

SENT VIA EMAIL AND CERTIFIED MAIL

[Date]

[Opposing Counsel Name]

[Law Firm Name]

[Address]

[City, State, Zip]

RE: [Case Name / Matter Description]

Subject: URGENT MEET AND CONFER - Demand for Preservation of Evidence

Dear [Counsel Name],

This letter serves as a formal demand for the immediate preservation of all relevant evidence, including electronically stored information (ESI), pertaining to the above-referenced matter. We have reason to believe that critical evidence is at risk of being deleted, overwritten, or otherwise destroyed.

Specifically, your client is required to suspend all automated deletion protocols and manual purging of the following:

- Email communications and attachments between [Date] and [Date];
- Text messages, instant messages, and internal chat logs (e.g., Slack, Teams);
- Hard drives, server logs, and cloud storage accounts belonging to [Specific Individuals];
- Physical documents, handwritten notes, and original files;
- [Insert specific category of evidence here].

Failure to take immediate steps to preserve this information may result in a motion for sanctions for spoliation of evidence, including evidentiary or terminating sanctions under [Insert Applicable Rule/Statute].

I am available to meet and confer regarding the scope of this preservation and a discovery schedule on [Date] at [Time]. Please confirm your availability or propose an alternative time no later than [Deadline Date/Time].

Sincerely,

[Your Name]

[Your Law Firm]

[Your Phone Number]

[Your Email]