

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

[Date]

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

**Re: [Case Name] v. [Case Name]**  
**Case No.: [Court Case Number]**  
**Subject: Meet and Confer Regarding Spoliation of Surveillance Footage**

Dear [Opposing Counsel Name],

I am writing to meet and confer in good faith regarding a serious discovery issue: the apparent destruction or failure to preserve surveillance footage relevant to the incident that occurred on [Date of Incident] at [Location].

On [Date of Preservation Letter], my office sent a formal preservation notice requesting that all video recordings, including CCTV and digital surveillance, be maintained. Despite this notice, your recent discovery responses indicate that [the footage has been overwritten / the footage no longer exists / the defendant failed to pull the data].

The loss of this evidence constitutes spoliation. This footage is central to the issues of liability and notice in this case. Your client had an affirmative duty to preserve this evidence when litigation was reasonably foreseeable, and certainly after receiving our preservation demand.

We request that you provide the following by [Date]:

- A detailed explanation of why the footage was not preserved.
- The date and time the footage was deleted or overwritten.
- The names of the individuals responsible for the surveillance system management.
- Confirmation of whether any backup or cloud storage exists that may contain the data.

If we do not receive a satisfactory response or a proposal to remedy this loss, we will be forced to file a Motion for Sanctions, seeking relief including, but not limited to, an adverse inference jury instruction or the striking of defenses.

I am available to discuss this matter via telephone on [Date] at [Time] to resolve this without court intervention.

Sincerely,

[Your Signature]

[Your Printed Name]