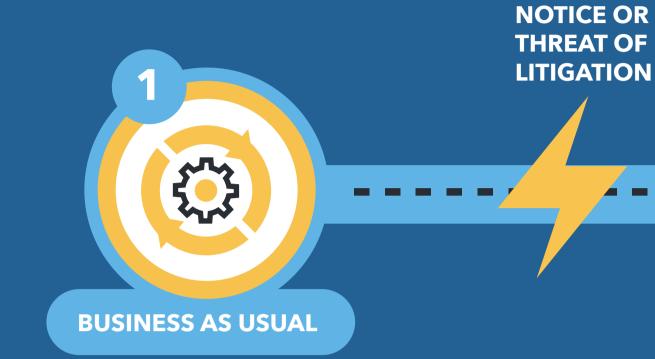
LITIGATION/E-DISCOVERY TIMELINE



A culture of litigation readiness is practiced

Normal IG Policies

Normal Backup

POTENTIAL TEMPLATED **DOCUMENTS** & FORMS





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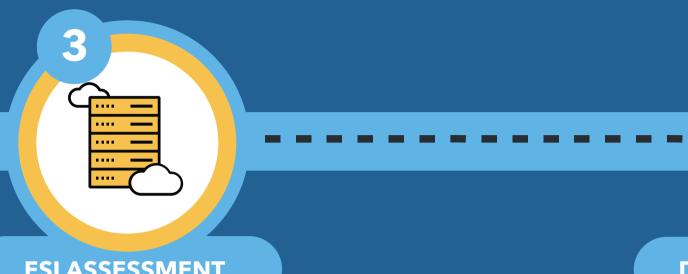
The threat of litigation requires immediate action to preserve potential

Initial Matter Review

Attorney calls litigation support for an initial matter review concerning potential sources of ESI, preservation obligations and legal hold management.

- Initial Matter Assessment
- Review of Potential ESI Source

 Review of Potential ESI Custodians • ID of IT Project Leaders • Legal Hold Issuance & Follow-up



In preparation for preservation, a meticulous review of ESI sources & custodians is initiated

ESI Source Indentification

Interview department heads & IT staff to develop a comprehensive data map. Interview custodians to complete the ESI picture All efforts are fully documented

- IT Management Interviews
- Department Head Interview
 - Custodian Interviews
- Data Map Creation Preservation Plans



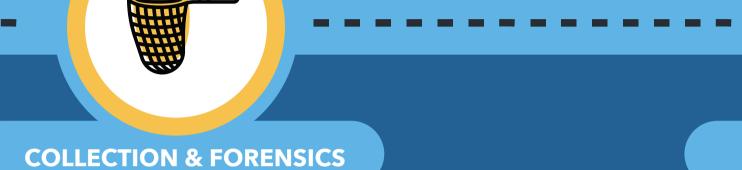
Legal team is provided with proper guidance to negotiate terms of discovery.

Discovery Protocols Defined

Data Narro will provide instructions for ESI preservation and will manage the collection process. We can provide forens collection for computers, servers mobile devices, & cloud/social media accounts.

- Meet & Confer Guidance
- Discovery requests are defined that are reasonable & proportional
- Agreements on ESI scope, keywords date ranges, metatags, etc.
- Advice for emerging sources of ESI





Identified sources of potentially responsive ESI are collected.

Collecting ESI

Be prepared with a starting ESI protocol template. Contain overburdensome collections Defining acceptable search criteria & scope. Make sure production make sense.

- Preservation, Preservation-in-Place
- Client Self-Collection Guided Client Collection
- Forensic Collection

Process
Documentation

ESI
Chain of
Custody

Smart culling & processing of data will save enormous amounts of time in review.

Right-sizing the Review Set

E-Discovery pros can guide you to the most efficient methods of culling raw data sets in order to avoid costly review and hosting costs

- E-Discovery Review Platform selected
- Data is culled in a documented, repeatable, & defensible manner
- ESI is ingested into review platform





Managed
Review
Best Practices

ANALYSIS & REVIEW

and for legal privilege

Reviewing the ESI

managed review.

Maximize the efficiency of

use of predictive coding/AI

Consider using outsourced

Use of AI/CAL/TAR defined

Review personnel defined

Redaction & Annotation

Ongoing review management

Ongoing QA for consistency

protocols and maximizing the

Review Process & Protocols defined

review by defining review

Data set is reviewed and

analyzed for responsiveness

-----------**PRODUCTION**

Productions can be tricky. Oftentimes it is best left to certified professionals.

Turning ESI Over

Turning over your responsive documents to the opposing party can be nerve racking Data Narro manages the process with checks & balances to ensure privileged material remains confidential.

- ESI is output in agreed upon format
- Productions are hosted on secured storage platforms pending download
- QA is performed to ensure confidential information is not released
- Full documentation is created

Production

QA Checklist



Expert Witness & Exhibit Prep

Turning over your responsive

documents to the opposing

party can be nerve racking.

Manage the process with a

material remains confidential

Exhibit presentation prep

Expert witness testimony

QA checkst to ensure privileged

Proper preservation and archiving of responsive material is crucial.

Archiving & Storage

Data can be put into short-term cold storage, ready to be accessed quickly if the need arrises. Alternatively, materials can be taken offline and placed in long-term archive

- Short-term cold storage
- Permanent matter archiving

















