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January 26, 2024

SENT VIA EMAIL AND CERTIFIED MAIL

Robert M. Gregory, Esq.
GREGORY LAW GROUP
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**Re: REQUEST FOR PRESERVATION OF EVIDENCE AND DEMAND TO
REFRAIN FROM DELETING INFORMATION**

Dear Mr. Gregory:

This preservation demand letter is intended for Ms. Armijo. We note that you represent her in a medical malpractice case against Dr. Becker. Please confirm that you will provide her with this notice, as we did not want to send this notice to an adverse party that is represented by counsel in a related matter. This preservation demand is directed to her. As such, any reference to “you” or “your” is directed to her. However, as you’re aware, as counsel you may be in possession of information that is related to the independent claims that are forthcoming as well. If you are unwilling to provide this demand to her, please contact my office immediately, and within 24-hours of your refusal so that we can ensure that your client understands her legal obligations and substantial risks of non-compliance.

My law firm and I represent Dr. Bradley Becker (“Client”) with respect to our current investigation regarding false allegations of a “botched” surgery while under the influence of alcohol, ongoing harassment of my Client’s staff, your online defamation of my Client, deceptive advertising, intentional interference with my Client’s medical practice (including contacting current and prospective patients and urging them to cancel their appointments), and false information disseminated on the “AZ Breast Implant Illness and Information” Facebook page (<https://www.facebook.com/groups/150443015762416/>), among other online platforms. Our investigation into forthcoming claims also includes the discovery of serious conflicts of interest between Robyn Towt, an administrator of the above-mentioned Facebook page, and surgeons to whom she is referring patients in exchange for money. Our investigation of claims is in its initial stages, but we anticipate a substantial amount of evidence to support what will likely be claims against you personally. **We accordingly demand that you both, along with your agents and attorneys, preserve all “Responsive Material”, as defined herein, in your possession or control.**

Please read this Preservation Notice carefully and distribute it to anyone with access to or knowledge of Responsive Material.

Responsive Material includes without limitation the following, in any form, paper or electronic, and any information likely to lead to any such material:

- Correspondence within your possession, or between you, or with third parties, in any form (digital or written), which relates to Dr. Becker or discusses the services offered by him;
- Documents related to or containing any communications between, with, from, to, or any third party related to the allegations being investigated by my law firm, as described on page one above; and
- Any and all other information which is or may be relevant to any claims or defense related to the allegations stated above on page one.

Responsive Material also includes any and all information that is within the purview of Arizona Rules of Civil Procedure, Rule 26.

In your efforts to identify Responsive Material, consider that Arizona courts define relevance very broadly: The term **“relevant” includes all records that are likely to lead to the discovery of admissible evidence or that may pertain to the claims or defenses of any party to the litigation, regardless of whether they are admissible in court. Accordingly, all records that bear any relation to the categories of records set forth herein must be identified and preserved.** But also note that given that litigation is imminent but not commenced, the scope of relevancy is much broader at this time. You are encouraged to contact my office if you have any questions about what should be preserved. Similarly, Arizona courts define “documents” broadly. “Documents” include, but are not limited to, voicemails, text messages (including messages using text applications, by way of example and not limitation, Signal, WhatsApp, Google Voice, etc.), emails, social media profiles and communications, spreadsheets, weblogs, telephone logs, reports, statements, correspondences and communications of any kind, memoranda, invoices, billing statements, contracts, personnel files, tape recordings, video and pictures, notes, draft documents, calendars, card files, appointment books, and the like. “Documents” also includes all copies stored in other folders, including “cc” or “bcc” folders, sent folders, etc.

Sources of Responsive Material that must be preserved may include, but are not limited to, electronic documents, email and electronic correspondence, images and graphics, deleted files, spreadsheets, presentations, databases, system usage logs, Internet history and cache files, as well as enterprise user information, such as contact lists, calendars, task lists, etc. Because electronic evidence can be both fragile and vulnerable to inadvertent destruction, you have an obligation to take reasonable steps to ensure that electronic information is preserved until this matter has been resolved. Data preservation includes, but is not limited to, ceasing all data destruction activities, automatic email deletion functions, backup tape recycling, hard drive reformatting or defragmenting, and cache-clearing processes.

You are reminded that your obligation to preserve Responsive Material includes its obligation to take reasonable steps to ensure that no Responsive Material is lost. Failure to take all reasonable steps toward preserving such information may cause irreparable harm in this case and could result in sanctions against you. Your strict adherence to the demands in this letter will allow

the parties to avoid the costs and burdens of court-compelled discovery.

Invariably, all of this information should be produced, via subpoena, during the course of discovery, as it is all clearly relevant, to the extent it is in possession of parties. However, as a party being placed on notice, you have a duty to ensure that you do not destroy any relevant evidence as well. **Please confirm that you will take the following steps to preserve Responsive Material:**

You should suspend their normal retention schedule and disposition policies for all relevant material until further written notice, and **should not delete or destroy** any relevant Documents, regardless of routine or automated practices in effect prior to the receipt of this Preservation Notice.

You should distribute this Preservation Notice to anyone with access to or knowledge of Responsive Material who are known or suspected to have relevant material in their possession, custody, or control.

You should track and obtain acknowledgment from all persons to whom the Preservation Notice was distributed, that such persons received and understood the Preservation Notice, and that such persons identify and categorize any relevant material within their possession, custody, or control. Please also document and disclose whether such persons know of others who may have relevant material, who should also receive a copy of this Preservation Notice.

You should direct any questions about the subject matter or scope of this Preservation Notice to this firm.

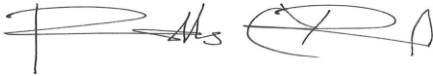
You and any third parties having possession, custody, or control of relevant material, should hold such material in suspense and safe from modification or destruction, until you are contacted by our firm to provide guidance on how such relevant material will be collected.

You should reissue and refresh this Preservation Notice distribution to any third parties having possession, custody, or control of relevant material to remind persons having relevant material that this Preservation Notice is still in effect, until advised to the contrary.

You must also preserve all other laptops, computers, network servers, hard drives, fixed or portable hard drives, floppy drives, thumb drives, flash memory or flash drives, backup “tapes” or backup drives, CDs, DVDs, SSD drives, memory cards, cell phones, and similar or related digital and mobile devices and drives. Such storage locations and devices fall within the scope of evidence to be preserved.

At minimum, we ask that you provide written confirmation that it will (1) take reasonable steps to identify Responsive Material; (2) preserve all Responsive Material pending the outcome in this lawsuit.

I would be happy to speak with you regarding this matter and provide further guidance or answer any questions.

A handwritten signature in black ink, appearing to read 'Raees Mohamed, Esq.', with a stylized flourish at the end.

Raees Mohamed, Esq.