

Exhibit A

DEF CORPORATION

Office of The General Counsel

March 28, 2006

**PRIVILEGED AND CONFIDENTIAL—ATTORNEY WORK PRODUCT  
AND ATTORNEY CLIENT COMMUNICATION**

**VIA CERTIFIED MAIL**

Employee  
Employee Address

**Re: ABC vs. DEF  
Civil Case No.: 06-CV-1026**

Dear Employee:

This is a matter of utmost importance. Please be advised that DEF's Office of General Counsel requires your assistance with respect to preserving corporate information in the above-referenced matter.

In connection with the litigation referred to above, we write to advise you of DEF's legal obligation to preserve relevant documents and data in this matter and enlist your assistance in this regard. The lawsuit requires preservation of all documents and data relating to [**description of event, transaction, business unit, product,; optional: brief description of litigation issue or claim**] from all sources.

"Documents and data" as used here means not only hard copy documents, but audio recordings, videotape, e-mail, instant messages, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, Internet usage files, and all other electronic information maintained created, received, and/or maintained by DEF on computer systems. "Sources" include all hard copy files, computer hard drives, removable media (e.g., CDs and DVDs), laptop computers, PDAs, Blackberry devices, and any other locations where hard copy and electronic data is stored. Keep in mind that any of the above mentioned sources of relevant information may include personal computers you use or have access to at home, or other locations. It also includes inaccessible storage media, such as back-up tapes which may contain relevant electronic information that does not exist in any other form.

In order to comply with its legal obligations, DEF must immediately preserve all existing documents and data relevant to the claim/investigation described above and suspend deletion, overwriting, or any other possible destruction of relevant documents and data. Guidance on how to preserve relevant documents and information has been posted on the DEF intranet site under "ABC v. DEF preservation guidance." If you have any questions on how to comply with this directive, please contact DEF's IT Department at extension 7777.

Electronically stored data is an important and irreplaceable source of discovery and/or evidence in this matter. You must take every reasonable step to preserve this information until further notice from the Office of General Counsel. *Failure to do so could result in extreme penalties against DEF.*

You will be contacted by DEF's IT Department and the Office of General counsel in the near future for an update on your preservation efforts and to answer any questions you may have. In the interim, if this correspondence is in any respect unclear, please contact Mary Smith, Esq. in the DEF Legal Department at extension 6666 or Jack Johnson in the DEF IT Department at extension 7777. They will assist you in any way necessary.

Sincerely,

John Q. Jones  
General Counsel

cc: Chief Executive Officer  
Chief Information Officer