



document produced. With the exception of scanned documents, the text of native files should be extracted directly from the native file and each text file should be named using the Bates number of the first page of the document (e.g., MSC000001.TXT). All documents that are hardcopy or paper files shall be scanned and produced in the same manner as documents existing in electronic format. For scanned or redacted documents, the text will be generated using OCR.

d. **Parent and child emails.** The parties shall produce email attachments sequentially after the parent email.

e. **Load files.** Database load file should be a standard database load file, such as a DAT file (compatible with **Concordance, Relativity, Allegro, iPro, iCONNECT**), with standard delimiters, including path information to text and native files in the load file, if applicable.

Comma (020),  
Quote (254),  
Newline (174)

Example:

```
þBEGDOCþþENDDOCþ  
þMSC000001þþMSC000003þ  
þMSC000004þþMSC000005þ
```

Imagebase load files should be a standard Opticon/Concordance Image load file with the following information, to the extent it exists:

ALIAS,VOLUME,PATH,DOC\_BREAK,FOLDER\_BREAK,BOX\_BREAK,PAGES

Example:

```
MSC000001,MSC001,D:\IMAGES\001\MSC000001.TIF,Y,,,3  
MSC000002,MSC001,D:\IMAGES\001\MSC000002.TIF,,,,  
MSC000003,MSC001,D:\IMAGES\001\MSC000003.TIF,,,,  
MSC000004,MSC001,D:\IMAGES\001\MSC000004.TIF,Y,,,2  
MSC000005,MSC001,D:\IMAGES\001\MSC000005.TIF,,,,
```

f. **Native files.** Excel (and other spreadsheet) files, videos, audio files, and other files that do not reasonably convert to a TIFF image will be produced in native format. These

documents will be designated by including a unique production number (i.e., Bates number) and appropriate confidentiality designation in the native document's file name. The parties agree to meet and confer to discuss requests for the production of additional files in native format, on a case-by-case basis. If the parties are unable to reach agreement with regard to requests for additional documents in native-file format, the parties reserve the right to seek relief from the Court. Documents produced natively shall be represented in the set of imaged documents by a slipsheet indicating the production identification number and confidentiality designation for the native file that is being produced.

g. **Metadata fields.** The parties are only obligated to provide the following metadata for all ESI produced, to the extent such metadata exists:

(i) Metadata from E-mail: Email Subject; Email Sender; Email To; Email CC; Email BCC; Email Master Date/Time (format: MM/DD/YYYY hh:mm:ss); Email Received Date/Time (format: MM/DD/YYYY hh:mm:ss); Email Sent Date/Time (format: MM/DD/YYYY hh:mm:ss); Email Message ID; Email Thread ID; MD5 or SHA Hash.

(ii) Metadata from Other Electronic Files: File Name; File Author; File Created Date/Time (format: MM/DD/YYYY hh:mm:ss); File Modified Date/Time (format: MM/DD/YYYY hh:mm:ss); File Extension; MD5 or SHA Hash.

(iii) Fielded Data (applies to both E-mail and Other Electronic Files): Custodian; All Custodians; Confidentiality Designation; Redaction (Y/N); Production Begin Number; Production End Number; Production Attachment Begin Number (where applicable); Production Attachment End Number (where applicable); Native File Link (where files are being produced in native form); Text File Link.

h. **Requests for hi-resolution or color documents.** The parties agree to respond to reasonable and specific requests for the production of higher resolution or color images. Nothing in this Stipulation shall preclude a producing party from objecting to such requests as unreasonable in number, timing or scope, provided that a producing party shall not object if the document as originally produced is illegible or difficult to read. The producing party shall have the option of responding by producing a native-file version of the document. If a dispute arises with regard to requests for higher resolution or color images, the parties will meet and confer in good faith to try to resolve it.

i. **Source code.** This Stipulation does not govern the format for production of source code, which shall be produced pursuant to the relevant provision of the Protective Order.

## SCHEDULE A

### (Categories of Information Which Need Not Be Preserved)

1. Deleted, slack, fragmented, or other data only accessible by forensics.
2. Random access memory (RAM), temporary files, or other ephemeral data that are difficult to preserve without disabling the operating system.
3. On-line access data such as temporary Internet files, history, cache, cookies, and the like.
4. Data in metadata fields that are frequently updated automatically, such as last-opened dates.
5. Back-up data that are substantially duplicative of data that are more accessible elsewhere.
6. Voice messages
7. Instant messages and text messages that are not ordinarily printed or maintained in a server dedicated to instant or text messaging.
8. Electronic mail or pin-to-pin messages sent to or from mobile devices (e.g., iPhone and Blackberry devices), provided that a copy of such mail is routinely saved elsewhere.
9. Other electronic data stored on a mobile device, such as calendar or contact data or notes, provided that a copy of such information is routinely saved elsewhere.
10. Logs of calls made from mobile devices.
11. Server, system or network logs.
12. Electronic data temporarily stored by laboratory equipment or attached electronic equipment, provided that such data is not ordinarily preserved as part of a laboratory report.
13. Data remaining from systems no longer in use that is unintelligible on the systems in use.