

[Your Name/Law Firm Address]

[Date]

[Opposing Counsel Name]
[Opposing Law Firm Name]
[Address]

Re: NOTICE OF LITIGATION HOLD AND ESI PRESERVATION DEMAND

Case Name: [Case Name]

Case Number: [Case Number]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for the preservation of all relevant Electronically Stored Information (ESI), documents, and tangible evidence related to the above-referenced matter. Please instruct your client(s), [Client Name(s)], to immediately suspend all routine deletion, overwriting, or destruction of data.

This preservation demand includes, but is not limited to:

- Email communications (including metadata and attachments);
- Internal messaging (Slack, Microsoft Teams, etc.);
- Text messages and mobile device data;
- Word processing documents, spreadsheets, and databases;
- Social media content and cloud storage files;
- Server logs, backup tapes, and system metadata.

You are hereby cautioned that any failure to take proactive steps to preserve this information may result in a claim of spoliation of evidence. We further request that you provide a description of the steps taken to ensure that relevant ESI is being preserved, including the date the litigation hold was formally issued to your client.

If you anticipate any technical challenges regarding the preservation of this data, please contact my office immediately so we may discuss a protocol for ESI discovery.

Sincerely,

[Your Name]
[Your Law Firm]