

[Your Name/Law Firm]
[Your Address]
[City, State, Zip Code]
[Phone Number]
[Email Address]

[Date]

[Opposing Counsel Name]
[Opposing Counsel Law Firm]
[Address]
[City, State, Zip Code]

RE: Notice of Duty to Preserve Evidence

Matter: [Case Name or Description]

Case No.: [Court Case Number, if applicable]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for your client, [Client Name], and all related entities, employees, and agents, to preserve all evidence potentially relevant to the above-referenced matter. This includes, but is not limited to, any blueprints, architectural drawings, and construction documents related to [Project Name/Address].

Scope of Preservation

You are required to take immediate action to prevent the deletion, destruction, alteration, or disposal of the following materials created or modified between [Start Date] and [End Date]:

- Original blueprints, schematics, and site plans;
- CAD (Computer-Aided Design) files and associated metadata;
- Revised drawings, "as-built" plans, and change orders;
- Permit applications and correspondence with building departments;
- Internal and external communications regarding the design (emails, memos, texts);
- Project logs, inspection reports, and meeting minutes.

Electronic Evidence

With respect to Electronically Stored Information (ESI), please ensure that no routine data deletion or "auto-delete" functions occur on servers, hard drives, or cloud storage containing these blueprints or related communications. This request extends to all versions, including drafts and superseded designs.

Legal Obligations

Failure to maintain this evidence may result in a motion for sanctions for spoliation of evidence, including but not limited to adverse inference instructions, monetary penalties, or default judgment. Please confirm in writing by [Date] that you have issued a formal litigation hold to your client regarding these specific items.

Sincerely,

[Your Signature]

[Your Printed Name]