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January 30, 2026

Via Email

Counsel for Respondent DRVM LLC
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**Subject: Preservation of Payroll and Compensation Records, Hollingsworth v. DRVM LLC
JAMS Arbitration No. 516000821**

Counsel,

I am writing to confirm preservation of documents and electronically stored information relevant to the pending arbitration between Claimant Jorden Hollingsworth and Respondent DRVM LLC.

I have been made aware of credible information indicating that Respondent intends to transition payroll and compensation systems from ADP to Paycom on or about Monday, February 2, 2026, including the migration, consolidation, or replacement of historical payroll data. This transition appears to be occurring during an active discovery period.

As you know, payroll and compensation records are directly relevant to the claims and defenses in this matter, including but not limited to issues concerning wages owed, timing of final pay, commissions, employer identifiers reflected in payroll records, and payment methods. Accordingly, Respondent's duty to preserve relevant evidence is fully triggered.

To avoid any potential issues regarding preservation, please confirm that Respondent has taken appropriate steps to preserve, in native and unaltered form, all payroll-related documents and electronically stored information, including but not limited to:

- All ADP payroll data, reports, databases, and records;
- Payroll audit trails, change logs, and associated metadata;
- Historical pay stubs, wage statements, and year-end payroll summaries;
- Records reflecting payment dates, methods, timing, and amounts;
- Employer identifiers, EINs, and entity information reflected in payroll systems;
- Any records related to the planning, export, transfer, validation, or migration of payroll data between ADP and Paycom.

This correspondence is not intended to expand the scope of discovery. It is directed solely to preservation obligations, to ensure that relevant payroll and compensation data remains

intact, accessible, and reproducible as it existed at the time relevant to Claimant's employment and termination.

Please confirm in writing that appropriate litigation-hold measures are in place and that no payroll or compensation data relevant to this matter will be deleted, altered, overwritten, or rendered inaccessible as a result of any system transition.

Given the reported timing of the payroll system transition, I respectfully request confirmation no later than Monday, February 2, 2026.

Thank you for your attention to this matter. I look forward to your confirmation.

Sincerely,

Jorden Hollingsworth
Claimant, Pro Se
JAMS Arbitration No. 5160000821