DRAFT PRESERVATION LETTERS

People v. Marcus Hale (fictional) | Execution set for request PR-002 | Document 08

Drafted by VdVLaw, Legal Support Services, for counsel review | August 20, 2026

Fictional demonstration matter. Method and format are VDVLAW's actual work product standard; all case facts, persons and identifiers are invented.

DRAFTING NOTE FOR COUNSEL (not part of the letters): Six letters follow, covering the PR-002 custodian groups, in counsel's voice for counsel to review, adapt, sign, and send on letterhead by certified mail with return receipt. Each letter is deliberately neutral: it asserts no loss, alteration, or wrongdoing; it asks that originals be preserved, that overwrite and disposal cycles be suspended, and that the custodian confirm in writing. The Trombetta and Youngblood framing for any later motion stays in the held audit, not in the letters. If an addressee title does not match an office's actual structure, redirect the letter rather than dropping the item list. Two cautions: the events are from March 2025 and these letters issue about seventeen months later, so each letter asks the custodian to preserve any remaining original or previously exported copy and to disclose prior preservation, export, overwrite, or disposal history. And Letter E is a voluntary defense preservation request only; it asserts no mandatory preservation duty under 18 U.S.C. § 2703(f), which applies to requests from a governmental entity. Remove this note before any use.

Contents and routing

Letter	Custodian (all fictional)	Core subject
A	Warden and Litigation Coordinator, Sierra Valley State Prison	All institutional records and media: video, phone system, logs, health care, fire response, incident file, visiting system
B	Lassen County Sheriff / Coroner's Office (Log 41207)	First-autopsy support package, retained specimens and slides, re-examination materials; routing to the examining office
C	Fire and emergency medical services provider	March 18 and March 19 response records, native monitor and ECG data, refusal documentation
D	County communications and dispatch center	CAD entries, recorded lines, radio traffic for March 18 and 19, 2025
E	Messaging service provider	Account, subscriber, and access records; content preserved pending legal process
F	Examining medical examiner's office (contract forensic pathology provider)	Original April 14, 2025 examination materials: diagrams, notes, photographs, histology, retained specimens

Registry alignment: these letters execute PR-002. The District Attorney is covered by the informal discovery letter (PR-001), the insurance carrier by PR-005, and certified priors by the PR-006 court route. Letters B and F pair (Lassen County consolidates Sheriff and Coroner and contracts autopsies out). Send all six now; what remains recoverable likely depends on what was exported or preserved early.

LETTER A | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law

State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)

By certified mail, return receipt requested

Warden and Litigation Coordinator
Sierra Valley State Prison (fictional)
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. Please route this letter to investigative services and evidence, visiting and control, health-care administration, the fire and emergency-response unit, and the telephone and video system administrators.

1. Video: any remaining or previously exported video covering Family Visiting Unit 3, its corridor, gates, and approaches for March 17 to 19, 2025, including exports made for the incident investigation and any referenced corridor coverage, with camera-assignment and retention logs.
2. Telephone system: native audio and complete metadata for all calls on the client's account for the period the system retains, and the system's export logs.
3. Institutional logs: count, tower, gate, key, movement, and visiting entry and exit logs for Family Visiting Unit 3 and its housing area for March 17 to 19, 2025.
4. Health-care records: all records of the March 18, 2025 medical response to Renee Hale (patient-care report, vital signs, any electrocardiogram or monitor data in native format, the signed refusal) and of the March 19, 2025 response and pronouncement.
5. Fire and emergency-response unit: run records, equipment data, crew assignments, and reports for both responses.
6. Incident and investigative file for SVR-25-0318: reports, notes, interview recordings in original form, scene logs, evidence inventories and items, and all photographs in original files with timing metadata.
7. Visiting system: the visit application, approval, screening, and scheduling records for this visit.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy. It covers originals and native files even where copies have already been provided to the District Attorney.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)

LETTER B | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law
State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)
By certified mail, return receipt requested

Lassen County Sheriff / Coroner's Office (fictional details)
Attention: Custodian of Coroner Records, Log 41207
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. This letter concerns the examination materials for Renee Hale, your Log 41207: the April 14, 2025 autopsy and the later re-examination. Because examinations for your office are performed through an outside medical examiner's office, please forward a copy of this letter to the examining office and identify it in your response (a separate letter to that office is Letter F).

1. The complete support package for the April 14, 2025 autopsy: the body diagram or diagrams, dissection and bench notes, the photograph log, and all autopsy photographs in original files with metadata.

2. Histology slides, paraffin blocks, and all retained tissues and specimens, including any neck-structure dissection materials, with their storage and chain-of-custody records.

3. Toxicology: retained aliquots, laboratory worksheets, instrument data, and the complete laboratory file behind each reported result.

4. Any radiographs or other imaging, in native format.

5. Intake, transport, release, and embalming-related records and correspondence for the decedent, including communications with the funeral provider.

6. All materials generated or received in connection with the February 10, 2026 re-examination.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy. Because retained specimens and slides may be subject to periodic disposal review, I ask specifically that no retained material for Log 41207 be released, transferred, or destroyed while this case is pending.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)

LETTER C | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law
State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)
By certified mail, return receipt requested

Fire and Emergency Medical Services Provider (fictional)
Attention: Custodian of Records
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. This letter concerns your agency's responses to Sierra Valley State Prison, Family Visiting Unit 3, on March 18, 2025 (a medical evaluation with a documented refusal of transport) and in the early hours of March 19, 2025 (a response to an unresponsive person, with a pronouncement at 2:36 a.m.).

1. The complete run record and patient-care report for each response.
2. All monitor and defibrillator data in native format, including any electrocardiogram, rhythm strips, and event logs, from the devices used on either response. Given the time elapsed, please determine whether device data was downloaded or exported for either response, and preserve any remaining memory and any export.
3. The refusal-of-transport documentation from March 18, 2025, including the signed form and any narrative.
4. Crew assignments, unit logs, and times for both responses.
5. All dispatch and radio records held by your agency for both responses, to the extent they are not held solely by the county communications center.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)

LETTER D | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law
State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)
By certified mail, return receipt requested

County Communications and Dispatch Center, County of Lassen (fictional)
Attention: Custodian of Records
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. This letter concerns dispatch traffic for the two responses to Sierra Valley State Prison, Family Visiting Unit 3, on March 18, 2025 and in the early hours of March 19, 2025.

1. Computer-aided dispatch (CAD) entries, incident histories, and unit status logs for both events.
2. Recordings of all telephone lines, including emergency and administrative lines, connected with either event.
3. Radio traffic recordings for the channels used on either event.
4. Retention schedules for each of the above.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy. Recorded audio at communications centers commonly cycles on short retention periods, and these events are from March 2025. Please determine whether the recordings for these two events were previously pulled, exported, or preserved, and preserve any remaining original or exported copy outside the automatic cycle immediately.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)

LETTER E | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law
State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)
By certified mail, return receipt requested

Messaging Service Provider (fictional)
Attention: Legal Compliance / Custodian of Records
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. This letter concerns the messaging accounts associated with Marcus Hale and Renee Hale on your platform (account identifiers to be provided under separate cover). It is a preservation request only; it does not ask you to disclose content, and any production of content will proceed by appropriate legal process.

1. Subscriber and account records for both accounts, including creation, billing, and identity information.

2. Access records: login history, IP logs, device identifiers, and password or credential change history for both accounts.

3. Message content, attachments, and deletion or edit histories for both accounts, preserved pending legal process.

4. Records of any account sharing, delegation, or linked devices.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy. If your standard practice issues a preservation confirmation number, please provide it with your written confirmation, together with the period for which the preservation will remain in effect and the procedure for extending it.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)

LETTER F | DRAFT FOR COUNSEL REVIEW

Elena R. Castillo, Attorney at Law
State Bar No. 999234 | Counsel for Marcus Hale (fictional) | Address and telephone on file (fictional)

August 20, 2026 (fictional)
By certified mail, return receipt requested

Examining Medical Examiner's Office (contract forensic pathology provider; fictional identifiers)
Attention: Custodian of Records
Address on file (fictional)

Re: People v. Marcus Hale, Superior Court of California, County of Lassen, Case No. 26CR00412; D.A. No. 26-0947; institution incident SVR-25-0318; coroner Log 41207; events of March 17 to 19, 2025 (all fictional). Preservation of evidence and information.

Dear Custodian of Records:

I represent Marcus Hale in the case referenced above, a pending homicide prosecution arising from a death during a family visit at Sierra Valley State Prison. This letter asks your office to preserve the materials listed below. It asserts no loss, alteration, or wrongdoing by anyone; its purpose is to keep routine retention, reuse, and overwrite cycles from consuming material relevant to a pending case. This letter concerns the April 14, 2025 examination of Renee Hale, performed for the Lassen County Sheriff / Coroner's Office under its Log 41207, and any materials your office holds from that examination or from the later re-examination.

1. The complete examination file: body diagrams, dissection and bench notes, dictation and drafts, and the final report file in native format.
2. The photograph log and all examination photographs in original files with their metadata.
3. Histology slides, paraffin blocks, and all retained tissues and specimens from the examination, with their storage and chain-of-custody records.
4. Toxicology aliquots, laboratory worksheets, and instrument data, to the extent held by your office rather than the referring agency.
5. Correspondence and transmittals with the Sheriff / Coroner's Office, the District Attorney, or any other agency concerning the examination, and any amendment or peer-review history of the report.

For each item, "records" includes originals and native electronic files with metadata, plus logs, indexes, and chain-of-custody documentation. Please do not alter, migrate, or dispose of any listed item; suspend any automatic deletion or overwrite cycle that would reach it; and where a cycle has already run, preserve any remaining original or previously exported copy. Please identify any materials transferred to another office or the referring agency, and confirm that no retained material will be released, transferred, or disposed of while this case is pending.

Please confirm in writing within 14 days that these materials are being preserved, and identify the retention schedule for each category. If any listed item no longer exists or cannot be located, please state whether it existed, the retention period, the overwrite or disposal date, the search performed, and any prior preservation, export, or litigation-hold history.

Thank you for your attention to this request. Please direct any questions to my office.

Sincerely,

Elena R. Castillo
Attorney for Marcus Hale (fictional)