

SENT VIA CERTIFIED MAIL / EMAIL

DATE: [Date]

TO:

[Opposing Party Name or Opposing Counsel Name]

[Address]

[City, State, Zip Code]

RE: [Case Name / Case Number]

NOTICE OF DUTY TO PRESERVE EVIDENCE

Dear [Name],

This letter serves as a formal notice to preserve all potentially relevant evidence, including electronically stored information (ESI), pertaining to the above-referenced family law proceeding.

You are hereby requested to take all necessary steps to prevent the deletion, destruction, concealment, or alteration of all data contained within your social media accounts, including but not limited to:

- Facebook
- Instagram
- X (formerly Twitter)
- TikTok
- LinkedIn
- Snapchat
- Dating applications (e.g., Tinder, Bumble, Hinge)
- Messaging applications (e.g., WhatsApp, Messenger, Signal)

This request specifically includes, but is not limited to, the following information dated from [Start Date] to the present:

- Status updates and wall posts;
- Photos, videos, and "stories" (including metadata and deleted items);
- Private messages, direct messages (DMs), and chat logs;
- Check-ins, location data, and "tags" by other users;
- Comments made on your posts or posts of others;
- Friend lists, follower lists, and connection requests.

Please be advised that the "deactivation" or "deletion" of any account, or the use of automated "disappearing message" features, may be considered spoliation of evidence. You are instructed to disable any auto-delete settings immediately. Any intentional or negligent destruction of this evidence may result in court-ordered sanctions.

Please confirm in writing within [Number] days that you have taken the necessary steps to preserve these records.

Sincerely,

[Your Name / Attorney Name]

[Your Phone Number]

[Your Email Address]