



McDonald & Cody, LLC
Attorneys at Law

Please Reply to:

South Office:

P. O. Box 555
Cornelia, GA 30531
Phone: 706-778-5291
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April 20, 2026

Via U.S. Certified Mail and Email

Rabun County Sheriff's Office
Attn: Sheriff Mark A. Gerrells
56 Boen Creek Road
Tiger, GA 30576
Via- contactus@rabuncounty.ga.gov

Re: ***Letter of Representation; Request for Policy Information; Notice to Preserve Evidence***

My Client: Matthew Worley, as Parent and Guardian of Mickey Worley, his
minor child
Date of Loss: April 18, 2026

To whom it may concern:

Please be advised that my firm has been retained as counsel for Mathew Worley, as Parent and Guardian of Mickey Worley, his minor child, as it relates to his claims arising from a collision that occurred on April 18, 2026, caused by a Rabun County Sheriff's Office Deputy while in control of a vehicle owned by the Rabun County Sheriff's Office. Pursuant to O.C.G.A. § 33-3-28, I request that you provide a written disclosure of the policy limits, including the declarations page, for all applicable insurance policies that may provide coverage for this incident. This request includes, but is not limited to, all liability policies, umbrella policies, excess coverage, or any other potentially applicable policies. If you are aware of any other insurance carriers that may provide coverage, please provide their names and addresses as well. Enclosed is an affidavit pursuant to § 33-3-28.

This letter is also a formal request that you preserve and not alter any and all equipment that was involved in the collision, along with photographs, video recordings, recorded audio or computer media, measurements, real evidence, documents, materials, and all other evidence and things relating to the crash that are presently in your possession or the possession of your employee(s) or agent(s). This includes, but is not limited to, all documents, whether paper, electronic or otherwise stored, concerning the striking driver and owner in general, as well as anything that shows if the owner or the driver either contributed to the cause of the crash or did nothing to contribute to the cause of the crash.

South Office — 4005 Highway 365 South — Alto, Georgia 30510
email: gus@mcdonaldcody.com • kathi@mcdonaldcody.com • teresa@mcdonaldcody.com • sam@mcdonaldcody.com



Pursuant to O.C.G.A. § 24-4-22; *R.A. Siegel Co. v. Bowen*, 246 Ga.App. 177 (2000); and *J.B. Hunt Transport, Inc. v. Bentley*, 207 Ga.App. 250, 427 S.E.2d 499 (1993), this letter serves as a formal preservation of evidence demand. You, your insured, and any related parties—including agents, representatives, employers (if applicable), independent contractors, and insurers—are instructed not to discard, alter, destroy, or tamper with any materials, documentation, or data relevant to the wreck.

You are specifically directed to preserve the following items:

- The vehicle involved in the collision, in its post-wreck condition;
- Maintenance, inspection, and repair records for the vehicle for the six (6) months prior to and any time after the collision;
- Photographs of the vehicles involved and the collision scene;
- Data from any on-board devices (ECM, trip recorders, GPS systems, etc.);
- Post-collision repair records or invoices;
- Communications, including emails, texts, and social media posts related to the incident;
- Witness statements and driver interviews;
- Accident reconstructions, SCRT reports, measurements, or scene diagrams;
- Evidence collected from the scene, including photos or video footage;
- Cell phone records or other communications from the driver on the day of the wreck and one hour thereafter; and
- Any medication or prescriptions taken by the driver on the date of the wreck;
- Driver's cell phones, or other personal electronic devices (by whatever name called), and the data/content contained therein, including but not limited to photographs, texts, applications, etc., owned, operated and/or utilized by the driver of the Rabun County Sheriff's Office Deputy of the Rabun County Sheriff's Office in any way during the twenty-four (24) hour period before and after the collision that occurred on April 18, 2026.

Furthermore, we demand that you place a ***litigation hold*** on this vehicle, its contents, and keep parts that are removed during repair for our expert and a jury to inspect at trial. We demand that you contact the insured and let them know that we are requesting ALL evidence be preserved from the crash (this includes photos, text messages, call logs, EDR crash data, CDR "black box" data, all repair bills, all former maintenance bills, and all videos taken from the scene or of the damage). If you are the agent for this insured please confirm you received this notice to preserve evidence and our request that a litigation hold be placed on this evidence so our experts can view the vehicle, test, measure and inspect the damage and condition of the property close in time to this crash. We will also be requesting a formal inspection of the vehicle involved. ***Please do not repair or modify the vehicle until this inspection has been completed.*** Contact our office immediately to coordinate a time.

Should you have any questions or need clarification regarding any portion of this request, do not hesitate to contact me directly.

Should this evidence be altered in any way, my client will seek all remedies afforded under Georgia law.

Please contact me if you have any questions.

Respectfully,

Gus McDonald

A handwritten signature in blue ink, consisting of a large, stylized 'G' followed by a horizontal line extending to the right.

STATE OF GEORGIA
COUNTY OF HABERSHAM

**AFFIDAVIT FOR DISCLOSURE
OF LIMITS OF LIABILITY**

COMES NOW, Gus McDonald, and states before an officer duly authorized to administer oaths, on oath, the following.

- a) My client, Matthew Worley, as Parent and Guardian of Mickey Worley, his minor child, has a claim against your insured, Rabun County Sheriff's Office Deputy, as it relates to a collision that occurred on April 18, 2026.
- b) I am requesting a statement, under oath, with regard to each applicable policy of insurance, the name of the insurer, the name of each insured, and the limits of liability as to each policy. This information may be in the form of a written response or a copy of the declaration page of each applicable policy. This request shall apply to all policies of insurance of every kind and nature, including, but not limited to, all liability, umbrella or excess coverage policies.

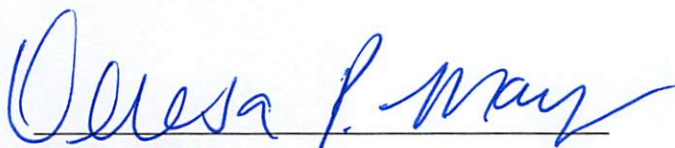
Further affiant sayeth not.



Gus McDonald

Subscribed and sworn before me this 20th day of April, 2026.

Gus McDonald, personally appeared before me, and acknowledged the execution of this **Affidavit** for the purposes set forth herein.



Notary Public

My Commission Expires March 10, 2028

