



Dave Koenig [REDACTED]

Inquiry re: David Koenig

Marc Mohan <marc@veritelawcompany.com>

Thu, Jun 22, 2023 at 3:55 PM

To: chris.lipe [REDACTED], carol [REDACTED], acen [REDACTED], jkel [REDACTED], mina [REDACTED], "lukeman [REDACTED]" <[REDACTED]>, tok [REDACTED], tony [REDACTED], douglas [REDACTED], light [REDACTED], tariq [REDACTED], wayne [REDACTED], karen [REDACTED], kinderman [REDACTED]
Bcc: david [REDACTED]

To the members of the WESPA Executive Committee:

I represent David Koenig in his action for defamation and other claims against Evans Clinchy, Jennifer Clinchy, and Brianna (Lola) McKissen.

My client has asked me to reach out to this committee in an effort to receive a definitive answer regarding his e-mail of June 8. He was informed that an answer would be forthcoming on Saturday, June 17, but as of today, he has not received a response.

I am writing to ask you to provide a response as soon as possible to Mr. Koenig and myself, or provide a reasonable explanation for any further delay. Your prompt attention to this matter is greatly appreciated.

In addition, you should treat this email as a litigation hold letter. You are instructed to preserve all electronic data and physical documents related to David Koenig's status in WESPA and all communications regarding him with other individuals or associations, including NASPA, WGPO, ABSP, and the Collins Coalition.

For clarity, electronic data includes but is not limited to the following:

- All communications by email, gmail, SMS, iMessage, 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
- Social media sites

Pursuant to this notice, please cease any automatic data destruction system that would otherwise destroy any related data.

Thank you very much for your help in this matter.

Sincerely,

Marc Mohan
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