

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

[Date]

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

Re: [Case Name/Matter Number] - Notice of Spoliation and Request for Meet and Confer

Dear [Opposing Counsel Name],

This letter serves as formal notice that we believe [Defendant/Respondent Name] has failed to preserve relevant corporate records, resulting in the spoliation of evidence critical to this litigation. Specifically, we have identified the following missing or destroyed categories of information: [List specific documents, email servers, or data sets].

Under [Applicable Rule of Civil Procedure], a party has an affirmative duty to preserve evidence when it knows or reasonably should know that the evidence may be relevant to pending or future litigation. The loss of these records significantly prejudices our client's ability to prove [Specific Claim or Element].

We hereby demand that [Defendant/Respondent Name] immediately cease any further destruction of data, including automated deletion protocols, and take all necessary steps to recover any lost or deleted information through forensic means.

Furthermore, we request a "Meet and Confer" conference to discuss this issue, the extent of the data loss, and potential remedial measures. We propose the following dates and times for a telephonic conference:

- [Option 1: Date and Time]
- [Option 2: Date and Time]
- [Option 3: Date and Time]

Please confirm your availability by [Deadline Date]. If we are unable to resolve this matter through a meet and confer, we intend to seek appropriate sanctions from the Court, including but not limited to adverse inference instructions, monetary penalties, or evidentiary exclusions.

Sincerely,

[Your Signature]

[Your Printed Name]