

EDRM Stage	Stage Area	Responsibility	CXO	Sr. Attorney	Attorney	Paralegal	Litigation Support	Discovery Analyst	Document /Data Analysis	Forensic	Records Management	Information Technology	Review Lead	Review Quality Control Lead	Project Management	Outside Vendors / Consultants	
Information Management	(see responsibility)	Governance	Yes	Yes							Yes	Yes			Yes	Yes	
		Develop the Identification Strategy & Plan		Yes	Yes												
Identification	(see responsibilities)	Data Mapping				Yes	Yes	Yes			Yes	Yes			Yes	Yes	
		Prepare the Identification Plan			Yes	Yes	Yes	Yes				Yes	Yes			Yes	Yes
		Establish the Identification Team			Yes			Yes				Yes	Yes			Yes	
		Identify Potentially Relevant ESI Sources		Yes	Yes				Yes								
		Identifying Key Witnesses and Custodians		Yes	Yes	Yes											
		Identify keyword lists		Yes	Yes	Yes		Yes	Yes					Yes			
		Identifying Potentially Relevant Document and Data Types		Yes	Yes	Yes		Yes	Yes		Yes		Yes	Yes			Yes
		Oversee File Storage					Yes	Yes				Yes	Yes				Yes
		Email Systems: Seek specifics regarding hardware, operating system, software name and version, location of servers, persons responsible for administering the mail system, etc				Yes	Yes	Yes					Yes				Yes
		Determine Relevance of Backup Media, Retired Hardware and Disaster Recovery Systems				Yes	Yes						Yes				Yes
		Consideration must be given to any prior systems that were in place to handle information during the relevant time period				Yes	Yes						Yes				Yes
		Identify: 1.1.1 Cloud Computing or Third-Party Systems				Yes	Yes						Yes				Yes
		Certify Potentially Relevant ESI Sources		Yes	Yes						Yes		Yes				Yes
		Status and Progress Reporting					Yes	Yes									Yes
		Documentation for Defensible Audit Trail					Yes	Yes				Yes	Yes				Yes
Quality Control / Validation												Yes	Yes		Yes		
Identify risks		Yes	Yes	Yes	Yes	Yes	Yes			Yes	Yes	Yes			Yes		
collection preservation	(see responsibilities)	promptly isolate and protect potentially relevant data in ways that are: legally defensible; reasonable; proportionate; efficient; auditable; broad but tailored; mitigate risks.			Yes	Yes				Yes	Yes	Yes			Yes	Yes	
		metadata should be collected in a manner that is legally defensible, proportionate, efficient, auditable, and targeted				Yes				Yes	Yes	Yes			Yes	Yes	
Processing	(see responsibilities)	visual inspection of statistically significant samples of the data			Yes			Yes	Yes				Yes	Yes			
		correlate audit reports with the results produced and differences flagged						Yes	Yes				Yes	Yes			
	Overall Analysis/ Validation	consider how likely they are to be potentially relevant and worthy of further processing.							Yes								
		Testing sample results							Yes				Yes	Yes			
	Overall Q/C	application of automated analytic tools							Yes			Yes				Yes	Yes
		testing to see that specific technical processes were performed as expected,							Yes			Yes	Yes	Yes		Yes	
Overall Reporting	tracking information as to the various tasks that have been performed on each item					Yes	Yes	Yes							Yes		
	document all high level processing and selection				Yes	Yes	Yes										
Develop Review Strategy/Plan	identify responsive documents to produce and privileged documents to withhold		Yes	Yes	Yes												

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review	Setup Review Room/Training	understand the scope of the review		Yes	Yes	Yes		Yes						Yes			
	Perform Data Analysis/Workflow	put in place supervision and procedures for managing the reviewers											Yes	Yes	Yes		
	Conduct Review	select the appropriate vendor, tools and platform for the review	Yes	Yes								Yes				Yes	
	Evaluate/Wrap Up	general knowledge of tools and trends										Yes				Yes	
	Status and Progress Reporting	preparing for a document review and managing it to completion.		Yes	Yes								Yes	Yes	Yes		
	Quality Control/Validation Recommendations	initial planning for the review selecting a vendor	Yes	Yes	Yes							Yes	Yes				Yes
	Risks	determining whether a review is better performed in-house or externally training of reviewers issues oversee a wide range of related management issues	Yes	Yes								Yes		Yes	Yes	Yes	
	Information Management	Determine whether an item (file, document or email) is a business record and should be retained		Yes			Yes				Yes	Yes			Yes		
		Categorize the retained items within a corporate, departmental, project, employee hierarchy		Yes			Yes				Yes	Yes			Yes		
	Litigation Readiness: Litigation History	Review past litigation		Yes			Yes				Yes	Yes			Yes		
		Prioritize the use of resources		Yes			Yes				Yes	Yes			Yes		
	Litigation Readiness: Litigation Hold	ID organization units most likely to engender the most discovery in the future		Yes			Yes				Yes	Yes			Yes		
		Design litigation hold policies		Yes			Yes				Yes	Yes			Yes		
		Identify inputs by interviewing Clients, IT Staff, and Legal Staff		Yes			Yes				Yes	Yes			Yes		
		Identify entities and persons who should participate in an actual litigation hold process		Yes			Yes				Yes	Yes			Yes		
		Focus on whether or not current systems which automatically archive or destroy data can be modified		Yes			Yes				Yes	Yes			Yes		
	Litigation Readiness: Outputs and Desired Outcomes	Review policies, procedures and software implementations that allow custodians to determine the file plan for items in litigation hold		Yes			Yes				Yes	Yes			Yes		
		Run periodic audit test litigation scenarios against implemented readiness procedures and systems.		Yes			Yes				Yes	Yes			Yes		
		Outside consultant Perform Gap Analysis Metrics as to the efficacy of a Litigation Readiness program gleaned from a periodic audit		Yes			Yes				Yes	Yes			Yes		
	Data Assessment	Review content identified for collection		Yes	Yes		Yes				Yes		Yes		Yes		
Determine litigation team's course of action & consequences			Yes	Yes		Yes						Yes		Yes			
Predict how much data should be preserved, collected, & processed.			Yes	Yes		Yes				Yes		Yes		Yes			
Predict full discovery effort costs			Yes	Yes		Yes						Yes		Yes			
Assess benefits and risks from various scenarios			Yes	Yes		Yes				Yes		Yes		Yes			

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Analysis	Data Assessment: Inputs	Conduct and analysis of potential custodian interviews		Yes	Yes		Yes					Yes			Yes			
		Prepare questionnaire and/or checklist for consistent interviews to identify inputs		Yes	Yes		Yes			Yes		Yes			Yes			
		Document the existence, location, format, and state of subject Electronically Stored Information (ESI)		Yes	Yes		Yes				Yes		Yes			Yes		
		Review content identified for collection		Yes	Yes		Yes				Yes		Yes			Yes		
	Data Assessment: Output and Desired Outcomes	Assess nature and volume of ESI		Yes	Yes		Yes				Yes		Yes			Yes		
		Analyze project scope including preservation and collection efforts		Yes	Yes		Yes				Yes		Yes			Yes		
		Review ESI and set budget requirements		Yes	Yes		Yes						Yes			Yes		
		Create documentation for data maps, checklists, custodian interview questionnaires, custodian and data tracking databases, gap analysis reports detailing actual ESI availability and hardware inventories		Yes	Yes		Yes				Yes		Yes			Yes		
		Begin collecting potential search terms from interviews and other interactions		Yes	Yes		Yes				Yes		Yes			Yes		
		Develop data strategy		Yes	Yes		Yes				Yes		Yes			Yes		
		Perform Gap Analysis to identify potentially responsive ESI that cannot be preserved or collected		Yes	Yes		Yes				Yes		Yes			Yes		
		Develop information collection protocol		Yes	Yes		Yes				Yes		Yes			Yes		
		Collection	Familiarity with tools for Gap Analysis, Timeline Views, Sampling			Yes		Yes				Yes		Yes			Yes	Yes
			Analyze whether additional data needs to be collected or if the gaps are expected and explainable			Yes		Yes				Yes		Yes			Yes	Yes
	Analyze the validity of the ESI collection to defend or prosecute issues related to incompleteness or spoliation.				Yes		Yes				Yes		Yes			Yes	Yes	
	Analyze actual quantity of the ESI collection to determine impact on scope				Yes		Yes				Yes		Yes			Yes	Yes	
	Search Enhancement (See EDRM Search Guide)	Locate potentially responsive and/or potentially privileged data within a collection (see EDRM Search Guide for Responsibilities)			Yes		Yes		Yes	Yes				Yes	Yes	Yes		

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	Review Enhancement	Identify Reviewers who are both highly productive and make high quality decisions			Yes								Yes	Yes	Yes		
		Review applications with built-in clustering, analytics, threading, inference or other tools			Yes									Yes	Yes	Yes	
		Define, implement, and manage Review process			Yes									Yes	Yes	Yes	
	Process Analysis	Understand the efficacy of the methods employed during discovery and the decisions reached based on Analysis			Yes			Yes	Yes								
		Compare the impact of a new or modified information management system:			Yes			Yes	Yes			Yes					
	Process Analysis: Impact Analysis	Review litigation readiness results following an audit or an actual preservation/collection			Yes			Yes	Yes					Yes	Yes		
		Analyze accuracy of Search Enhancement process			Yes			Yes	Yes								
		Analyze accuracy of Review Enhancement process			Yes			Yes	Yes					Yes	Yes		
		Estimate rate of deduplication			Yes			Yes	Yes					Yes		Yes	Yes
	Process Analysis Impact Analysis: Search Enhancement	Estimate percentage of items reduced by file type/meta data filtration and impact of alternative scenarios			Yes			Yes		Yes				Yes		Yes	Yes
		Determine contrast in results between different search iterations			Yes			Yes		Yes				Yes		Yes	Yes
		Determine Impact of search iterations and terms by file type, custodian, date range, etc.			Yes			Yes		Yes				Yes		Yes	Yes
		Determine results of validation tests and sampling across file types, meta data and search iterations			Yes			Yes		Yes				Yes		Yes	Yes
		Determine results of clustering			Yes			Yes		Yes				Yes		Yes	Yes
		Determine results of actual human review against various iterations and individual terms to show which terms were most/least effective for finding actually responsive and/or actually privileged documents			Yes			Yes		Yes				Yes		Yes	Yes

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Analysis	Process Analysis Impact Analysis: Review Enhancement	Familiarity with Review Tools			Yes					Yes			Yes	Yes	Yes		
		Comparison of human review decisions vs. any automated suggestions via clustering or analytics			Yes									Yes	Yes	Yes	
		Comparison of levels of accuracy across different groups of reviewers			Yes									Yes	Yes	Yes	
		Comparison of linear to clustered review in rare circumstances when both are used			Yes									Yes	Yes	Yes	
		Identify and select highly productive Reviewers who can make high quality decisions			Yes									Yes	Yes	Yes	
		Track progress of highly productive Reviewers			Yes									Yes	Yes	Yes	
		Perform quality checks on reviews			Yes									Yes	Yes	Yes	
	Review platform with real-time custodian statistical reporting			Yes									Yes	Yes	Yes		
	Process Analysis: Validation / Quality Assurance	Perform Real-time Quality Assurance and Validation														Yes	
		Test results returned by one software with another														Yes	
	Process Analysis: Documentation	Create documents in real time													Yes		
	Process Analysis: Timeline Creation	Create timeline for each process													Yes		
Production	Confirm Forms of Production	Smooth and efficient production			Yes		Yes	Yes				Yes			Yes		
	Data Analysis	All data is available and thorough analysis of data to determine production forms					Yes	Yes				Yes			Yes		
	Identify Product Requirements	Thorough understanding of information available in various software mediums			Yes		Yes	Yes				Yes			Yes		
	Prepare Files	Ability to review documents from different file types					Yes	Yes				Yes					
	Copy Files to Media	Every piece of media has to be tracked throughout the stages and by persons				Yes	Yes	Yes				Yes					
	Status and Progress Reporting	Document history of both paper and electronic documents			Yes	Yes	Yes										
	Document for Audit Trail QC Validation	Review for technical and legal compliance, making data useable				Yes						Yes					
	Receipt of Production	Conduct preliminary review and memo to attorney and paralegal with assessment					Yes	Yes				Yes					
	Overall Processing		"selecting" only appropriate items to move forward to review.				Yes	Yes									
			convert to facilitate further processing (legacy mail formats; legacy file formats). During these processing stages items are cataloged and their associated metadata is captured.						Yes	Yes							
	Assessment		ensure that the processing phase is aligned with the overall e-discovery strategy,		Yes	Yes										Yes	
			identify any processing optimizations that may result in substantive cost savings			Yes										Yes	Yes
			minimize the risks associated with processing.			Yes										Yes	
	Preparation		ensure that the processing methodology will yield the expected results in terms of the effort, time and costs, as well as expected output data streams.			Yes										Yes	Yes
			determine a number of activities required to enable handling and reduction of that data							Yes						Yes	
Selection		determine activities the "selection" of data to be included into a review set			Yes												
		De-duplicate to suppress redundant data from being reviewed multiple times.						Yes	Yes	Yes							
Output		classify items being moved forward into review.						Yes	Yes								
		implement final QA procedures that match the results of the processing against previously mapped expectations, including identifying and explaining exceptions.			Yes			Yes	Yes						Yes		
	(see responsibilities)	Identify Exhibits (Trial & Deposition)			Yes											Yes	

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Presentation	(see responsibilities)	Develop Strategy		Yes	Yes											Yes
	(see responsibilities)	determine Goals & Objectives			Yes											
	(see responsibilities)	perform Legal Analysis			Yes											
	(see responsibilities)	Conduct Client and Witness Interviews and Meetings			Yes											
	(see responsibilities)	Prepare Exhibits				Yes	Yes	Yes	Yes						Yes	Yes
	(see responsibilities)	Testing & Delivery				Yes	Yes	Yes	Yes						Yes	Yes
	(see responsibilities)	Present		Yes	Yes											Yes
	(see responsibilities)	Acquire & Store				Yes	Yes	Yes	Yes		Yes				Yes	Yes