

Randi Erickson, Licensed Abstractor & Notary Public for the State of Minnesota

Florida Broker

Escrow Agent/for E'Clause LLC clients listed

9285 – 205th Ave. NW

Elk River, MN 55330

March 23, 2024

TO: The Law office of Jack Maro, PA and Jack Maro individually & personally

RE: Notice to Preserve Electronic Evidence and Files in conjunction with Neely Petrie-Blanchard Case

Dear Sir or Madam,

This letter requests your immediate action to preserve electronically stored information that may contain evidence important to the above legal matter. Briefly, **the matter involves a HOBBS ACT/RICO cases involving myself, Timothy Charles Holmseth, under escrow (as well as Neely), and others.**

This notice applies to your law firms on- and off-site computer systems and removable electronic media plus all computer systems, services, and devices (including all remote access and wireless devices) used for your [company's] overall operation. This includes, but is not limited to, e-mail and other electronic communications; electronically stored documents, records, images, graphics, recordings, spreadsheets, databases; calendars, system usage logs, contact manager information, telephone logs, internet usage files, deleted files, cache files, user information, and other data. Further, this notice applies to archives, backup and disaster recovery tapes, discs, drives, cartridges, voicemail and other data. All operating systems, software, applications, hardware, operating manuals, codes, keys and other support information needed to fully search, use, and access the electronically stored information must also be preserved.

The importance of immediate action cannot be overstated. Electronically stored information is easily corrupted, altered, and deleted in normal daily operations. Even booting a drive, running an application, or reviewing a document can permanently alter evidence. An important method for preserving data in its original state is to have a forensic image (mirror image or clone image) made of pertinent hard drives of both office and home computers used for business and of network servers. This image captures all current data, including the background or metadata about each document. Simply copying data to a CD-

ROM or other common backup medium is not adequate. For each captured image file, record and identify the person creating the image altered, and deleted in normal daily operations. Even booting a drive, running an application, or reviewing a document can permanently alter evidence. An important method for preserving data in its original state is to have a forensic image (mirror image or clone image) made of pertinent hard drives of both office and home computers used for business and of network servers. This image captures all current data, including the background or metadata about each document. Simply copying data to a CD-ROM or other common backup medium is not adequate. For each captured image file, record and identify the person creating the image and the date of creation. Secure the file to prevent subsequent alteration or corruption and create a chain of custody log. Once the forensic data image file is created, the pertinent computer or other device can be placed back into operation.

[If known, identify any key persons', officers', supervisors', and employees' computers to which special attention for forensic imaging must be directed.]

This preservation notice covers the above items and information between the following dates: **from Hire date of Services for Neely Petrie-Blanchard to date of removal by Neely Petrie-Blanchard.**

INCLUDE ALL COMMUNICATIONS (WHETHER ELECTRONIC OR ANY OTHER MEANS) WITH ANYONE SHOWN IN THE NEFARIOUS NETWORK FILED ON THE DOCKET IN SAID CASE OF:

STATE OF FLORIDA VS NEELY PETRIE BLANCHARD AND ANY OTHER CASES UNKNOWN.

Follow the above procedures to preserve electronic information created after this notice.

Current law and rules of civil procedure clearly apply to the discovery of electronically stored information just as they apply to other evidence, and confirm the duty to preserve such information for discovery. Your Attorneys and Law Firm and your officers, employees, agents, and affiliated organizations must take all reasonable steps to preserve this information until this legal matter is finally resolved. Failure to take the necessary steps to preserve the information addressed in this letter or other pertinent information in your possession or control may result in serious sanctions or penalties.

Further, to properly fulfill your preservation obligation, stop all scheduled data destruction, electronic shredding, rotation of backup tapes, and the sale, gift or destruction of hardware. Notify all individuals and affiliated organizations of the need and duty to take the necessary affirmatives steps to comply with the duty to preserve evidence.

Sincerely,

Randi Lynn Erickson / ESCROW AGENT FOR NEELY PETRIE-BLANCHARD, ET AL – 3/23/2024

 3-23-24

CC/ Emai & Regular Mail