

From: Abed Ayoub <aayoub@adc.org>
Date: March 17, 2023 at 11:52:25 PM EDT
To: "kjs@boswellgroup.com" <kjs@boswellgroup.com>, "prezantphd@gmail.com" <prezantphd@gmail.com>
Cc: Ata Hindi <ata@adc.org>, "legal@adc.org" <legal@adc.org>
Subject: **Litigation Hold Request: Dr. Lara Sheehi**

March 16, 2023

Via Electronic Email

Dr. Kerry Sulkowicz
President
American Psychoanalytic Association (APsaA)
122 East 42nd St, Ste. 2310
New York, NY 10168

Dr. Daniel W. Prezant
President-elect
American Psychoanalytic Association (APsaA)
122 East 42nd St, Ste. 2310
New York, NY 10168

Re: Records Hold Demand

Dear Dr. Sulkowicz and Dr. Prezant:

I hope this email finds you well. I am writing to you on behalf of the American-Arab Anti-Discrimination Committee (ADC), the country's largest Arab American grassroots civil rights organization. Our office has been retained by Dr. Lara Sheehi, an esteemed member of the American Psychoanalytic Association (APsaA). Our office is aware of on-going conversations and attempts to disinvite Dr. Sheehi from a speaking engagement.

We demand that you take immediate action to preserve all potentially relevant documents, evidence, writings, written and recorded information and "ESI" (electronically stored information) and to prevent the intentional or accidental deletion or spoliation of any evidence that in any manner relates to Dr. Sheehi. Any accidental, negligent, or intentional deletion or spoliation of evidence will be dealt with accordingly.

These records include any correspondences pertaining to the ongoing attempts to disinvite Dr. Sheehi from an upcoming speaking engagement. The records will be relevant to upcoming litigation.

To ensure that all relevant information is preserved and available for use in this matter, we demand that APsaA and respected members suspend normal document retention/destruction policies and preserve all evidence related to this matter including all electronic and written documents.

We also ask that this notice be sent to all members of APsaA who are involved in any conversations pertaining to Dr. Sheehi.

Please note that these records may contain sensitive and confidential information, and therefore it is imperative that they be preserved in a manner that maintains their integrity and confidentiality.

Please confirm receipt of this email. Thank you for your attention to this matter.

Thank you,

Abed Ayoub

Abed A. Ayoub, Esq.
National Executive Director
American-Arab Anti-Discrimination Committee (ADC)
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Barred in the state of Michigan and District of Columbia

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