

URGENT LEGAL MATTER: NOTICE TO PRESERVE EVIDENCE

DATE: [Date]

TO: [Company Name / Legal Department]
[Address]
[City, State, Zip]

RE: Notice of Litigation and Demand for Preservation of Ephemeral Messaging and Electronic Data

Dear [Contact Name or General Counsel],

This letter serves as a formal notice to [Company Name], its officers, employees, and agents, regarding a pending or anticipated class action litigation involving [Brief Description of Subject Matter].

1. Duty to Preserve

You are hereby directed to take immediate steps to preserve all documents, data, and electronically stored information (ESI) potentially relevant to this matter. This obligation supersedes any standard document retention or destruction policies.

2. Ephemeral Messaging Applications

This demand specifically includes, but is not limited to, communications conducted via ephemeral or encrypted messaging applications such as **Signal, WhatsApp, Telegram, Slack, Microsoft Teams**, or any other proprietary internal messaging systems. You are required to:

- Disable all "auto-delete," "disappearing messages," or "burn-on-read" features for all relevant custodians.
- Instruct all employees and contractors to cease the deletion of messages related to [Subject Matter].
- Preserve all metadata, encryption keys, and hardware associated with these communications.

3. Scope of Preservation

The scope of this preservation request includes all communications from [Start Date] to the present regarding:

- [Specific Topic 1]
- [Specific Topic 2]
- [Specific Topic 3]

4. Targeted Custodians

While your duty extends to the entire organization, you must immediately secure the devices and accounts of the following individuals: [List Key Names/Titles].

5. Consequences of Spoliation

Failure to comply with this notice may result in severe legal sanctions, including evidentiary exclusions, monetary penalties, or adverse inference instructions issued by the Court.

Please acknowledge receipt of this letter within [Number] business days and confirm that the requested preservation measures, specifically regarding ephemeral messaging, have been implemented.

Sincerely,

[Your Name/Law Firm Name]

[Your Title]

[Phone Number]

[Email Address]