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25 S. Charles Street, Suite 2015 ▪ Baltimore, MD 21201
Phone: 410-752-2468 ▪ Fax: 410-752-2046

www.tandllaw.com

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COUNSEL
CLINTON R. BLACK, IV
DAVID M. SHEEHAN o

January 15, 2021

Via Email ([REDACTED])

Mr. [REDACTED]

Re: Document Preservation Notice

Dear Mr. [REDACTED]

This law firm represents the owner of the Choptank restaurant (“**Choptank**”). Please direct all future communications to the undersigned.

You have engaged in a course of conduct to intentionally harm Choptank, without legal justification. Your actions include, but are not limited to, filing multiple false complaints with the Board of Liquor License Commissions for Baltimore City (the “**Liquor Board**”) and protesting the renewal of the liquor license currently held by Choptank under false pretenses and as a deliberate means to interfere with Choptank’s business.

Your unlawful conduct has caused significant harm to Choptank. As such, Choptank intends to take all steps necessary to protect its legal rights, including filing suit against you. Therefore, you are hereby directed to preserve all evidence relating to: 1) your complaints and communications, including any renewal protests, submitted to the Liquor Board and/or to any other government agency; 2) statements you have made about Choptank; 3) social media posts made by you relating to Choptank; and 4) communications with other persons relating to Choptank. This preservation notice includes, but is not limited to, the following forms of evidence:

- Documents
- Emails
- Text messages
- Voicemails
- Contacts
- Complaint forms
- Letters
- Video recordings
- Audio recordings

- Handwritten notes, letters, or other communications
- Electronic versions of documents, including, but not limited to, PDF, Word, Email, etc.

Because litigation against you is now reasonably foreseeable, your failure to comply with this notice may subject you to sanctions for spoliation of evidence. In addition, if you are represented by an attorney at this time, or at any time in the future, please forward this letter to your attorney and have your attorney contact the undersigned so that we may direct all future communications to your attorney.

Please govern yourself accordingly.

Sincerely,



Scott H. Marder

cc: Alexander F. Smith
Anastasia T. Nardangeli