

[Your Name/Law Firm Address]

[Date]

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

Re: Notice of Preservation of Evidence and Demand to Cease Use of Ephemeral Messaging Applications

Matter: [Case Name / Matter Number]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for your client, [Client Name], and all its employees, agents, and representatives, to preserve all electronic information relevant to the above-referenced matter. This demand specifically includes data generated by or stored within ephemeral messaging applications.

We are aware that your client may utilize messaging platforms including, but not limited to, Signal, WhatsApp, Telegram, Wickr, Slack, or Microsoft Teams. Many of these applications contain features that automatically delete, "vanish," or "burn" messages after they are read or after a set period of time.

Pursuant to your client's discovery obligations, you are hereby instructed to:

- Immediately disable all auto-delete, self-destruct, or ephemeral messaging settings on all devices and accounts used for business purposes or relevant communications.
- Suspend any routine data destruction policies that would affect these applications.
- Preserve all existing message history, metadata, and attachments within these platforms.
- Identify all individuals who have utilized such applications to discuss matters related to this litigation.

The failure to disable these features and preserve this data may result in the permanent loss of discoverable evidence and may subject your client to motions for spoliation sanctions, including adverse inference instructions or monetary penalties.

Please confirm in writing by [Date] that the auto-delete features have been disabled and that all relevant ephemeral data is being preserved.

Sincerely,

[Your Name]
[Your Law Firm]