



EXHIBIT B

LITIGATION HOLD LETTER

ATTORNEY-CLIENT COMMUNICATION

TO: [Addressees]

NOTICE - The information in this correspondence, including all attachments thereto, is considered **ATTORNEY-CLIENT PRIVILEGED AND CONFIDENTIAL** and is intended only for the use of the individual(s) named above. Any unintended recipient is hereby notified that any disclosure, reproduction, use or distribution of such information is prohibited.

Re: [Lawsuit Name].

1. Retention/Collection of Documents

I am sending you this written message in follow-up to the telephone conversations and face-to-face meetings that we have had with many of you regarding the above lawsuit. It is being sent to you because you may have possession and/or knowledge of the existence of documents relevant to the above lawsuit involving the company. This written notice is to ensure that all relevant documents have been searched for and collected.

Accordingly, please review the description of documents set forth below, and if you have possession or control of, or know of the existence of, any responsive documents, whether in hard copy or electronic form, please follow the instructions provided below for getting a copy of the documents into the hands of the company's lawyers.

[Describe the Lawsuit]

We have an obligation to maintain all documents and records, including electronic information, such as e-mail files, relating to the lawsuit. Please, therefore, locate and retain all records and files and documents that relate to [the lawsuit and/or the incident and/or the transaction, etc.].



THIS NOTICE SUPERCEDES ANY AND ALL EXISTING COMPANY DOCUMENT RETENTION POLICIES. DOCUMENTS IN ANY WAY RELEVANT TO THIS CASE MUST BE RETAINED.

If you know of other company employees who were involved in any way in [the lawsuit and/or the incident and/or the transaction, etc.] or who has had contact with the Company concerning such matters, please send me an email with their names.

Several of you have already met and may continue to (or begin to) communicate with attorneys from our outside law firm Foley & Lardner LLP, who may contact you to discuss the lawsuit. Please cooperate completely.

If anyone affiliated with [opposing party] or its outside law firm [list firm name] speaks to you about this lawsuit, do not answer any questions that might be asked or provide any information to such individual. Please contact me immediately, should you receive such a telephone call or personal contact. Similarly, if you become aware that one of the Company's customers has been contacted by [opposing party] or its outside law firm [list firm name] regarding this lawsuit, please contact me immediately.

2. Documents

At the present time, we do not know all of the documents that may exist that must be maintained for this lawsuit. However, at a minimum, please search for and maintain the following:

[list]

3. Collection Guidelines

In responding to the above, please observe the following instructions:

- Please review the files and records over which you have control to identify the existence of responsive documents. Each and every likely location should be searched, including:

-  File drawers
-  Desk and office drawers
-  Personal files at home
-  Office computers and laptops



- Active emails
- Emails in folders
- Attachments to emails
- Documents on hard drives
- Documents on portable media, including floppy disks, CD's, memory sticks.

 Servers

- If you have responsive hard copy documents, please put them in a folder labeled “Documents of [insert your name here].” Please copy documents in the manner in which they are kept in your files, and please copy the file folder labels, if any, of the folders that documents may be maintained in.
- Please supply electronic documents in electronic form. Please do not print them out. If you have responsive electronic documents on the hard drive of your personal computer, please put those files only on a disk, CD or zip disk labeled “Documents of [insert your name here]” and put the disk, CD or zip disk in a similarly labeled folder.
- In undertaking this exercise, no files should be deleted (paper, electronic, or otherwise).
- Proprietary Information and Company Official Information must be produced. Identify such information in accordance with its proper status. Such information will be subject to a protective court order limiting its dissemination.
- It does not matter how old or recent the document is, as we are required to produce all responsive material.
- If a responsive document is extremely difficult to supply, please contact me directly to discuss the logistics and the reasons you believe it would be difficult to provide the entire document.
- If you believe that you once had responsive electronic documents, but no longer possess them because such documents have been lost or deleted (either from your computer or from the Company's servers), please contact me directly and immediately to discuss whether such documents can be recovered. This is extremely time sensitive in view of the recycling of the Company's electronic information back-up tapes.
- Please hand deliver the folders to _____ or _____, preferably no later than the end of business on [INSERT DATE].

If you have any questions, please do not hesitate to contact me directly at [telephone number and email address].

[Inside Counsel or Company Officer]