



THENELL LAW GROUP, P.C.

Oregon ♦ Washington ♦ Idaho ♦ Nevada ♦ Alaska ♦ Utah

Daniel E. Thenell, Partner

Admitted in Oregon & Washington
Idaho, Utah & Alaska

Dan@Thenelllawgroup.com

www.thenelllawgroup.com

P: (503) 372-6450

F: (503) 372-6496

December 16, 2025

2025-040/2025-046

TORT CLAIMS NOTICE

[ORS 30.275]

VIA US MAIL AND CERTIFIED MAIL

Springfield Public Schools
640 A Street
Springfield, Oregon 97477

RE: Our Client: David Collins and Todd Hamilton
Tort Claim: Springfield Public Schools

**TORT CLAIMS NOTICE
PRESERVATION AND PUBLIC RECORDS REQUEST**

To Whom it May Concern:

My firm has been retained to represent the interests of David Collins and Todd Hamilton. Please be advised that pursuant to ORS 30.275, I hereby provide you with notice that this office has been retained regarding claims against Springfield Public School, Jonathan Light, Ken Kohl, and Amber Langworthy, and any agents or employees of those named for personal damages arising from retaliation, false light, defamation, and whistleblower under ORS 659 regarding David Collins and Todd Hamilton. My clients are providing this notice of their intent to bring a suit.

Our clients' potential claims include but are not exclusive of retaliation, false light, defamation, and unlawful employment practices by retaliating against our clients for protected activity. These claims occurred on or about August 2025, when Todd Hamilton and David Collins submitted formal written complaint to the Springfield Public Schools Board of Directors alleging misconduct, to the present. The actions stem from a broader continuing pattern of retaliation that began in 2021 when Jonathan Light returned to the Board.

If you require any additional information to determine the nature of my clients' claims, please contact my office at your immediate convenience.

The further purpose of this letter is to provide notice to those named above and any of its manager(s), agent(s), employer(s) and any other person(s), (collectively, "you" or "your") who are

or may be responsible for the maintenance, storage, retention, including any retention policy, in any way relating to the preservation of documents, electronically stored information and tangible things which are or may be subject to the requirements of OREGON AND FED. R. CIV. P. 26 and/or 36 in relation to the above-referenced matter. For the purposes of the memorialization of this Notice, "documents," "electronically stored information" and/or "tangible things" (collectively, "documents") refers to, or may refer to any definition of the same provided in the FEDERAL or OREGON RULES OF CIVIL PROCEDURE in addition to, but not limited to, any or all of the following which are or may be in your client's possession, custody or control, or subject to your client's custody or control, whether drafts or unfinished versions, originals, or nonconforming copies thereof, however created, produced or stored (manually, mechanically, electronically or otherwise) from 1/2025 to present:

1. File servers;
2. Email servers;
3. Files, whether digital or not, and regardless of any technical classification;
4. Hard drives;
5. Removable media, regardless of form or format;
6. Peripherals;
7. Backup tapes;
8. PDAs;
9. Legacy systems;
10. Database systems;
11. Customer relationship management (CRM) systems and databases;
12. Electronic query systems, regardless of form or format;
13. Personal and home computers, including servers, desktop computers and laptops;
14. Cell phones;
15. Fax machines;
16. Digital cameras, including video-cameras;
17. Wires;
18. Telegrams;
19. Telexes;
20. Telephones and related logs;
21. Notes or records of conversations or meetings;
22. Contracts;
23. Agreements;
24. Calendars, whether digital or not;
25. Date books, whether digital or not;
26. Work sheets;
27. Invoices;
28. Bills;
29. Records of payments and receipt of payments;
30. Magnetic tape;
31. Tape recordings;
32. Disks;
33. Diskettes;

34. Disk packs;
35. Websites;
36. Microfilm;
37. Instant messages, regardless of form or format;
38. Microfiche;
39. Storage devices in any form or format;
40. Appointment books, whether digital or not;
41. Diaries, whether digital or not;
42. Notices, whether digital or not;
43. Message slips, whether digital or not;
44. Books;
45. Papers;
46. Minutes;
47. Summaries;
48. Records in any form or format;
49. Archives, whether digital or not;
50. Spillman and/or fatpot data and records;
51. Dispatch data, documents, recordings and records; and
52. Any and all other electronic media.

The aforementioned definition includes, or may include, without limitation, any information in electronic form stored in any computer file, PDA or remote communication device, including offsite computers and/or servers, "cloud" servers and/or external database systems, to include, without limitation, the preservation of any associated "metadata".

Specifically, my clients demand that all correspondence, including but not limited to, emails, texts and voicemail, between anyone at the Springfield Public Schools, and regarding our clients, is to be preserved and produced to my office. Both professional and personal communication devices need to be preserved.

It is **hereby demanded** that any of the aforementioned documents having any tendency to lead to the discovery of relevant information be preserved for the purposes of litigation, along with any and all discoverable evidence that may not have been expressly delineated herein. There may be other electronic evidence that should be protected and made available subject to discovery requests that will or may be promulgated in the future. You should make every effort to retrieve data that has been either inadvertently or purposefully deleted if there is any reasonable possibility that it relates to this matter in such a way that it may be discoverable. Failure to do so may result in stiff penalties and sanctions levied against your client. Reasonable preservation efforts may include imaging of hard drives, suspension of the overwriting of all data on any electronic system, including the overwriting of emails, retrieving and/or pulling backup tapes from rotation, the maintenance of any chain of custody procedures utilized by your client, and/or the suspension of document and data retention programs that do or may involve the routine destruction of data.

This letter is being sent to you via Regular and Certified Mail. This notice is provided to you pursuant to ORS 30.275 as formal notice that a claim for damages will be asserted against the

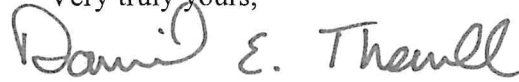
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Springfield Public Schools and individuals named above. If you need additional information regarding the nature of potential claims against the Springfield Public Schools, or the circumstances underlying those claims, please contact my office at your convenience.

Please direct any communication intended for my clients in this matter to me, and not to my clients directly.

Very truly yours,

A handwritten signature in dark ink, reading "Daniel E. Thenell". The signature is written in a cursive style with a large, stylized "D" and "T".

Daniel E. Thenell

DT/KFC/ch
Tort.Claim.Springfield