

Email & U.S. Mail Service

Mr. Michael J. Young, Attorney
The Law Office of Michael Young
9842 Roosevelt Rd
Westchester, IL 50154

May 16, 2019

***Re: Preservation of Communications & Documents Relating to Case: 2019L004480
Ted E.C. Bulthaup III vs The Law Office of Michael Young & Michael J. Young***

Dear Mr. Young:

As you will remember, I was your Client in State of Illinois vs Ted Bulthaup, 14CF2165 & 14CF2166 and now Plaintiff in the related pending matter referenced above. It is believed that certain relevant documents and communications were and have been in your possession since December 2014.

As a result, this letter is intended to ensure that all documents relating to the litigation referenced above are preserved for possible use. Therefore, it is hereby requested that you do not to destroy, conceal or alter any paper or electronic files, other data generated by and/or stored on any personal or business systems and storage media (e.g., hard disks, floppy disks, backup tapes, etc.), or any other electronic data, such as emails & voicemail, or on paper such as files, notes, legal pads, letters, in any way related to these cases received from or sent to, from any source. This naturally includes any and all privileged or non-privileged communications between you and myself, your former client Ted Bulthaup, my family, friends, witnesses, your staff, the staff of the 18th Judicial Circuit in DuPage County, the Illinois Department of Revenue, Illinois Department of Corrections or the Office of the Attorney General, any and all related personnel of the above.

This information and documentation further includes, but is not limited to, e-mails, texts and other electronic communications; word processing documents; spreadsheets; databases; calendars, telephone logs, internet usage files; offline storage or information stored on removable media, and information contained on laptops or other portable devices, including cellular telephones and PDAs.

You were put on constructive notice of this request directly during phone calls in the Spring of 2017, most notably in a phone conversation after the Hearing to Reconsider on April 28, 2017, and subsequently by written and emailed communications later that year and again in 2018; and then by several further email and then phone requests in 2018.

Due to nature of the documents and records believed to be in your possession, you are asked to preserve all information relevant to the cases until the final resolution of any claims and disputes. Further, you are requested that you take every necessary step to preserve this information, including discontinuing all data destruction and backup tape recycling policies. In addition, we ask that you refrain from:

Initiating any procedure that would alter any active, deleted, or fragmented electronic data, including deleting or attempting to delete any electronic information, saving newly-created files to disks that already contain information, loading new software on such disks, or running data compression or defragmentation (optimization) routines on them;

Rotating, altering, recycling, or destroying any media that stores electronic data where such activity could result in the alteration or loss of any electronic data, and

Disposing of any media that contains electronic data.

With regard to electronic data created subsequent to the date of this letter, we again ask that you take the appropriate steps to avoid destruction of such evidence.

If you have any questions or concerns regarding this correspondence, or would like to discuss this correspondence further, please do not hesitate to contact the undersigned. I am,



Sincerely,
Ted E.C. Bulthaup III
I'm not dead yet
Ted.Bulthaup@gmail.com
(630) 297-6726

cc: Ken Sullivan

