

# Litigation: Chin v. Port Authority's Impact on the Duty to Issue Litigation Holds

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The article discusses the recent Second Circuit case, *Chin v. The Port Authority*. In contrast to Judge Shira Scheindlin's decision in the *Zubukale* case, the court in *Chin* held that failure to issue a written litigation hold resulting in destruction in relevant documents did not constitute gross negligence and warrant sanctions. The author analyzes the case and fact pattern, contrasting it with relevant case law. He also provides a larger interpretation of the practical impacts of the *Chin* ruling.