



DISCOVERY CHECKLIST

1. Initial Intake
2. Data Identification
3. Data Acquisition/
Preparation
4. Document Management
& Review
5. Document Production
6. Ongoing Support

Document Preservation, Collection and Management Project Plan

- Initial Intake
 - a. Review subpoenas/complaints and relevant correspondence/discussions
 - b. Meeting with counsel (preferably including corporate counsel)
 - c. Review document/data preservation notice
 - d. Assist in drafting of interview questionnaires of key personnel
 - e. Coordinate scheduling of DOAR interviews of IT personnel
- Data Identification
 - a. Interview key IT personnel re: sources of relevant data among:
 - b. Map IT environment
 - c. Document archival/backup routines
 - d. Prepare document/data preservation plan
- Data Acquisition/Preservation
 - a. Present data preservation standards to relevant personnel (IT, department managers, senior executives, etc.)
 - b. Schedule periodic review of preservation standards
 - c. Implement standards for preservation
 - d. Create snapshot of active data¹
 - e. Collect designated backup tapes
 - f. Create forensic images of designated PCs, laptops, servers and other systems
 - g. Implement central repository for documents and data collected
 - h. Categorize documents and data to be preserved for potential future consideration vs. that which needs to be reviewed
- Document Management and Review
 - a. Prioritize document and data sources to be reviewed
 - b. Image hard copy documents
 - c. Determine standards for identifying potentially relevant information
 - d. Assist in communicating criteria, timeline and status of production to requesting party
 - e. Convert potentially relevant documents to image format
 - f. Create document review environment
- Document Production
 - a. Establish timeline for production of documents to requesting party and other parties if required
 - b. Define criteria to be used to pull documents from document review system based on review team's efforts
 - c. Choose format for production (TIFF, PDF, paper)
 - d. Assign production numbers and other designations
 - e. Update system with production history
- Ongoing Support
 - a. Manage system for subsequent review/productions
 - b. Monitor and enforce preservation standards