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[date]

VIA EMAIL AND US MAIL

DRAFT

Panel committee member name
Panel committee member address
Panel committee member email

Re: Investigation Involving Laurelwood Elementary School
("Laurelwood ") conducted by the Santa Clara Unified School
District ("District")

Dear Ms./Mr. [panel committee member name]:

My name is Gregory J. Rolan of Haight Brown & Bonesteel. Our office has been retained to investigate certain matters regarding Laurelwood. The purpose of this correspondence is to inform you of your document preservation duties in light of the investigation involving Laurelwood and the District.

Specifically, until further notice, you must preserve and retain all documents and electronically stored information ("ESI") (in its native format) potentially relevant to Laurelwood and you may not destroy, remove, alter or dispose of potentially relevant documents and ESI. This includes, but is not limited to District email, personal email, text messaging and/or hard copy communications.

You must suspend the recycling or destruction of backup or disaster recovery media until further notice, preserve all existing such media and refrain from overwriting or deleting such information, including suspending any automatic e-mail deletion programs. Please be advised that this includes personnel and all off-site data storage companies. Evidence preservation should extend to, without limitation, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data compilations stored in any medium (e.g., hard copy files or electronically) from which information can be obtained.

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Please note that ESI may be contained on network servers, off-site internet service providers, personal computers, laptops, CDs/DVDs/flash drives, personal data assistants, cell phones, backup media (personal backups), handhelds, voicemail, instant messages, personal e-mail accounts, home computers, and data held by third parties, including Facebook or Twitter.

The documents and ESI potentially relevant to the investigation include, without limitation, documents and ESI created or received between (DATE) and the present relating to (1) the selection and/or appointment of the Laurelwood principal; (2) discussions regarding same with District administrators; (3) any writings, including email messages, which refer to personnel opinions and/or actions which refer or relate or pertain to the Laurelwood principal appointment process; (4) communications with District Board members regarding Laurelwood; and (5) any documents or ESI relating District policies, procedures or direction related to the Laurelwood appointment process.

In order to show preservation compliance, you should create and maintain a log, documenting all alterations or deletions made to any electronic data storage device or any electronic data processing system.

At this point, the District need not collect any documents. It need only preserve its relevant documents. It would be advisable to consult with your information technology advisors on implementing protocols to comply with this request. If you need to modify your system to preserve data, please contact us as soon as possible so that we can record and approve the modification.

Please feel free to contact me at (415) 281-7654 if you have any comments, questions or concerns.

Very truly yours,

Gregory J. Rolen
Haight Brown & Bonesteel LLP