



*Scott and Daughter Law Firm*

19351 W. Washington St.  
Grayslake, IL 60030  
847 543 2000  
info@scottlawfirm.com

**ATTORNEY-CLIENT COMMUNICATION**

TO: Scott Walker

Re: LITIGATION HOLD LETTER

NOTICE - The information in this correspondence, including all attachments thereto, is considered **ATTORNEY-CLIENT PRIVILEGED AND CONFIDENTIAL** and is intended only for the use of the individual(s) named above. Any unintended recipient is hereby notified that any disclosure, reproduction, use, or distribution of such information is prohibited.

**Re: *Scott Walker v. Tanya Brewster; Case # 12345***

1. Retention/Collection of Documents

I am sending you this written message in follow-up to the telephone conversations and face-to-face meetings that we have had with you regarding the above lawsuit. It is being sent to you because you may have possession and/or knowledge of the existence of documents relevant to the above lawsuit involving the company. This written notice is to ensure that all relevant documents have been searched for and collected.

Accordingly, please review the description of documents set forth below, and if you have possession or control of, or know of the existence of, any responsive documents, whether in hard copy or electronic form, please follow the instructions provided below for getting a copy of the documents into the hands of the company's lawyers.

Scott Walker is suing Tanya Brewster for negligent storage of a firearm and negligent supervision of her minor child; T.J. Negligent storage of a firearm has recently been recognized as a new civil cause of action by three New Columbia trial courts. Negligent supervision of a minor child is a well-established cause of action in New Columbia.

Scott claims that T.J.'s acquisition and use of the pistol were the result of Tanya's negligent actions. Scott has incurred, and will continue to incur, substantial medical expenses due to Jesse's injuries. In addition, Scott claims that his enjoyment of the companionship and services of his son has been significantly limited by Jesse's permanent paralysis.

Tanya claims that it is not her fault that Jesse was injured. She believes that she functioned as a responsible parent at all times. She claims that it was Scott's negligent supervision of his children that allowed the accident to happen. She also argues that negligent storage of a firearm should not be recognized as a cause of action by this court. Even if the court does recognize this cause of action, Tanya argues that the facts of this case do not support a finding of negligent storage of a firearm on her part.

We have an obligation to maintain all documents and records, including electronic information, such as e-mail files, relating to the lawsuit. Please, therefore, locate and retain all records, files, and documents that relate to Scott Walker v. Tanya Brewster, case # 12345.



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If you know of other individuals who were involved in any way in Scott Walker v. Tanya Brewster, case # 12345, or who have had contact with you concerning such matters, please send me an email with their names.

If anyone affiliated with Tanya Brewster or its outside law firm, We Win Law Firm speaks to you about this lawsuit, do not answer any questions that might be asked or provide any information to such individual. Please contact me immediately, should you receive such a telephone call or personal contact. Similarly, if you become aware that an individual who has knowledge of the lawsuit has been contacted by Tanya Brewster or its outside law We Win Law Firm regarding this lawsuit, please get in touch with me immediately.

## 2. Documents

At the present time, we do not know all the documents that may exist that must be maintained for this lawsuit. However, at a minimum, please search for and maintain the following:

- A. Any and all email, written, or electronic communication regarding the lawsuit.
- B. Any and all pictures, videos, or electronic images regarding the lawsuit.
- C. Any and all social media communications, posts, and comments regarding the lawsuit.
- D. Personal files and notes regarding the lawsuit.
- E. Documents on hard drives, cloud storage, or disk related to the lawsuit.

If you have any questions, please do not hesitate to contact me directly at 847-543-2000 or [cwichert@scottlawfirm.com](mailto:cwichert@scottlawfirm.com).

Sincerely,

Christina Wichert