April 25, 2024

*Sent via Certified Mail*

DALTON MOTORS SD-SU LLC

800 WILSHIRE BLVD SUITE 400

LOS ANGELES CA 90017

Re: Personnel File Request of > >

Dear Madam or Sir:

This office represents Mr. Gray. His authorization is enclosed. Please acknowledge receipt of this request by >May 3, 2024.

Please direct all communication concerning Mr. Gray to our office. Our client would like to inspect his complete personnel file at once, pursuant to California Labor Code sections 226 and 1198.5. This inspection will include all records pertaining to him, all documents he signed, any employee handbooks, any expense reports, all sales commission agreements [pay plans], training records, employment contracts, commissions and payments, and all time cards, time-off requests and/or timesheets for her. If there is an arbitration agreement between you and Mr. Gray, please provide it with your response. To facilitate the inspection by our copy service and your offices, we would like to coordinate the date in advance rather than just show up unexpectedly during regular business hours. We reasonably expect the inspection to occur no later than

>May 31, 2024.

Furthermore, it is hereby requested that the following steps be taken to immediately identify and preserve any information that is in your possession, custody or control, including your subsidiaries, divisions, agents, employees and relevant third-parties or vendors: [[1]](#footnote-1)

Preserve all electronic communications concerning Mr. Gray in their original native form, including the preservation of any video surveillance, metadata, headers or embedded information as stored in its native form. Electronic communications includes electronic mail sent or received by any custodian relevant to our client’s employment. This includes immediate identification and suspension of any deletion, destruction or alteration of electronic information where it is stored - whether on a laptop, desktop, email server, email archive server, backup systems, archival systems, email journaling systems, file servers, cloud systems, Document Management System, PDA, smartphones, any hand-held devices, and/or external media such as CDs, DVDs, thumb drives, flash drives, external hard drives, floppy disks and other electronic storage device.

Preserve all information and data stored in your payroll and timekeeping system, all evaluations whether written or electronic, all payroll records, including the preservation of any metadata, embedded information, structured data, databases, reports, logs, bibliographical information, database tables, and system audits as stored in their respective, native form. This includes immediate identification and suspension of any deletion, destruction or alteration of electronic information where it is stored - whether on a laptop, desktop, backup systems, archival systems, file servers, cloud systems, PDA, smartphones, any hand-held devices, and/or external media such as CDs, DVDs, thumb drives, flash drives, external hard drives, floppy disks and other electronic storage device.

Preserve all information and data exported from the payroll system or imported into any other system, including any reports and electronic documents and any associated metadata and embedded information as stored in its native form. This includes immediate identification and suspension of any deletion, destruction or alteration of electronic information where it is stored - whether on a laptop, desktop, backup systems, archival systems, file servers, cloud systems, PDA, smartphones, any hand-held devices, and/or external media such as CDs, DVDs, thumb drives, flash drives, external hard drives, and other electronic storage device.

Your cooperation is appreciated.

Sincerely,

*s/Arthur R. Botham, Jr.*

Arthur R. Botham, Jr.

1. the following list is non-exhaustive. As of course, all evidence should be preserved by you and your firm. [↑](#footnote-ref-1)