

VIA CERTIFIED MAIL / RETURN RECEIPT REQUESTED

[Date]

[Ride-Share Company Name]
[Legal Department / Registered Agent Address]
[City, State, Zip Code]

RE: NOTICE TO PRESERVE EVIDENCE

Date of Incident: [Date of Accident]
Location: [Location of Accident]
Vehicle: [Year, Make, Model, License Plate]
Driver Name: [Driver Name, if known]
Ride-Share Trip ID: [Trip ID Number, if known]

To Whom It May Concern,

This letter serves as a formal demand for the preservation of all electronically stored information (ESI) and physical evidence related to the motor vehicle collision referenced above. This demand specifically includes data from the Motor Vehicle Event Data Recorder (EDR), often referred to as the "Black Box," and all telematics data associated with the vehicle and the driver's mobile application at the time of the incident.

You are hereby directed to take immediate steps to ensure that the following items are not deleted, overwritten, modified, or destroyed:

- **Event Data Recorder (EDR) Data:** All pre-crash and crash-pulse data, including vehicle speed, throttle position, braking status, seatbelt usage, and steering input.
- **Telematics and GPS Data:** All records indicating the vehicle's location, speed, and heading leading up to and at the time of the impact.
- **App Usage Records:** Logs indicating the driver's status (e.g., "Online," "Accepting Ride," "En Route," "On Trip") and any interaction with the ride-share application.
- **On-Board Video/Audio:** Any footage from internal or external cameras or dash-cams installed in the vehicle.
- **Communication Logs:** All messages, alerts, or notifications sent between the driver and the ride-share platform during the 24-hour period surrounding the collision.

Failure to preserve this evidence may result in legal sanctions for spoliation of evidence, and we will request that the court provide an adverse inference instruction to a jury regarding the destroyed data.

Please confirm in writing within ten (10) business days that you have placed a litigation hold on this evidence and that the vehicle and its data will be maintained in their current condition for inspection.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title/Law Firm Name]

[Your Phone Number]

[Your Email Address]