



STATE OF RHODE ISLAND JUDICIARY

SUPERIOR COURT

OMNIBUS CALENDAR ASSIGNMENT FORM

<input type="checkbox"/> Providence/Bristol County	<input type="checkbox"/> Kent County	<input type="checkbox"/> Washington County	<input type="checkbox"/> Newport County
			CASE NUMBER
VS.			

CALENDAR TYPE MUST BE SELECTED FOR SCHEDULING PURPOSES

☐ FORMAL SPECIAL CAUSE CALENDAR ☐ BUSINESS CALENDAR ☐ DISPOSITIVE MOTION CALENDAR

FORMAL SPECIAL CAUSE AND BUSINESS CALENDAR

<input type="checkbox"/> AGENCY APPEAL <input type="checkbox"/> ASSESSMENT OF DAMAGES <input type="checkbox"/> APPOINTMENT OF A SPECIAL MASTER <input type="checkbox"/> CONFIRM ARBITRATION <input type="checkbox"/> DECLARATORY JUDGMENT <input type="checkbox"/> ENTRY OF JUDGMENT <input type="checkbox"/> EVIDENTIARY HEARING <input type="checkbox"/> FIRST AND FINAL REPORT <input type="checkbox"/> FORECLOSURE OF RIGHT OF REDEMPTION <input type="checkbox"/> FRIENDLY SUIT <input type="checkbox"/> APPOINTMENT OF PERMANENT RECEIVER <input type="checkbox"/> MOTION TO ATTACH <input type="checkbox"/> MOTION FOR ATTORNEYS FEES <input type="checkbox"/> MOTION TO COMPEL RECEIVER <input type="checkbox"/> MOTION TO DEFAULT <input type="checkbox"/> MOTION FOR ENTRY OF FINAL JUDGMENT <input type="checkbox"/> MECHANIC'S LIEN <input type="checkbox"/> MOTION FOR APPROVAL <input type="checkbox"/> MANDATORY INJUNCTION <input type="checkbox"/> MOTION TO ADJUDGE IN CONTEMPT <input type="checkbox"/> OTHER FORMAL MATTER (EXPLAIN) _____ <input type="checkbox"/> OTHER BUSINESS MATTER (EXPLAIN) _____ Enter Plaintiff's Proposed ESI Order _____	<input type="checkbox"/> MOTION FOR PROTECTIVE ORDER <input type="checkbox"/> MOTION TO RECONSIDER <input type="checkbox"/> ORAL PROOF OF CLAIM <input type="checkbox"/> PETITION TO ALLOW SECURED CLAIM <input type="checkbox"/> PETITION TO APPOINT TEMPORARY RECEIVER <input type="checkbox"/> PROOF OF CLAIM <input type="checkbox"/> PETITION TO ENFORCE <input type="checkbox"/> PETITION FOR INSTRUCTIONS <input type="checkbox"/> PRELIMINARY INJUNCTION <input type="checkbox"/> APPOINTMENT OF PERMANENT SPECIAL MASTER <input type="checkbox"/> PETITION TO RECLAIM <input type="checkbox"/> PARTITION PROCEEDINGS <input type="checkbox"/> PETITION TO SELL <input type="checkbox"/> RECEIVERSHIP PROCEEDINGS <input type="checkbox"/> SHOW CAUSE HEARING <input type="checkbox"/> SUPPLEMENTARY PROCEEDINGS <input type="checkbox"/> TITLE PROCEEDINGS <input type="checkbox"/> TEMPORARY RESTRAINING ORDER <input type="checkbox"/> TRUSTEE PROCEEDINGS <input type="checkbox"/> VACATE ARBITRATION <input type="checkbox"/> WRIT OF MANDAMUS <input type="checkbox"/> WRIT OF REPLEVIN
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If you require witnesses, state the estimated time frame of said hearing and attach a witness list and expected testimony to this form.

DISPOSITIVE MOTION CALENDAR

<input type="checkbox"/> MOTION TO DISMISS, UNDER RULE 12 <input type="checkbox"/> MOTION FOR ENTRY OF JUDGMENT ON PLEADINGS <input type="checkbox"/> OTHER DISPOSITIVE MOTION: (EXPLAIN) _____ _____	<input type="checkbox"/> MOTION FOR PARTIAL SUMMARY JUDGMENT <input type="checkbox"/> MOTION FOR SUMMARY JUDGMENT
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HEARING DATE:

APPROVED BY:

Failure to fill out this form properly may result in your hearing date not being approved.

Signature of Attorney or Self-represented Litigant
/s/ _____

Address:

Rhode Island Bar Number:

Office Telephone Number:

Date:

HEARING DATE: SEPTEMBER 2, 2025 at 11:00 a.m. via WEBEX

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND,

Plaintiff,

v.

C.A. No. PC-2024-04526

AECOM TECHNICAL SERVICES, INC.,

AETNA BRIDGE COMPANY,

ARIES SUPPORT SERVICES INC.,

BARLETTA HEAVY DIVISION, INC.

BARLETTA/AETNA I-195 WASHINGTON

BRIDGE NORTH PHASE 2 JV,

COLLINS ENGINEERS, INC.

COMMONWEALTH ENGINEERS &

CONSULTANTS, INC.,

JACOBS ENGINEERING GROUP, INC.

MICHAEL BAKER INTERNATIONAL, INC.,

PRIME AE GROUP, INC.

STEERE ENGINEERING, INC.,

TRANSYSSTMS CORPORATION, and

VANASSE HANGEN BRUSTLION, INC.

Defendants.

PLAINTIFF'S MOTION SEEKING IMPLEMENTATION OF THE
PLAINTIFF'S PROPOSED ESI PROTOCOL

Now comes the Plaintiff, the State of Rhode Island (the "Plaintiff"), by and through its counsel, and hereby moves for the entry of an Order adopting the Plaintiff's Proposed ESI Protocol, a copy of which is attached hereto as **Exhibit 1**. As grounds for this motion, the Plaintiff states the following:

1. On January 16, 2025, the Plaintiff provided its draft Proposed ESI Protocol to the Defendants—AECOM Technical Services, Inc., Aetna Bridge Company, Aries Support Services, Inc., Barletta Heavy Division, Inc., Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, Collins Engineers, Inc., Commonwealth Engineers & Consultants, Inc., Jacobs Engineering

Group, Inc., Michael Baker International, Inc., Prime AE Group, Inc., Steere Engineering, Inc., TranSystems Corporation, and Vanasse Hangen Brustlin, Inc. (together, the “Defendants”).

2. Since that time, the Plaintiff and the Defendants (together, the “Parties”) have collectively worked to finalize an agreed ESI Protocol.

3. Through those efforts, the Parties have agreed to most of a Proposed ESI Protocol, but there remains one area of disagreement.

4. To that end, the Parties have reached an impasse regarding the scope of the ESI collection from electronic devices.

5. Rule 34 of the Superior Court Rules of Civil Procedure provides, in relevant part, that: “Any party may serve on any other party a request within the scope of Rule 26(b):

(1) To produce and permit the party making the request, or someone acting on the party’s behalf, to inspect, copy, test, or sample the following items in the responding party’s possession, custody or control:

(A) Any designated documents or electronically stored information (including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations) stored in any medium from which information can be obtained either directly or, if necessary, after translation, by the responding party into a reasonably usable form or format”

Super. R. Civ. P. 34(a)(1)(A).

6. Rule 26(a)(2)(A) further defines the terms “electronic” and “electronically stored information,” as follows: “[e]lectronic’ means relating to technology having electrical, digital, magnetic, wireless, optical, electromagnetic, or similar capabilities;” and “[e]lectronically stored information’ means information stored in an electronic medium and is retrievable in perceivable format.” Super. R. Civ. P. 26(a)(2)(A)(i)-(ii).

7. Electronic devices necessarily include tablets and mobile devices. While the Defendants agree electronic devices should be included in the ESI collections, they have opposed

carving out specific language that will govern the collection of ESI from mobile devices or tablets. In their view, such an endeavor would be unduly burdensome, overly overbroad, and an unnecessarily costly discovery process.

8. The Plaintiff has reason to believe that relevant information related to work performed on the Washington Bridge is stored on electronic devices provided to the Defendants' employees. For example, as this Court has observed, "people are likely to communicate with a greater level of candor and in a less guarded manner through text messages." *Exchange St. Hotel LLC v. Tocci Bldg. Corp.*, 2021 WL 6111511, at *12 (R.I. Super. Dec. 20, 2021) (Stern, J.); see also *id.* (quoting *Handbook of Federal Civil Discovery & Disclosure: E-Discovery & Records*, § 2:30 (4th ed.) for the proposition "that '[b]ecause text messages are less guarded than e-mail—shorter, quicker, and apt to draw a quick response—they can be important evidence'").

9. Accordingly, the Plaintiff is entitled to discover any materials stored on the electronic devices of the Defendants' employees that may be potentially relevant to the Plaintiff's claims and the Defendants' defenses.

10. To ensure a fair, reasonable, and thorough search for, collection of, and production of ESI, the Plaintiff's Proposed ESI Protocol seeks to impose on all Parties the obligation of ascertaining and producing the following:

- i. The names of managerial/supervisory employees, (if any), that were issued electronic devices for communication by their employer; and,
- ii. Collection of all relevant ESI from the electronic devices of the employees outlined in (i.), (if any), related to work being performed on the Washington Bridge; and,
- iii. Production of any data collected from these electronic devices in the manner outlined in **Exhibit 1**.

11. To narrow the scope of the employees involved in the collection of potential ESI from any relevant electronic devices, the Plaintiff has even proposed limiting the first level search to employees whose roles could be described as managerial or supervisory. In that way, any subsequent searches would only be conducted of additional employees/personnel, if the information generated from the first-level search indicates that other employees may also have relevant information contained in their electronic devices.

12. While the Defendants may have had several employees working on the Washington Bridge during the relevant period involved in this action, the individuals that may be included in these searches are few. The Plaintiff seeks discovery of ESI from the electronic devices of relevant employees (if any) that would have been included in:

- a. bridge on-site oversight;
- b. reporting regarding fulfilment of their company's contractual obligations under their contract with the Rhode Island Department of Transportation ("RIDOT");
- c. communicating with high-level staff at RIDOT regarding recommendations for completion of the job; and/or
- d. making recommendations on the scope of work and any challenges, or lack thereof, while in the performance of their job related to the Washington Bridge.

Conducting such a search in the narrow manner proposed by the Plaintiff is neither unduly burdensome nor overbroad. The Plaintiff's approach to the discovery of ESI from electronic devices is not only fair and reasonable, but also entirely consistent with Rhode Island's liberal discovery rules that are designed and construed to promote broad discovery. *See DeCurtis v. Visconti, Boren & Campbell, Ltd.*, 152 A.3d 413, 421 (R.I. 2017) (explaining that "[c]ritically, our discovery rules are liberal and have been construed to 'promote broad discovery'") (quoting

Henderson v. Newport County Regional Young Men's Christian Association, 966 A.2d 1242, 1246 (R.I. 2009)); *see also id.* ("The philosophy underlying modern discovery is that prior to trial, all data relevant to the pending controversy should be disclosed unless the data is privileged.") (quoting *Cabral v. Arruda*, 556 A.2d 47, 48 (R.I. 1989)).

13. The Plaintiff has highlighted, in yellow, the disputed language it proposes for inclusion in the ESI Protocol that will govern this action. All other language in **Exhibit 1** has been agreed to by the Parties.

WHEREFORE, because the scope of Plaintiff's Proposed ESI Protocol narrows the reach of the ESI search, as well as the search of electronic devices to company issued cellphones and/or tablets, and because it seeks to discover information that may be relevant to the claims and defenses in this case, the Court should grant this Motion and enter the Plaintiff's Proposed ESI Protocol, in the form attached hereto as **Exhibit 1**.

FOR THE STATE OF RHODE ISLAND:

By Its Attorneys,

PETER F. NERONHA
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STATE OF RHODE ISLAND

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of August, 2025, I electronically filed and served this document through the electronic filing system on counsel of record. The document is available for viewing and/or downloading from the Rhode Island Judiciary's electronic filing system.

/s/ Edward D. Pare III

EXHIBIT 1

STATE OF RHODE ISLAND
PROVIDENCE, SC.

SUPERIOR COURT

STATE OF RHODE ISLAND,)
)
Plaintiff,)
)
v.)
)
AECOM TECHNICAL SERVICES, INC.,)
AETNA BRIDGE COMPANY,)
ARIES SUPPORT SERVICES INC.,)
BARLETTA HEAVY DIVISION, INC.,)
BARLETTA/AETNA I-195 WASHINGTON)
BRIDGE NORTH PHASE 2 JV,)
COLLINS ENGINEERS, INC.,)
COMMONWEALTH ENGINEERS &)
CONSULTANTS, INC.,)
JACOBS ENGINEERING GROUP, INC.,)
MICHAEL BAKER INTERNATIONAL, INC.,)
PRIME AE GROUP, INC.,)
STEERE ENGINEERING, INC.,)
TRANSYSTEMS CORPORATION, and)
VANASSE HANGEN BRUSTLIN, INC.,)
)
Defendants.)

C.A. No. PC-2024-04526

STIPULATION

The Plaintiff, the State of Rhode Island (the “Plaintiff”), by and through its counsel, and the Defendants—AECOM Technical Services, Inc., Aetna Bridge Company, Aries Support Services, Inc., Barletta Heavy Division, Inc., Barletta/Aetna I-195 Washington Bridge North Phase 2 JV, Collins Engineers, Inc., Commonwealth Engineers & Consultants, Inc., Jacobs Engineering Group, Inc., Michael Baker International, Inc., PRIME AE Group, Inc., Steere Engineering, Inc., TranSystems Corporation, and Vanasse Hangen Brustlin, Inc. (together, the “Defendants”)—by and through their respective undersigned counsel, hereby stipulate and agree as follows regarding the discovery of Electronically Stored Information:

A. Types of Electronically Stored Information to be Produced.

Electronically Stored Information (“ESI”) means information that is generated, received, processed and recorded, and/or maintained by or in computers, databases, systems, network drives, shared spaces, external or removal media, mobile devices, messaging platforms, workspace collaboration tools and other electronic devices and sources, and technologies. The Parties agree that their obligation requires a first-level search of all personnel/employees whose roles could be described as management or supervisory. Subsequent searches should be conducted of additional personnel/employees, if the information generated from the first-level search indicates that they may also have relevant information contained in their computers, databases, systems, network drives, shared spaces, external or removal media, mobile devices, messaging platforms, workspace collaboration tools and other electronic devices and sources, and technologies.

Text or chat messages shall be processed and reviewed in 24-hour segment RSMF, or equivalent, format, maintaining familial relationships and embedded data. This data shall be produced in image format pursuant to above specifications.

The Parties agree that their obligation to preserve and/or collect ESI in response to discovery requests is governed by the Rhode Island Superior Court Rules of Civil Procedure (“Rules of Civil Procedure”) and applicable case law. The Parties will undertake good faith, reasonably diligent efforts to preserve relevant ESI that is discoverable under the Rules of Civil Procedure. Nothing in this Stipulation establishes any agreement as to the proper subject matter of this litigation or admissibility of any evidence.

B. Deleted Files.

The Parties shall not be obligated under this Stipulation to preserve or produce deleted ESI lost as a result of routine, good-faith operation of an ESI preservation system prior to the date on which the duty to preserve ESI arose. Nothing in this provision limits or expands a Party’s obligation to search for ESI deleted by a user that remains as a copy on an archive or other central server or place within a Party’s possession, custody, or control provided such a search is otherwise consistent with and does not exceed the Party’s obligation under the Rules of Civil Procedure.

C. Search Parameters.

To help contain costs and reduce the volume of ESI that may not be relevant to this matter, the Parties agree to the use of reasonable search terms, custodians, and date ranges as a means to identify likely relevant ESI for review and production. The parties further agree on the use of standard eDiscovery tools and technologies to assist the review and production efforts for processing, analysis, review and production. These tools include, but are not limited to Deduplication, Email Threading, and Technology Assisted Review tools (including predictive coding). The fact that a document may have been retrieved by application of search terms shall not prevent any Party from withholding production of such document for lack of responsiveness, privilege, or other permissible objection. Notwithstanding the foregoing, to the extent that a Party identifies responsive ESI not hit upon by search terms, custodians, and/or date ranges, all such non-privileged documents must be produced, subject to the Party's objections to discovery requests.

After a discovery request is served that calls for the production of ESI, the Parties will meet and confer to discuss the potential use of search terms, date ranges, and custodians to apply to the request. To the extent that the Parties decide that such search criteria is appropriate, the Party making the discovery request will first propose search terms, date ranges, and custodians. The Parties will then meet and confer in good faith to further discuss the appropriate parameters of searches.

D. ESI Document Production.

The Parties shall use an individually identifiable prefix based on the Party's name followed by the applicable Bates stamp numbers. In the event of duplicative letters among the Parties, each Party shall adopt a combination sufficient to distinguish it from other Parties in the action. The parties, through their counsel, agree to work through any compatibility issues with respect to their productions and agree as follows:

- unless impracticable, all ESI shall be produced as either single-page Tag Image File Format (TIFF) files or native format files (*e.g.*, photos, videos, Excel,

PowerPoint) subject to the below requirements. Upon request, a party may provide image files in searchable PDF format. Email attachments must be mapped to their parent email or identified by metadata provided in the production load files.

- To allow commonly used electronic discovery software to utilize the ESI production, two separate load files are requested:
 - An OPT file for identifying images and document breaks; and,
 - A DAT file containing native file links, extracted text/OCR and metadata fields.
- All hidden text (e.g., track changes, hidden columns, hidden slides, mark-ups, notes, comments) to be visible
- Production data sets may also require customizations. All customizations should be agreed to by the Parties before production.
- Additional details of the required ESI Protocol for document production are described in “**Exhibit 1**”.

E. Privilege Log.

Within thirty (30) days following each production, the producing Party shall provide a log of the documents withheld or redacted for privilege from that production, as provided for under the Protective Order and which is consistent with the applicable rules of civil procedure, with a log populated exclusively with the following extracted metadata fields: From, To, CC, BCC, Subject, File Name, Date Sent for emails, Date Created for documents, Basis of Withholding/Redaction, and descriptions of the document or ESI sufficient to enable the Requesting Party to assess the validity of the privilege claim. If there is more than one redaction, each redaction shall be addressed in the log with sufficient information to allow the Receiving Party to understand the basis for the redactions. Forwarded emails withheld from disclosure or

redacted shall be separately logged.

The privilege log shall be produced as an Excel spreadsheet.

All counsel or their employees (or direct reports for in-house counsel) involved in the purportedly privileged communications or work product shall be identified as such for each entry on the privilege log.

The Parties agree that they need not include on any privilege log the following types of documents: (i) communications that are protected by the attorney-client privilege and occurred after the filing of the Complaint in this case or are with counsel of record; and (ii) work product created by trial counsel.

After the receipt of a privilege log, if a Requesting Party believes in good faith that one or more items in a Producing Party's privilege log are inappropriately being withheld and should be produced, then it shall raise the issue as to each log entry with the Producing Party in writing with sufficient detail so that the Producing Party may understand the Requesting Party's complaint. Within ten (10) business days, the Producing Party shall respond in writing. If the response does not satisfy the Requesting Party, then the Parties shall meet and confer within five (5) days of the Producing Party's response, and if the dispute as to the privileged nature of the materials cannot be resolved, then the Requesting Party may seek relief from the Court as to the specific log entries raised with the Producing Party.

F. Costs of Production.

The Parties shall each bear their own costs in connection with their obligation under this Stipulation, unless otherwise agreed upon by the Parties or ordered by the Court.

G. Generative AI.

Material produced in this matter shall not be submitted to any open Generative AI tool that is available to the public at large. Before submitting any discovery material to a Generative AI tool on premises or within a private cloud environment, a receiving Party shall ensure that it (or its vendor) can delete all such discovery material from the Generative AI tool at the conclusion of this matter, including any derivative information stored within the tool. The obligations and restrictions of this paragraph will apply even when the discovery material has been anonymized.

EXHIBIT A - ESI PROTOCOL

I. IMAGE FILES (.OPT)

A. Image File Formats – Black and white images

These files are to be produced as Group IV (1 bit) single page tiffs with the file extension ‘.TIF’. Each image is to be named with its corresponding production number.

B. Image File Formats – Color Images

These files are to be produced as JPEGs with the file extension, .jpg. Each image is to be named with its corresponding production number.

C. Image Load File Format

Images are loaded into Relativity or other software with an Opticon load file. This type of load file is a page level load file with each line representing one image. The image key to be used is the production number.

Sample of an Opticon (.OPT) load file:

FL0000001,FL001,[D:\IMAGES\001\FL0000001](#),Y,,,2
FL0000002,FL001,[D:\IMAGES\001\FL0000002](#),,,,,

The fields are, from left to right:

- Field 1 (FL0000001): The page identifier
- Field 2 (FL001): The volume identifier
- Field 3 ([D:\IMAGES\001\FL0000001](#)): Path to the image to be loaded
- Field 4 (Y): Document marker – a “Y” indicates the start of a unique document
- Field 5 (Blank): Can be used to indicate box
- Field 6 (Blank): Can be used to indicate folder
- Field 7 (2): Used to store the page count for the document

II. NATIVE FILES, EXTRACTED TEXT/OCR AND METADATA

Native files, document level text and metadata are loaded into Relativity or other software using a Concordance DAT file. A DAT file is a document level load file where information about one document is in one row of the load file.

A. NATIVE FILES

When producing files in native format, the native files are to be named with the bates number assigned to the document.

For each natively produced file, a tiff placeholder should be included. The placeholder is to state, "This document has been produced in native format" and it should be endorsed with the confidentiality legend and bates number.

A text file must be provided for each native file. If extracted text is not available, the text file should include a machine generated OCR.

Both the image and text file must be named with the bates number and reside in the same directory.

B. EXTRACTED TEXT/OCR

Each produced document will have a single text file, named for the production number. The text files will be delivered as multi-page ASCII. The location of the text file for a document will be captured in the TextFileLink field.

For native files, extracted text is preferred.

For any redacted documents, a machine generated OCR text file from the redacted image is it to be provided.

For any hard copy materials, a machine generated OCR text file is it to be provided.

C. METADATA FIELDS

Metadata fields associated with all electronically stored information (ESI) will be exchanged. The metadata associated with any redacted documents will be withheld from production.

Metadata should be provided in a standard Concordance load file, also known as a .DAT file. The first line of the load file must include the field names. Each subsequent line will contain the fielded information for the document.

D. LOAD FILE SPECIFICATIONS – DELIMITERS

The DAT file will use the following delimiters.

Delimiter	Characte	Function	Ascii Code
□	Comma	The field delimiter separates the load file columns	20
þ	Quote	The text qualifier. Marks the beginning and end of each load file field.	254

®	New line	The delimiter that marks the end of a line of extracted or long text.	174
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Sample Concordance (.DAT) load file:

pProdBegBatesp□pProdEndBatesp□pProdBegAttachp□pProdEndAttachp
 pFL0000001p□pFL0000002p□p□p
 pFL0000003p□pFL0000057p□p□p

E. LOAD FILE SPECIFICATION - PRODUCTION FIELDS

The following default fields will be provided for all documents in the production.

FIELD NAME	DESCRIPTION	Applies To
ProdBegBates	Ending bates number of all produced documents	All Documents
ProdEndBates	Ending bates number of all produced documents	All Documents
ProdBegAttach	Beginning attachment number	All Documents
ProdEndAttach	Ending attachment number	All Documents
ProdParentBeg	Beginning Bates number of parent document unique to this	All Documents
ProdAttachBeg	Beginning Bates number(s) for each attachments unique to this document	All Documents
Confidential	Confidentiality designation	All Documents
NativeFileLink	Production path to native file	All Documents
TextFileLink	Production path to extracted text or OCR file	All Documents

F. LOAD FILE SPECIFICATIONS - METADATA FIELDS

To the extent the information is available, the following metadata fields will be provided for the document types identified in the Applies To column.

FIELD NAME	DESCRIPTION	Applies To
Author	Native file author	EDOC
File Name	Name of the application file	EDOC
DateCreated	Date file was created	EDOC
TimeCreated	Time file was created	EDOC
DateMod	Date file was last modified	EDOC
TimeLastMod	Time file was modified	EDOC
To	Recipient(s)	Email/Texts/IMs
From	Sender	Email/Texts/IM
CC	Carbon copy recipient(s)	Email
FIELD NAME	DESCRIPTION	Applies To
BCC	Blind carbon copy recipient(s)	Email
Subject	Subject line of the email	Email
Date Sent	Email sent date	Email/Texts/IM
TimeSent	Email sent time	Email/Texts/IM
Date Rec	Email received date	Email/Texts/IM
TimeRcvd	Email received time	Email/Texts/IM
Custodian	Individual in possession of the document or Mailbox.	All Documents
Source	Physical location where the data was collected	All Document
DocType	Type of file (Word, Excel, email, etc)	All Documents
DocExt	File extension of document	All Documents
Native File Size	Size of file in bytes	All Documents
Hash Value	MD5 Hash Value	All Documents
All Custodians	Names of all custodians, including duplicates withheld from production	All Documents
Original Path	The original folder path of the file	All Documents
Email Attachments	Original filename of attachments	All Documents
Conversation Index	Email thread identification	All Documents
Redaction Status	redactions	All Documents