

IN THE CIRCUIT COURT OF 9TH JUDICIAL CIRCUIT OF
ORANGE COUNTY, FLORIDA

LESLIE FERDERIGOS,
Plaintiff,
v.

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JEREMY HALES,
ELEPHANT SHOE, LLC.
MARTHA GEORGE RIZK, (aka GEORGE HALES)
JASON HIPSHER (aka "JAYHIP"),
MEGAN M. FOX (aka, MEGAN FOX),
MATTHEW LEWIS (aka "THAT UMBRELLA GUY")
JOHN DOE (aka "SHIZZYWIZNUT")
and JOHN/JANE DOES 1-10,
Defendants.

**PLAINTIFF'S NOTICE OF LETTER SERVED TO DEFENDANT(S) TO PRESERVE
EVIDENCE**

PLEASE TAKE NOTICE Plaintiffs Letter served to Defendant(s) to Preserve Evidence
ATTACHED & E-SERVED.

CERTIFICATE OF SERVICE

WE DO CERTIFY, that a copy of the foregoing has been furnished electronically with
the Clerk of Courts by using the EPORTAL system, all parties of record. Including:
MeganFox.writer@protonmail.com, justjayhip@gmail.com, SHIZZYWIZNUT@GMAIL.COM,
rshochet@shochetlaw.com, JeremyBHales@gmail.com

Respectfully submitted,

6/15/25
Dated

/s/ Michael Ferderigos
Michael Ferderigos, Esq.
Bar No.: 604011
10454 Birch Tree Lane
Windermere, FL 34786
Telephone 407-592-0035
mferderigos@gmail.com
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Case No. 2025-CA-004528

MICHAEL FERDERIGOS, ESQUIRE
10454 Birch Tree Lane Windermere, Florida 34786
michael@civilestatelaw.com

Re: 2025-CA-004528 Ferderigos v Jeremy Hales, Et. Al.

Via E-Service by Email

MeganFox.writer@protonmail.com
justjayhip@gmail.com
SHIZZYWIZNUT@GMAIL.COM
rshochet@shochetlaw.com
JeremyBHales@gmail.com

In preparation for serving Lawsuit on behalf of Leslie Ferderigos, you are directed to preserve all records, electronically stored information, and tangible records pertaining to Case No. **2025-CA-004528**, against you as named Defendants. You are named defendants in said State lawsuit, among others not listed, either in your official capacity, individual capacity, or both. Records include, but are not limited to, all records of all LIVE Streams, published content on all social media forums since January 2025 to present, and continuing thereafter. All posts, reports, records, pertaining to any social media forum, including but not limited to: YouTube, Facebook, Rumble, TikTok, Twitter, etc.

You were contacted prior in an attempt to rectify the improper actions that you have participated in. However, to date, there has been no attempt to rectify the improper use of the name Leslie Ferderigos, image or likeness, or any mechanism implying Leslie Ferderigos either directly or implied through fictitious names in the furtherance of obtaining donations, funds, view counts.

Demand for Preservation of Electronically Stored Information

It is anticipated that an additional FEDERAL LAWSUIT will be filed in addition to the State Lawsuit for various constitutional violations, that give rise to various constitutional violations and violations of RICO.

Those listed have taken action in this case and are being requested to preserve all evidence. Individuals include: Megan M. Fox, Jeremy B Hales, Martha George Rizk, Matthew Lewis, "John Doe", who appears as "Shizzlywiznut" in social media and streaming forums.

Due to the above-referenced matter, Leslie Ferderigos, represented by counsel, hereby demands that you preserve all documents, tangible things, and electronically stored information potentially relevant to the issues in this case. As used in this document, "you" and "your" refers to any entity that has published, discussions of Leslie Ferderigos, used her image, receives donations during LIVE Streaming, and their respective officers, directors, agents, attorneys, accountants,

employees, partners, or other persons occupying similar positions or performing similar functions for the putative Defendants listed.

You should anticipate that much of the information subject to disclosure or responsive to discovery in this matter is stored on your current and former digital systems and other media and devices. This includes servers, computers, laptops, smartphones and tablets, messaging systems, digital medical devices, and cloud repositories.

Electronically Stored Information (hereinafter "ESI") should be afforded the broadest possible definition and includes (by way of example and not as an exclusive list) potentially relevant information electronically, magnetically, or optically stored as:

- Digital communications (e.g., e-mails, texts, voicemails, instant messages);
- Word-processed documents (e.g., Word documents and drafts);
- Spreadsheets and tables (e.g., Excel or Google Docs worksheets);
- Accounting Application Data (e.g., QuickBooks or Great Plains data files);
- Image and Facsimile Files (e.g., .PDF, .TIFF, .JPG, .GIF images);
- Sound Recordings (e.g., .WAV, .MP3 files);
- Video and Animation (e.g., .AVI and .MOV files);
- Databases (e.g., Access, Oracle, SQL Server data);
- Contact and Relationship Management Data (e.g., Outlook, Address book apps);
- Calendar and Diary Application Data (e.g., Outlook PST, Webmail, blog tools);
- Web Access Data (e.g., Temporary Internet Files, History, Cookies);
- Presentations (e.g., PowerPoint, Impress);
- File server data, local or cloud (e.g., on Windows, Linux/Unix, Mac);
- Mobile device data and app data (e.g., on Android, Apple, Windows Mobile);
- Network Access and Server Activity Logs;
- Project Management Application Data;
- Back Up and Archival Files

ESI resides not only in areas of electronic, cloud-based, magnetic, and optical storage media reasonably accessible to you, but also in areas you may deem not reasonably accessible. You are obliged to preserve potentially relevant evidence from both these sources of ESI, even if you do not anticipate producing such ESI.

The Florida state rule requiring a party to preserve evidence upon request is primarily governed by **Florida Rule of Civil Procedure 1.380(e)** and case law related to spoliation of evidence. While the rule itself does not explicitly mandate preservation upon request, Florida courts have established through case law that parties have a duty to preserve evidence when they know or reasonably should know that the evidence may be relevant to anticipated litigation.

1. **Duty to Preserve Evidence:** A party has a duty to preserve evidence when litigation is pending or reasonably foreseeable. This includes tangible evidence and electronically stored information (ESI).
2. **Spoliation of Evidence:** If a party fails to preserve evidence, it may face sanctions for spoliation, which can include adverse inference instructions, dismissal of claims, or monetary penalties.
3. **Case Law:** Florida courts have reinforced this duty through decisions such as *Golden Yachts, Inc. v. Hall*, which emphasize that the duty to preserve arises when a party is on notice of potential litigation.

Florida Rule of Civil Procedure 1.280(b)(1) also governs discovery and the scope of relevant evidence, which indirectly supports the duty to preserve evidence relevant to litigation.

Accordingly, even ESI that you deem reasonably inaccessible must be preserved in the interim so as not to deprive the plaintiffs of their right to secure the evidence or the Court of its right to adjudicate the issue.

Preservation Requires Immediate Intervention

You must act immediately to preserve potentially relevant ESI, including, without limitation.

Best Wishes,

/s/Michael Ferderigos

Michael Ferderigos, Esq

CIVIL ESTATE LAW, P.A.

Counsel for Plaintiff Case No. 2025-CA-004528