.

This letter serves as your opportunity to resolve this matter amicably. We prefer to settle this issue without resorting to formal legal action, but we are prepared to enforce our rights and protect the Banxso brand through all available legal means.

**Confirmation of Receipt:**

Please acknowledge receipt of this notice and confirm your intentions to comply with the demands outlined herein. Your cooperation in this matter will be appreciated and will contribute to a swift resolution.

Should you have any questions or require further clarification, please directly contact Lara Hughes Thom – Chief Legal Officer at: [Lara.h@banxso.com](mailto:Lara.h@banxso.com)

We expect your immediate attention to this matter.

Yours sincerely,  
**Lara Hughes -Thom**  
**Chief Legal Officer**  
Email: [lara.h@banxso.com](mailto:lara.h@banxso.com)



ENS

35 Lower Long Street  
Foreshore Cape Town 8001  
P O Box 2293 Cape Town South Africa 8000  
Docex 14 Cape Town  
Tel +2721 410 2500  
info@ENSafrica.com  
ENSafrica.com

To:

Dynadot Inc  
Immediate Matrix  
abuse@dynadot.com  
abuse@cloudflare.com

Per email

Banxso our ref  
The Immediate Matrix your ref  
15 February 2024 date

Dear Sir/Madam,

**RE: CEASE AND DESIST NOTICE FOR UNAUTHORIZED USE AND MISREPRESENTATION**

1. We refer to the above matter and confirm that we act on behalf of Banxso (hereinafter referred to as **"our client"**).
2. Our client is a licensed and reputable financial service provider.
3. Our instructions are as follows:-
  - 3.1. It has come to our client's attention that your website has been engaging in activities that unlawfully associate your operations with our client, without any permission and/or authority to do so.
  - 3.2. Your website, [immediatematrix.io](https://immediatematrix.io), has been redirecting users to our homepage, creating a false impression of a partnership or endorsement by Banxso.
  - 3.3. This redirection and the overall presentation on your website suggest an affiliation with our client, which is entirely unfounded and misleading to the public.
  - 3.4. These actions have the potential to damage Banxso's reputation, mislead consumers, and infringe upon our brand integrity.



4. In light of the above, we have been instructed to demand – as we hereby do – that:-
  - 4.1. Dynadot stops any and all use of our client's name, branding, and any content that suggests an association with our company;
  - 4.2. Dynadot removes any material, links, or references that imply a relationship between [immediatematrix.io](https://immediatematrix.io) and our client from your website and any other platforms or marketing materials; and
  - 4.3. Dynadot provides written confirmation within five (5) business days from the date of this letter that you have complied with these demands.
5. Should you fail to adhere to the demands set out in paragraph 4 above within five (5) business days from the date of transmission of this letter, we hold instructions to institute, *inter alia*, urgent proceedings against Dynadot for, *inter alia*, interdictory relief.
6. In addition to the above, our client is also quantifying its damages suffered to date and its rights remain reserved to institute a damages claim against you at the appropriate time.
7. We trust that Dynadot will accede to our client's demands without our client being forced to approach, *inter alia*, the High Court of South Africa to protect its rights.
8. Our client's rights remain reserved and trust that Dynadot will cooperate to a swift resolution of this matter.
9. We await to hear from you.

Yours,

**Edward Nathan Sonnenbergs Inc.**

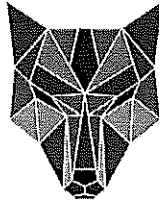
Per:

**Professor Angela Itzikowitz**

*(transmitted electronically and not signed)*

[aitzikowitz@ensafrica.com](mailto:aitzikowitz@ensafrica.com)

3rd floor, one on ninth  
cnr glenhove road and 9th street  
melrose estate, johannesburg, 2196  
po box 72464, parkview, 2122  
011 486 2850 (t)  
lauren@swvginc.co.za  
www.swvginc.co.za



ATTORNEYS  
**SWVG INC**  
Swartz | Weil | Van der Merwe | Greenberg

registration no: 2017/297672/21

YOUR REF :  
OUR REF : MS L BRABANT/as/MB0011  
DATE : 15 FEBRUARY 2024

## DYNADOT INC

### IMMEDIATE MATRIX

E-mail: [abuse@dynadot.com](mailto:abuse@dynadot.com)  
[abuse@cloudflare.com](mailto:abuse@cloudflare.com)

Dear Sirs,

### RE: CEASE AND DESIST NOTICE FOR UNAUTHORIZED USE AND MISREPRESENTATION

1. This letter serves as a formal notice from Banxso, a licensed and reputable financial service provider, to the operators of [immediatematrix.io](https://immediatematrix.io), as well as its hosting service and domain registrar. It has come to our attention that your website has been engaging in activities that unlawfully associate your operations with our company, Banxso, without our permission or authorization.

### ALLEGATIONS

2. Unauthorized Association: Your website, [immediatematrix.io](https://immediatematrix.io), has been redirecting users to our homepage, creating a false impression of a partnership or endorsement by Banxso.
3. Misrepresentation: This redirection and the overall presentation on your website suggest an affiliation with Banxso, which is entirely unfounded and misleading to the public.
4. Potential Harm: These actions have the potential to damage Banxso's reputation, mislead consumers, and infringe upon our brand integrity.

### DEMANDS

5. We hereby demand that you immediately:

Chairman : David Swartz

Directors: Rachael Weil Chalmers | Etienne van der Merwe | Joshua Greenberg | Gabriella Hodes

Associates: Lauren Brabant | Jordan Dias

LAS



- 5.1. Cease and Desist: Stop all use of Banxso's name, branding, and any content that suggests an association with our company;
- 5.2. Remove Content: Take down any material, links, or references that imply a relationship between [immediatematrix.io](http://immediatematrix.io) and Banxso from your website and any other platforms or marketing materials;
- 5.3. Confirmation: Provide written confirmation within five (5) business days from the date of this letter that you have complied with these demands.

#### **LEGAL ACTION**

6. Please be advised that failure to comply with these demands will compel Banxso to take further legal action to protect its interests. This may include but is not limited to seeking injunctive relief, damages, and legal costs associated with these proceedings.
7. This letter serves as your opportunity to resolve this matter amicably. We prefer to settle this issue without resorting to formal legal action, but we are prepared to enforce our rights and protect the Banxso brand through all available legal means.

#### **CONFIRMATION OF RECEIPT**

8. Please acknowledge receipt of this notice and confirm your intentions to comply with the demands outlined herein. Your cooperation in this matter will be appreciated and will contribute to a swift resolution.
9. Should you have any questions or require further clarification, please directly contact Ms Lauren Brabant – Attorney – at [lauren@swvginc.co.za](mailto:lauren@swvginc.co.za).

LAB



ATTORNEYS  
**SWVG INC**  
Swartz | Weil | Van der Merwe | Greenberg

10. We expect your immediate attention to this matter.

Yours faithfully,

A handwritten signature in black ink that reads "L Brabant". The signature is fluid and cursive, with the first letter "L" being particularly large and stylized.

**SWVG INCORPORATED**  
**PER: LAUREN BRABANT**  
**Associate**