[redacted]

[redacted]

[redacted]

November 19, 2026

[redacted]

Re: *SecurityScorecard, Inc. v.* [redacted] *and Factor Cybersecurity, Inc.*

Dear [redacted]

We are counsel for SecurityScorecard, Inc. ("SSC") in the above-referenced proceeding against [redacted] and Factor Cybersecurity, Inc. (together, "Factor"). This dispute concerns alleged breaches of [redacted]'s agreements and contractual and policy obligations to SSC, as well as disparagement of SSC, competitive harm to SSC, unauthorized use of SSC's intellectual property, bad faith, and breach of fiduciary duty.

We understand that you are a [redacted] to Factor. You may therefore possess records relevant to this dispute. Please promptly take reasonable steps to preserve all documents, data, and electronically stored information. You are expected to promptly take reasonable steps to preserve such documents, data, and information within your possession, custody, or control, for the period January 1, 2017 to the present, and preserve any subsequently created or received records. Please do not destroy, delete, or materially alter such records and take reasonable steps to prevent their loss through routine deletion or other processes.

Please also preserve relevant paper records and electronic information, including email, text messages, messaging application communications, shared drive and cloud workspace records, and records on devices or accounts used for the relevant engagement. And please preserve native files and associated metadata, materially different versions, annotated copies, and unique attachments. Please avoid preservation methods that strip metadata or replace native records with printouts or screenshots alone.

Also, to the extent applicable, please notify any of your personnel reasonably likely to hold relevant records and coordinate with appropriate IT personnel or service providers to suspend routine deletion, auto-delete, ephemeral-message settings, or other processes to the extent reasonably necessary to prevent loss of relevant information. If potentially relevant information exists only in a backup or other source that presents a material preservation burden, please contact us promptly to discuss an appropriate approach before it is lost.

Relevant materials may be sought through appropriate formal process. This letter requests preservation only; it does not request production of documents or disclosure of privileged or

[redacted]

protected information, or ask you to waive any privilege, protection, confidentiality obligation, or objection. Please preserve potentially relevant materials even if you believe they may be privileged or otherwise protected.

Please acknowledge receipt by December 4, 2026 and identify the appropriate contact for preservation-related communications. If you anticipate material difficulty or burden in preserving any identified source, please contact us promptly, through your counsel if appropriate, so that we can discuss a reasonable approach.

We are available to further discuss if you have any questions.

[redacted]

cc: [redacted]q. (by email)

[redacted]