

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

[Date]

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

**Re: [Case Name / Matter Number] - Initial Meet and Confer Regarding Evidence Preservation and Potential Spoliation**

Dear [Opposing Counsel Name],

I am writing to initiate a meet and confer regarding concerns over the preservation of evidence relevant to the above-referenced matter. We are concerned that certain Electronically Stored Information (ESI) or physical evidence may be at risk of destruction or alteration.

Specifically, we believe the following categories of evidence are relevant and must be preserved:

- [Item 1: e.g., Internal email communications between X and Y]
- [Item 2: e.g., Automated log files from Server Z]
- [Item 3: e.g., Physical hardware or damaged components]
- [Item 4: e.g., Surveillance footage from Date/Time]

We request that you provide immediate written confirmation that a formal litigation hold has been issued to all relevant custodians. Please also provide details regarding the steps taken to suspend routine document destruction or automated deletion protocols for the data sets listed above.

We would like to schedule a brief telephonic conference to discuss these preservation efforts and ensure that no further spoliation occurs. Please let us know your availability for a call on [Date] at [Time] or [Date] at [Time].

We look forward to your prompt response and to resolving this matter cooperatively.

Sincerely,

[Your Signature]  
[Your Printed Name]