

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

[Opposing Counsel Name]

[Opposing Law Firm Name]

[Address]

[City, State, Zip Code]

RE: Notice of Preservation of Evidence and Request for Forensic Imaging

Case Name: [Case Name]

Case Number: [Case Number]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for your client, [Client Name], to take all necessary steps to preserve electronically stored information (ESI) relevant to the above-referenced matter. Specifically, we demand that your client immediately create and preserve forensic "mirror images" of all relevant hard drives and storage media.

A standard copy or "drag-and-drop" of files is insufficient, as it fails to preserve critical metadata, deleted files, and unallocated space. We request that forensic imaging be performed on the following devices:

- [Description of specific computers/workstations]
- [Description of laptops]
- [Description of external drives or servers]
- [Description of mobile devices/tablets, if applicable]

The forensic imaging process must be conducted by a qualified third-party forensic expert to ensure the integrity of the data and to maintain a proper chain of custody. The images must include bit-by-bit copies of the media, including:

- Active files and directories;
- Deleted files and file fragments;
- Slack space and unallocated sectors;
- System registry files and logs;
- Original file metadata (creation, access, and modification dates).

Please confirm in writing by [Date] that your client has initiated the forensic imaging process and that all automatic data destruction or "recycling" protocols for these devices have been

suspended. Failure to preserve this evidence may result in a motion for sanctions for spoliation of evidence.

We look forward to your prompt cooperation.

Sincerely,

[Your Signature]

[Your Printed Name]