

HUDGINS LAW FIRM

515 KING STREET, SUITE 400
ALEXANDRIA, VIRGINIA 22314
(703) 739-3300
FAX (703) 739-3700
www.hudginslawfirm.com



Direct dial: (703) 837-3206
e-mail: dhudgins@hudginslawfirm.com

March 15, 2012

Wade Bartlett, County Administrator
County Administration Office
111 South Street, 3rd Floor
Farmville, VA 23901

Re: Notice of Claim Under Va. Code Ann. § 15.2-209

Dear Mr. Bartlett:

By this letter I am advising that I have been retained by Ms. Lillian Snelling, both individually and in her capacity as Personal Representative of the Estate of John B. Snelling, for all matters related to the employment, injury, medical treatment, and death of John Snelling in the Town of Farmville at the facility operated by Immigration Centers of America. As you may know, Mr. Snelling died on January 19, 2011, after an incident at the Immigration Centers of America. I will be investigating any and all injuries, damages, and claims which may exist against various individuals and entities, including the Town of Farmville.

Upon information and belief, Prince Edward County emergency services responded to the incident, provided treatment to Mr. Snelling, transported him to the hospital, and provided information to hospital staff regarding Mr. Snelling. Potential claims against the County may include negligence, wrongful death, discrimination, fraud, conspiracy, and conflicts of interest.

Since our investigation into this matter is still underway, the precise theories that would be asserted against the Town are subject to change. Therefore, I hereby request that immediate steps be taken by you and all other entities and individuals to preserve all documents and data from all sources that relate to or have any possible connection with John Snelling, Immigration Centers of America, and these potential claims.

“Documents and data” as used here means not only hard copy documents, but audio recordings, videotape, email, instant messages, word processing documents, spreadsheets, databases, calendars, telephone logs, contact manager information, Internet usage files, and all other electronic information maintained, created, received, and/or maintained by you on computer or data systems. “Sources” include all hard copy files, computer hard drives, removable media (e.g., CDs and DVDs), laptop computers, PDAs, Blackberry devices, and any

601 PENNSYLVANIA AVE., N.W.
SUITE 900, SOUTH BUILDING
WASHINGTON, D.C. 20004

201 N. CHARLES STREET
SUITE 600
BALTIMORE, MARYLAND 21201

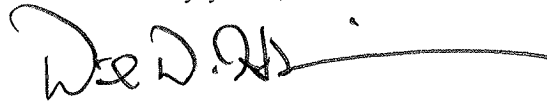
other locations where hard copy and electronic data is stored. Keep in mind that any of the above-mentioned sources of relevant information may include personal computers your employees use or have access to at home, or other locations. It also includes inaccessible storage media, such as back-up tapes, which may contain relevant electronic information that does not exist in any other form.

Electronically stored data will also be an important and irreplaceable source of discovery and/or evidence in these matters. You must take every reasonable step to preserve all such information in its possession, custody or control until further notice. *Failure to do so could result in serious adverse consequences.*

In order to comply with these legal obligations, the County must take immediate steps to preserve all existing documents and data related to and arising out of John Snelling's employment, injury, medical treatment, and death, and all such existing documents related to Immigration Centers of America, and suspend deletion, overwriting, or any other possible destruction of relevant documents and data.

Thank you for your anticipated cooperation in this regard.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D. D. Hudgins", followed by a long horizontal flourish line extending to the right.

David D. Hudgins

cc: Lillian Snelling