

Priya Ross

26 Field Court

Poughkeepsie, NY 12601

priya.marie.ross@gmail.com

May 27, 2025

VIA EMAIL and CERTIFIED MAIL

Legal Department

Goldman Sachs & Co. LLC

200 West Street

New York, NY 10282

gs-legal@gs.com

To Whom It May Concern,

I am writing to notify Goldman Sachs & Co. LLC of a pending legal matter and to request the preservation of documents and information potentially relevant to that matter: *Ross v. Israely*, Docket No. FST-CV25-6073650-S, currently pending in the Superior Court of Connecticut, Judicial District of Stamford.

I am the plaintiff in that case and am currently proceeding **pro se** (self-represented).

The litigation includes allegations that confidential information related to my mental health may have been improperly accessed or disclosed by Robert (Bob) Boroujerdi, a former employee of Goldman

Sachs, and subsequently shared with Attorney Ruth Israely and/or her clients, in connection with ongoing legal proceedings.

Accordingly, I respectfully request that Goldman Sachs immediately preserve any and all materials—including electronically stored information (ESI)—that may be relevant to these issues. Specifically, this includes but is not limited to:

- Records or communications concerning myself, Priyamol (Priya) Ross;
- Internal or external communications referencing or discussing my medical, psychiatric, or mental health status;
- Any access to, review of, or transmission of employee or personal records by Bob Boroujerdi;
- Communications between Goldman Sachs and Attorney Ruth Israely or her clients that reference or relate to me or my personal information.

This request includes, but is not limited to, emails, internal messaging systems (e.g., Slack, Teams), HR records, audit trails, access logs, and documentation from any Goldman Sachs systems or devices.

Please be advised that this request for preservation applies regardless of whether Goldman Sachs is currently a party to the litigation. Destruction, alteration, or failure to retain relevant materials after receipt of this notice may result in judicial sanctions or adverse inferences under applicable rules of civil procedure.

Please confirm receipt of this notice and provide the name and contact information of a representative within your legal department for further communications.

Sincerely,



Priyamol (Priya) Ross

Plaintiff, pro se