

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

[Opposing Counsel Name]

[Opposing Counsel Law Firm]

[Address]

[City, State, Zip Code]

RE: EVIDENCE PRESERVATION DEMAND - [Case Name / Matter Reference Number]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for your client, [Client Name], to take all necessary steps to preserve and protect any and all audio recordings relevant to the above-referenced matter. This demand includes, but is not limited to, the following:

- Voicemail messages and recordings;
- Recorded telephone conversations;
- Audio files from digital recording devices or smartphones;
- Surveillance system audio;
- Meeting or dispatch recordings;
- Metadata associated with any electronic audio files.

You are hereby notified that your client must immediately suspend any automated deletion, overwriting, or recycling policies that might affect these records. Failure to preserve these materials may result in a motion for sanctions or an adverse inference instruction for spoliation of evidence.

Please confirm in writing by [Date] that you have advised your client of their duty to preserve this evidence and that all necessary preservation measures have been implemented.

Sincerely,

[Your Signature]

[Your Printed Name]