MEMO TO: IT Official, (others, i.e. Risk Manager, Director of Facilities, Director of Research, Human Resources Director, EEO Officer, Labor Relations Manager)

DATE:

FROM: University Counsel

PRIVILEGED AND CONFIDENTIAL

ATTORNEY CLIENT COMMUNICATION

ATTORNEY WORK PRODUCT

We have received a\_\_\_\_\_\_\_\_\_\_\_\_(i.e. notice of tort claim, labor grievance, Maine Human Rights Commission Complaint) filed by \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_. Under the Federal “e-discovery” rules there is a duty on the part of the University to preserve all documents in its possession that would be potentially relevant to this and any further legal action. We require your assistance in notifying all those involved with this matter to preserve any and all data and documents in their files or in those that they can access. This would include both hard copy documents and electronic or magnetically stored data.

Electronic data includes but is not limited to the following:

* All communications by email, gmail, Blackberry (or similar device), and other electronic means
* Text files
* Files on shared servers
* Databases
* Calendar entries
* Computer system activity logs
* Internet usage files
* Backup tapes
* Internal network applications

Other potentially relevant files or data include:

* Files stored on hard drives
* Laptops
* i-Pads, Notebooks, etc.
* Home computers
* Handheld devices
* Diskettes
* CD’s
* DVD’s
* Smartphones
* “Thumb drives”
* Voice-mail
* Video tape
* Twitter
* On-line social media sites

Those potentially having information regarding this matter who should be notified are the offices of the \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ , particularly the members involved in \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, as well as the offices of (i.e. Equity and Compliance, Human Resources, the Dean of the College, the Provost and the President, Risk Management, Facilities) and individual members of each of these if there is the possibility they may have relevant materials. Please verify compliance with those having been notified. Any information created following this notice is also subject to e-discovery and a litigation hold. Periodic requests and updates are required.

As you have done in the past pursuant to these litigation hold notices, please cease any automatic data destruction system that would otherwise destroy any related data.

Thank you very much for your help in these matters.