

Confidential Attorney-Client Communication: Email Only

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Nicole Hemenway Bratz
Northwest Youth Services
Email: nkhemeway@gmail.com

RE: Document Preservation

Dear Nicole:

To follow up on our conversation last week, I want to provide our standard letter emphasizing the need to preserve all documents and data that relate in any way to Paula Matthyse.

Northwest Youth Services' preservation efforts should encompass all documents including hard copies, audio recordings, video, email, instant messages, spreadsheets, databases, calendars, telephone logs, text messages, internet usage, and all other electronic information maintained, created, or received on a computer. Sources include hard copy files, computer hard drives, removable media storage, laptops, PDA's, tablet computers, cellular and smart phones and any other device in which data is stored. This preservation effort also encompasses inaccessible storage media, such as back-up tapes which may contain relevant electronic information that does not exist in any other form.

Northwest Youth Services should consider taking the following three steps to ensure that all data including electronic data, is preserved.

- First, Northwest Youth Services may want to designate one person to take the lead on preserving this information. This person will ensure that all necessary preservation efforts are taken in their entirety, and that steps are not accidentally skipped because of an assumption that another person is taking care of it.
- Second, if some of the relevant information is stored electronically, Northwest Youth Services will need to have a strategy for preserving that information and may need to consult with its IT specialist. If any relevant information has been recently deleted, we should attempt to recover it and document what was deleted and when.

- Finally, if Northwest Youth Services automatically disposes of or recycles digital or paper files, video tapes, digital back-up tapes or other storage media, such as pursuant to a document retention and/or destruction policy, Northwest Youth Services should suspend that practice for the time being. We can then discuss which information should be preserved throughout the litigation.

We must take every reasonable step to preserve this information until further notice. Failure to preserve documents and prevent their destruction might result in significant difficulties in litigation.

Thanks Nicole, and let me know if you have questions about this matter in particular.

Very truly yours,



Jeffrey P. Fairchild, Esq.
JPF/sc