



Discovery Collection Control Email Templates

COPY & PASTE LANGUAGE TO PREVENT SELF-COLLECTION & PRESERVE DEFENSIBILITY

How documents and data are handled at the very beginning of discovery can affect what data is available later, how defensible the process is, and what issues arise down the line. Once files are sent, altered, or deleted, options narrow quickly.

These templates give you clear, professional language to stop self-collection, preserve information, and buy time to confirm the right approach.

Developed by Everest Discovery, a security-certified eDiscovery provider trusted by law firms nationwide.

Email 1 — Standard pause (default, most cases)

Subject: Next steps for document and data collection

Hi [Client Name],

We are reviewing the best way to collect documents and data related to this matter.

Before sending anything over, please do not export, forward, delete, alter, or organize files on your own, including emails, attachments, or folders. How data is handled at this stage can affect what data is available later and how it may be reviewed or produced.

Deleting, destroying, or altering any documents or information at this time could have serious implications for your case and its outcome. For that reason, it's important that no potentially relevant information is modified or removed.

We will follow up shortly with specific instructions once the collection approach is confirmed.

Thank you,
[Name]



Before you commit to anything, run it by us. We'll flag potential issues and help you chart the smartest path forward. Reach out at info@everestdiscovery.com or 215.325.1800.

Email 2 — Firm pause (client eager or asking questions)

Subject: Please pause on sending documents for now

Hi [Client Name],

I want to pause document sharing for the moment.

Before any files are sent, we need to confirm the appropriate way to collect the information related to this matter. Collecting, deleting, or altering data — even with good intentions — can limit our options later and create unnecessary issues.

Deleting, destroying, or modifying any documents or evidence at this stage could have serious implications for your case and its outcome. Please hold off on sending any documents or data, and do not delete or alter any potentially relevant information.

We'll be back in touch shortly with next steps.

Best,
[Name]

Email 3 — High-risk / CYA (client already acting or is technically capable)

Subject: Important: Please hold all documents and data

Hi [Client Name],

Before any further action is taken, we need to ensure that all documents, emails and data related to this matter remain in their current state.

Please do not delete, alter, export, reorganize, or modify any potentially relevant information, event with good intentions. Actions taken at this state can affect what data is available later and how it may be reviewed or produced.

Preserving materials exactly as they exist is critical to protecting your position and avoiding complications.

We will follow up shortly with specific guidance on next steps.

Thank you,
[Name]



Need an extra set of eyes before hitting send? Send us what you have → info@everestdiscovery.com or call us at 215.325.1800.