

SENT VIA EMAIL AND CERTIFIED MAIL

Date: [Date]

To: [Name of Recipient/Registered Agent]
[Company Name]
[Address]
[City, State, Zip Code]

Re: NOTICE TO PRESERVE ELECTRONICALLY STORED INFORMATION (ESI)

Dear [Name],

Please be advised that [Your Name/Company Name] ("the Requesting Party") intends to initiate legal action against [Recipient Name] ("the Producing Party") regarding [Brief description of the dispute or incident].

This letter serves as a formal demand for the preservation of all Electronically Stored Information (ESI) and physical evidence related to this matter. This demand is issued pursuant to applicable rules of civil procedure and legal obligations to prevent the spoliation of evidence.

1. Scope of Preservation

You are required to preserve all documents, data, and ESI created, received, or maintained between [Start Date] and [End Date/Present] that relate to [Specific Subject Matter].

2. Definition of ESI

ESI includes, but is not limited to:

- Emails and attachments (including deleted items and archive folders).
- Internal and external instant messages, Slack logs, or text messages.
- Word processing documents, spreadsheets, and presentations.
- Database records and activity logs.
- Metadata associated with any electronic files.
- Voicemails and audio/video recordings.

3. Storage Media

This preservation demand applies to data stored on:

- Centralized servers and cloud-based storage (e.g., Google Drive, AWS, SharePoint).
- Individual workstations, laptops, and home computers.
- Mobile devices, tablets, and external hard drives.
- Backup tapes and disaster recovery systems.

4. Suspension of Routine Destruction

You are hereby directed to immediately suspend any automated deletion policies, "auto-shred"

functions, or routine recycling of backup media that may impact the information described above.

Failure to comply with this notice may result in severe legal sanctions, including but not limited to, evidentiary fines, adverse inference instructions, or default judgment.

Please confirm in writing within [Number] business days that you have taken the necessary steps to implement a legal hold and preserve the requested information.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title/Law Firm Name]

[Contact Information]