



December 18, 2024

Via E-Mail and Regular Mail

Mr. Justin Bailey, Esq.



Re: Feagins – SCS – Litigation Hold Letter

Dear Mr. Bailey:

It is my honor and pleasure to represent Dr. Marie Feagins, Superintendent of Memphis Shelby County Schools regarding the current ouster effort by certain members of The Memphis and Shelby County Schools Board to terminate her contract. Please forward all communication regarding this matter to me and not to Dr. Feagins. Since you are the General Counsel for the District it is unavoidable that during the regular course of business you must communicate with her, and should do so, however; please make a concerted effort to deal with me when it comes to any communication related to her contract, the ouster effort, or any negotiations about resolution of this matter.

Hopefully, the outcome of the meeting last night will be to resolve any issues in such a way that Dr. Feagins can retain her job and continue to move the District forward in a positive manner and in collaboration with all Board Members. That is Dr. Feagins' desire and her goal over the next 30+ days.

In the event these certain Board Members persist with this effort and succeed, then depending on what they do, there may be litigation brought by Dr. Feagins. Therefore, I am writing to inform you that this legal matter requires The District, the Board, and all Board Members preserve certain documents and information. As part of your clients' legal obligations, it is imperative that they take immediate steps to preserve all relevant materials related to this matter.

Please inform and direct all Board Members to preserve any and all records and potential evidence they may personally possess in hard copy form or on personal or District provided electronic devices, hard drives, DropBox or other similar repositories, or depositories of any kind. This includes all cell phone records, text messages, email messages, , calendars, social media posts or information, or other communication between Members or third parties about Dr. Feagins, any discussion to terminate or discipline Dr. Feagins, or the basis thereof or justification thereto. If any Member needs to obtain a new cell phone or other device, please make sure that ALL information contained thereon is preserved.

Scope of Preservation:

1. **Documents and Data:** Preserve all documents, whether in paper or electronic form, that may be relevant to this matter. This includes, but is not limited to, emails, memos, reports, spreadsheets, calendars, and any other forms of communication or documentation.
2. **Electronic Data:** Ensure that all electronic data, including emails, files, databases, and any other digital information, is preserved in its original format. This includes data stored on computers, servers, mobile devices, and any other electronic storage media.
3. **Physical Evidence:** Preserve any physical evidence or materials that may be relevant to this matter.
4. **Suspension of Routine Destruction:** Immediately suspend any routine document destruction or data deletion policies that may result in the loss of relevant information.

Duration of Hold:

This litigation hold will remain in effect until you receive written notice from us that it has been lifted. Please ensure that all relevant personnel within your organization are informed of this hold and understand their obligations to preserve information.

Compliance and Questions:

Failure to comply with this litigation hold may result in legal consequences. If you have any questions or require further clarification regarding this notice, please contact me at **901.519.4676** or **acrone@cronelawfirmplc.com**.

Thank you for your prompt attention to this matter. I am looking forward to working with you to resolve this situation for the betterment of the students, parents, faculty, and staff of the District.

Very truly yours,

/s Alan G. Crone

Alan G. Crone, Esq.

acrone@cronelawfirmplc.com

AGC/als

cc: Dr. Marie Feagins, Superintendent