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Defendants

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

22 IN RE: MCKINSEY & CO., INC.
23 NATIONAL PRESCRIPTION OPIATE
CONSULTANT LITIGATION

24 This Order Relates to:
25 ALL ACTIONS

Case No. 21-md-02996-CRB (SK)

**[PROPOSED] PRETRIAL ORDER NO. 5:
REGARDING DOCUMENT AND
ELECTRONICALLY STORED
INFORMATION PRODUCTION
PROTOCOL**

1 **I. PURPOSE**

2 This Order will govern production of Documents and ESI (as defined below) by Plaintiffs
3 and Defendants (the “Parties”) as described in Federal Rules of Civil Procedure 26, 33, and 34.

4 This Order shall apply to the production of hard-copy and electronic documents by the Parties in
5 this litigation.

6 The production of documents and ESI by the Parties also shall be subject to the provisions
7 of orders concerning confidentiality, privilege, and/or protected health information as agreed to
8 among the Parties and/or entered by the Court.

9 The Parties reserve all objections under the Federal Rules of Civil Procedure and
10 applicable decisional authority other than concerning matters that are addressed in this Order.

11 Nothing in this Order shall be interpreted to require disclosure of irrelevant information or
12 relevant information protected by the attorney-client privilege, work-product doctrine, or any
13 other applicable privilege or immunity. The Parties do not waive any objections to the
14 discoverability, admissibility, or confidentiality of documents or ESI. Nothing in this Order shall
15 be interpreted to supersede the provisions of orders governing confidentiality, privilege, and/or
16 protected health information entered by the Court in this litigation, unless expressly provided for
17 in such an order.

18 **II. DEFINITIONS**

19 a. “Confidentiality Designation” means the legend affixed to Documents or
20 ESI for confidential or highly confidential information as defined by, and subject to, the terms of
21 the order concerning confidentiality agreed to and/or entered by the Court in this litigation.

22 b. “Document” is defined to be synonymous in meaning and equal in scope to
23 the usage of this term in Rules 26 and 34 of the Federal Rules of Civil Procedure. The term
24 “document” shall include hard-copy documents, electronic documents, and ESI as defined herein.

25 c. “Electronic Document or Data” means documents or data existing in
26 electronic form at the time of collection, including but not limited to: e-mail or other means of
27 electronic communications, word processing files (e.g., Microsoft Word), computer slide
28

1 presentations (e.g., PowerPoint or Keynote slides), spreadsheets (e.g., Excel), and image files
2 (e.g., PDF).

3 d. “Electronically stored information” or “ESI,” as used herein, has the same
4 meaning as in Rules 26 and 34 of the Federal Rules of Civil Procedure and includes Electronic
5 Documents or Data, and computer-generated information or data, stored in or on any storage
6 media located on computers, file servers, disks, tape, USB drives, or other real or virtualized
7 devices or media.

8 e. “Extracted Full Text” means the full text that is extracted electronically
9 from native electronic files, and includes all header, footer, and document body information.

10 f. “Hard-Copy Document” means documents existing in paper form at the
11 time of collection.

12 g. “Hash Value” is a unique numerical identifier that can be assigned to a file,
13 a group of files, or a portion of a file, based on a standard mathematical algorithm applied to the
14 characteristics of the data set. The most commonly used algorithms, known as MD5 and SHA,
15 will generate numerical values so distinctive that the chance that any two data sets will have the
16 same Hash Value, no matter how similar they appear, is less than one in one billion.

17 h. “Load files” means an electronic file containing information identifying a
18 set of paper-scanned images, processed ESI, or native format files, as well as the corresponding
19 Extracted Full Text or OCR text files, and containing agreed-upon extracted or user-created
20 metadata, as well as information indicating unitization (i.e., document breaks and document
21 relationships such as those between an email and its attachments) used to load that production set
22 into the document review platform of the Party receiving a production (“Receiving Party”), and
23 correlate its data within that platform. A load file is used to import all image, native, and text files
24 and their corresponding production information into a document database. The Producing Party
25 shall produce a load file for all produced documents with each particular production in
26 accordance with specifications provided herein.

27 i. “Media” means an object or device, real or virtual, including but not
28 limited to a disc, tape, computer, or other device on which data is or was stored.

1 j. “Metadata” means: (i) information embedded in or associated with a native
2 file that describes the characteristics, origins, usage, and/or validity of the electronic file; (ii)
3 information generated automatically by the operation of a computer or other information
4 technology system when a native file is created, modified, transmitted, deleted, or otherwise
5 manipulated by a user of such system, (iii) information, such as Bates numbers, redaction status,
6 privilege status, or confidentiality status created during the course of processing documents or
7 ESI for production, and (iv) information collected during the course of collecting documents or
8 ESI, such as the name of the media device on which it was stored, or the custodian or non-
9 custodial data source from which it was collected. Nothing in this order shall require any party to
10 manually populate the value for any metadata field.

11 k. “Native Format” or “native file” means the format of ESI in which it was
12 generated and/or used by the Party Producing ESI or documents (the “Producing Party”) in the
13 usual course of its business and in its regularly conducted activities. For example, the native
14 format of an Excel workbook is an .xls or .xlsx file.

15 l. “Optical Character Recognition” or “OCR” means the optical character
16 recognition technology used to read the text within electronic images of paper Documents and
17 create a file containing a visible, searchable text format of such Documents.

18 m. “Searchable Text” means the native text extracted from an electronic
19 document and any Optical Character Recognition text (“OCR text”) generated from the electronic
20 image of a paper Document.

21 **III. E-DISCOVERY LIAISON**

22 The Parties will identify to each other liaisons who are and will be knowledgeable about
23 and responsible for discussing their respective ESI (“E-discovery Liaisons”). Each Party’s
24 designated E-discovery Liaison(s) will be, or will have access to those who are, familiar with
25 their Party’s respective electronic systems and capabilities and knowledgeable about the technical
26 aspects of e-discovery, including the location, nature, accessibility, format, collection, search
27 methodologies, and production of ESI in this matter. The Parties will rely on the liaisons, as
28 needed, to confer about ESI and to help resolve disputes without court intervention.

1 **IV. IDENTIFICATION OF DOCUMENTS AND ESI**

2 1. The Parties agree to meet and confer to discuss (i) the identification of the
3 custodial and noncustodial data sources containing potentially relevant ESI for potential
4 collection, review, and production; (ii) additional parameters for scoping the review and
5 production efforts (e.g., application of date ranges, de-NIST'ing, etc.); (iii) potential use and
6 identification of search terms, tools, or techniques; (iv) the identification and production of
7 documents and ESI from custodial and non-custodial sources that do not require the use of search
8 terms, tools, or techniques; (v) the method each Party proposes to use to identify and de-duplicate
9 duplicate documents, and any exceptions to such de-duplication the Party proposes to implement;
10 and (vi) the treatment of non-responsive documents within parent-child families. The meet and
11 confer between Plaintiffs and each Defendant will take place by the later of fourteen(14) calendar
12 days following entry of this Order, or twenty-one (21) days after the particular Defendant is
13 served with a first document request herein.

14 2. A Party who intends to use search terms will describe a search protocol that will
15 include: (a) the criteria to be used to identify the universe of documents to which search terms
16 will be applied (e.g., custodians and date ranges), and (b) proposed search terms to be applied to
17 that universe of documents, subject to revision based on, for example, meet and confer of the
18 parties and the number of hits returned by each term. A Requesting Party may also suggest search
19 terms to be applied. Any Search Protocol will include a requirement for the Producing Party to
20 provide hit reports for proposed search terms prior to utilizing the search terms to narrow the
21 universe of documents to be searched.

22 3. Before a Producing Party uses technology assisted review (“TAR”), the Parties
23 agree to meet and confer regarding a protocol for doing so and submit any unresolved disputes to
24 the Court for resolution. A Party who intends to use TAR will describe a TAR Protocol that will
25 include: (a) the TAR system to be used; (b) the criteria to be used to identify the universe of
26 documents to which TAR is to be applied (the “TAR Universe”); (c) its methodology for training
27 the TAR model and identifying responsive documents; (d) the methodology for validation testing
28 to be used; (e) the subject-matter expert who will oversee the implementation of the TAR

1 Protocol; and (f) the process by which documents excluded as not conducive to categorization
2 (e.g. multimedia files, primarily numerical spreadsheets, database files) will be reviewed for
3 production.

4 4. If a party is using culling technology, criteria or methods, the Producing Party
5 agrees to disclose details in advance to the receiving party along with the sources across which it
6 plans to apply the culling techniques. The parties must also provide written information
7 regarding the use of any other advanced culling techniques they employ in connection with their
8 culling of the documents if they are using such technology to exclude documents from manual
9 review.

10 5. The Parties further agree to meet and confer to the extent that this Order imposes
11 any undue burden or expense on any Plaintiff or Defendant with respect to its response to any
12 particular discovery request.

13 6. Nothing in this order shall be deemed to be a waiver of any Party's right to
14 reasonably seek agreement from the other Parties, or a Court ruling, to modify proposed or
15 previously agreed-to search terms, techniques, or tools (including any proposed as supplements).

16 **V. DEDUPLICATION**

17 1. Except as provided in Section V, Paragraph 7 below, to the extent exact duplicate
18 documents reside within a Party's ESI data set, the Party shall produce only a single, deduplicated
19 copy of a responsive document. "Exact duplicate" shall mean bit-for-bit identity of the document
20 content with exact hash value matches; so-called "near duplicates" will not be included within
21 this definition.

22 2. Except as provided in Section V, Paragraph 7 below, to the extent a party de-
23 duplicates its documents, it shall de-duplicate stand-alone documents or entire document families
24 in their ESI sources by the use of MD5, SHA-1, or SHA256 hash values. Where any such
25 documents have attachments, hash values must be identical for both the document plus-
26 attachment (including associated metadata) as well as for any attachment (including associated
27 metadata) standing alone.

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1 3. Except as provided in Section V, Paragraph 7 below, a Producing Party shall de-
2 duplicate documents across custodians and populate a field of data that identifies each custodian
3 who had a copy of the produced document (the “Duplicate Custodian” field) in addition to a
4 separate field of data identifying the custodian whose document is produced; such de-duplicated
5 documents shall be deemed produced from the custodial files of each such identified custodian
6 for all purposes in this litigation, including for use at deposition and trial. A Producing Party shall
7 use a uniform description of a particular custodian across productions. Multiple custodians in the
8 “Duplicate Custodian” field shall be separated by a semicolon. Entity/departmental custodians
9 should be identified with a description of the entity or department to the extent applicable.

10 4. No Party shall identify and/or eliminate duplicates by manual review or some
11 method other than by use of the technical comparison using MD5 or SHA-1 hash values outlined
12 above.

13 5. Hard-Copy Documents shall not be eliminated as duplicates of ESI.

14 6. If the Producing Party makes supplemental productions following an initial
15 production, that Party also shall provide with each supplemental production an overlay file to
16 allow the Receiving Party to update the “Duplicate Custodian” field. The overlay file shall
17 include all custodians listed in the “Duplicate Custodian” field in prior productions and any
18 custodians newly identified in the current supplemental production.

19 7. With respect to documents previously collected and processed in connection with
20 subpoenas or civil investigative demands previously issued to McKinsey, the Parties agree that
21 such documents do not need to be reprocessed in the first instance. Plaintiffs reserve the right to
22 request reprocessing of any such productions if they lack sufficient metadata or are otherwise
23 unusable, and to seek relief from the Court if such a request is denied.

24 **VI. PRODUCTION FORMAT SPECIFICATIONS**

25 1. Standard Format. Unless otherwise specified in Section 6(b) or pursuant to Section
26 6(j) below, the Parties shall produce documents in tagged image file format (“TIFF”). TIFFs of
27 ESI shall convey the same information and image as the original document, including all
28 commenting, versioning, and formatting that is visible in any view of the document in its native

1 application. All hidden text will be expanded, extracted, and rendered in the TIFF file and, to the
2 extent possible, the Producing Party will instruct its vendor to force off Auto Date. Any TIFFs
3 produced shall be single-page, 300 DPI with 1 bit depth, Group IV TIFF files. After initial
4 production in image file format is complete, a party must demonstrate particularized need for
5 production of ESI in its native format.

6 2. Native Format. Except as provided by Section VI, Paragraph 2 below, the Parties
7 shall produce all spreadsheets, computer slide presentations, audio files, video files, and other file
8 types that cannot be accurately represented in TIFF format in native format, provided, however,
9 that the Parties will meet and confer regarding appropriate format of production for databases and
10 structured data (e.g., Microsoft Access, Oracle, or other proprietary databases). For each
11 document produced in native format, a responding Party shall also produce a corresponding cover
12 page in TIFF image format, specifying that the document has been “produced in native format”
13 and endorsed with the Bates Number and Confidentiality Designation, if applicable, which will be
14 inserted into the image population in place of the native file. When the native file is produced, the
15 Producing Party shall preserve the integrity of the electronic document’s contents, i.e., its original
16 formatting and metadata. Notwithstanding the foregoing, with respect to documents previously
17 produced with redactions in connection with subpoenas or civil investigative demands previously
18 issued to McKinsey, the Parties agree such documents may be reproduced in the same format as
19 previously produced, including in TIFF image format, in the first instance. Plaintiffs reserve the
20 right to request reprocessing of any such productions if they lack sufficient metadata or are
21 otherwise unusable, and to seek relief from the Court if such a request is denied.

22 3. Color. Documents containing color need not be produced in color, except that (i)
23 word processing documents that contain hidden text, and (ii) certain redacted documents shall be
24 produced in color in TIFF format. The Producing Party will honor reasonable requests for a color
25 image of a document, if production in color is necessary to understand the meaning or content of
26 the document.

27 4. Embedded Objects. If documents contain embedded objects, the Parties shall
28 extract the embedded objects as separate documents and treat them like attachments to the

1 document to the extent reasonably possible. To the extent reasonably possible, images embedded
2 in emails shall not be extracted and produced separately.

3 5. Load Files. Each production of ESI and Documents shall be accompanied by
4 Concordance or comma delimited load files (.dat and .opt) containing a field with the full path
5 and filename to files produced in native format and also containing metadata fields identified in
6 Appendix A, to the extent the information is available in the original ESI file and can be extracted
7 without unreasonable burden using standard litigation support processing platforms (except for
8 vendor-generated fields related to the litigation production, such as “BEGDOC”, “ENDDOC”,
9 bases for redaction, and Confidentiality Designations).

10 6. .Txt Files. For all documents containing extracted full text or OCR text, the
11 Producing Party shall provide searchable document level .txt files (named using the Bates
12 start/”BEGDOC”), which shall reside in the same file directory as the images for such documents.

13 7. Bates Numbering and Other Unique Identifiers. Every item or file of ESI that is
14 produced shall be identified by a unique page identifier (“Bates Number”) and a Production
15 Volume Number for any storage device (e.g., CD, USB, hard drive) containing such files. All
16 Bates numbers will consist of an Alpha Prefix, followed by a numeric page index. There must be
17 no spaces in any Bates number. Any numbers with less than 8 digits will be front padded with
18 zeros to reach the required 8 digits. All ESI produced in TIFF format shall contain a unique Bates
19 Number on each page of the document, electronically “burned” onto the image at a location that
20 does not obliterate, conceal, or interfere with any information from the source document. If a
21 member of a document family that has otherwise been determined to be responsive cannot be
22 technically processed (e.g., unsupported file format, file corruption, inaccessible password-
23 protected document), those technical problems shall be identified and disclosed to the Receiving
24 Party by production of a Bates-labeled slip sheet that states “Technical issue—file cannot be
25 processed,” along with a log identifying each such file; the associated metadata for the file with
26 the technical problem shall be produced if technically possible. A Receiving Party thereafter may
27 raise with the Producing Party any questions or concerns, and the Parties shall meet and confer to
28 attempt to resolve any issues.

1 8. Hard-Copy Documents. Except as otherwise set forth in this paragraph, the Parties
2 agree that responsive paper documents shall be converted to single-page TIFF files, and produced
3 following the same protocols set forth in Section 6(a) above, including the production of OCR
4 text that is generated to make such documents searchable. Generally, all paper documents will be
5 scanned and produced electronically, unless a Party establishes good cause for making such
6 documents available via paper and reasonable access is provided to the opposing Party to review
7 the documents directly. In scanning all Hard-Copy Documents, Hard-Copy Documents should be
8 logically unitized. Accordingly, distinct documents should not be merged into a single record, and
9 single documents should not be split into multiple records. In the case of an organized
10 compilation of separate documents (for example, a binder containing several separate documents
11 behind numbered tabs), each of the Hard-Copy Documents should be separately scanned, but the
12 relationship among the documents in the compilation should be reflected in the proper coding of
13 the beginning and ending documents and attachment fields. The Parties will make their best
14 efforts to unitize the documents correctly. Producing Hard-Copy Documents as provided herein
15 does not change their character from Hard-Copy Documents into ESI. For Hard-Copy
16 Documents, the Parties need only populate the following metadata fields: “BEGDOC,”
17 “ENDDOC,” “PROD VOLUME,” “CUSTODIAN,” “SOURCE,” “CONFIDENTIAL,”
18 “REDACTION,” and “COMPANY” fields, as well as “BEGATTACH” and “ENDATTACH”
19 fields where applicable.

20 9. Confidentiality Designation. To the extent any Document or ESI (or portion
21 thereof) produced as a TIFF image in accordance with this Order is designated as confidential or
22 highly confidential under the order concerning confidentiality agreed and/or entered in this
23 litigation, the Producing Party will brand the required Confidentiality Designation in a corner of
24 any TIFF images representing the produced item and in a consistent font type and size that does
25 not obscure any part of the underlying image or Bates number, to the extent possible.

26 10. Redactions. A Party may use redactions to protect attorney-client or work product
27 privileges consistent with the order concerning privilege agreed and/or entered in this litigation.
28 Any redactions shall be clearly indicated on the face of the document, with each redacted portion

1 of the document stating that it has been redacted and the basis for the redaction, and a metadata
 2 field shall indicate that the document contains redactions and the basis for redaction (e.g. “A/C
 3 Privilege”). Where a responsive document contains both redacted and non- redacted content, the
 4 Producing Party shall produce the remainder of the non-redacted portions of the document and
 5 the text/OCR corresponding to the non-redacted portions. Email header information (e.g., date,
 6 subject line, etc.) should not be redacted unless it is independently privileged. The production of a
 7 document in a redacted form does not affect the Producing Party’s obligation to timely assert and
 8 substantiate the assertion of privilege over the content in a privilege log. For Excel and
 9 PowerPoint type files that are printed to TIFF for redaction and redacted, the following printing
 10 options shall be enabled:

11 **Excel Print to TIFF Options**

- 12 • Unhide columns and rows
- 13 • Unhide worksheets
- 14 • Autofit columns and rows, settings to be over by columns first and, then down by rows
- 15 • Print gridlines
- 16 • Do not apply Autofilter
- 17 • Display headings
- 18 • Display comments
- 19 • Header and Footer filename field handling: Show field code

20 **PowerPoint Print to TIFF Options**

- 21 • Print notes pages
- 22 • Print hidden slides
- 23 • Print comments

24 The Parties shall honor reasonable requests for the production of particular redacted documents in
 25 other formats where the TIFF image is not reasonably usable. The foregoing does not apply to
 26 documents previously produced in connection with subpoenas or civil investigation demands
 27 previously issued and, the Parties agree those documents do not need to be reprocessed and may
 28 be reproduced in the same format as previously produced. Plaintiffs reserve the right to request
 reprocessing of any such productions if they lack sufficient metadata or are otherwise unusable,
 and to seek relief from the Court if such a request is denied.

11. Parent-Child Relationship. The Parties acknowledge and agree that parent-child
 relationships within a document family (the association between an attachment and its parent

1 document or between embedded documents and their parent) shall be preserved. Responsive non-
2 privileged electronic documents attached to an e- mail or embedded within other electronic
3 documents and hard-copy documents attached or appended to hard-copy documents must be
4 mapped to their parent by the beginning Bates number and immediately follow that parent file in
5 the sequence of the production. Email attachments and embedded files or links “BEGATTACH”
6 and “ENDATTACH” fields listing the unique beginning Bates number of the parent documents
7 and ending number of the last attachment must be populated for each child and parent document.

8 12. OCR. OCR software shall be set to the highest quality setting during processing.

9 13. Deviation from Production Specification. If a particular document or category of
10 documents warrant a different format, the Parties will cooperate in good faith to arrange for a
11 mutually acceptable production format.

12 14. Productions From Other Proceedings. To the extent documents produced by
13 Defendants in other proceedings are responsive to document requests issued by Plaintiffs,
14 Defendants shall produce such documents to Plaintiffs in the same format in which they were
15 previously produced, including any previously produced metadata, load files, and accompanying
16 text files.

17 15. Password Protection. In the event any Document or ESI (or portion thereof)
18 produced is password protected, the Producing Party shall make all reasonable efforts to provide
19 the password needed to access the document or ESI.

20 16. Use at Deposition. Any document produced in native that a party identifies and/or
21 marks as an exhibit at a deposition must include as part of that identification or exhibit the
22 produced corresponding cover page in TIFF image format, endorsed with document’s Bates
23 Number and Confidentiality Designation, as described in Section 6(a), above.

24 **VII. PRODUCTION MEDIA**

25 The Producing Party shall produce documents on readily accessible, computer or
26 electronic media, including external hard drive (with standard PC compatible interface), via
27 secure FTP site, or such other readily accessible computer or electronic media as the Parties may
28 agree (the “Production Media”). Each piece of Production Media shall be encrypted and assigned

1 a production number or other unique identifying label (“Production Volume Number”)
2 corresponding to the date of the production of documents on the Production Media as well as the
3 sequence of the material in that production, and shall include (a) the name of the litigation and the
4 case number; (b) the identity of the Producing Party; (c) the production date; (d) the Bates
5 Number range of the materials contained on such Production Media item; and (e) the Production
6 Volume Number of the Production Media. The Producing Party shall accompany all document
7 productions with a transmittal cover letter identifying by Bates number the documents produced.
8 If the Producing Party produces documents via secure FTP site, the Producing Party shall specify
9 the date through which the materials will remain available via the secure FTP site and the
10 Producing Party shall, within a reasonable time, accommodate requests from another Party or
11 Parties that documents be reposted to the FTP site.

12 **VIII. COST SHIFTING**

13 The costs of production pursuant to this Order shall be borne by the Producing Party.
14 However, in agreeing to this Order, no Party waives or relinquishes any right or interest it may
15 have under the Federal Rules of Civil Procedure to seek cost shifting or apportionment for the
16 costs of electronic discovery.

17 **IX. THIRD-PARTY ESI**

18 1. A Party that issues a non-Party subpoena (the “Issuing Party”) shall include a copy
19 of this Order and the order concerning confidentiality agreed and/or entered in this litigation with
20 the subpoena and state that the Parties in the litigation have requested that third-Parties produce
21 documents in accordance with the specifications set forth herein.

22 2. The Issuing Party shall produce a copy to all other Parties of any documents and
23 ESI (including any metadata) obtained under subpoena to a non-Party.

24 3. If the non-Party production is not Bates-stamped, the Issuing Party will endorse
25 the non-Party production with unique Bates prefixes and numbering scheme prior to reproducing
26 them to all other Parties.

27 **X. BEST EFFORTS COMPLIANCE AND DISPUTES**

28 The Parties agree to use their best efforts to comply with and resolve any differences

1 concerning compliance with any provision/s of this Order. If a Producing Party cannot comply in
2 a particular circumstance with this Order, such Party shall promptly inform the Receiving Party in
3 writing why compliance with the Order is not reasonable or feasible. No Party may seek relief
4 from the Court concerning compliance or non-compliance with the Order until it has met and
5 conferred with the other Party in a good faith effort to resolve or narrow the area of disagreement.

6 **XI. MODIFICATION**

7 This Order may be modified by a Stipulated Order of the Parties or by the Court for good
8 cause shown.

9 IT IS SO ORDERED.

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12 Dated: September 21, 2021

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APPENDIX A: ESI METADATA AND CODING FIELDS

Field Name	Field Description	Populated For	Example Values
BegDoc	Bates number of the first page of the document.	All	Prefix-0000000001
EndDoc	Bates number of the last page of the document.	All	Prefix-0000000002
BegAttach	Bates number of the first page of the first document of the document family.	All	Prefix-0000000001
EndAttach	Bates number of the last page of the last document of the document family.	All	Prefix-0000000004
PageCount	Number of printed pages in the document.	All	2
Confidential	Confidentiality designation, if any, of the document	All	Confidential Highly Confidential
Custodian	Names of all custodians who possessed the document, including deduplicated values, in format: Lastname, Firstname. Where multiple individuals share first and last name, individuals should be distinguished by an initial which is kept constant between productions. For instance: Smith, John A. and Smith, John B. For documents from centralized repositories where custodian name(s) are unavailable, identifying source information should be provided.	All	Doe, John; Smith, John; Smith, Jane
Duplicate Custodian	Names of all other custodians who possessed the document.	ESI	
Duplicate Custodians	The file path/directory path correlating to the unproduced	ESI	

Field Name	Field Description	Populated For	Example Values
Directory Path	duplicate copies of files.		
Source	Source shall be used in connection with document obtained from third-Parties and identify the third-Party having provided the particular material. If the third-Party's production of documents included individual custodian information, such information shall also be included in the "CUSTODIAN" field.		
Subject/E-Subject	Subject line of an e-mail.	E-mails	Text of the subject line
To	All recipients that were included on the "To" line of the e-mail.	E-mails	John.Doe@e-mail.com
From	The name and e-mail address of the sender of the e-mail.	E-mails	Jane.Doe@e-mail.com
CC	All recipients that were included on the "CC" line of the e-mail.	E-mails	Bill.Black@email.com
BCC	All recipients that were included on the "BCC" line of the e-mail.	E-mails	ceo-gs@email.com
DateSent	Date an e-mail was sent.	E-mails	01/01/2015
TimeSent	Time an e-mail was sent.	E-mails	12:30:00
DateModified	Date the document was last modified.	E-attachments; Electronic documents	01/01/2015
TimeModified	Time the document was last modified.	E-attachments; Electronic documents	12:30:00
DateCreated	Date the document was created.	E-attachments; Electronic documents	01/01/2015

Field Name	Field Description	Populated For	Example Values
TimeCreated	Time the document was created.	E-attachments; Electronic documents	12:30:00
Family Date	Date last modified or, for e-mails, sent date of the parent	Electronic documents; E-attachments	01/01/2015
Family Time	Time last modified or, for e-mails, sent time of the parent	Electronic documents; E-attachments	12:30:00
DateReceived	Date email was received.	E-mails	01/01/2015
TimeReceived	Time email was received.	E-mails	12:30:00
Date Last Printed	Date the document was last printed.	E-attachments; Electronic documents	01/01/2015
Time Last Printed	Time the document was last printed.	E-attachments; Electronic documents	12:30:00
Date Last Saved	Date the document was last saved.	E-attachments; Electronic documents	01/01/2015
Importance	Level assigned by creator	E-mails	High
Conversation	E-mail conversation designation	E-mail	Re: Smith Summary
Conversation Index		E-mail	
Title/E-Title	Title of document	E-attachments; Electronic documents	Smith Summary

Field Name	Field Description	Populated For	Example Values
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1	Redaction	Basis for redactions in document.	E-attachments; Electronic documents	
2				
3	FileName	File name of original document	Electronic documents; E-attachments	Microsoft Word 2007/2010
4				
5	File Type	Application type	Electronic documents; E-attachments	Word
6				
7	File Size	Size of file	All	40 gb
8				
9	File Extension	The file extension of the document.	E-attachments; Electronic documents	.doc
10				
11	NativeLink	Relative file path to each native file on the production media.	All documents produced in native format	Natives\Document_12345.doc
12				
13	Author	Document author/creator	E-attachments; Electronic documents	John Doe
14				
15	Company	Party making the production	All	Company X
16				
17	Title	Document Title	E-attachments; Electronic documents	Text of the title line
18				
19	HASH	MD5 or SHA-1 Hash value	Electronic documents; E-attachments; E-mails	
20				
21	Prod Volume	Production Volume	All	Defendant X Volume 1
22				
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24				
25				
26				

27	Field Name	Field Description	Populated For	Example Values
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File Path			
AttachDocID		Electronic documents; E-attachments; E-mails	
ATTACHNAME			
ATTACHRANGE			
FOREIGN LANGUAGE			
TIME ZONE PROCESSED			
E-LAST MODIFIED BY			
MESSAGE TYPE			
CALENDAR MEETING STOP/START			
RECORD TYPE			
HAS HIDDEN DATA			
MESSAGE ID			
NUMBER OF ATTACHMENTS			
ORIGINAL FOLDER PATH			
TextPath	Relative file path to each extracted text/OCR text file on the production media.	All	\\Text\Document_12345.txt
Redaction Reason	The reason a document is redacted		