FICTIONAL SAMPLE · DRAFTED BY FREE DEMAND WRITER FROM A MADE-UP CASE FILE · NOT LEGAL ADVICE

PLEASE VERIFY BEFORE SENDING

Unverified AI draft. Every fact must be checked against the records before use. It is not legal advice. Fill in every [ADD: …] placeholder, set the demand amount, confirm anything marked [VERIFY], and delete this box before sending.

- Redcliff's address comes only from the crash report, and no contact person is named. Confirm the recipient, ZIP, registered agent and delivery method. Also confirm Redcliff is not represented by counsel on this matter before sending directly. The insurer asked that communications go to Mr. Whitley.
- The tractor's location (Canyon Heavy Recovery yard) is documented only as of May 19, 2026. The statement that Redcliff will pick it up "next week" is secondhand, from the client's investigator via the yard. The insurer says the tractor will return to service once repaired. Confirm current status, since timing is urgent.
- Possible conflict: the crash report says the driver had been driving "from Ridgefield Junction" (eastbound), while the bill of lading shows delivery due in Ridgefield Junction on May 9, 2026 at 2:00 PM. The letter cites both without reconciling them. Please check.
- The video window (May 8 and 9, 2026) and the ELD/ECM/GPS window (May 1 through 9, 2026) come from the intake memo only. Consider whether to widen them. The insurer says footage is stored on a rolling basis, so the actual retention period is unknown. The date range for dispatch messages is left as a placeholder.
- [VERIFY: Utah rule on spoliation of evidence] appears in the letter. No statute or case is cited, and the attorney should add any authority.
- The letter quotes the driver's statement and the unnamed eastbound witness as recorded in the crash report and intake memo. The witness's name is deliberately omitted. Confirm you want these facts disclosed to the recipient. The witness account is from the intake memo, not the crash report excerpt.
- The response deadline, date, firm address, phone and email are placeholders. The firm notes give no deadline. No money demand is included, per the firm notes.
- The sources do not show whether our May 19, 2026 letter of representation went to Redcliff itself. It is cited only as sent to the insurer. Injury detail is kept minimal. The discharge summary and the crash report's carrier ID were not provided.

Sorensen Pike & Albright PC
[ADD: firm street address]
[ADD: city, state ZIP]
[ADD: phone] · [ADD: email]

[ADD: date]

VIA [ADD: delivery method]

[ADD: recipient name or registered agent]
Redcliff Freight Lines Inc.
900 Depot Way
Granger Point, Utah [ADD: ZIP] [highway_patrol_crash_report.pdf p.1]

Re: Demand to Preserve Evidence. Our client: Tyler M. Jakobsen. Date of loss: May 9, 2026. Utah Highway Patrol Report No. UHP-26-1-04471. Tractor R-2208 / Trailer T-7719. Summit Range Transport Insurance Claim No. SRT-26-31877

Dear [ADD: recipient name]:

Introduction

We represent Tyler M. Jakobsen regarding the head-on collision on May 9, 2026 on State Route 214 near mile post 38, Sunderland Canyon, Utah. The collision involved Redcliff Freight Lines Inc. tractor No. R-2208 with trailer No. T-7719, driven by Redcliff employee Lyle Brandvold [highway_patrol_crash_report.pdf p.1]. This letter asks Redcliff to preserve all evidence relevant to that collision and to any claims or litigation arising from it. We have notified your insurer, Summit Range Transport Insurance, of our representation [insurer_acknowledgment_email.pdf p.1].

The claim

According to the Utah Highway Patrol crash report, the collision occurred at about 6:05 AM on May 9, 2026, at dawn on a dry road, in a left-hand curve on a two-lane highway posted at 55 mph [highway_patrol_crash_report.pdf p.1]. The report states that Mr. Brandvold's eastbound tractor-trailer drifted across the double yellow center line in the curve and struck Mr. Jakobsen's westbound pickup head-on, offset on the driver's side, pushing the pickup into the guardrail [highway_patrol_crash_report.pdf p.1].

The report records that Mr. Brandvold stated he "must have zoned out for a second" and that he had been driving since late the previous evening from Ridgefield Junction. It also records that the paper log in the cab did not match the time he described [highway_patrol_crash_report.pdf p.1]. A motorist driving behind the truck reportedly told the trooper that the truck "had been wandering over the line for about a mile" [client_intake_memo.pdf p.1]. The tractor is equipped with an electronic logging device, a forward-facing dash camera and an in-cab driver-facing camera [highway_patrol_crash_report.pdf p.1].

Mr. Jakobsen was extricated by Sunderland County Fire and flown to Granger Point Medical Center [highway_patrol_crash_report.pdf p.1]. He was hospitalized there from May 9 to May 18, 2026 [client_intake_memo.pdf p.1].

The tractor and trailer were towed to the Canyon Heavy Recovery yard at 455 Freight Spur Road, Granger Point, where they remained as of May 19, 2026 [highway_patrol_crash_report.pdf p.1; client_intake_memo.pdf p.1]. Summit Range has told us

that Redcliff's camera system stores footage on a rolling basis and that the tractor is scheduled to return to service once repaired [insurer_acknowledgment_email.pdf p.1]. On May 22, 2026, we asked Summit Range to have Redcliff refrain from repairing, moving or releasing the tractor and trailer and from allowing footage or electronic data from May 8 and 9, 2026 to be overwritten. We had received no reply as of May 26, 2026 [insurer_acknowledgment_email.pdf p.1]. We therefore send this formal notice.

Evidence to preserve

Redcliff must preserve all evidence in its possession, custody or control, or in the possession of anyone acting for it, that relates to the collision, Mr. Brandvold, or the operation and condition of tractor R-2208 and trailer T-7719. This includes, without limitation:

- **Video and photographs.** All forward-facing dash camera and driver-facing in-cab camera video from tractor R-2208 for May 8 and May 9, 2026 [client_intake_memo.pdf p.1], including any event-triggered clips and footage stored on the camera system or any server or cloud account. Please suspend any rolling or automatic overwriting of this footage [insurer_acknowledgment_email.pdf p.1]. Also preserve any photographs or video of the scene, the vehicles or the load.
- **Electronic data.** Electronic logging device data, engine control module data, and GPS or telematics data for tractor R-2208 for May 1 through May 9, 2026 [client_intake_memo.pdf p.1]. Also preserve dispatch messages and other electronic communications with Mr. Brandvold for [ADD: date range for dispatch messages]. Please keep all of this in native format with metadata intact, and do not reset, clear or reprogram any unit.
- **The tractor and trailer.** Tractor R-2208 and trailer T-7719 must not be repaired, moved, released, altered, sold or destroyed before we have had an opportunity to inspect them. This includes the electronic logging device, camera units, and brake and steering components, as well as any parts removed or replaced after the collision.
- **Driver records.** Mr. Brandvold's hours of service records, including the paper log found in the cab, along with his fuel and toll receipts, hiring file, training records, and the results of any drug and alcohol testing after the crash [client_intake_memo.pdf p.1; highway_patrol_crash_report.pdf p.1].
- **Policies.** Redcliff's cell phone use policy [client_intake_memo.pdf p.1] and any other policy on driver hours, fatigue or in-cab technology in effect on May 9, 2026.
- **Maintenance records.** Maintenance and inspection records for the tractor and trailer, including all brake and steering work [client_intake_memo.pdf p.1].
- **Load and trip documents.** The bill of lading and related dispatch and delivery records for the load from shipper Bluefield Packaging Co., which was due for delivery in Ridgefield Junction on May 9, 2026 at 2:00 PM [client_intake_memo.pdf p.1].
- **Incident materials.** Any accident or incident reports, witness statements or witness lists, and internal or insurer communications about the collision, including those that Redcliff considers privileged, which should be preserved and logged.

Litigation hold

Redcliff is on notice of its obligation to preserve this evidence, and the loss, alteration or destruction of relevant evidence may carry consequences in later litigation [VERIFY: Utah rule on spoliation of evidence]. We ask that Redcliff immediately suspend routine deletion, overwriting and recycling of the materials described above, and that it issue a written litigation hold notice to all employees, contractors and vendors who hold or control them. These include Mr. Brandvold, dispatch and safety personnel, maintenance personnel, any camera, electronic logging or telematics providers, and Canyon Heavy Recovery, which is holding the tractor and trailer [highway_patrol_crash_report.pdf p.1].

Inspection and response

Before any item described above is moved, repaired, altered or released, please give us written notice and a reasonable opportunity to inspect it and to take part in the download and imaging of its electronic data. We specifically ask for an inspection of tractor R-2208 and trailer T-7719 in their current condition.

Please confirm in writing by [ADD: response deadline] that Redcliff has put a litigation hold in place and will preserve the evidence described in this letter, and tell us where the tractor and trailer are now located. Please direct your response to me. Because Summit Range has asked that claim communications go to Mr. Whitley, we are sending him a copy of this letter.

Sincerely,

Hannah L. Sorensen
Sorensen Pike & Albright PC

cc: Graham Whitley, Senior Claims Specialist, Summit Range Transport Insurance, Claim No. SRT-26-31877, via [ADD: delivery method] [insurer_acknowledgment_email.pdf p.1]