

[Your Name/Law Firm Name]

[Your Address]

[City, State, Zip Code]

[Phone Number]

[Email Address]

[Date]

[Opposing Counsel Name]

[Opposing Law Firm Name]

[Address]

[City, State, Zip Code]

RE: NOTICE OF PRESERVATION OF EVIDENCE

Matter: [Case Name/Reference Number]

Client: [Your Client's Name]

Dear [Opposing Counsel Name],

This letter serves as a formal demand for your client, [Opposing Party Name], and its agents, employees, and representatives, to preserve all evidence potentially relevant to the above-referenced matter.

Relevant evidence includes, but is not limited to, the following items in your client's possession, custody, or control:

- **Electronic Data:** Emails, text messages, instant messages, voicemails, social media posts, and metadata.
- **Physical Documents:** Paper files, handwritten notes, logs, diaries, calendars, and photographs.
- **Surveillance:** Video recordings, CCTV footage, and audio recordings.
- **Internal Records:** Employee files, incident reports, maintenance logs, and financial records.
- **Hardware:** Hard drives, servers, mobile devices, and backup tapes.

You are hereby instructed to immediately initiate a "litigation hold" and suspend any automated deletion or destruction policies regarding the aforementioned categories of evidence. Failure to maintain this evidence may result in a motion for sanctions for spoliation of evidence, including but not limited to adverse inference instructions or monetary penalties.

Please confirm in writing within [Number] days that your client has received this notice and has taken the necessary steps to preserve all relevant evidence.

Sincerely,

[Your Signature]

[Your Printed Name]