

**SENT VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED**

**DATE:** [Date]

**TO:**

[Name of Opposing Party/CEO]

[Company Name]

[Address]

[City, State, Zip Code]

**RE: LEGAL PRESERVATION NOTICE / SPOILIATION ADMONITION**

Dear [Name of Contact],

This letter serves as a formal demand for the preservation of all relevant evidence in anticipation of litigation regarding [Brief Description of Matter/Claim].

**1. Duty to Preserve**

You are hereby notified that you have an immediate legal obligation to preserve all documents, data, and tangible things that may be relevant to this matter. This includes a mandatory "litigation hold" on all routine document destruction policies.

**2. Ephemeral Messaging Applications**

Evidence suggests that your employees, agents, or representatives utilize ephemeral messaging applications, including but not limited to Signal, WhatsApp, Telegram, Wickr, or Slack. You are specifically directed to:

- Disable all "Auto-Delete," "Disappearing Messages," or "Burn on Read" features for all accounts used for business purposes.
- Instruct all relevant personnel to cease the use of ephemeral messaging for any communication related to [Subject Matter] until further notice.
- Preserve all message metadata, encryption keys, and hardware (mobile phones, tablets, workstations) used to access these applications.

**3. Scope of Electronic Data**

Preservation efforts must include, but are not limited to:

- Internal and external emails and attachments.
- Text messages (SMS/MMS) and instant messages.
- Cloud storage data (Google Drive, Dropbox, OneDrive).
- Social media content and direct messages.
- Server logs and system backups.

**4. Notice Regarding Spoliation**

Failure to comply with this preservation demand may result in severe legal sanctions. These may

include evidentiary or terminating sanctions, an adverse inference jury instruction, and the recovery of attorney fees and costs necessitated by the loss of evidence.

Please acknowledge receipt of this letter in writing within [Number] business days and confirm that a formal litigation hold has been issued to all relevant custodians.

Sincerely,

[Your Name/Law Firm Name]

[Your Title]

[Your Phone Number]

[Your Email Address]

CC: [Opposing Counsel, if known]