

#### Michael D. Sarlo, EnCE, CBE, RCA, CCLO, CCPA

### Partner and Senior EVP of eDiscovery and Digital Forensics

Michael is a Partner and Senior Executive Vice President of eDiscovery and Digital Forensics at HaystackID.

In this role, Michael facilitates all operations related to electronic discovery, digital forensics, and litigation strategy both in the US and abroad while working on highly complex forensic and e-Discovery projects.

Michael is fluent in a wide variety of digital forensic, ECA, e-Discovery processing and hosting technologies in addition to the IT infrastructure associated with deploying and administering such tools. He is also a frequent speaker on digital forensics best practices, GDPR issues, ESI treatment methodologies, and cost containment strategies for working with massive volumes of data.

Michael is an expert witness and holds certifications around several forensic tools including Cellebrite, EnCase, and BlackLight. He is also a Relativity Certified Administrator (RCA).



# John Wilson, ACE, AME, CBE CISO and President of Forensics, HaystackID

John provides expertise and expert witness services to help companies address various matters related to digital forensics and electronic discovery (eDiscovery), including leading investigations, ensuring proper preservation of evidence items and chain of custody. He develops processes, creates workflows, leads implementation projects as well as GDPR data mapping services for clients including major financial institutions, Fortune 100 companies, Am Law 100 law firms as well as many other organizations small and large. In addition, he provides expert witness services and consulting in matters of all sizes. His work spans some of the largest litigations and matters on record in the United States and many of the 39 countries where has worked on cases.

John is a certified forensic examiner, licensed private investigator and information technology veteran. He has over two decades of experience working with the US Government and both public and private companies. He serves clients in a variety of industries and is an advisor to outside counsel, general counsel and in-house executives on best practices.



#### Seth Curt Schechtman

#### Senior Managing Director of Review Services, HaystackID

Seth is the Senior Managing Director of Review Services and lead for ReviewRight operations within HaystackID. Seth has extensive industry experience of more than a decade as a staff attorney and eDiscovery review manager with leading law firms, Proskauer Rose LLP and Dechert LLP.

Seth is one of the industry's leading experts in all aspects of legal document review ranging from sourcing and evaluation of review attorneys to automated and remote reviews.

A graduate of Lehigh University, Seth holds a J.D. from Fordham Law School.



# Agenda Remote Collections and Reviews

- Remote eDiscovery
   Definitions, Feasibility, and Use Cases
- Adaptation
   Worst Case Planning for Best Case Results
- Reviewing Remotely
   From Reviewer Selection to Secure Technologies
- Remote eDiscovery Best Practices
   Practical Considerations and Recommendations

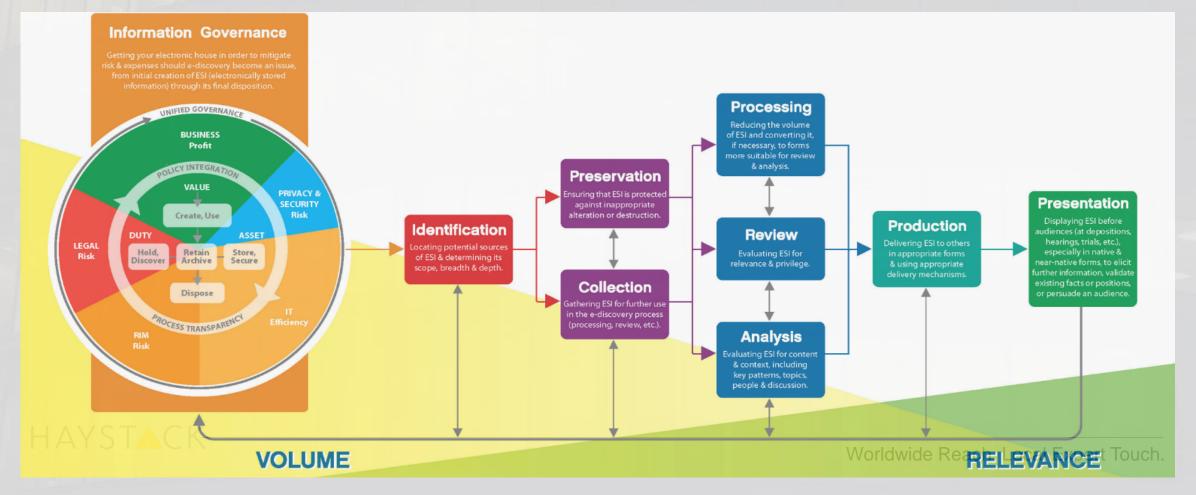




### What is Remote eDiscovery?

#### Remote eDiscovery and The Electronic Discovery Reference Model

**Remote eDiscovery** is the process of executing around a task, phase, or action across the **EDRM** where physical distance between humans, data sources, software, experts, legal resources, and legal venues are bridged via technological means to achieve investigation, information governance, compliance, and discovery objectives.



### The Case for Remote eDiscovery

### Remote eDiscovery in a COVID-19 World

Most organizations do not have Strong Information Governance policies and/or eDiscovery procedures to facilitate eDiscovery, let alone remote eDiscovery on their own.

It is up to eDiscovery practitioners to guide organizations, as it always has been, but now working **closer than ever with IT** and end custodians to accomplish discovery objectives while navigating:

- Travel Constraints (Vendor, Lawyers, Corporations)
- Health Constraints (Vendor, Lawyers, Corporations)
- Logistics & Supply Chain Disruption (Shipping and Equipment)
- Organization Wide Disruption (Pandemic meets Lawsuit)
- Regional Shutdowns and General Quarantines
- Budget Constraints and Cash Flow Constraints





### Who is a Candidate for Remote eDiscovery?

### Remote eDiscovery in an IDEAL World

**Strong Information Governance (IG)** facilitates efficient end to end eDiscovery workflow, reduces spend, reduces risk, and results in overall better eDiscovery outcomes in the long term.

Organizations with well defined IG polices and compliance systems are better suited to accomplish eDiscovery objectives in a pandemic world due to:

- Pre-existing inventory of Data Sources <u>and</u> Data Producers:
  - Physical Geography
  - Network / Cloud Locations
  - Physical Asset Tracking
- Defined mechanisms and best practices for legal hold and preservation
- Infrastructure and capability for IT to provide remote access to data

**Alignment** between legal, information technology, compliance, and cyber security groups around eDiscovery processes **can** facilitate remote eDiscovery.





# Adaptation

Planning for The Worst Case to Create the Best Case



## **COVID-19:** The New Proportionality Test

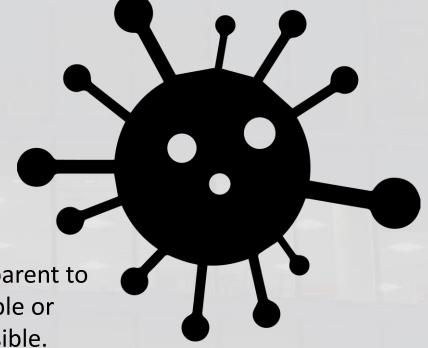
#### **Executing Today and Planning for Tomorrow**

- In the pandemic world a **new proportionality test** relating to data preservation has begun to develop that hinges on:
  - Data Subject Safety
  - Legal Practitioner Safety
  - Evidence Identification Feasibility
  - Evidence Collection Feasibility
  - Evidence Transfer Feasibility

#### COVID-19 DOES NOT EASE BURDEN TO PREVENT SPOILATION

- Any discovery "short cuts" should be documented, made transparent to all parties, and conducted in the most defensible manner possible or with a mechanism to conduct a defensible collection when possible.
- Avoid spoliation at all costs there is almost always a way to preserve evidence remotely



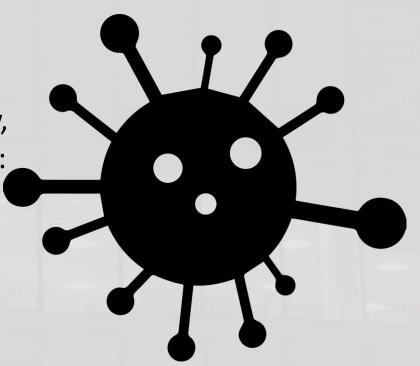


## **COVID-19:** The New Proportionality Test

#### **Executing Today and Planning for Tomorrow**

 Standard workflow for some litigators and corporations are a piecemeal collection and production effort around motion practice.

- The pandemic world does not allow for piecemeal workflow, and requires early planning around worst case scenarios for:
  - Potential custodians,
  - Potential data repositories
  - Potential devices
- Data mapping, an eDiscovery tale as old as time, is even more important in a post-apocalyptic world.

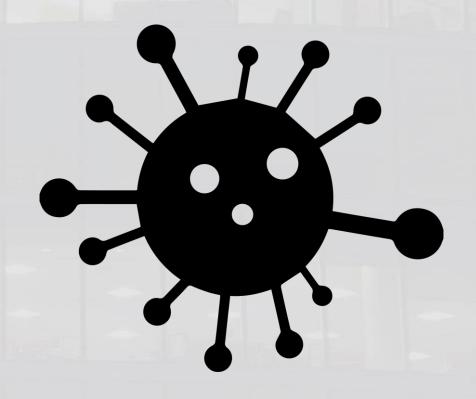




### Social Distancing and eDiscovery

#### **Executing Today and Planning for Tomorrow**

- Legal practitioners need to be sensitive to social distancing norms and should operate deep in the realm of caution when discussing, designing, and executing collection workflows that do not compromise defensibility.
- Physical collections should focus on social distancing protocols as a part of the device transfer workflow, and should follow CDC guidance regarding sanitization of devices



Collection workflows should aim to reduce the use of PHYSICAL MEDIA as much as possible. NOTE: HAYSTACKID offers high-speed data transfer mechanism that surpass standard file transfer mechanism both from a distance and speed standpoint.



# Into the Enterprise

Integrating Behind the Firewall



### Behind The Firewall

#### Strategies for Setting up Quickly

- Engagements now need to prioritize remote access at the contracting stage, and on first level kick off calls with clients.
  - Be prepared to answer first level security questions
  - Be prepared to complete detailed security questionnaires on a rush basis having a library of responses is critical where many enterprises can have 1,000+ questions.
- VPN alone often is not suitable for remote collection tasks.
- Clearly articulate dial-in access needs, and hedge always to dedicated virtual machine infrastructure.
- Preservation obligations go beyond e-mail, network shares, and personal shares
  - Application based discovery can be the most challenging piece of a modern data mapping exercise, and permissions may be complex.
  - Application based discovery may also require additional compute and storage resources – plan and <u>ask for more</u> with large enterprises, as the approval process is often a one-shot exercise when it comes.





### Technology Deployment – Essential Workflows

Behind the Firewall – Service Provider – Hybrid



**On Premise** 

Behind the Firewall



**Service Provider** 

Data delivered to partner

Take out





Hybrid

On Premise & Service Provider

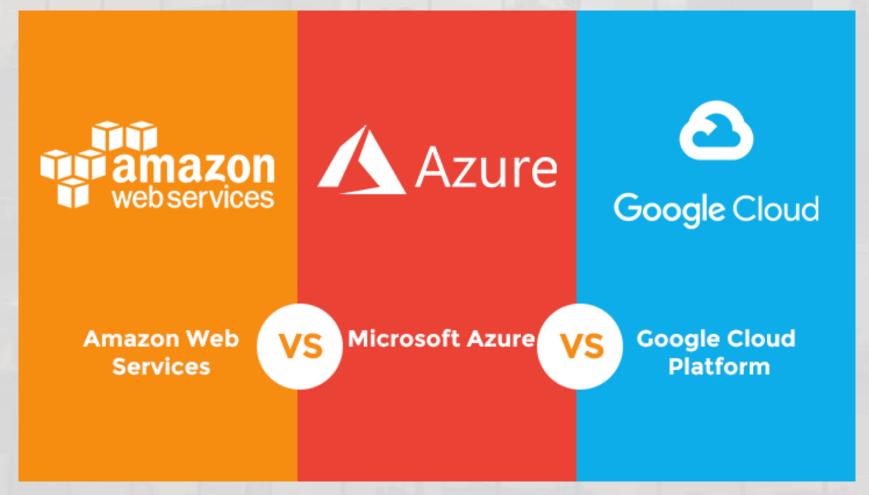
Some Processes with Each

- Onsite controls when and where the data is moved to and can leverage data lake indexes
- Service Provider can leverage operational expertise for faster processing & assessment
- Hybrid model can significantly improve throughput by leveraging multiple resources and vendor expertise



### eDiscovery In The Cloud

Spin Up Anywhere to Meet Matter Needs





# ReviewRight Secure Remote

The Secure Virtual Document Review Environment





### Access to the Secure Virtual Review Environment

#### **Designated Virtual Portal Restrictions**

Best practices for secure remote reviews warrant the implementation and management of reviewers through a virtual portal that governs access and actions to review environments based on limiting sign-on from only dedicated static IP addresses via the virtual environment (i.e., no signing in from local computers).

#### **Virtual Review Environment Restrictions**



ACCESS TO THE INTERNET; ONLY WHITELISTED WEBSITES



RESTRICT ACCESS TO
PERSONAL EMAIL ACCOUNTS;
LIMITED SENDING OF EMAILS
FROM REVIEWERS TO ONLY
WITHIN HAYSTACKID DOMAIN



RESTRICT THE ABILITY TO
DOWNLOAD/PDF/PRINT/COPY/
CUT/PASTE/EXPORT TO LOCAL
MACHINE



PREVENT INSTALL/UPLOAD OF ANY SOFTWARE AND READ/WRITE ACCESS TO LOCAL DRIVES AND MEDIA



NO ACCESS TO APPLICATIONS
BESIDES APPROVED BROWSERS

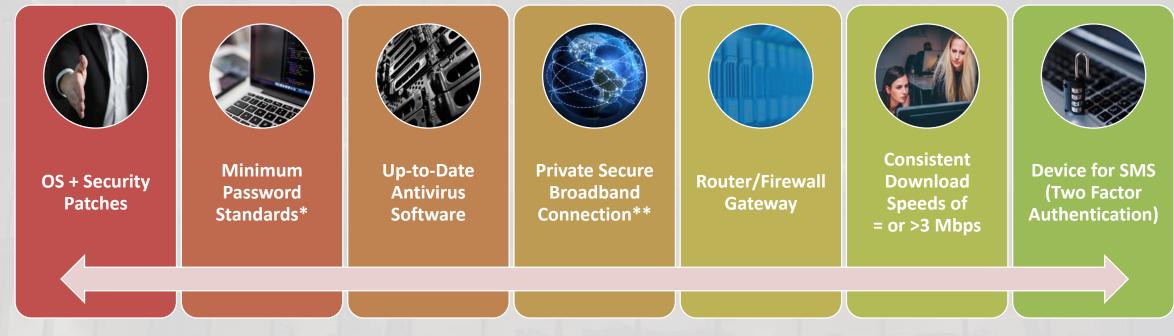


#### Access to the Review Environment

#### Hardware, Software, and Network Requirements

Best practices for secure remote reviews warrant the standardization of project specific hardware, software, network applications, security, and equipment requirements.

#### **Review Environment Standards**





### Access to the Review Environment

#### Home-Based Work Environment Considerations

Best practices for secure remote reviews warrant adherence to workspace security and privacy controls

#### **Workspace Security**



- All Work Performed in a Secure Space that is Physically and Visually Secured
- No Voice Activated Home or Phone Devices

#### **Privacy Controls**

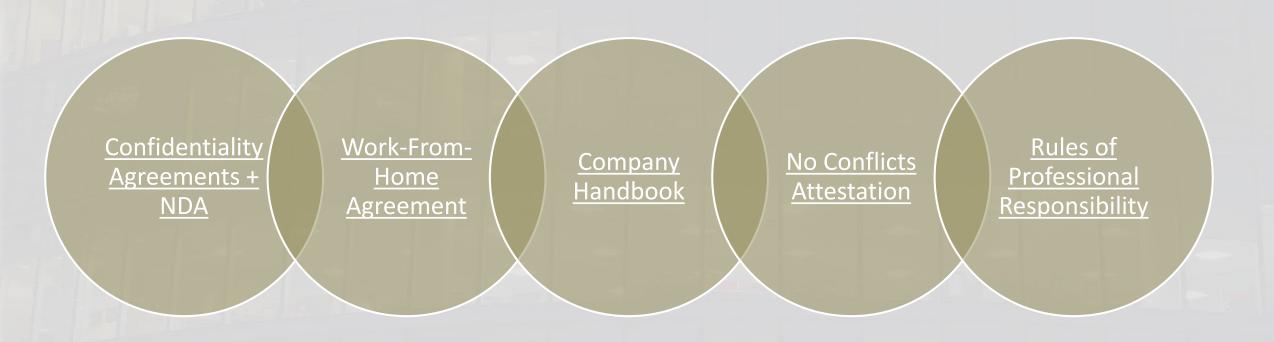


- No Unattended, Unlocked Computers
- Headphone Use for Calls and Review of Records with Sound
- No Mention of Clients or Cases By Name on Calls
- No Handwritten Notes
- No Recordings/Pictures
- No Printing of Review Materials



### Reviewer Agreements

Protecting and Securing the Integrity of Reviews





Qualification, Identification, Screens, Ratings and Certification



# Reviewer Selection Overview

#### **Proprietary ReviewRight Software:**

- Evaluates contract attorneys through exclusive testing and artificial intelligence allowing HaystackID to structure the most efficient, accurate, tailored review teams for each and individual project regardless of project specifications.

#### **ReviewRight Match**

The core of the ReviewRight Match process is the active and systematic recruitment of tested, qualified, identified, certified and continuously evaluated document review attorneys as part of the most comprehensive reviewer selection program available.

Qualification

Identification

Screening

Ratings and Certifications

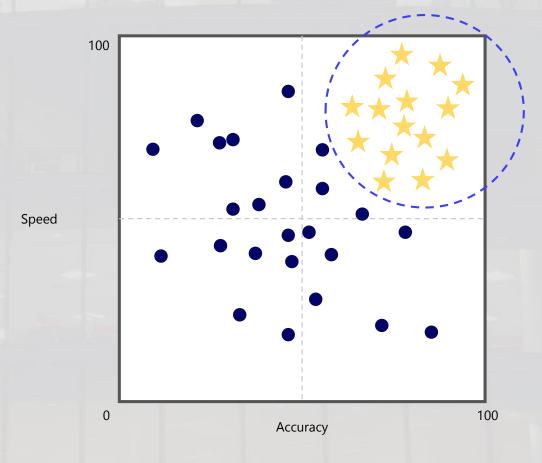


# Reviewer Selection Qualification

#### **ReviewRight Test Assessment**

Reviewers who seek to be considered for document review opportunities must first take a skills assessment test. They are presented with a fact pattern (i.e. case background) and a review protocol. With this information, the reviewers are administered 15 documents and are asked four (4) questions related to relevance, issue spotting and privilege per document that provides HaystackID with immediate, quantifiable, objective insight into a reviewer's legal review capabilities, including projected accuracy per task and rate of review.

#### **Target Reviewers**





#### **Comprehensive Classification for Remote Reviewers**

In order to be considered for remote opportunities, reviewers are required to have completed a minimum of three (3) document review projects in addition to achieving a qualifying score on the skills assessment.

Reviewers are further classified based on their expertise in 31 practice areas, 12 languages, and 13 review tasks/roles, totaling 4,836 unique combinations to allow for the assembling of a targeted review team with the highest level of expertise, knowledge, proficiency, and skills for each review project.

Qualification Identification Screening Ratings and Certifications

Worldwide Reach. Local Expert Touch.

Screens: Interviews

#### **Meaningful Interviews for Comprehensive Evaluations**

HaystackID recruiters conduct meaningful interviews with each candidate to determine their ideal placement, including focusing on attributes that we've found make a reviewer more likely to be successful working from home. We are only looking to place candidates in situations in which they succeed.

#### **Sample Interview Questions**

- How many document review projects have you completed, for how long total, and were any performed remotely? If yes, what were the benefits and drawbacks of remote work?
- When you don't know how to do something or what something means, what steps do you take?
- What is your target review rate? How do you get to that number if the protocol is difficult and/or complex? Which is more important, accuracy or speed?
- When you realize you will not be available for a project, to whom and how do you communicate this information?
- How do you stay motivated? How do you deal with distractions? What techniques do you use to focus during long stretches?
- Do you work better by yourself or within a team atmosphere? What does a team player mean to you?
- What makes someone a good leader? Describe a situation in which you led a group to accomplish a difficult task. What roadblocks did you face and how did you overcome them?



#### Screens: Background Checks, License Verifications, and Conflict Checks

**Background Checks.** HaystackID conducts background checks on all document reviewers. All reviewers being considered for placement must have a clear background check on file at HaystackID within the last 365 days. Checks include but are not limited to:



**License Verifications.** Prior to each individual project placement, HaystackID verifies each candidate has an active bar license in good standing with no disciplinary actions.

**Conflicts of Interest Screens.** Contract attorneys are required to keep accurate records of both represented, adverse and third-parties, along with employers, law firms (if known), and a brief description of the matters worked on for their past seven (7) years. All self-identified parties for each candidate are screened against relevant parties for each potential project.



#### Screens: Ratings and Certifications

Targeted Ratings and Earned Certifications: After every HaystackID project, all reviewers are evaluated and rated on their performance based on a three-factor scale to determine their five-point rating. The first two factors are purely objective: coding accuracy per coding field and review speed per task. The third is based on intangibles, including attendance, lateness, average hours worked per day/week, billing timeliness, quality and frequency of questions, curiosity, conscientiousness, helpfulness, verbal and written communication skills, ability to learn new tasks quickly, team player, and leadership. These ratings serve as a substantial factor in future project placement.

In addition, in order to be promoted to higher level roles on our review teams, reviewers must pass ReviewRight certifications, ensuring top quality candidates at all levels of review teams.

Qualification

Identification

Screening

Ratings and Certifications



# Managed Attorney Review

Why HaystackID is the First Choice and Best Choice



# Managed Review Review Philosophy

HaystackID Review Managers work closely with counsel and clients from the early stages of litigation through final document production and analysis to devise document review strategies that limit review set populations, select review technologies, craft customized workflows that increase review speed and accuracy, and develop searches to target key documents to enable counsel to tailor legal strategies to the case facts.



**Reduced Review Counts** 

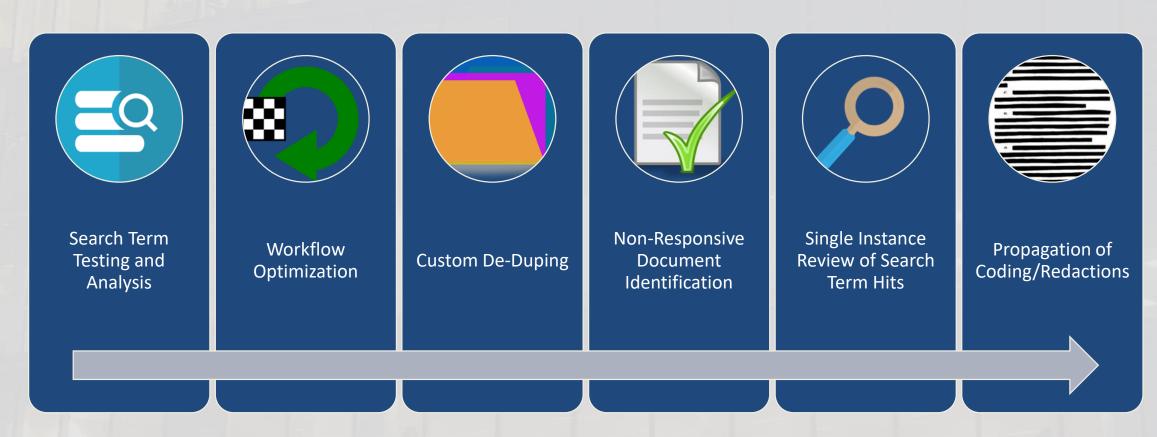
**Optimized Workflows** 



### Managed Review

### Reduced Review Counts and Optimized Workflows

#### **Example Tactics and Techniques**





## Quality Control

### Starting with the Gauge Analysis

#### **Gauge Analysis**

Before releasing team members to pull general review batches, we use a gauge analysis that **tests and scores each reviewer's coding on the same set of documents**. Using this test ensures that the reviewers understand the review protocol before being released to code the review set. In addition, we use this test to **identify protocol deficiencies** by gauging the reviewers' responses against counsels' responses. Allowing us to get immediate feedback for the team, and adjust the protocol if necessary.





## Communication

Early and Often



#### Communication

■ Training, Calls, and Written Instructions





Mandatory Initial Training Session



Daily/Weekly Project Calls



Only Written Instructions

# Communication Secure Chat Room

**Secure Chat Room**: All reviewers must remain logged into the review workspace and monitor the secure chat simultaneously on dual screens. Separate threads are created in each room for separate topics and inquiries. Rooms are designated by workflow. RMs/Team Leads ("TLs") are assigned monitoring hours to ensure full coverage to answer questions.

A separate room is used for QC'ers/TLs/RMs to communicate amongst themselves.

Clients/counsel can be granted access to the secure chat as well to monitor team communications.





#### Communications

#### Issue Log and Notification of Technical Issues

Issue Log: All review questions and feedback are logged chronologically in a decision/issue log. This log is distributed to the client/counsel daily (or more frequently during the initial stages of review) and posted on a secure share drive for the entire team to monitor. Reviewers are expected to read each new version of the issue log before commencing work each day or with each new iteration.

Notification of Technical Issues: Reviewers agree to timely notify HaystackID company employees (designated project Review Manager and the Recruiting Department) via email or equivalent method of any technical issues with the review platform, email, virtual environment, secure chat room or any other service necessary to performing their duties.





#### Communications

### Shared Resources and Feedback with Samples

**Shared Resources**: Generate and continually update shared lists of attorneys, project code names, acronyms/initialisms, and chronologies and custodian crib sheets.

Feedback with Samples: All individual reviewer positive and constructive feedback, except for the rare one-off, are shared with the entire review team, including creating folders/saved searches to house sample documents on review platforms. It's essential to reinforce accurate coding and make sure that reviewers who are starting to diverge from the team are brought back in line.





## Auditing

Trust, but Verify.



#### Audits

#### Communication and Document Viewing History

#### **Audit Absolutes**



Mandatory
Participation in
Calls With Verbal
Attendance



Read Receipts on Project Emails



Secure Chat Room Attendance



Audit Document History

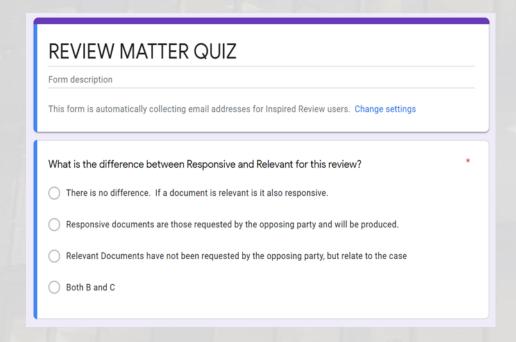


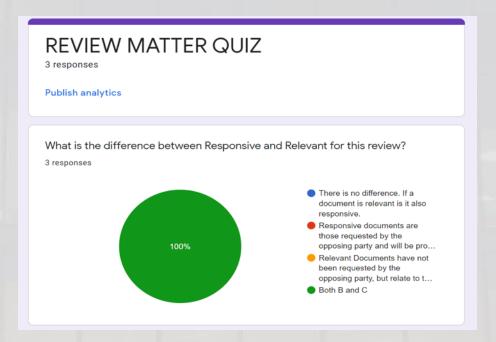
Audit Issue Log Viewing History



### Audits Reviewer Quizzes

HaystackID conducts individual reviewer quizzes on review rules and procedures throughout the duration of the review to ensure reviewers maintain their coding knowledge and comprehend protocol updates.







#### Audits

#### Sample Individual and Team DPH and OT Tracking

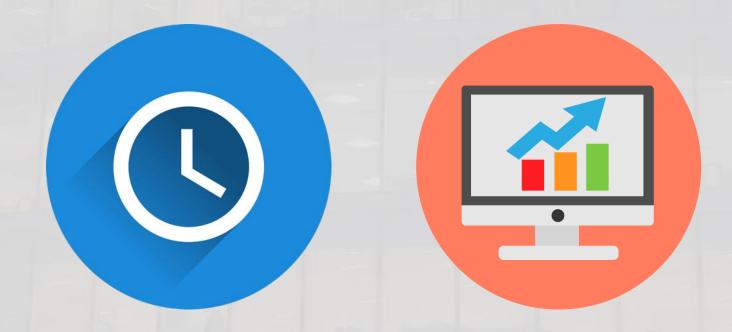
HaystackID tracks team and individual reviewer rates of review per task, as well as overturn ("OT") rates per coding field. Reviewers are expected to maintain certain speeds and accuracy levels per task and coding field. Additional QC audits are conducted for reviewers who fall above and below two standard deviations for review pace.

|               |        |         | НО      | URS   |       | DOC COUNTS | QUALITY | R       | EVIEW SPEED       | WEEK 1 | WEEK 2 | WEEK 3 | WEEK 4 | WEEK 5 | WEEK 6 | WEEK 7 | WEEK 8 | WEEK 9 | WEEK 10 | WEEK 11 | WEEK 12 | WEEK 13 | WEEK 14 |
|---------------|--------|---------|---------|-------|-------|------------|---------|---------|-------------------|--------|--------|--------|--------|--------|--------|--------|--------|--------|---------|---------|---------|---------|---------|
| REVIEWER NAME | STATUS | TOTAL   | REGULAR | MNGMT | QC    | REVIEWED   | Error % | 1ST LVL | CORRECTED 1ST LVL | TOTAL   | TOTAL   | TOTAL   | TOTAL   | TOTAL   |
| TOTALS        |        | 5,157.6 | 4,567.2 | 157.5 | 817.1 | 142,490    | 3.0%    | 104.2   | 1.0               | 125.9  | 411.4  | 442.9  | 186.9  | 279.8  | 453.7  | 585.1  | 823.4  | 558.4  | 501.6   | 617.9   | 153.1   | 17.5    | 0.0     |
| Wang, Steve   | SRM    | 609.4   | 19.0    | 157.5 | 432.9 | 250        |         | 0.4     | 11.8              | 12.0   | 56.3   | 39.0   | 60.0   | 9.3    | 67.7   | 56.1   | 44.9   | 58.6   | 67.1    | 65.3    | 55.6    | 17.5    | 0.0     |
| Reviewer 1    | t1     | 377.0   | 377.0   | 0.0   | 8.0   | 34,306     | 4.7%    | 91.0    | 79.3              | 8.9    | 32.5   | 41.9   | 16.0   | 29.0   | 39.0   | 45.6   | 47.0   | 35.2   | 31.2    | 43.7    | 7.0     | 0.0     | 0.0     |
| Reviewer 2    | t1     | 443.6   | 443.6   | 0.0   | 1.0   | 53,932     | 3.8%    | 121.6   | 105.0             | 18.0   | 51.8   | 54.0   | 8.5    | 34.4   | 48.0   | 55.0   | 51.0   | 38.6   | 42.6    | 35.7    | 6.0     | 0.0     | 0.0     |
| Reviewer 3    | t1     | 451.5   | 451.5   | 0.0   | 0.0   | 62,254     | 5.2%    | 137.9   | 116.9             | 16.5   | 50.0   | 67.0   | 19.5   | 21.0   | 50.0   | 49.0   | 57.0   | 40.0   | 30.0    | 46.5    | 5.0     | 0.0     | 0.0     |
| Reviewer 4    | t1     | 516.7   | 516.7   | 0.0   | 0.0   | 78,452     | 3.6%    | 151.8   | 131.2             | 19.5   | 63.5   | 65.6   | 17.2   | 34.4   | 54.0   | 62.8   | 52.9   | 46.0   | 41.4    | 50.4    | 9.0     | 0.0     | 0.0     |
| Reviewer 5    | t1     | 465.0   | 465.0   | 0.0   | 0.0   | 66,214     | 2.5%    | 142.4   | 124.6             | 17.6   | 51.8   | 62.8   | 15.4   | 30.5   | 47.8   | 55.0   | 56.2   | 37.2   | 36.0    | 44.3    | 10.4    | 0.0     | 0.0     |
| Reviewer 6    | t1     | 394.9   | 394.9   | 0.0   | 1.0   | 31,670     | 5.5%    | 80.2    | 67.9              | 16.9   | 53.0   | 44.4   | 6.7    | 29.2   | 43.0   | 43.5   | 44.5   | 32.5   | 30.1    | 39.8    | 11.3    | 0.0     | 0.0     |
| Reviewer 7    | t1     | 443.5   | 443.5   | 0.0   | 0.0   | 51,850     | 2.7%    | 116.9   | 102.1             | 16.5   | 52.5   | 50.0   | 9.0    | 32.0   | 48.0   | 48.0   | 53.0   | 39.0   | 37.0    | 46.0    | 12.5    | 0.0     | 0.0     |
| Reviewer 8    | t1     | 310.4   | 310.4   | 0.0   | 0.0   | 30,822     | 2.1%    | 99.3    | 87.3              | 0.0    | 0.0    | 8.7    | 17.3   | 27.3   | 46.2   | 44.6   | 54.0   | 38.4   | 25.5    | 48.4    | 0.0     | 0.0     | 0.0     |
| Reviewer 9    | t1     | 72.5    | 72.5    | 0.0   | 0.0   | 9,867      | 1.1%    | 136.1   | 121.0             | 0.0    | 0.0    | 9.5    | 17.3   | 32.7   | 10.0   | 3.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
| Reviewer 10   | t1     | 216.0   | 216.0   | 0.0   | 0.0   | 21,935     | 2.0%    | 101.6   | 89.4              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 18.0   | 58.0   | 40.0   | 42.5    | 47.0    | 10.5    | 0.0     | 0.0     |
| Reviewer 11   | t1     | 205.0   | 205.0   | 0.0   | 0.0   | 30,286     | 2.6%    | 147.7   | 129.1             | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 18.7   | 56.2   | 40.4   | 34.2    | 46.5    | 9.0     | 0.0     | 0.0     |
| Reviewer 12   | t1     | 61.7    | 61.7    | 0.0   | 0.0   | 6,267      | 0.7%    | 101.6   | 90.7              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 18.0   | 43.7   | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
| Reviewer 13   | t1     | 100.1   | 100.1   | 0.0   | 0.0   | 8,459      | 1.3%    | 84.5    | 75.0              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 20.3   | 68.0   | 11.8   | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
| Reviewer 14   | t1     | 200.5   | 200.5   | 0.0   | 0.0   | 14,652     | 3.9%    | 73.1    | 62.9              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 17.5   | 54.5   | 41.9   | 34.5    | 48.8    | 3.3     | 0.0     | 0.0     |
| Reviewer 15   | t1     | 138.8   | 138.8   | 0.0   | 0.0   | 10,007     | 3.0%    | 234.0   | 62.7              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 17.0   | 42.5   | 30.3   | 24.0    | 20.5    | 4.5     | 0.0     | 0.0     |
| Reviewer 16   | t1     | 151.0   | 151.0   | 0.0   | 0.0   | 12,663     | 3.7%    | 83.9    | 72.4              | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 13.0   | 40.0   | 28.5   | 25.5    | 35.0    | 9.0     | 0.0     | 0.0     |
| Team Lead 1   | t3     | 0.0     | 0.0     | 0.0   | 205.7 | 0          |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
| Team Lead 2   | t3     | 0.0     | 0.0     | 0.0   | 168.5 | 0          |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    |        |        | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |
|               |        | 0.0     | 0.0     | 0.0   | 0.0   |            |         |         |                   | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0    | 0.0     | 0.0     | 0.0     | 0.0     | 0.0     |



# Audits Time and Productivity Audits

HaystackID conducts daily and weekly analysis of billing versus review platform usage and active time, including plotting review rates over time looking for quick bursts of activity followed by relatively fallow periods. Separate accounting for non-review workspace time, including reading issue logs, reviewing training materials, conferencing with teammates, and taking reviewer quizzes aids in this process.





# Audits Coding Consistency Metrics

Coding Consistency: Assuming four-corner coding (i.e., coding based on the content within each individual document, irrespective of family coding), HaystackID analyzes coding inconsistencies across similar documents to identify patterns of ambiguity within the review protocol. These inconsistencies also help elucidate reviewers who need retraining on certain coding fields and options.







### HaystackID Backgrounder

Service Portfolio



# About HaystackID Why HaystackID Instead of Other Providers

HaystackID is a specialized eDiscovery services firm that helps corporations and law firms find, listen to, and learn from data when they face complex, data-intensive investigations and litigation.

| Focus              | Enablers    | Markets      | Workstreams    | Models        |
|--------------------|-------------|--------------|----------------|---------------|
| Forensics          | Experts     | Law Firms    | Audits         | Pay for Use   |
| Early Case Insight | Technology  | Corporations | Investigations | Subscriptions |
| Legal Review       | Integration | Governments  | Litigation     | MSA*          |

HaystackID serves more than 500 of the world's leading corporations and law firms from North American and European locations. HaystackID's combination of expertise and technical excellence coupled with a culture of white glove customer service make it the alternative legal services provider that is big enough to matter but small enough to care.



## Forensic First Services Why HaystackID Instead of Other Providers

Forensics First Services help you find your data during investigations and litigation.

- Computer Forensic Collections and Analysis
- Computer Forensic Expert Witness Testimony
- ESI Identification, Collection and Preservation
- **ESI Triage Services**
- Data Discovery Consulting and Management (Compliance, Information Governance, Computer Forensics)

These services can be employed in data discovery and legal discovery situations from the point of unstructured data creation and interrogation to data collection.

Data Discovery: The exploration of patterns and trends within unstructured data with the objective of positive outcomes through insight.









Collection



### Early Case Insight Services Why HaystackID Instead of Other Providers

Early Case Insight Services help you listen to your data to gain insight for legal discovery decisions.

- **ESI Ingestion and Processing**
- **ESI** Assessment and Analytics
- **ESI** Hosting
- **Managed Services**
- Legal Discovery Consulting and Management

These services and be employed in data discovery and legal discovery situations from the point of collection through the ingestion, processing, and review of data.

Legal Discovery: The process of identifying, preserving, collecting, processing, searching, reviewing, and producing ESI.

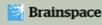
















### ReviewRight Services Why HaystackID Instead of Other Providers

**ReviewRight Services** help you **learn** from your data to make the right decisions for positive and quality investigation and litigation outcomes.

- ReviewRight Match (Reviewer Selection/Sourcing)
- ReviewRight Translate (Foreign Language Review)
- ReviewRight Manage (Integrated Review/Metrics)
- ReviewRight Host (Review Platform Hosting)
- ReviewRight Automate (Predictive Coding)
- ReviewRight Virtual (Remote Review)



These services can be employed in **legal discovery** situations after processing for the review of data.

ReviewRight provides six services that can be used individually or integrated to optimize review impact on investigations and litigation.















