PROPOSED ELECTRONIC DISCOVERY MEETING CHECK LIST

1. Get list of custodians of relevant electronically stored information - including their title and responsibilities, location.
2. Identify single person through which all e-discovery shall occur who is familiar with electronic systems, knowledgeable about technical aspects of e-discovery, organization and format issues and prepared to participate in e-discovery dispute resolutions.
3. Name and contact information of person to serve as e-discovery liaison.
4. A list of each relevant computer system or server that has been in place at all relevant times and a general description of each system, including nature, scope character, organization and format employed in each system.
5. Name of person responsible for electronic document retention and the retention policies for the systems identified.
6. Identify the universe of potentially responsive data that exist including the platforms on which and places where such data may be found (including databases network, networks, systems, servers, archives, back up or disaster recovery systems, tapes, discs, drives, cartridges, and other storage media, laptops, PC's, Internet data and PDA's) and the time frame in which such data may have been created.
7. Need to know whether electronically stored information is of limited accessibility, or in media no longer in use.
8. Establish steps taken and to be taken to segregate and preserve computer-based information in order to avoid accusations of spoliation.
9. Identify data that may have been deleted, and dates of deletion. Determine if deleted information still exists, determine if it may be restored the extent to which restoration of deleted information is needed, and who will bear the cost of restoration.
10. Establish and agree on scope of e-mail discovery and e-mail search protocol.
11. Provide notice of any problems reasonably anticipated to arise in connection with e-discovery.
12. Agree on format of disclosure to us; i.e., native searchable format.
13. Identify any proprietary software or software not commercially available necessary to retrieve electronically stored information.
14. Identify description and nature of electronically stored information parties can stipulate are self authenticating or will require no authentication.
15. Establish agreement regarding what will happen in the event privileged electronically stored information is inadvertently disclosed.
16. Establish cost and time required for disclosure or production of data beyond what is reasonably available to the parties in the ordinary course of business and agree on allocation of costs.
17. Stipulate and agree to immediately apply the provisions of the new Federal Rules 26, 33 & 34.
18. How much data is expected to be harvested and who will be providing collection and harvesting services.

EXHIBIT "A"