

[Date]

[Insurance Carrier Name]
[Claims Department Address]
[City, State, Zip Code]

RE: NOTICE OF ANTICIPATED SUBPOENA AND FORMAL DEMAND FOR PRESERVATION OF RECORDS

Claim Number: [Claim Number]
Insured Party: [Insured Name]
Date of Loss/Incident: [Date]
Policy Number: [Policy Number (if known)]

To the Custodian of Records:

Please be advised that this office represents [Client Name] in connection with a legal matter involving the above-referenced incident. We anticipate serving your company with a formal subpoena for records in the near future.

Pursuant to your legal obligations to preserve evidence when litigation is reasonably anticipated, you are hereby directed to maintain and preserve all documents, data, and tangible items related to the aforementioned claim, including but not limited to:

- The complete claim file, including all adjusters' notes, internal logs, and chronologies.
- All correspondence, emails, and written communications concerning the claim or the insured.
- All investigative reports, witness statements (written or recorded), and interview transcripts.
- All photographs, video footage, or digital images related to the incident or property damage.
- All medical records, billing statements, and independent medical examination (IME) reports.
- All policy declarations, endorsements, and coverage determinations applicable to this loss.
- Metadata associated with any electronic records or communications.

You are further instructed to suspend any routine document destruction policies, "auto-delete" functions, or data recycling procedures that may result in the loss of these materials. Failure to preserve this evidence may result in legal sanctions for spoliation.

Please acknowledge receipt of this letter in writing and confirm that a litigation hold has been placed on the requested files.

Sincerely,

[Your Name]
[Law Firm Name]
[Phone Number]
[Email Address]