

Date
Alison Attorney, Esq.
Johnson, Smith & Jones, LLP
Your Town, ST 54321

Larry Lawyer, Esq.
Andrews, Williams & Stephens, LLP
Any Town, ST 54312

Dear Larry Lawyer:

As you know, Allan Attorney and I are representing Penny Plaintiff with respect to the above-referenced incident. I am writing in response to your firm's March 2, 2016 letter to our firm.

We wish to arrange an inspection of your clients' vehicle. We are in receipt of photographs previously submitted along with the traffic incident report taken at the scene. This letter is also meant to advise you that you must also preserve all data of any type relating to the collision.

This includes any written material such as witness statements, log books, further incident reports, inspections, service records, bills, dispatch records, maintenance records, accident reporting records, driver hiring and employment records; electronic data of any kind; any video or audio recordings, as well as any data relating to the use of any cell phones or other communication devices prior to or during the time of incident.

Please do not dispose of any of this material. We anticipate that it will be both discoverable and admissible in any litigation that may arise out of this claim. Failure to preserve this material will result in a request for a spoliation instruction at any trial in this matter.

I understand you intend to preserve the vehicle itself at least until June 2, 2016. I am attempting to arrange to have it inspected prior to that date; however, if it cannot be scheduled by then, I am asking that the vehicle be preserved until an inspection can take place.

I look forward to hearing from you.

Sincerely,

Alison Attorney