

**CONFIDENTIAL ATTORNEY WORK PRODUCT**  
**INDIVIDUAL LITIGATION REPORT**

**for the Litigation Section  
of the  
Oklahoma Attorney General**

When state agencies, officials and employees are sued in state or federal courts, it is necessary that allegations are promptly investigated and a defense initiated. To this end, the Litigation Section of the Oklahoma Attorney General has implemented the following Individual Litigation Report to help marshal information and promptly prepare a litigation strategy.

The Individual Litigation Report is the best way to quickly get solid litigation information to your attorney. The Litigation Section initially will be subject to very short deadlines, with a potentially steep learning curve. The party suing you already has a head start. The Individual Litigation Report is the first step in leveling the playing field.

Each Individual Defendant must fill in the following information.

*Note: Please prepare, identify, handle and safeguard the litigation report to preserve its character as attorney work product. This report is “Confidential Attorney Work Product.”*

**1. Client Information:**

**Answer the following questions:**

**Case Name** \_\_\_\_\_

**Case Number** \_\_\_\_\_

**Your Name** \_\_\_\_\_

**Date you were served with the lawsuit** \_\_\_\_\_

**Home Address** \_\_\_\_\_

**Home Telephone Number** \_\_\_\_\_

**Cell Phone Number** \_\_\_\_\_

**E-mail Address** \_\_\_\_\_

**Name of Employer** \_\_\_\_\_



**3. Potential Witnesses:**

**Witness #1:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony  
\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_  
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**Witness #2:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony  
\_\_\_\_\_  
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**Witness #3:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony  
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**Witness #4:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony

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**Witness #5:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony

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**Witness #6:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony

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**Witness #7:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony

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**Witness #8:**

- a. Full Name \_\_\_\_\_
- b. Work Address and Telephone Number \_\_\_\_\_
- c. Home Address and Telephone Number \_\_\_\_\_
- d. E-mail Address(es) \_\_\_\_\_
- e. Brief summary of the Witness(es)' Testimony

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**4. Documents:**

**Please note: Just like traditional hardcopy records, electronically stored information is important and an irreplaceable source of discovery and/or evidence. The lawsuit requires preservation of all relevant information from your agency's files, computer system and removable electronic media. This includes, but is not limited to hard copy records, email, text messages, instant messages and other electronic communication, word processing documents, spreadsheets, databases, calendars, telephone logs, mobile device files, contact**

**manager information, photographs, video camera footage, audio recordings, internet usage files and network access information. This could also possibly include data stored on personal computer systems, personal email, personal mobile devices and cellular telephones used for work, and any personal removable electronic media. Failure to comply with preservation of information may result in severe sanctions, attorney fees, and/or a spoliation jury instruction.**

Enclose with this report copies of all relevant documents that are currently in your possession which pertain to the claims in the lawsuit. Retain all original documents including but not limited to the following:

- a) a copy of the summons and petition/complaint;
- b) witness statements;
- c) photographs, video footage, and audio files;
- d) correspondence (including memos and email) with Plaintiff and attorney or others;
- e) Pre-litigation reports of investigations, grievances or administrative proceeding (e.g. EEOC administrative records); and
- f) recordings and transcripts of any recordings.

**Please note: The original summons and petition/complaint with the original envelope should be sent with this report. Copies of all other documents should also be sent. Retain the originals in a central location. The originals may be needed as litigation proceeds. As new relevant records come into your possession you should add them to this preservation collection.**

**Questionnaire:**

**In order to assist in the identification of records relevant to this effort please complete the questionnaire below.**

- a. **Do you have any hardcopy records relevant to this matter?** \_\_\_\_\_
- b. **If yes, please describe them and where they are stored.** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- c. **Do you have electronically stored records relevant to this matter?** \_\_\_\_\_
- d. **If yes, please indicate which of the following storage media are used, and describe them (Dell, Apple, tower, Gmail, carrier, etc.) and their location:**
  - **Desktop computer in your office/work station** \_\_\_\_\_
  - **Laptop or tablet computer provided by your workplace** \_\_\_\_\_
  - **Shared office storage drive(s)** \_\_\_\_\_
  - **Email account(s) (work or personal)** \_\_\_\_\_
  - **Personal computer** \_\_\_\_\_

